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Information REACH

03th August 2023

Subject:

New EU standard on chemicals (REACH)

Dear Sir or Madam,

Käfer Messuhrenfabrik GmbH & Co. KG, manufacturer of articles (for example dial gauges) and not of substances or mixtures, is hence a downstream user for REACH in accordance with article 3 (13) of the REACH regulation for the main product areas. Therefore Käfer Messuhrenfabrik GmbH & Co. KG is not responsible for the registration of substances.

Käfer Messuhrenfabrik GmbH & Co. KG requires from its suppliers / subcontractors to comply with the relevant legal obligations and, if necessary, to obtain substance declarations in order to ensure communication within the supply chain.

According to the REACH regulation article 33, we are obliged to inform you if a delivered product contains a substance of the SVHC candidate list for the authorization procedure (<https://echa.europa.eu/de/candidate-list-table>) at a rate of more than 0.1%. Reference value is the smallest component of a composite product (definition under <https://www.reach-clp-biozid-helpdesk.de/de/REACH/Erzeugnisse/EuGH-Urteil/EuGH-Urteil.html>).

On 27th June 2018 lead (CAS no.: 7439-92-1) was added to the candidate list.

Lead currently is still contained in products and individual or spare parts of our product range as an alloy component of free cutting steel and brass.

As an EU-based manufacturer and supplier of mechanical dial gauges and dial measuring devices, especially for measuring of length etc., which in accordance with the above regulation constitute products from which no substances are releasing under normal operating conditions, we ourselves are not subject to registration of substances and mixtures. The same applies to the complementary goods distributed by us.

The Käfer products manufactured by us, in particular the dial gauges and dial measuring devices (among others comparator gauges, dial test indicators, thickness measurement gauges, contact points) contain in several components made of steel the substance lead (CAS number: 7439-92-1; EINECS number: 231-100-4) at a rate of more than 0.1%.

Lead is included in the very commonly used free-cutting steel material number 1.0718 (11SMnPb30 + C) at a rate of 0.15-0.35%. As lead is a substantially incorporated alloying component and thus there is no exposure anticipated, no additional information on safe use is necessary.

With a few number of small components lead-containing brass serves as material for screws and coil springs. Here too, lead is contained as an alloying component at a rate of more than 0.1%. Since lead is a substantially incorporated alloying component and thus there is no exposure anticipated, no additional information on safe use is necessary.

The use of these products is authorized and safe. A safeguard documentation is not required

We do not produce, process or use any PFAS (per- and polyfluorinated alkyl compound) in our products.

Käfer Messuhrenfabrik GmbH & Co. KG
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