



ATI Specialty Rolled Products  
1300 Pacific Ave  
Natrona Heights, PA 15065 USA

June 5, 2024

**Subject:** Product Compliance Statements

Regarding the European Union Directives 2011/65/EU (**RoHS2**) & 2015/863/EU (**RoHS3**) – the restriction of the use of certain hazardous substances in electrical and electronic equipment:

- The content of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) or Diisobutyl phthalate (DIBP) in products supplied by ATI Specialty Rolled Products do not exceed the maximum concentration values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances. The content of these substances in our products is negligible. The Chromium in our stainless is METALLIC form (zero-valent).
- Products supplied by ATI Specialty Rolled Products are compliant with the European Union Directives 2011/65/EU (RoHS2) & 2015/863/EU (RoHS3).

Regarding the European Union Directive 2000/53/EC on end-of life vehicles:

- The content of lead, mercury, cadmium, and hexavalent chromium in products supplied by ATI Specialty Rolled Products do not exceed the maximum concentration values for such substances in homogenous materials of up to 0.01% by weight for cadmium and 0.1% for the other substances. The content of these substances in our products is negligible. The Chromium in our stainless is METALLIC form (zero-valent).
- Products supplied by ATI Specialty Rolled Products are compliant with the European Union Directive 2000/53/EC.

With respect to the application of **European Union Regulation (EC) No 1907/2006 (REACH)** to our products and our intention to comply with the requirements, we can assure you that:

- All products supplied by ATI Specialty Rolled Products (e.g., plate, sheet, strip, and Precision Rolled Strip®) are articles under REACH.
- These articles have no intended release, as outlined in the European Chemical Agency's 'Guidance on requirements for substances in articles' (RIP 3.8), and, therefore, we have no registration obligation under REACH for the articles.
- Products supplied by ATI Specialty Rolled Products do not contain any significant amounts of the chemical compounds on the **Jan 2024 EU Candidate List of 250 Substances of Very High Concern (SVHC)** and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight. As such, we have no reporting



obligation for SCIP under the Waste Framework Directive (WFD). We will continue to monitor the candidate list as it is updated.

- Products supplied by ATI Specialty Rolled Products are not subject to the REACH Restrictions listed on Annex XVII database of 73 entries, last updated Dec 12, 2023. We will continue to monitor the Annex XVII database as it is updated.

Products supplied by ATI Specialty Rolled Products do not contain any of the chemical compounds on the REACH Annex XIV Authorization List, last updated on November 1, 2023. We will continue to monitor the Authorization List as it is updated.

With respect to the application of GADSL to our products, we declare the following:

- Cobalt, Copper (metallic), and Nickel are specified constituent of many alloys and may be present in others at levels above 0.1%.
- The content of other elemental substances on the GADSL list do not exceed 0.01% by weight. The content of these substances in our products is negligible.
- The Chromium in our stainless is metallic form (zero-valent).

Additional Compliance and/or Applicability Statements:

- Products supplied by ATI Specialty Rolled Products do not contain Persistent organic pollutants (POPs) as defined by ECHA List of substances subject to POPs Regulations Annex I, III, & IV on Aug 11, 2023. More information of substances subject to POPs regulations can be found at <https://www.echa.europa.eu/list-of-substances-subject-to-pops-regulation>
- Products supplied by ATI Specialty Rolled Products do not contain Biocides as defined by EU Biocidal Products Regulation (BPR), Regulation (EU) 528/2012.
- EU Waste Electrical and Electronic Equipment (WEEE 2) Directive (2012/19/EU) is not applicable to products produced by ATI Specialty Rolled Products.
- Products supplied by ATI Specialty Rolled Products do not contain any significant amounts of the chemical compounds on the March 2020 IAEG® Aerospace and Defense Declarable Substances List (“AD-DSL”) and the maximum concentration for such substances in homogenous materials does not exceed 0.1% by weight. We will continue to monitor the AD-DSL as it is updated.
- Products supplied by ATI Specialty Rolled Products do not contain any of the five (5) persistent, bioaccumulative and toxic (PBT) chemicals identified in the January 6, 2021 final rules issued by EPA in accordance with the Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21<sup>st</sup> Century Act.
- Products manufactured by ATI Specialty Rolled Products do not contain pre- and polyfluoroalkyl substances (PFAS), including PFHxS.
- ATI Specialty Rolled Products are not made containing natural rubber latex.
- Safety Data Sheets and California Prop 65 Labels, where applicable, are available at the following website <https://www.atimaterials.com/safety-data-sheets>

If you have any additional questions, please contact our RoHS and REACH representative Kevin Hineman by email [Kevin.Hineman@ATIMaterials.com](mailto:Kevin.Hineman@ATIMaterials.com)