



Customer Regulatory Declaration

REACH - RoHS - Substances in Articles - Responsible Sourcing

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Key point. This declaration sets out RLSA's general regulatory position. It is not a universal certificate of conformity for all alloys. Any binding declaration must identify, at a minimum, the product or alloy, the RLSA reference and, where necessary, the lot or order.

1. Scope and supporting documentation

RLSA manufactures and supplies precision cold-rolled metal strips and sheets. When supplied for cutting, machining, forming or incorporation into an assembly, these products are normally considered articles within the meaning of REACH, because their shape, surface or design determines their function to a greater degree than their chemical composition. Their status must be reassessed if the product is supplied primarily for remelting.

The information below is based on alloy specifications, material certificates, supplier declarations, safety information sheets published by RLSA and, where available, test results. A voluntary safety information sheet for an article is neither sufficient evidence of RoHS compliance nor a substitute for a product-specific declaration.

Framework	What RLSA can declare	What depends on the finished product / customer
REACH	Article status, Candidate List substances and safe-use information for the identified alloy.	Obligations of the EU importer and assessment of the complex article.
RoHS	Documented concentrations in the homogeneous material and any exceedance of the basic thresholds.	EEE scope, category, exemption and EU declaration of conformity for the finished product.
WEEE	No stand-alone WEEE compliance for a semi-finished metal strip.	Collection and treatment of the finished electrical or electronic equipment.
Prop. 65	Known presence of listed substances in the identified alloy.	Exposure assessment and need for a warning in California.
Minnesota	Composition of the identified alloy.	Qualification as a 'covered product', thresholds, exceptions and placing on the market.



2. REACH - Regulation (EC) No 1907/2006

2.1 Article status and registration

RLSA articles are not designed to intentionally release a substance under normal or reasonably foreseeable conditions of use. The registration obligation under Article 7(1) for a substance intended to be released therefore does not apply on that basis. The obligations of an importer established in the European Union must still be assessed in light of its circumstances.

2.2 Candidate List and Article 33

Where an article contains a Candidate List substance at a concentration above 0.1% weight by weight (w/w), Article 33 requires sufficient information to be communicated to allow safe use, including at least the name of the substance. The applicable REACH threshold is 0.1% w/w; there is no general 0.05% threshold for lead under Article 33.

Lead (CAS 7439-92-1) is on the Candidate List. Consequently, RLSA does not declare that all its products are SVHC-free. Some grades intentionally alloyed with lead exceed 0.1% w/w. Examples documented on the RLSA website include CuZn38Pb2, which contains 1.6 to 2.5% Pb, and CuNi12Zn25Pb, which contains 0.5 to 1.5% Pb. Other grades must be assessed against their exact specification.

Safe-use information for articles containing lead. In solid form and under normal handling conditions, avoid generating or inhaling dust or fumes. For machining, grinding, polishing, welding or thermal operations, carry out a risk assessment, provide suitable local exhaust ventilation, comply with occupational exposure limits and use the required personal protective equipment. Wash hands after handling and give preference to separate collection and recycling of metal waste. Consult the alloy information sheet.

2.3 SCIP

For articles placed on the European Union market and containing a Candidate List substance above 0.1% w/w, the supplier established in the Union must assess its notification obligations to the SCIP database under the Waste Framework Directive. RLSA, a company established in Switzerland, provides its customers and importers with the available material information; the customer remains responsible for its notification and for the structure of its complex article.



3. RoHS - Directive 2011/65/EU, as amended

RoHS applies to electrical and electronic equipment (EEE). A semi-finished metal strip is not, by itself, EEE, and RLSA does not issue the EU declaration of conformity for the finished product. RLSA can declare the known concentrations in the homogeneous material supplied; the manufacturer or importer of the EEE must determine the scope, category, exclusions and exemptions.

Restricted substances in homogeneous materials	Maximum concentration
Pb, Hg, Cr(VI), PBB, PBDE, DEHP, BBP, DBP and DIBP	0.1% w/w each
Cd	0.01% w/w

A grade whose documented lead content exceeds 0.1% w/w does not comply with the basic RoHS thresholds unless an exemption applies. An Annex III or IV exemption may apply to the finished product, particularly for certain uses of lead as an alloying element; its number, scope, EEE category and validity period must be confirmed at the time of declaration. The exemptions for lead in steel, aluminium and copper were amended, in particular, by Commission Delegated Directive (EU) 2025/2364.

RLSA therefore only describes a product as 'RoHS compliant' if the alloy and reference are identified and the available data support compliance with the thresholds, or if the customer provides the context required to document an applicable exemption.

4. WEEE, Proposition 65 and Minnesota law

4.1 WEEE

Directive 2012/19/EU concerns the collection and treatment of waste electrical and electronic equipment. It is not an independent composition requirement applicable to a semi-finished metal strip. Any general claim of 'WEEE compliance' has therefore been removed from this document.

4.2 California Proposition 65

Proposition 65 requires a warning before a knowing and intentional exposure to a listed substance, unless an exemption applies or exposure is shown to be below the applicable level. The concentration in the alloy alone is insufficient to conclude that a warning is required or unnecessary. RLSA communicates the known presence of listed substances, particularly lead in the relevant grades; the manufacturer, distributor or importer of a product intended for California must assess the exposure and warning requirements.

4.3 Minnesota Statutes, section 325E.3892

This provision applies to a defined list of covered consumer products and, subject to exceptions, sets limits of 90 ppm for lead and 75 ppm for cadmium. It does not apply indiscriminately to all industrial products shipped to the United States. A grade intentionally containing lead exceeds these basic limits; the customer must determine whether the finished product is covered and whether an exception applies. RLSA does not issue a general Minnesota conformity statement without identification of the finished product.



5. RBA and responsible sourcing

RLSA supports the principles of the RBA Code of Conduct, version 8.0, without claiming RBA certification, membership or audit. For 3TG minerals and other minerals covered by customer requests, RLSA applies risk-based due diligence and seeks information from its suppliers, including through the current CMRT and EMRT templates where relevant.

Section 1502 of the Dodd-Frank Act imposes reporting obligations on certain issuers subject to the SEC; it does not prohibit sourcing from the Democratic Republic of the Congo or adjoining countries. Likewise, Regulation (EU) 2017/821 and Swiss law are based on due diligence. The RMAP status of a smelter or refiner is useful evidence, but does not by itself guarantee the origin or compliance of a specific lot.

CMRT/EMRT declarations provided by RLSA reflect the responses available in its supply chain on the issue date. RLSA does not declare an absolute origin that it cannot verify back to the mine.

6. Recyclability and recycled content

The metals and alloys supplied can generally be collected and recycled through suitable channels. However, a recycled-content rate or a reduction in CO₂ emissions should only be stated for the relevant product, with a documented source, scope and method. General figures of 60 to 80% recycled content and standardised carbon-footprint reductions are therefore not included in this regulatory declaration.

7. Specific declarations and validity

On request, RLSA can issue a specific declaration stating: customer, RLSA reference, alloy designation and composition, order or lot if necessary, REACH/SVHC status, RoHS data and any exemption to be documented, together with the sources used. This declaration is valid on its issue date and must be reassessed following a change to the alloy, a change of supplier or process liable to affect the composition, a relevant regulatory update or, at a minimum, during the annual review.



Official references and documents checked

ECHA - REACH Candidate List: <https://echa.europa.eu/candidate-list-table>

ECHA - Requirements for substances in articles:

https://echa.europa.eu/documents/10162/17224/articles_en.pdf

ECHA - SCIP: <https://echa.europa.eu/scip>

European Commission - RoHS Directive: https://environment.ec.europa.eu/topics/waste-and-recycling/rohs-directive_en

EUR-Lex - Consolidated RoHS Directive as at 1 July 2026: <https://eur-lex.europa.eu/eli/dir/2011/65/2026-07-01/eng>

EUR-Lex - Commission Delegated Directive (EU) 2025/2364: https://eur-lex.europa.eu/eli/dir_del/2025/2364/oj/eng

OEHHA - Businesses and Proposition 65: <https://oehha.ca.gov/proposition-65/businesses-and-proposition-65>

Minnesota Revisor - Statutes 325E.3892: <https://www.revisor.mn.gov/statutes/cite/325E.3892>

SEC - Conflict Minerals Rule: <https://www.sec.gov/rules-regulations/2012/08/conflict-minerals>

European Commission - Conflict Minerals Regulation:

https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation/legal-texts-and-other-documents_en

RBA - Code of Conduct, version 8.0: <https://www.responsiblebusiness.org/code-of-conduct/>

RLSA - Safety information sheets: <https://www.robertlaminage.com/outils-et-donnees-techniques/msds>

Le Locle, 3 September 2026

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