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To our Customers

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## Position on Art.33/REACH & SCIP concerning glass products

Dear Sir or Madam,

This letter is in response to your request for REACH information for the products listed here below:

Product(s): **MEMpax®**

All in development state of January 2022.

We would like to take this opportunity to inform you about the SCHOTT position concerning the upcoming legislative requirements given by Art. 9(1)(i) and 9(2) EU Waste Framework Directive (98/2008/EG; SCIP) with reference to Art.33/REACH Regulation (1907/2006/EC; SVHC).

The current major chemical legislation of the European Union, REACH, entered into force on June 1, 2007. It regulates the manufacture, the import, and the placing on the market of substances, substances in mixtures, and substances in articles. REACH in its complexity makes clear distinctions between 'substances', 'mixtures' and 'articles', and requires different actions to the relevant producers, to enable them to comply with the law.

In particular, we are aware of our duties as a supplier of articles according to Art.33 REACH regulation.

We are obliged to provide information to our customers (downstream-user information) regarding substances contained in our products that:

- a) are listed on the candidate list of substances of very high concern (SVHC)
- b) in an amount (w/w) of higher than 0.1 wt-%.

The current Candidate List of SVHC substances can be located at:  
<http://echa.europa.eu/candidate-list-table>

Since our products consist mainly of tempered glass and since glass, as a substance itself (CAS 65997-17-3), is not included in the candidate list, currently our glass products are exempt from this information duty under REACH. For the production of tempered glass and molded parts, we may use other substances besides glass, which may be already included on the candidate list. But those substances are completely incorporated in the glass matrix forming the new substance glass while losing their former specific properties.

Only in the case of improper handling, possibly small amounts of the network components could again be available in oxidic form. In this absolutely not recommended case, their specific characteristics must be taken into account in the obligate risk assessment. Please refer to the materials' specific material datasheets (MDS) or safety datasheets (SDS).

Therefore, based upon our review of the information provided to us by our suppliers, we confirm that the products listed above do not contain materials included in the current SVHC candidate list, nor are any such substances present in the products above the applicable threshold (0.1%).

The duty for provision of respective information as well via the SCIP database (Waste Framework Directive) is explicitly connected to the information duty Art.33/REACH. As our glass products are not subject to Art.33/REACH, there is no duty for notification in SCIP also.

Furthermore we confirm that the products listed above comply with all entries of Annex XVII/REACH regarding general, non-application-specific restrictions, especially entry 68 regarding "C9-C14 PFCA" and C9-C14 PFCA related substances.

The current Annex XVII list of substances can be located at:  
<https://echa.europa.eu/en/substances-restricted-under-reach>

The information given in the present declaration is based upon the current level of our knowledge and is intended to provide information about our products. It should therefore not be construed as guaranteeing specific properties. Buyer or user are responsible for ensuring that the products they use, as supplied by us, comply with the specific requirements of their intended application. Due to the progress (evolution) of national and international regulations and laws, the status of the listed product could eventually change. If you have any doubt relating to the current correctness of this declaration, please contact us for an update.

Should you have any questions, please do not hesitate to contact us.

Yours sincerely,

**SCHOTT AG**  
High-Performance Materials  
Site Grünenplan

ppa.

i.V.

Dr. Alexander Glacki  
Site Manager

Marcin Berbesz  
Head of Quality Management

This document has been signed electronically within the SCHOTT electronic document management system and is valid without a signature.

SCHOTT AG, Location Grünenplan

Chairman of the Supervisory Board: Dr. Michael Bolle

Board of Management: Dr. Torsten Derr (Chairman), Dr. Andrea Frenzel, Dr. Heinz Kaiser, Marcus Knöbel

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