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To whom it may concern

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

Dear Sir or Madam,

This letter is for REACH information for the named products listed here below:

### Glass Tubing and Glass Rods from SCHOTT AG, Business Unit Tubing

We would like to take this opportunity to inform you about the SCHOTT position concerning the 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/EG; SVHC).

The current major chemical legislation of the European Union, REACH, entered into force on June 1st 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 'substances', 'mixtures' and '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-%.

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. 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 not recommended case, their specific characteristics must be taken into account in the obligate risk assessment. Therefor refer to the materials' specific material datasheets (MDS) or safety datasheets (SDS).

Based upon our review of the information provided to SCHOTT AG, Business Unit Tubing by its 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 current candidate list of SVHC can be located at:

<http://echa.europa.eu/candidate-list-table>

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, there is not duty for notification in SCIP also.

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.

Sincerely,

**SCHOTT AG**  
**Business Unit Tubing**



Senior Product Manager  
Pharmaceutical Tubing

Dr. Claudia Heinl

**SCHOTT AG**  
**Business Unit Tubing**



Global Director Quality Management  
Business Unit Tubing

Dr. Karsten Hennig