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17 July 2024

**Subject:** Michigan Seamless Tube REACH Compliance

Dear Valued Customer,

**Introduction:** Michigan Seamless Tube is a producer of cold finished seamless steel tubes and pipes that can be imported into the European Union (EU). In order to document compliance with the EU Regulation (EC 1907/2006) on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Michigan Seamless Tube has prepared this document based on the "REACH Guidance for the European Steel Industry", Version 7.1, September 2009, published by the European Confederation of Iron and Steel Industries (EUROFER), and "ECHA Guidance in A Nutshell – Requirements for Substances in Articles"-Version 3.0 issued December 2017.

**Discussion:** Michigan Seamless Tube produces cold finished seamless steel tubes and pipes that meet the definition of "articles" under the REACH directive. Pursuant to REACH Article 7, our products are not subject to registration as they do not have any intentional release of substances into the environment, nor do they contain any of the **235 Substances of Very High Concern (SVHC)**, as listed in the June 14, 2023 Candidate List. Since the raw material used by Michigan Seamless Tube is not intended to be re-melted it is not required to be registered. The products sold by Michigan Seamless Tube are considered to be a semi-finished part.

Products sold by Michigan Seamless Tube are often protected by a surface treatment such as a rust-inhibiting oil or an Ultraviolet cured coating. Surface treated articles are also not subject to registration based on "EUROFER Common REACH Questions and Answers," published June 2009. Neither of these two surface treatments contain any of the SVHC as listed above, and the individual SDS can be downloaded at [www.mstube.com/customer-downloads/](http://www.mstube.com/customer-downloads/). Material required by the customer to be coated with any other surface treatment would have to be evaluated at the time of order.

**Material Substance Content:** All products shipped by Michigan Seamless Tube contain a chemical analysis supplied by the original raw material supplier that can be used for material substance reporting, if desired. This chemical analysis is not required by the REACH directive, but is openly provided.

**Disclaimer:** *This product compliance report is provided by Michigan Seamless Tube for information only and does not constitute legal advice. The information presented in this*

*report is the best information at the time of its issuance, and may be subject to change. If any further clarification is required please contact your local sales representative.*

Thank you for your continued support!  
Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Sleder', with a stylized, cursive script.

Tom Sleder  
General Manager  
Michigan Seamless Tube, LLC