
Declaration of Conformity: International Substance Regulations (EU & USA)

05.03.2026

1. General scope

The companies of the NOTZgroup* confirm that all metal products manufactured and marketed by our divisions comply with the main international regulations applicable to our raw materials and metal products.

2. REACH (EC) No. 1907/2006

Our products are articles within the meaning of REACH. No NOTZgroup article is designed to intentionally release substances (Art. 7(1)). When our articles contain an SVHC > 0.1% (w/w), we comply with Article 33 by informing our customers. Where applicable, we carry out SCIP notifications in accordance with Directive 2008/98/EC (WFD).

3. RoHS (2011/65/EU)

The RoHS Directive only applies if NOTZgroup materials are incorporated by the customer into Electrical and Electronic Equipment (EEE). In such cases, our lead-containing alloys remain compliant thanks to official exemptions, in particular 6(a), 6(b), and 6(c) according to the delegated acts adopted in 2025. The correct use of RoHS exemptions is the responsibility of the customer when integrating into an EEE.

4. POPs – Regulation (EU) 2019/1021 as amended

NOTZgroup products do not intentionally contain any substances listed in Annex I of the POPs Regulation. We are incorporating the 2025 updates, including stricter PFOS limits and the addition of the antioxidant UV-328 and the flame retardant Dechlorane Plus.

5. PFAS – Universal restriction (REACH)

We are actively monitoring developments regarding PFAS. The ECHA Risk Assessment Committee (RAC) adopted its final opinion on March 3, 2026. We will update this statement as soon as the final text is adopted by the European Commission. To date, none of the PFAS listed in the current proposal are intentionally used in our metal alloys.

6. USA – TSCA Section 6(h) (PBT)

Our products comply with applicable US requirements, in particular for DecaBDE and PIP (3:1), with an unintentional threshold of < 0.1% in accordance with the 2024–2025 EPA updates.

Appendix – Regulatory references

- REACH – Articles: Art. 7(1)/7(2), Art. 33; SCIP (WFD 2008/98/EC) (ECHA).
- RoHS – Lead exemptions 6(a)/6(b)/6(c) updated in 2025 (ECHA/EUR-Lex).
- POPs – Regulation (EU) 2019/1021: PFOS (2025/718), UV-328 (2025/843), Dechlorane Plus (2025/1930).
- PFAS – ECHA: RAC opinion adopted on March 3, 2026 (REACH restriction process).
- USA – TSCA Section 6(h): EPA revisions 2024–2025 (PIP (3:1), DecaBDE; 0.1% unintentional threshold).

7. Responsibilities

NOTZgroup responsibilities:

Ensure regulatory compliance of our raw materials and processes; inform our customers in the event of SVHC > 0.1%; monitor regulatory developments; provide official declarations upon request.

Customer responsibilities:

Verify the compliance of materials in their end use (EEE/RoHS integration, sector requirements, finished product obligations) and make any regulatory declarations applicable to the final product.

Notes:

This declaration of conformity is based on information given by our suppliers. Even though we consider this information as correct and that they are diligently prepared we cannot take any responsibility for correctness and completeness and recommendations given. The transmission of the information given herewith in part or in full represents no legal binding of any kind and does not form any separate contract. The interested party is obliged to verify quality and properties of the products and has to verify itself if the product fits the intended purpose of use in the absence of any specific guarantee given by us in writing. This applies equally to our other information and deliberations given, be it verbally or in writing. This declaration has been issued based on legislation in effect at this point in time and is based on our best will, belief and knowledge.

*The NOTZgroup companies:

- Notz Metal Inc. registered office in CH-2555 Bruegg
- Jacques Allemann, branch of Notz Metal Inc. registered office in CH-2555 Bruegg
- Studer-Biennaform, branch of Notz Metal Inc. registered office in CH-2555 Bruegg
- Voco Sàrl registered office in F-68210 Dannemarie
- Weber + Calibra SA registered office in CH-2605 Sonceboz

8. Compliance contact

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