



german made



Window & Door  
Technology

INFORMATION REQUIREMENTS FOR SUPPLIERS

# Declaration of no objection according to REACH

The producer

**Roto Frank Fenster- und Türtechnologie GmbH**

hereby complies with his

**Duties to provide information for suppliers of articles in accordance with Article 33 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18th December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).**

Under REACH, we are a downstream user and are therefore in the same position as our customers. We use some chemical substances in our manufacturing processes, but do not produce or modify any chemicals. The obligation to pre-register and register substances is solely the responsibility of the manufacturers and importers of substances.

Article 33(1) of REACH obligates the supplier of an article which fulfils one of the criteria of Article 57 and contains a substance listed on the ECHA candidate list in accordance with Article 59(1) in a concentration above 0.1% weight by weight (w/w) to provide the purchaser of the article with the information they have available that is sufficient to allow safe use of the article, but at least the name of the substance in question. We will, of course, fulfil this obligation in accordance with regulations in applicable cases in order to be able to guarantee our customers the usual safe use of our high-quality articles.



For our product groups for window technology with Tilt&Turn and sliding hardware, door technology and equipment with E-Tec, handles, glazing blocks and folding shutters, we can confirm that these articles do not contain any substances from the REACH candidate list (version dated 19th January 2021) in concentrations above 0.1% weight by weight (w/w) with the exception of lead CAS no.: 7439-92-1 EC/List no.: 231-100-4.

We process metal alloys with a lead content above 0.1% weight by weight (w/w) in our window technology and door technology equipment and articles. Lead, as an alloying element, is bound and will not be released when used as intended. Please follow our installation instructions to ensure safe use. We and our suppliers are of the opinion that the use of lead in metal alloys is currently standard engineering practice and that it has better machining properties and clear advantages over other alloying agents and production processes in terms of energy and cost efficiency. We can nevertheless assure you that we are actively working on a lead substitute together with our suppliers.

In accordance with the ECHA's obligation to provide information under Article 7 of the REACH Regulation, Roto Frank Fenster- und Türtechnologie GmbH fulfils this obligation by registering components with a lead content of more than 0.1% by mass in the SCIP database.

At present, there is no other information or concerns which would require us to perform sample analysis on a case-by-case basis as part of our objective duty of care and risk assessment. We will, of course, inform you of changes in line with legal regulations and agree on suitable measures with you on a case-by-case basis. Given our extensive range of articles and the fact that we rely on our upstream suppliers to comply with legal obligations, we are sure that you will understand that we are furthermore unable to readily make any legally binding declarations.

This declaration applies exclusively to the articles supplied by us. It does not cover modifications to articles as part of further processing.



**ppa. Eberhard Mammel**  
Director Product Innovation and Marketing



**i.V. Daniel Zähringer**  
Head of Strategy Deployment, Organizational Development and Sustainability