



Trojan Special Fasteners Ltd

CERTIFICATE OF COMPLIANCE – REACH DECLARATION

EC Regulation 1907/2006 - Concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). This is an EU regulation which also applies in the UK.

The REACH etc. (Amendment) Regulations 2019 (SI 2019/758) - Also known as UK REACH, which applies to downstream users, manufacturers, and importers within Great Britain.

Current Status of the Candidate Lists

- **EU REACH:** The European Chemicals Agency (ECHA) last updated the Candidate List of Substances of Very High Concern (SVHC) on 4 February 2026, bringing the total to 253 substances.
- **UK REACH:** The Health and Safety Executive (HSE) maintains a separate UK REACH Candidate List, which currently contains 211 substances.

Our Position Under REACH

Registration - This does not apply to the products we manufacture because Trojan Special Fasteners Ltd does not import nor manufacture chemical substances covered under the regulation.

Evaluation - Trojan Special Fasteners Ltd reviews the REACH guidance and evaluates its products on an ongoing basis.

Authorisation and Restriction - These are the two REACH mechanisms and processes used to regulate substances which pose concern to health or the environment. REACH restrictions may prohibit the use of a substance, but more usually they restrict or prohibit the supply of products containing it above specified thresholds.

Important Definitions

As stated in Article 3 of EU REACH 1907/2006 and UK REACH 2019/758:

Substance: Means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Preparation: Means a mixture or solution composed of two or more substances.

Article: Means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.

Product Classification and Lead (Pb) Content

The regulations require all substances, mixtures and preparations to be registered. However, articles are not governed by REACH registration in this manner. Trojan Special Fasteners manufactures fasteners from hexagon, round and square bar in the following metals, which it classes as articles and thus do not require registration:

Material	Composition of Lead (Pb) %
Aluminium (2011T3)	0.20 – 0.40
Brass CZ121/CW614N	2.50 – 3.50
Naval Brass CZ112/CW712R	0.20 – 0.60
Bright Mild Steel 230M07Pb/EN1APb	0.00 – 0.35
Phosphor Bronze PB1	0.00 – 0.25
Leaded Bronze/Phosphor Bronze LB2/LB5/PB2	10.00 – 11.50

For this reason, Trojan Special Fasteners Ltd can confirm that products supplied to you are classified as articles and therefore do not need to be registered under REACH.

Article 33 Communication and Compliance

Because Lead (CAS 7439-92-1) is present on both the EU and UK REACH SVHC Candidate Lists in a concentration above **0.1% w/w**, Trojan Special Fasteners Ltd fully complies with its communication duties under Article 33.

All articles containing lead will have packaging containers marked with their respective materials. Consignment paperwork will clearly state "Contains Lead" as per Article 33 requirements. Safe handling documentation is available to download on our website at trojansf.co.uk/legal

This policy is evaluated annually to ensure continuous regulatory compliance.

Authorised Signature: 

Name: Yaz Ali

Position: Manager

Date: 9th July 2026