

REACH EC 1907/2006

Technical Bulletin: Customer information concerning Lead content alert

Pursuant to the European Union Registration, Evaluation, Authorization of Chemicals Regulation 1907/2006/EC (REACH), Macnaught has an obligation to inform its customers about certain substances contained in our products. Where an article contains any substances of very high concern (SVHC) and is identified in a concentration above 0.1 % weight by weight (w/w), Macnaught is obligated to provide sufficient information to allow safe use of the article including, as a minimum, the name of that contained substance.

Lead [CAS No. 7439-92-1] has been added to the SVHC list on the 27th of June 2018. Lead is a substance nowadays still commonly used in copper, steel and aluminium alloys as CNC machining aid (free cutting grade) to enhance machinability and increase processing efficiency.

The main routes to Lead exposure are ingestion, inhalation and permeation via skin although the risk associated with these is minimal when the substance is contained in a metal matrix, such as copper, steel and aluminium alloys. In normal conditions of use, users of Macnaught products can only come in contact with this substance by physical contact, although as said the actual risk of exposure is deemed very low due to the substance being contained in a metal matrix.

A variety of Macnaught products use copper, steel and aluminium alloys, which are processed into 'articles' by Macnaught according to the definition given in Article 3(3-4) of the REACH regulation (EC 1907/2006) mainly by CNC machining and die casting.

Certain copper, steel and aluminium alloys can contain lead in concentration greater than 0.1% by weight. While the global industrial community is committed to transition to lead-free metal alloys, the process is slow and leaded alloys are still the standard in many industries. The significant technological challenges associated with the elimination of lead as machining aid in copper, steel and aluminium alloys led the EU regulator to grant exemptions to the REACH regulatory requirements in terms of lead content over time, which have now lapsed.

While Macnaught is committed to its environmental responsibility to use lead-free copper, steel and aluminium alloys in all our products and most of our materials and parts are already lead-free, limitations in the industry and within our supply chain make it impossible at the moment to go lead-free in some materials and parts. As a result, some of Macnaught products may still include articles made of copper, steel and aluminium alloys which may contain lead in concentration greater than 0.1% w/w.

In accordance with Article 33(1) of EC 1907/2006, this technical bulletin informs our customers about the lead concentration exceeding the 0.1% w/w threshold in some materials and parts included in Macnaught products.

Macnaught will endeavour to push towards the complete elimination of leaded metal alloys from its products, although that final transition is expected to require some time to complete, depending on the speed of technological progress within the industry.

Sincerely,

For and on behalf of Macnaught Pty. Ltd



Marco Uccellani
R&D Manager

20/01/2026

Date