



# **BRALO ENVIRONMENTAL DECLARATION FOR PRODUCTS & PROCESSES**

**APRIL 2025 Review**



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## 1 FOREWORD.

BRALO, S.A. is fully committed to sustainability, waste reduction, and environmental protection. For many years, we have proactively worked to eliminate substances under surveillance long before they were officially banned, required for disclosure, or subject to environmental protocols and regulations.

A decade ago, we issued our first self-declaration affirming full compliance with all local, regional, national, European, and destination market regulations concerning substances present in our products and packaging components.

As substance regulations have grown increasingly complex and technical over the years, we have strived to make this declaration as clear as possible, to align with the typical format of compliance requests received by our organization, we have structured our declaration highlights accordingly. So this document is divided into two sections: one focusing on legal regulations and the other addressing substance groups, while also ensuring traceability to key applicable regulations.

The following paragraphs form the core of our compliance declaration, confirming the absence of specific groups or individual substances in BRALO, S.A. products. Additionally, major regulations encompassing various substance groups or materials—such as RoHS and ELV—are explicitly referenced by name or acronym.

## 2 MAJOR REGULATIONS/LAWS FULFILMENT GUARANTEE

### 2.1 RoHS (2002/95/EC), RoHS II (2011 /65/EU) RoHS III (EU 2015/863).

The Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive (2002/95/EC) aims to minimize the environmental impact of waste electrical and electronic equipment, by restricting the quantities of heavy metals and other substances. The scope of this document includes the update of Annex 11 of restricted substances on 37/03/2015, Annexes III & IV about exemptions last update on 2017. None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 2.2 ELV (2000/53/CE).

The End-of-Life Vehicles directive 2000/53/CE of the European parliament and of the council of June 1 O of 2005) aims to minimize the environmental impact and increase the vehicles recyclability level by restricting the heavy metals present in the vehicle components. None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 2.3 EUROATOM (2013/59/Euro atom).

Council Directive 2013/59/Euratom of 5 December 2013 laying down basic safety standards for protection against the dangers arising from exposure to ionizing radiation, and repealing Directives 89 / 618/Euratom, 90/ 641 /Euratom, 96/29 /Euratom, 97 / 43/Euratom and 2003/122/Euratom. BRALO, S.A. have communicated this requisite as mandatory in our downstream supply Chain and all our wire suppliers have guaranteed (through a signed declaration) the fulfilment of this legal duty in their downstream supplement (wire drawing) or on their main production (steel manufacturers).

### 2.4 REACH REGULATION. As from 1st of June 2007, the regulation (EC) 1907 /2006 (REACH)

Entered into force on 2006. Since the introduction of the REACH regulations there has been an update which affects to several substances named as substances of very high concern. These substances are related into a list of SVHC (Substances of Very High Concern) and this list will be updated by ECHA adding the new substances catalogued as SVHC. These substances are carcinogenic, mutagenic, and toxic for reproduction or persist in





the environment and accumulate in living organisms. So, under the EU's REACH regulation (Regulation N° 1907 /2006 for Registration, Evaluation, Authorisation and Restriction of Chemicals) the SVHC substances cannot be placed on the market or used unless authorisation has been granted for a specific use. None of the substances or compounds banned in the SVHC list is being used in our processes, this declaration can be applied to all BRALO, S.A. manufactured articles & processes.

## 2.5 CA Prop. 65 List.

State of California environmental protection agency office of environmental health hazard assessment safe drinking water and toxic enforcement ad of 1986 chemicals known to the state to cause cancer or reproductive toxicity (list review of April 21, of 2023). None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

## 2.6 EPA/TSCA Inventory list (Toxic Substances Control Act)

The non-confidential portion of EPA's Toxic Substances Control Act Chemical Substance inventory (TSCA inventory) is updated approximately every six months. TSCA addresses the manufacturing, processing, distribution, use, and disposal of commercial and industrial chemicals. This declaration has been updated with the February 2023 updated list. On the moment of this review date, the TSCA Inventory contains 86,685 chemicals of which 42,170 are active, most of these substances have no relations with the BRALO, S.A. processes or products but have been checked anyway. The inventory list reflects soe different groups of chemical substances that are included in other international regulations too and mentioned in other paragraphs of this declaration since the point of view of other regulations. In this review of the TSCA inventory list, the groups of substances specially reviewed are Section 56(2) and Section 6(h). None of the substances banned on this groups are present in the BRALO, S.A. products & processes.

# 3 GROUPS/FAMILIES OF BANNED SUBSTANCES FULFILMENT GUARANTEE

## 3.1 POPs Persistent Organic Pollutants Regulations

### 3.1.1 As per REACH Annex XIV.

None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 3.1.2 As per Stockholm Convention on Persistent Organic Pollutants (New 16 POPs) as per annexes A, B & C.

The root CAS numbers for these 16 pollutants are as follows :

- Alpha & Beta hexachlorocyclohexane (CAS 319-84-6, 319-85-7, 58-89-9), Chlorodecone (CAS 143-50-0), Decabromodiphenil eter (CAS 1163-19-5), Hexabromobiphenyl (CAS 36356-01-8), Hexabromocyclododecane (CAS 25637-99-4, 3194-55-6),
- Hexabromodiphenyl and heptabromodiphenyl ethers (CAS 68631-49-2, 207122-15-4, 446255-22-7, 207122-16-5), Hexachlorobutadiene (CAS 87-68-3), Lindane (gamma-HCH) (CAS 58-89-9), Pentachlorobenzene (PeCB) (CAS 608-93-5),



- Pentachlorophenol and its salts and esters (CAS 87-86-5, 131-52-2, 27735-64-4, 3772-94-9, 1825-21-4),
- Perfluorooctane sulfonic acid and its salts and perfluorooctane sulfonyl fluoride (CAS 1763-23-1, 307-35-7), Polychlorinated naphthalenes (CAS 70776-03-3), Short chain chlorinated paraffins (SCCPs) (CAS 85535-84-8), Technical endosulfan and its related isomers (CAS 115-29-7, 959-98-8, 33213-65-9), Tetrabromodiphenyl & pentabromodiphenyl ether (CAS 5436-43-1, 60348-609).

None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 3.2 PBTs Persistent Bio accumulative and Toxic Regulations

#### 3.2.1 As per REACH annex XIII (PBT / vPvB)

Substances that are persistent, bio accumulative and toxic (PBT) or very persistent and very bio accumulative (vPvB). None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

#### 3.2.2 As per EPA/TSCA Section 6 PBTs

As required under the Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21 st Century Act, EPA issued five final rules on January 6, 2021, to reduce exposures to certain chemicals that are persistent, bio accumulative and toxic (PBT). These toxics are : 1) decabromodiphenyl ether (decaBDE) (CAS 1163-19-5) / 2) phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CAS 68937-41-7) / 3) 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)(CAS 732-26-3) / 4) hexachlorobutadiene (HCBD) (CASRN 87-68-3) / 5) pentachlorothiophenol (PCTP)(CASRN 133-49-3). None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 3.3 PFAS/PFOS Per- and polyfluoroalkyl substances Regulations

#### 3.3.1 As per REACH a group of PFAS are on the REACH

Candidate List of substances of very high concern (SVHC 271 substances ECHA review of 31/03/2025), for example PFOA, perfluorinated carboxylic acids (C9-14 PFCAs) and PFHxS. Perfluorinated carboxylic acids (C9-14 PFCAs), their salts and precursors are restricted in the EU/EEA from February 2023 onwards following a decision taken by the European Commission on a proposal by the German and Swedish authorities. In June 2019, January 2020 and January 2023, three groups of PFAS were identified as SVHCs. These three groups are as follows:

- 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides (HFPO-DA), a short-chain PFAS substitute for PFOA in fluoropolymer production, was the first substance added to the Candidate List. Its ammonium salt is commonly known as GenX. [General Court judgment];
- perfluorobutane sulfonic acid (PFBS) and its salts, a replacement of PFOS; and
- perfluoroheptanoic acid (PFHpA) and its salts.



None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

### 3.3.2 As per Stockholm Convention on Persistent Organic Pollutants.

Since 2009, perfluorooctane sulfonic acid and its derivatives (PFOS) have been included in the international Stockholm Convention to eliminate their use. PFOS has been restricted in the EU for more than 10 years already, under the EU's Persistent Organic Pollutants (POPs) Regulation. The Stockholm Convention also regulates the global elimination of perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds. PFOA has been banned under the POPs Regulation since 4 July 2020. In June 2022, the Stockholm Convention parties decided to include PFHxS, its salts and related compounds in the treaty. The Commission added the substance group in the EU's POPs Regulation in May 2023 and the regulation entered into force on 28 August 2023. Long-chain perfluorinated carboxylic acids (C9-21 PFCAs) are being considered for inclusion in the Stockholm Convention and consequent global elimination. None of the substances banned in this regulation are present in the BRALO, S.A. products.

### 3.3.3 As per EPA (Environmental Protection Agency USA).

In October 2023, EPA released a final rule that will improve reporting on PFAS to the Toxics Release Inventory (TRI) by eliminating an exemption that allowed facilities to avoid reporting information on PFAS when those chemicals were used in small concentrations. Under this new rule, EPA will receive more comprehensive data on PFAS and looks forward to sharing these data with our partners and the public. Federal Register / Vol. 88, No. 209 / Tuesday, October 31, 2023 / Rules and Regulations. On February 2025 EPA Added Nine Additional PFAS to the Toxics Release Inventory that have been included in this review. None of the substances banned in this regulation are present in the BRALO, S.A. products & processes.

## 3.4 GADSL Global Automotive Declarable Substance List.

GADSL covers declaration of certain information about substances relevant to parts and materials supplied by the supply chain to automobile manufacturers. The information is applicable to the use of these parts or materials in the production of a vehicle up to its usage and relevant to the vehicle's re-use or waste disposal.

The GADSL has been reviewed on its version of February 1st of 2025. The global automotive supply chain, including automotive original equipment manufacturers (OEMs), tier suppliers and material suppliers has been established a work group, called the Global Automotive Stakeholder Group (GASG). Early information and dialogue up and down the supply chain will help facilitate compliance with current and future regulations, as well as consider customer requirements to ensure sustainable products. Optimized handling of relevant information flow can help OEMs meet existing and projected reporting requirements in a consistent, understandable, and efficient way. None of the substances classified as D/P are present on the BRALO, S.A. products, for this check BRALO, S.A. has followed the criteria described on the guidance document emitted by the GADSL organization and revised on February of 2025.

## 3.5 IMDS. (International Materials Data System)

This is the materials data system of the automotive industry, initially it was a joint development of Audi, BMW, Daimler, DXC, Ford, Opel, Porsche, Volks Wagen and Volvo. Other manufacturers have since joined the



community and IMDS has become the global standard used by most of the world's OEMs. At IMDS, all the materials used for automobile manufacturing are collected, preserved, analysed, and archived. Using the IMDS, automobile manufacturers and their suppliers can fulfil their obligations, following national and international standards, laws and regulations. Since more than 15 years BRALO, S.A. has been registering, the detailed chemical composition for all our manufactured parts under the International Materials Data System (IMDS) for automotive customers, and automotive supply chain.

### 3.6 CoRAP (Community Rolling Action Plan).

Additionally, BRALO, S.A. has enhanced its monitoring of substances that could be subject to regulation, classified as SVHC, or flagged as potentially hazardous under the **Community Rolling Action Plan (CoRAP)**. The CoRAP prioritizes substances for evaluation over a three-year period to assess potential concerns related to their use and manufacturing, determining whether they pose a risk to human health or the environment. In this declaration the CoRAP update checked is the one published on 25/03/2025 that encloses 31 substances being surveyed from 2025 to 2027. None of substances surveyed in CoRAP are present on BRALO, S.A.