



March 8, 2023

# Re: JSW Steel USA Product Stewardship Declarations Melted & Manufactured Carbon Steel Products

To Whom it May Concern:

JSW Steel (USA) Inc. and JSW Steel USA Ohio, Inc. (collectively "JSW Steel USA") has completed a detailed technical analysis of the raw materials, intermediate products, and production processes related to the melting and manufacturing of carbon steel products at its Mingo Junction, Ohio, and Baytown, Texas operating locations in the context of product stewardship. The carbon steel products manufactured by JSW Steel USA include slabs, coils, plates, and pipe and any associated coatings that may be applied. Specifically, the product stewardship reviews included a regulatory analysis to determine whether the carbon steel products that JSW Steel USA manufactures contains substances / ingredients that are:

- Regulated under EU Directive 2015/863 (RoHS 3)
- Listed as Substances of Very High Concern (SVHC) published in accordance with Article 59(10) of EU Regulation (EC) 2006/1907 as currently amended (EU REACH SVCH)
- Listed as carcinogenic or a reproductive toxin under California's Safe Drinking Water and Toxic Enforcement Act of 1986 (**Proposition 65**), or
- Substances/ingredients subject to reporting under the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 via CMRT v6.01 (Conflict Minerals)
- Chemical compounds listed in United States Toxic Substances Control Act (**TSCA**), Section 6(h) regarding chemicals that are Persistent, Bioaccumulative and Toxic (**PBT**).

As a result of the product stewardship review, the following declarations can be made:

• RoHS 3 Declaration:

Carbon steel products manufactured by JSW Steel USA are not known or expected to contain any substances currently regulated under EU Directive 2015/863 (RoHS 3) at concentrations at or above the maximum concentration values, by weight in homogeneous material, as listed in Annex II of that regulation.

**JSW Steel (USA) Inc.** 5200 E. McKinney Rd. Baytown, TX 77523 **T** (281) 383-5100

www.jswsteel.us



## **JSW Steel USA**

## • EU REACH SVHC Declaration:

Carbon steel products manufactured by JSW USA are not known or expected to contain any substances currently listed in the Candidate List published in accordance with Article 59(10) of Regulation (EC) 1907/2006 REACH at concentrations at or above 0.1% by weight in homogeneous material.

### • California Prop. 65 Declaration:

Processing (e.g., cutting, drilling, welding, or grinding) of the carbon steel products manufactured by JSW Steel USA can result in exposure to chemicals including chromium (hexavalent chromium compounds), nickel (metallic), and molybdenum trioxide which are known to the State of California to cause cancer; and chromium (hexavalent chromium compounds) which is known to the State of California to cause birth defects or other reproductive harm. For more information go to www.P65Warnings.ca.gov.

## • Conflict Minerals Declaration:

JSW Steel USA does not mine or otherwise source or use any minerals or substances that would be subject to reporting under the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 via CMRT v6.01 and the carbon steel products manufactured are not known or expected to contain such substances.

### • TSCA PBT Declaration:

Carbon steel products manufactured by JSW Steel USA are not known or expected to contain any substances currently regulated under Section 6(h) of TSCA regulations.

Please contact the JSW Steel USA Health, Safety, and Environmental (HSE) Team should you have any questions regarding these product stewardship regulations and the carbon steel products manufactured by JSW Steel USA.

Thank you,

Marshen & Comm

Matthew E. Caprarese Vice President – Engineering & HSE JSW Steel USA

**JSW Steel (USA) Inc.** 5200 E. McKinney Rd. Baytown, TX 77523 **T** (281) 383-5100

www.jswsteel.us