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RF-QS-299	von 2			

Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas

(version: December 2020)

Dear Sir or Madam,

thank you for your request regarding „Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas”¹, in short EU Conflict Minerals Regulation.

We are pleased to declare as follows:

1. The EU Conflict Minerals Regulation focuses


- ‘minerals’ as listed in Part A of Annex I: ores and concentrates containing tin, tantalum or tungsten, and gold;
- ‘metals’ as listed in Part B of Annex I: metals containing or consisting of tin, tantalum, tungsten or gold.

For ease of identification, the relevant product categories are listed in Annex I to the Regulation according to their classification in the Combined Nomenclature.

2. The EU Conflict Minerals Regulation applies exclusively to Union importers who import the minerals and metals listed in Annex I into the EU above a defined quantity threshold (import of the whole year, weight). ‘Union importer’ means any natural or legal person declaring minerals or metals for release for free circulation within the meaning of Article 201 of Regulation (EU) No 952/2013 of the European Parliament and of the Council or any natural or legal person on whose behalf such declaration is made, as indicated in data elements 3/15 and 3/16 in accordance with Annex B to Commission Delegated Regulation (EU) 2015/2446.

3. In summary, the EU Conflict Minerals Regulation directly affects companies that import the minerals and metals in Annex I into the EU (upstream industry) and exceed a certain quantity threshold. No binding regulations are envisaged for the further processing (downstream industry), i.e. for the producers and importers of end products, among others. For companies whose activities take place after metal production, there are no specific obligations on the basis of the regulation, such as the sending of declarations, confirmations etc.

¹ <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32017R0821>

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4. Against the background of the statements in the above-mentioned points 1., 2. and 3., we would like to point out that our company does not fall within the scope of the EU Conflict Minerals Regulation, i.e. is not to be considered a Union importer within the meaning of the Regulation. Consequently, declarations, confirmations etc. with reference to the EU Conflict Minerals Regulation are not necessary and will not be provided.

5. We would like to emphasize that we permanently observe current developments in the field of human rights due diligence and related obligations to react quickly to new requirements. For the supply of the raw materials qualified and trustworthy sources or distributors are very important for us.

This statement applies only to the product supplied by us. Modifications of the product or material within the processing are thereby not covered.

For any further questions do not hesitate to contact us.



Andreas Elenz

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