



LEED® Recycled Content and REACH Compliance of Williams Brothers Doors

Williams Brothers Corporation of America proudly manufactures many of our doors in our Virginia factory using **Nucor steel**, North America's largest recycler of scrap steel. Architects and builders who specify our doors can be confident they are choosing a product that blends performance, sustainability, and compliance. In 2023, Nucor recycled more than **20.8 million net tons of scrap steel**, produced with Electric Arc Furnace (EAF) technology—an environmentally responsible process that maximizes post-consumer scrap while minimizing reliance on raw materials.

Average recycled content of Nucor steel products by weight:

- Bar & Rebar Products: 96.3%
- Engineered Bar: 92.6%
- Beams: 83.5%
- Plate: 74.6%
- Sheet: 62.2%
- Combined Average: 77.0%

These levels of recycled content qualify for use in **LEED® v4/4.1 Green Building credit calculations**, supporting sustainable design and helping projects meet demanding certification standards. By specifying Williams Brothers doors produced in Virginia, you not only ensure strength and reliability—you directly contribute to your project's sustainability goals.

In addition, Williams Brothers doors manufactured in our Virginia facility and produced with Nucor steel are fully compliant with the **European Union's REACH Regulation (EC 1907/2006)**. Nucor steel products contain no Substances of Very High Concern (SVHCs) above regulatory thresholds requiring registration or notification, with the exception of specific leaded cold-finished grades or coated fasteners. This ensures safe, responsible use of our products in a wide range of environments.

Why Architects Specify Williams Brothers Virginia-Made Doors:

- Verified LEED® contribution through high recycled steel content
- Proudly manufactured in Virginia with domestic steel
- Compliance with international environmental standards (REACH)
- Products that combine durability, performance, and sustainability

- Access doors
- Floor doors
- Roof hatches
- Ladders
- Safety Railings
- Corner Guards

Corporate Office:

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The World's Largest Access Door Store™

July 1, 2024

NUCOR CORPORATION
Statement on the European Union's
Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
Regulation (EC 1907/2006)

NUCOR STEEL PRODUCT STATEMENT

Nucor steel merchant bar & rebar, engineered bar, structural steel, carbon steel plate, and sheet steel products do not contain any Substances of Very High Concern (SVHCs), listed as of June 27, 2024, in concentrations requiring registration or notification.

If a Nucor leaded-grade cold-finished product or coated fastener product requires REACH certification, please contact the undersigned Nucor contact to confirm whether that product may require registration or notification prior to import to the EU.

REACH Compliance Analysis

Purpose of the REACH Regulation

The purpose of the REACH regulation is to ensure a high level of protection of human health and the environment.

Impact of REACH on Importers of Nucor Steel and Steel Products

The REACH Regulation generally requires the registration of *substances* that are manufactured in or imported into the European Union (EU) either as the substance or as part of a mixture. In general, if greater than 1 tonne is imported, registration is required. Article 6(1). Different rules apply, however, to imports of *articles*.

An *article* is defined under the REACH Regulation as “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 content.” Article 3(3). The European Confederation of Iron and Steel Industries (EUROFER) demonstrated, and the European Chemicals Agency (ECHA) accepted in a letter dated 2 September 2009, that steel slabs, bars, billets and blooms are articles. Similarly, ECHA guidance for articles has determined that bars, blanks, coil, forgings, plate, pipe and tube, sheet and strip (coated and uncoated), stampings, wire rod and wire (coated and uncoated) are articles. Last, applying ECHA’s June 2017 “Guidance on requirements for substances in articles,” Section 2.3, Decision-Making Workflow, to Nucor Corporation manufactured steel products, Nucor concludes that all of its steel products meet the definition of an *article*.

REACH Registration

An *article* requires *registration* under the REACH Regulation if the article contains a substance that is intended to be released under normal or reasonably foreseeable conditions of use (Article 7 (1)). ECHA has further clarified that “substances that are released because of aging of articles, because of wear and tear or as an unavoidable side-effect of the functioning of the article, are generally not intended releases, as the release as such does not provide a function in itself.” (Requirements for substances in articles, Version 2, § 3.1 (April 2011))

Nucor steel products are not designed to release substances under normal or reasonably foreseeable conditions of use. Therefore, under Article 7 and the ECHA guidance, registration is not required.

REACH Notification

An *article* requires *notification* under the REACH Regulation if an article contains a substance on the latest candidate list of *Substances of Very High Concern* (SVHC List) and the substance is present in the article in concentrations greater than 0.1 percent by weight (Article 7 (2)). The producer or importer of an article can exclude from this threshold the exposure of humans and the environment to the substance during normal or reasonably foreseeable conditions of use of the article, including its disposal. (Article 7 (3)). In such cases, the producer or importer shall supply appropriate instructions to the recipient of the article. (Article 7 (3)).

Based upon the foregoing, Nucor steel product would only require notification if it contains greater than 0.1% by weight of an SVHC or candidate substance. As of the date of this Statement, the only Nucor steel products that may exceed these thresholds and potentially require notification under the REACH Regulation are the following:

- Leaded grades of cold-finished products;
- Fasteners which have certain specified coatings.

All other Nucor steel products do not require either registration or notification under the REACH Regulation. *If a leaded-grade cold-finished product or coated fastener will be imported to the EU, please contact the undersigned Nucor contact to confirm whether that product may require registration or notification prior to import.*

REACH Communication

Article 33 (1) of the REACH Regulation requires that Nucor, as the manufacturer of an article that contains more than 0.1% of a SVHC, supply the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance. Similarly, Article 33 (2) requires Nucor to supply this information to a consumer of the article or substance upon request.

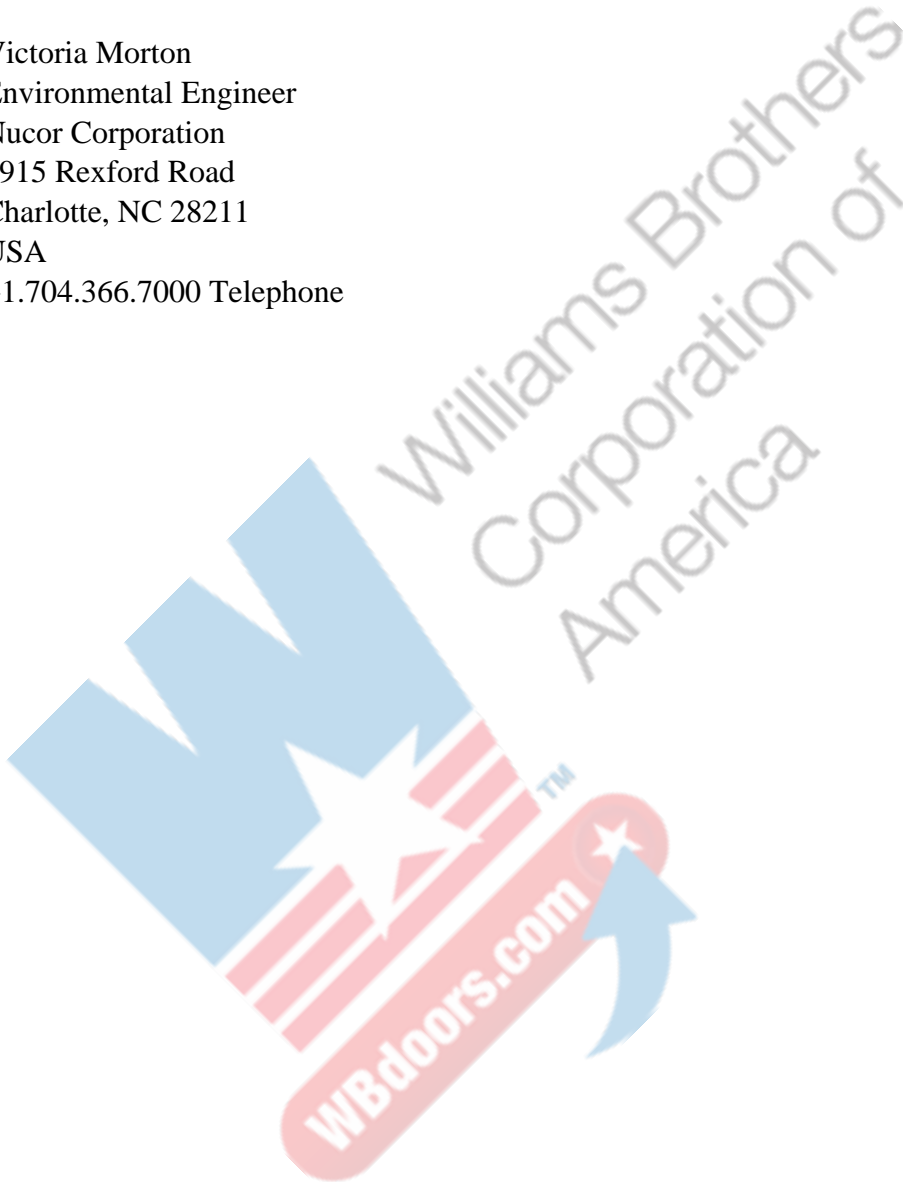
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To the extent that a Nucor product contains an SVHC above the regulatory threshold, Nucor supplies this information on its safety data sheets (SDS), which are provided to each purchaser, and available at <https://www.nucor.com/certifications/> or upon written request.

If you need additional information on a specific Nucor steel product, please contact:

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March 2024

To: All Nucor Customers

Re: 2023 Recycled Content Averages for Nucor Downstream Steel Products

Nucor Corporation is North America's largest recycler, using approximately 20.8 million net tons of scrap steel in 2023 to create new products. Nucor uses Electric Arc Furnace (EAF) technology at all its steel recycling facilities. EAFs use post-consumer scrap steel material as the major feedstock, unlike blast furnace operations that use mined iron ore as the major feedstock. Nucor has prepared the following information to help calculate the recycled content for products being used in "Green Building" applications or for projects in the LEED® certification program and to provide recycled content averages for customer use. These percentages are based on the total weight of products produced by the respective entity. The values reflect estimates of the product's pre- and post-consumer scrap content as a percentage of total relevant inputs to the manufacturing process in accordance with ISO 14021:2016. The recycled content presented reflects the recycled content of steel products manufactured from Nucor steel.

Recycled Content – Averages for Nucor Products

2023 Recycled Steel Content of Nucor Products (% by Total Weight)	
Product Group	Average Recycled Content
Nucor Bar Products	96.3%
Nucor Engineered Bar Products	92.6%
Nucor Beam Products	83.5%
Nucor Plate Products	74.6%
Nucor Sheet Products	62.2%
Total Nucor Steel Combined	77.0%

Nucor Downstream Products Group

2023 Recycled Steel Content of Nucor Steel Products			
	Total Scrap Steel Used	Total Post-Consumer Recycled Content	Total Pre-Consumer Recycled Content
Vulcraft Structural Products	96.3%	85.8%	10.5%
Vulcraft / Verco Decking	62.2%	24.8%	37.4%
Nucor Grating / Fisher-Ludlow Grating	96.3%	85.8%	10.5%
Nucor Building Group	77.0%	48.9%	28.0%
Harris Rebar	96.3%	85.8%	10.5%
Nucor Tubular Products - Sheet	62.2%	24.8%	37.4%
Nucor Tubular Products - Plate	74.6%	45.7%	28.9%
Nucor Fastener Products	96.3%	85.8%	10.5%
Nucor Wire Products	96.3%	85.8%	10.5%
Nucor Cold Finish - Bar	96.3%	85.8%	10.5%
Nucor Cold Finish - SBQ	92.6%	58.0%	34.6%
Skyline Steel Group	85.1%	62.0%	23.1%

Vulcraft Group locations:

Vulcraft – Florence, SC; Norfolk, NE; Brigham City, UT; Grapeland, TX; St. Joe, IN; Fort Payne, AL; Chemung, NY; Nisku, AB; Ancaster, ON; Verco Decking – Phoenix, AZ; Fontana, CA; Antioch, CA.

The bar steel for Vulcraft joists and structural products is typically obtained from one of the eleven (11) Nucor bar mills. Steel for decking produced by Vulcraft facilities is typically obtained from one of the five (5) Nucor sheet mills. Verco Decking, Inc. may obtain steel from sources outside of Nucor that may contain lower amounts of recycled content. Specific product information regarding Verco Decking, Inc. and individual Vulcraft locations is available from facility representatives.

Nucor Building Group locations:

Nucor Building Systems - Swansea, SC; Waterloo, IN; Terrell, TX; Brigham City, UT; American Buildings Company – Eufaula, AL; La Crosse, VA; El Paso, IL; Kirby Building Systems – Portland, TN; CBC Steel – Lathrop, CA.

Nucor Building Group products may contain steel from all the Nucor steel mills or obtain steel from outside of Nucor Corporation for their sheet, plate, bar, and beam steel needs. Various components contain varying amounts of recycled content. Contact the Building Group facility directly for additional information.

Nucor Grating / Fisher & Ludlow Grating locations:

Nucor Grating Brigham City, UT; Grapeland TX; Fisher & Ludlow Wetaskiwin, AB; Burlington, ON; Pointe-aux-Trembles, QC.

Steel for grating products is typically obtained from Nucor bar mills. Contact Nucor Grating / Fisher & Ludlow directly for job specific information and recycled content data for galvanized, stainless steel or aluminum products.

Nucor Tubular Products locations:

HSS Divisions – Chicago, IL; Marseilles, IL; Birmingham, AL; Decatur, AL; Conduit Divisions – Louisville, KY; Cedar Springs, GA; Specialty/Automotive – Madison, IN; Trinity, AL.

Steel for Nucor Tubular Products is typically obtained from Nucor sheet mills and Nucor plate mills. Contact the Nucor Tubular Product facility directly for specific information.

Nucor Fastener Products locations:

Nucor Fastener - St. Joe, IN; Nucor Fastener – Shelbyville, IN; Nucor-LMP – Maryville, MO

Steel for Nucor fasteners is typically obtained from Nucor bar mills. Some fasteners may contain high percentages of alloys that may reduce the total recycled content of the products. Contact the facility directly for specific information.

Nucor Cold Finish Group locations:

Nucor Cold Finish – Norfolk, NE; Darlington, SC; Brigham City, UT; Oak Creek, WI;
Nucor-LMP – Maryville, MO; Laurel Steel – Burlington, ON; Nucor Bright Bar – Orrville,
OH; St. Louis Cold Drawn – St. Louis, MO.

Steel processed at Nucor Cold Finish is typically obtained from Nucor bar mills or Nucor SBQ mills. Contact the Nucor Cold Finish facility directly for specific information.

Nucor Wire Products locations:

Nucor Wire Products – Brigham City, UT; Wallingford, CT; Nucor-LMP –
Maryville, MO.

Steel processed at Nucor Wire Products is typically obtained from Nucor bar mills.
Some wire products can contain varying recycled content. Contact the Nucor Wire
Products facility directly for specific information.

Nucor Insulated Panel Locations:

Insulated Panel Locations – Las Vegas, NV; Lewisville, TX; Sheridan, AR; Laurens, SC;
Prince George, VA; Frankfort, KY; Shelbyville, IN; Waterloo, IN; Hamilton, ON, Canada

Estimates are based on the recycled content of steel from Nucor sheet mills. Contact
the Nucor Insulated Panel locations directly for specific information, which may vary.

Skyline Steel Group Locations

Skyline Steel Locations – Blytheville, AR; Belpre, OH; Camp Hill, PA; Cartersville, GA;
Luka, MS; Longview, WA; Newton, IL; Pomona, CA.

Steel processed at Skyline Steel locations is typically obtained from Nucor beam, plate,
sheet, and tubular locations. Contact the Skyline Steel locations directly for specific
information.

Nucor Rebar Fabrication locations:

See www.harrisrebar.com/contact-locations.php for location and contact information.
Rebar fabricated at Harris Rebar facilities is typically sourced from Nucor bar mills.
Contact the Harris Rebar facility for project specific information.

LEED Information

Nucor can provide a variety of documentation to help projects satisfy LEED v4/4.1 credit requirements. Nucor publishes a Corporate Sustainability Report which can be found on our website at <https://www.nucor.com/sustainability/>

We continue to develop product-specific Environmental Product Declarations and Health Product Declarations for a variety of product groups. Nucor has developed facility and product specific Environmental Product Declarations as well as participated in multiple industry-wide EPDs. Additionally, Nucor will work directly with any customer requiring product life cycle inventory data or other environmental footprint information.

Additional industry information is available online through the Steel Recycling Institute at <https://www.steelsustainability.org/>

