

Frequently Asked Questions about REACH & Beryllium Oxide FAQ 311

Does the Registration, Evaluation and Authorization of Chemicals or REACH Directive currently restrict the import or use of Materion products containing Beryllium Oxide?

The vast majority of the Materion Ceramic products imported into the European Economic Area (EEA) are classified as articles under REACH and the European Commission (EC) has determined that substances in articles do not require European Chemicals Agency (ECHA) permission to be used or imported into the EEA. **This article designation includes Beryllium Oxide Ceramic of sheet, foil, rod, wire, tube, bar, plate, forgings, extrusions, cast shapes and finished parts. Therefore, the beryllium oxide and other elements contained in the most common forms of our products do not have to be authorized to be used or imported into the EEA.** It is important to note that these materials powder form cannot be classified as an article and are regulated in REACH.

What is REACH?

Registration, Evaluation and Authorization of Chemicals, or REACH, is a European directive designed to provide safety, health, environmental and use information about chemical substances to the ECHA and to downstream users. REACH requires producers and importers to register chemical substances produced in or imported into the EEA market. The ultimate goal of the REACH directive is to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry.

I understand that REACH will require registration of substances. Did Materion Ceramics Inc. register beryllium oxide?

Even though the majority of our customers buy articles, we have registered beryllium oxide as required by REACH. We participated in the registration of beryllium metal and beryllium oxide, as well as copper, aluminum, nickel and other constituents. This was done to assure the continued and unhindered use of these products by companies in the EEA.

Is beryllium on the list of Substances of Very High Concern (SVHC)?

No, beryllium is not on the SVHC Candidate List. However, the initial Substance Evaluation Conclusion Document for beryllium and compounds prepared by Germany as part of the "Substance Evaluation" under the Community Rolling Action Plan (CoRAP) program and submitted a [Substance Evaluation Conclusion Document](#) to ECHA in March 2014. Germany did recommend to include beryllium and compounds as an SVHC. However, stakeholders opposed placing beryllium and compounds on the SVHC List and have provided extensive scientific evidence to support their position during the next step in the review process which was a Risk Management Option Analysis (RMOA). Germany published the results of the RMOA in November 2016 and concluded that identifying beryllium and compounds as an SVHC was not necessary in lieu of the development and implementation of a voluntary product stewardship program. The Beryllium Science and

Technology Association (BeST) developed and issued a voluntary product stewardship program for beryllium entitled “Be Responsible” which can be found at BerylliumSafety.eu.

How can I obtain assistance?

Materion Beryllium and Composites will continue to provide the technical expertise, support and information to help make it easy for customers to meet any current or future regulatory obligations. If you have any questions regarding the information provided above, would like a copy of any of the documents described in this summary or wish to provide feedback, please contact Ted Knudson, Director, Product Stewardship, our point of contact for REACH, via phone at +1 (216) 383-4040 or e-mail at Theodore.Knudson@materion.com. You may also call the Materion Brush Inc. Product Safety Hotline at (800) 862- 4118.