

Frequently Asked Questions about REACH & Alloys Containing Beryllium FAQ 111

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

The vast majority of the Materion Performance Alloy metal 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 copper beryllium (CuBe), nickel beryllium (NiBe) and aluminum beryllium (AlBe) alloys in the form of strip, rod, wire, tube, bar, plate, forgings, extrusions, cast shapes and finished parts. Therefore, the beryllium 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 alloys in ingot or powder form and expected to be melted 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 requires registration of substances. Did Materion Performance Alloys register any substances?

Even though the vast majority of products provided to our customers are articles, we have registered the substances in our products that are melted and cast in Europe as required by REACH. We participated in the registration of beryllium metal and beryllium oxide, as well as copper, aluminum, nickel and other alloy 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 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 as an SVHC. However, stakeholders opposed placing beryllium 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 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.

Is there any other important information regarding beryllium and REACH?

Beryllium has been identified by the European Commission as one of 27 substances determined to be critical to the EU. Materials are designated as “critical” when the risks for supply shortage or their impacts on the economy are high compared with most other materials. Materion Performance Alloys has ensured a continuing, long-term supply of products containing beryllium to our EU customers. It is widely recognized that beryllium cannot be substituted by any other material in the applications that rely on the properties of beryllium to enhance product life, minimize waste, reduce energy utilization, and allow for product miniaturization and the decrease of raw material utilization. More importantly, beryllium cannot be substituted in numerous life-saving and life-enhancing applications that provide for the safety and well being of the general public.

How can I obtain assistance from Materion Performance Alloys?

Materion Performance Alloys 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, Regulatory Affairs and 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.