



INDUSTRIAL FASTENERS INSTITUTE

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IFI Position Update European Union **REACH** Regulation Compliance Relative to Plated and Coated Fasteners

The European Union regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (**REACH**), much like the End-of-Life Vehicle (**ELV**) Directive and the Restriction of Hazardous Substances (**RoHS**) Regulation are all aimed at dealing with the environmental impact of potentially hazardous substances in the EU. The combined impact of these three regulations cover, most, if not all manufactured products, with REACH having the broadest applicability. The REACH regulations cover many substances that must be registered before shipping them into the EU. Within that large universe of substances some are considered particularly hazardous and after substance-specific sunset dates, the shipper must receive authorization to ship those substances and articles containing those substances in certain amounts in to the EU.

Fasteners containing SVHC substances in excess of 0.1% by Weight: The REACH Regulation requires the establishment of a list of hazardous substances referred to as **Substances of Very High Concern (SVHC)**. Likely to be included in the SVHC list at some point are **hexavalent chrome, cadmium, and lead**, which are sometimes present in fastener finishes. Once included in the SVHC list and after substance-specific sunset dates, the firm shipping product into the EU containing SVHC in excess of 0.1% by weight must obtain REACH authorization before the fasteners can be shipped.

If a fastener contains SVHC in excess of 0.1% by weight, there is an immediate requirement to communicate that fact to the EU customers. Beginning in June 2011, there is an additional requirement to notify the European Chemicals Agency if the fastener both contains SVHC in excess of 0.1% by weight and the total annual amount of the SVHC to the EU is 1 tonne per year or more.

Fasteners with no SVHC and those containing less than of 0.1% by Weight: Suppliers shipping fasteners that do not contain any SVHC and those NOT containing SVHC in excess of 0.1% by weight do not have to register or obtain authorization because of two caveats found in REACH:

1. The fastener itself is considered an article under REACH and the finish is integral to the function of the fastener.
2. The fastener finish is not intended to be released into the air, ground or water in the EU (a cornerstone of REACH).

The eventual oxidation of zinc-containing finishes constitutes normal wear and tear of the fastener finish performing its intended function. According to REACH, normal wear and tear does not constitute "release".

Barring the listing of additional substances in the future, it can be generally stated that if completed fasteners are free of the hazardous substances listed in the ELV Directive or RoHS, they would not require registration or authorization under REACH.

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