



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 Substances of Very High Concern (SVHC):

The REACH Regulation requires the establishment of a list of hazardous substances referred to as **Substances of Very High Concern (SVHC)**. Currently included in the list of SVHC 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 supplying any fasteners into the EU* containing SVHC in excess of certain allowable limits (typically $\leq 0.1\%$ by weight) **must obtain REACH authorization before the fasteners can be shipped**.

After obtaining authorization for fasteners containing SVHC in excess of its specific allowable percentage weight limit, there is an immediate requirement to communicate that fact to the EU customers.

REACH requires an update of the Candidate List of SVHC at least every 2 years. After a period of public review and comment, new substances can be added to the list of SVHC in REACH. Fastener manufacturers should periodically consult their metal finishers and other post-treatment suppliers to ensure that they are current with the REACH regulations, and to ascertain if any actions are necessary to obtain authorization for any materials used on their fasteners which would be shipped into the EU.

Fasteners with no SVHC and those containing $\leq 0.1\%$ by weight:

Suppliers shipping fasteners that do not contain any SVHC or those NOT containing SVHC in excess of their allowable percentage weight (typically $\leq 0.1\%$ 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.

Respectfully,

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