REACH Regulation impacting building hardware industry

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Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)


of 18 December 2006
Aim of REACH

• REACH aims to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances.

• This is done by the four processes of REACH, namely the registration, evaluation, authorisation and restriction of chemicals.

• REACH also calls for the progressive substitution of the most dangerous chemicals (referred to as "substances of very high concern“ - SVHC) when suitable alternatives have been identified.
European Chemicals Agency (ECHA) in Helsinki

• This Agency is the central point in the REACH system.
Lead (Pb) – 1

• Lead was added to the so-called list ‘Candidate List of Substances of Very High Concern for authorisation’ on 27\textsuperscript{th} June 2018.

• This triggered certain obligations, mainly the ‘duty to communicate information on substances in articles’ (Art. 33).

• When components of building hardware products (and in some cases the product itself) contain lead in a concentration above 0,1 \% weight by weight (w/w), Art. 33 applies.

• More info in ARGE’s Recommendation document.
Lead (Pb) – 2

• Lead has been restricted for the use under certain conditions since years:

• ... shall not be placed on the market if the content of lead is equal or greater than 0.05 % by weight, and those articles or accessible parts thereof may, during normal or reasonably foreseeable conditions of use, be placed in the mouth by children.

• That limit shall not apply where it can be demonstrated that the rate of lead release from such an article or any such accessible part of an article, whether coated or uncoated, does not exceed 0.05 μg/cm² per hour (equivalent to 0.05 μg/g/h).
Lead (Pb) – 2 (cont.)

- ‘Keys and locks, including padlocks’ have been on the list of derogations.

- On 10\textsuperscript{th} July 2019: ECHA makes a call for evidence on the review of lead in Consumer Articles (deadline is 19\textsuperscript{th} Sept 2019).

- ARGE has teamed up with other European industry associations in order to keep ‘keys and locks, including padlocks’ on the list of derogations.
Nickel (Ni)

Success story nickel guideline:

• Since Q1/2017 ARGE has been lobbying against the proposal of the European Chemicals Agency (ECHA) to restrict the use of nickel in keys. In spring 2019 the European Commission and ECHA decided to discontinue the preparation of a guideline which would have extended the presently existing restriction of the use of nickel. As a result, the threat that nickel would be restricted for the use in keys is averted for the time being.