4 March, 2013

Joint Position of Associations inside the Electrical Industry's Value Chain

View about SVHC*) in Glass concerning the EU-REACH Regulation
= Including the Handling of the Lead Oxides and Complex Oxides Containing Lead Added in the 8th Revision of the SVHC Candidate List =

Lead oxides and Complex Oxides containing Lead, which are well known as constituents of glass, were added in the 8th Revision of the SVHC Candidate List of the EU REACH Regulation ((EC) No 1907/2006) (published on 19 December, 2012).
We present below the view of the Electronic Components Industry concerning the notification and information transmission duties based on the REACH Regulation for those constituents when included in glass.

1. View of the Electronic Components Industry concerning SVHCs

The Electronic Components Industry understands and cooperates with the EU standpoint aiming at the management and transmission of substance risk information. It shall be noted that, in the REACH Regulation, substances called SVHC are specified as candidate substances for "authorization" based on Article 59 (1), and are not regarded as banned substances.

The REACH Regulation establishes requirements on notification of SVHCs to ECHA (European Chemicals Agency) in accordance with Article 7 (2) et seqq. and information transmission of SVHCs to downstream users and consumers in accordance with Article 33, for articles imported or manufactured within the area of the EU Member States. However, in the case of glass with a complex structure and composition including multiple constituents, a particular SVHC used as constituent can become a part of the glass matrix. In this case to determine whether it is still correspondent to an SVHC or becoming part of a new compound due to chemical and physical reactions, it is imperative to establish standardized judgment criteria.

2. View Concerning Glass in Electronic Components

In the REACH Regulation, according to EU Official Journal "Commission Regulation (EC) No. 987/2008", glass is one substance and not a mixture of several substances.
On the other hand, in order to communicate information on glass, when considering from its chemical structure that glass is a solid solution of several metallic oxides in an amorphous state for which a crystal system cannot be specified, it has become common to communicate information on composition of glass (e.g. within the International Material Data System of the automotive industry) in a more easy way apart from its real chemical structure as a list of constituent metallic oxides. This information does not imply that the listed oxides themselves exist as constituents of the glass.

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*) SVHC Substance of Very high Concern

see also : http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/substances-of-very-high-concern-identification

Nevertheless, there are cases when an SVHC may exist within a glass without being solved into a solid solution. In such cases, it shall be interpreted as a mixture of glass and that particular SVHC.

3. View Concerning Lead Oxides and Complex Oxides Containing Lead Added in the 8th Revision of the SVHC Candidate List

Based on the judgment criteria shown by the view concerning glass in general from the previous item, we present our view concerning the handling of notification and information transmission based on the REACH Regulation for lead oxides and complex oxides containing lead.

3.1. Handling of Lead Oxide (PbO, Pb_3O_4)) Noted as Constituent of Glass

Chemical characteristics including risk to environment and human beings of lead oxides (PbO, Pb_3O_4) as substances as such are not comparable in properties when finally integrated into the glass matrix. This glass matrix is not a Substance of Very High Concern (SVHC). Manufacturers/importers are not obliged to communicate information on the substance mentioned above according to Article 33 (1) and in accordance to Art. 7 (2) et seqq. of the REACH Regulation.

Japan Electronics Information and Technology Industries Association
Technical Committee
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