

ARGE Recommendation concerning the heavy metal lead (Pb) being on REACH's Candidate List of Substances of Very High Concern (SVHC)

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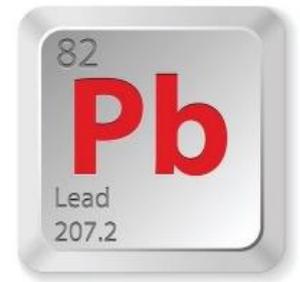
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1. Executive summary

- Until 27th June 2018 the *REACH Regulation* did not play a significant role for producers of building hardware products, but when at this date **the heavy metal lead (Pb) was added to the so-called 'Candidate List of Substances of Very High Concern for authorisation'** (in short '*Candidate List of SVHC*') certain duties and obligations of the *REACH Regulation* became relevant for our industry as well.
- In respect to **building hardware products, lead is sometimes used as a minor addition to the alloy of which components** (and in some cases the products themselves) are made of. Examples are brass bars and coils, as well as machining steel where lead is added for its chip breaking properties, allowing better and more efficient machining.
- The **most prominent duty** under the *REACH Regulation* in relation to lead being on the *Candidate List of SVHC* – which is assumed **to concern quite many suppliers of building hardware products** – is the '**duty to communicate information on substances in articles**' under the *REACH Regulation*, Article 33. The trigger for this '*duty to communicate information on substances in articles*' is that 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)**.
- ARGE has prepared an example for an information letter as suppliers have to provide it in order to meet the duties under *REACH Regulation*, Article 33.
- Another obligation which might have to be met by producers of building hardware products (assumably not many) is the **obligation to notify the European Chemicals Agency (ECHA)** as defined in *REACH Regulation*, Article 7. Such a notification is required for lead containing raw materials, as coils, sheets, profiles, etc, as well as components, semi-finished and finished products in case they contain lead in a concentration above 0,1 % weight by weight (w/w), and if they are **imported** by the producer of building hardware products **into the European Economic Area (EEA)**, to which all members of the *European Union (EU)* belong, as well as Iceland, Norway and Liechtenstein. The threshold for the obligation to notify is the **total weight of lead** in those articles of **one tonne per year**. **All articles procured** by the producer of building hardware products **inside the EEA are not taken into account in the calculation of the total weight**.
- Whilst it has no direct relevance for producers of building hardware products, it is of interest to understand that **duties and regulations** as set out in Article 33 and Article 7 of the *REACH Regulation* concern also the producers' distribution **channel partners, as wholesalers, retailers, installers, locksmiths, carpenters**, etc.
- There might apply even more obligations and duties for producers of building hardware after lead having been added to the *Candidate List of SVHC*, of which reference is made in this recommendation only to the impact on the **Declarations of Performance (DoP)** under the *Construction Products Regulation (CPR)* and on **Environmental Product Declarations (EPD)**.

- Whether in future the use of lead will be subject to authorisation or will even be restricted will depend on ambitions of *EU members states*, of *ECHA* and the *European Commission*. Anyway, there is also significant lobbying against imposing further conditions and limitations on the use of lead.

2. About this recommendation

- The aim of this recommendation is to support producers of building hardware by providing condensed information on important duties and obligations they have or might have after lead was added to the *Candidate List of SVHC*. This document is based on not only on the *REACH Regulation* itself, but also on the many hundreds of pages of guidance documents, manuals, webinar documentations, FAQ's, video tutorials which are available on *ECHA's* website, as well as on legal advice and expert's knowledge and experience.
- This recommendation is planned to be updated after having received feed-back from ARGE members. A FAQ section is planned to be established. Hence, any comments, criticism and questions are appreciated.
- When translating this document and the attachments into another language it should be considered that certain terms referred to are terms as defined in the *REACH Regulation*. The *REACH Regulation* is available on *EUR-Lex'* website in 23 out of the 24 official languages of the European Union: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006R1907>

3. Background

3.1. *REACH Regulation* in general

- The *REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)* – in short '**REACH Regulation'** – came into force on **June 1st, 2007**.
- **The *REACH Regulation* is relevant within the *European Economic Area (EEA)*. The *EEA* consists of all members states of the *European Union*, as well as of *Iceland, Norway and Liechtenstein*. It has to be noted that whilst in the *REACH Regulation* when making territorial references the term '*Community*' is used, and guidance documents of *ECHA* refer to '*EU*' (*European Union*), the territorial relevance of the *REACH Regulation* is the *EEA*. Hence, when establishing this document, the term *EEA* has been added in brackets where applicable.**

- Compliance with the **REACH Regulation is mandatory for companies placing articles on the market in the EEA**. It is important to understand that the *REACH Regulation* is applicable not only for chemicals per se but for all types of substances, preparations and articles as defined – including articles used in daily life.
- **The REACH Regulation is not applicable in Switzerland**. Switzerland has its own chemical regulation with REACH-like registration requirements adopted: The *Verordnung über den Schutz vor gefährlichen Stoffen und Zubereitungen (Chemikalienverordnung, ChemV)* – in English: *Chemicals Ordinance on Protection against Dangerous Substances and Preparations* (known as *ChemO*).
- Whilst the *REACH Regulation* was adopted in order to amalgamate several individual regulations and directives into one piece of legislation, it is considered now to be probably the most complex EU Regulation enterprises within the *EEA* have to deal with. In particular, the related challenges for SMEs (small and medium-sized enterprises) can be considerable.
- Here are **some relevant statements concerning the REACH Regulation** taken from the website of the European Commission:
 - *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 aims to enhance innovation and competitiveness of the EU chemicals industry.*
 - *"No data no market": the REACH Regulation places responsibility on industry to manage the risks from chemicals and to provide safety information on the substances. Manufacturers and importers are required to gather information on the properties of their chemical substances, which will allow their safe handling, and to register the information in a central database in the European Chemicals Agency (ECHA) in Helsinki. The Agency is the central point in the REACH system: it manages the databases necessary to operate the system, co-ordinates the in-depth evaluation of suspicious chemicals and is building up a public database in which consumers and professionals can find hazard information.*
 - *The Regulation also calls for the progressive substitution of the most dangerous chemicals (referred to as "substances of very high concern") when suitable alternatives have been identified.*

3.2. REACH Regulation and building hardware products

- Until 27th June 2018 the *REACH Regulation* did not play a significant role for the producers of building hardware products.
- **On 27th June 2018 the heavy metal lead (Pb) was added to the *REACH Regulation's* so-called *Candidate List of Substances of Very High Concern (SVHC) for authorisation.***
- As **components of several building hardware products** – or the products themselves – **contain lead as a minor addition to the alloy** they are made of, certain duties and obligations as defined under the *REACH Regulation* have become relevant for suppliers of such building hardware products.

3.3. Important terms under the *REACH Regulation*

In the *REACH Regulation* most of the terms used in the regulation are defined (Article 3). Additional information on certain terms can be found in guidance documents of the *European Chemical Agency (ECHA)*. For the sake of better understanding of the duties and obligations of producers of building hardware products the definitions of some relevant terms as given under *REACH Regulation*, Article 3 are shown below:

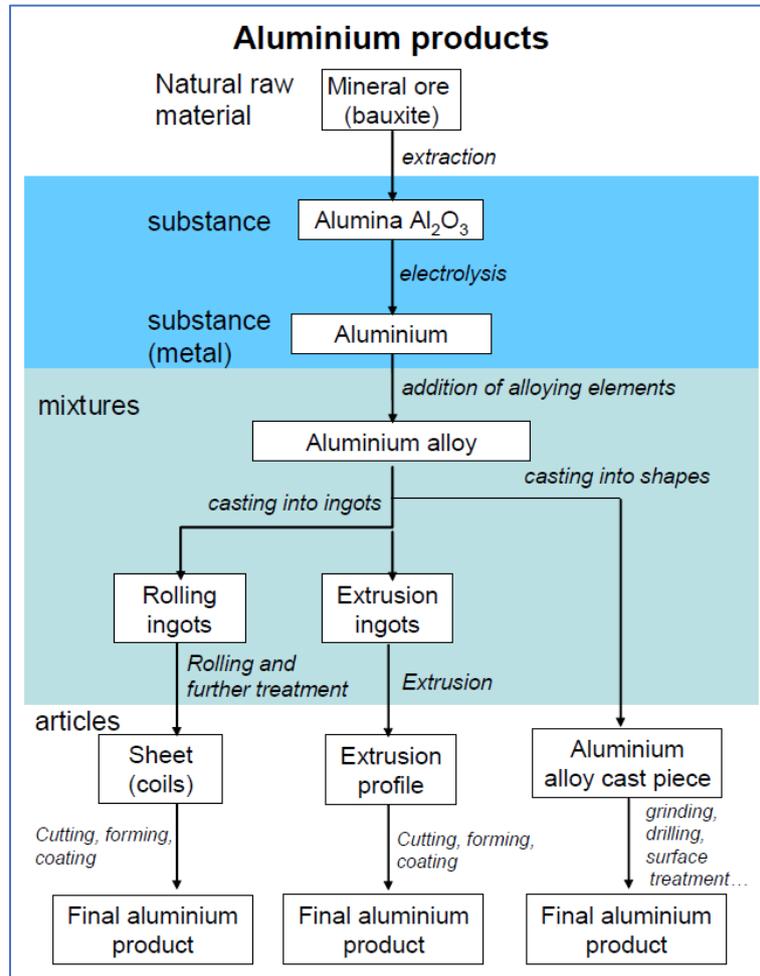
3.3.1. Substance

According to *REACH Regulation*, Article 3(1), *substance means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.*

3.3.2. Article

According to *REACH Regulation*, Article 3(3), *article means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.*

The chart below depicts the transition from bauxite to final aluminium products and shows as of which status in the transition reference to 'articles' is made.



Source: ECHA's Guidance on requirements for substances in articles, Version 4.0 – June 2017, page 79

ECHA's Guidance on requirements for substances in articles, Version 4.0 – June 2017 states further on pages 80 and 81:

'Raw material types in the form of metal and alloy semi-finished products similar to coils and profiles are: bars, blanks (e.g. cut, machined, pressed, etc), coil (coated and uncoated), extrusion profiles, films and filaments, foil and ribbons, forgings, plate, pipe and tube (cast, seamless and welded), pipe and tube fittings, sintered semi-finished and final products, sheet and strip (coated and uncoated), stampings, wire rod and wire (coated and uncoated).'

3.3.3. Complex object

The term 'complex object' is not defined in the REACH Regulation.

In ECHA's *Guidance on requirements for substances in articles, Version 4.0 – June 2017* the term 'complex object' refers to 'any object made up of more than one article. In complex objects, several articles can be joined or assembled together in various manners. The more articles it is made of, the more complex an object becomes.'

Examples for 'articles' and 'complex objects':

Articles: All components (as springs, pins, bolts, housings, etc.) of a building hardware product, which itself in most of the cases is a complex object, but also products like e.g. key blanks or cut keys when sold without cylinders

Complex objects: Door and window handles, locks, cylinders, door closing devices, etc. (practically all building hardware products except for products which don't consist of components, as e.g. key blanks and keys – see above)

It is important to understand that articles that are assembled or joined together in a complex object remain articles in the sense of the *REACH Regulation*, as long as they keep a special shape, surface or design, which is more decisive for their function than their chemical composition, or as long as they do not become waste.

As a simple rule one can say: "Once an article, always an article!"

3.3.4. Producer of an article

According to *REACH Regulation*, Article 3(4), *producer of an article means any natural or legal person who makes or assembles an article within the Community (EEA).*

Under the terminology of the *REACH Regulation* the main role – or the only role – of a producer of building hardware products (which are in *REACH Regulation's* terms complex objects and articles) is the role of 'producer of an article'. Producers of an article – amongst certain other actors in the supply chain – have the role of a 'supplier of an article'.

3.3.5. Importer

According to *REACH Regulation*, Article 3(11) *importer means any natural or legal person established within the Community (EEA) who is responsible for import.*

Importer:

An obligation for notifying ECHA according to *REACH Regulation*, Article 7 exists under certain conditions (see item 5.2.2 Notification).

Import means the physical introduction into the customs territory of the European Economic Area (EEA), e.g. from Switzerland, Turkey, USA, Canada, Asian countries, etc.

3.3.6. Supplier of an article

According to *REACH Regulation*, Article 3(33) *supplier of an article means any producer or importer of an article, distributor or other actor in the supply chain placing an article on the market.*

Supplier of an article:

Having the role of a supplier of an article – as producers of building hardware do – triggers specific duties under the *REACH Regulation*, of which the duties as defined in Article 33 and Article 7 are described in this document.

3.4. The European Chemicals Agency (ECHA)



- **ECHA is an agency of the European Union**, located in Helsinki.
- **ECHA's establishment is stipulated in the REACH Regulation.**
- From the ECHA website (www.echa.europa.eu):

ECHA is the driving force among regulatory authorities in implementing the EU's ground-breaking chemicals legislation for the benefit of human health and the environment as well as for innovation and competitiveness.

ECHA helps companies to comply with the legislation, advances the safe use of chemicals, provides information on chemicals and addresses chemicals of concern.
- Amongst many other tasks, **ECHA manages the Candidate List of Substances of Very High Concern (SVHC) for authorisation**, whereby the proposal to add a substance onto the *Candidate List of SVHC*, as well as the decision about it is a process which involves all members states of the *European Union*.
- **ECHA plans to establish a new database on Candidate List substances in articles by 2021.** In this context *ECHA* published the following on their website on 11th July 2018:

ECHA will establish a new database on the presence of hazardous chemicals in articles by the end of 2019 for waste treatment operators and consumers. The database will comprise information submitted by companies producing, importing or selling articles that contain Candidate List substances. Companies need to submit this information by the end of 2020.

ARGE is monitoring the development and will provide its members with information – and if feasible – with support in due time.

3.5 **Candidate List of Substances of Very High Concern (SVHC) for authorisation**

- The following information has been excerpted from 'ECHA's Guidance on requirements for substances in articles', June 2017, Version 4.0, page 25:

Substances fulfilling one or more of the criteria defined in Article 57 of the REACH Regulation can be identified as Substances of Very High Concern (SVHC) and put on the Candidate List for authorisation. These SVHC can be:

- *Substances meeting the criteria for classification as carcinogenic, mutagenic or toxic for reproduction (CMR) category 1A or 1B in accordance with the CLP Regulation (EU regulation (EC) No 1272/2008 on classification, labelling and packaging of chemical substances and mixtures)*
 - *Substances which are persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) according to REACH Annex XIII*
 - *Identified, on a case-by-case basis, from scientific evidence as causing probable serious effects to human health or the environment of an equivalent level of concern as those above*
- **Once a substance is identified as a SVHC, it is included in the Candidate List. The inclusion in the Candidate List brings immediate obligations for suppliers of the substance, as well as for suppliers of articles containing the substance if the concentration of the substance in the article is above a defined threshold (in the case of lead the threshold is 0.1 % w/w).**
 - Presently there are 191 substances on the *Candidate List of SVHC for authorisation* (status as at 19th December 2018).

3.6 **Lead**

- In February 2018, Sweden as a member state of the *European Union* proposed that the heavy metal lead shall be identified as a *Substance of Very High Concern*.
- Initially, some member states took a stance against this proposal, as did the *International Lead Association (ILA)*. Also ARGE expressed concerns.
- After this matter had passed the evaluation by the *Member State Committee* with a unanimous decision, **lead** – together with 9 other substances – **was added to the Candidate List of SVHC on 27th June 2018**.
- According to *ILA*, 80% of modern lead usage globally is in the production of batteries of which more than 99% are recycled.
- In respect of manufacturers of building hardware products, the use of lead as a minor addition to the alloy the components (and in some cases the products themselves) are

made of, is relevant. Examples are brass bars and coils, as well as machining steel where lead is added for its chip breaking properties, allowing better and more efficient machining.

4 Scope of this recommendation

4.1 In Scope

- **In scope** of this recommendation are two specific duties of producers of building hardware products under the *REACH Regulation*, resulting from lead having been added to the *Candidate List of SVHC*:
 - ***Duty to communicate information on substances in article*** (*REACH Regulation, Article 33*)
 - ***Notification of substances in articles*** (*REACH Regulation, Article 7*)
- In addition, some recommendation is given in relation to the duty to communicate under *REACH Regulation*, Article 33 effecting two specific types of documents relevant to the building hardware industry:
 - *Declaration of Performance (DoP)* under the *Construction Products Regulation (CPR)*
 - *Environmental Product Declarations (EPD)*, based on EN 15804

4.2 Not in scope

- Not in scope of the recommendation are all other duties and obligations related to lead which might result from other provisions of the *REACH Regulation* or from e.g. any industrial health and safety regulations on local, national or EU level.

5 Important obligations of producers and importers of building hardware

5.1 ***Duty to communicate information on substances in articles (REACH Regulation, Article 33):***

Whilst according to the provisions of the *REACH Regulations* this duty takes effect on the day when a substance is added to the *Candidate List of SVHC* (which in the case of lead was on 27th June 2018), it is expected that it takes some time until this duty can be fulfilled in its entirety.

REACH Regulation, Article 33 differentiates between the duty to communicate information on substances in articles to ‘recipients’ and to ‘consumers’:

5.1.1 To recipient (as defined in *REACH Regulation*, Article 33(1))

- *Recipient of an article: means an industrial or professional user, or a distributor, being supplied with an article but does not include consumers.*
- *REACH Regulation*, Article 33(1), states: *Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.*

5.1.2 To consumer (as defined in *REACH Regulation*, Article 33(2))

- The term ‘consumer’ is not defined in the REACH Regulation, but in interpretation of the Council Directive 93/13/EEC one can assume that “*all customers who are not ‘recipients’ are ‘consumers’*”. Hence, ‘Consumers’ are, colloquially speaking, private end-users.
- *REACH Regulation*, Article 33(2), states: *On request by a consumer any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the consumer with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance. The relevant information shall be provided, free of charge, within 45 days of receipt of the request.*

Example for information letter:

An example of an information letter to a recipient as recommended by ARGE has been prepared as a separate document (document name: ‘ARGE Recommendation REACH – lead (Pb) - Information letter with comments – v_1.’).

Safety data sheet:

It is not required to establish and provide safety data sheets for building hardware products, as such safety data sheets are compulsory for substances only (e.g. lead) – and not for articles and complex objects as building hardware products are.

5.2 Registration and notification of substances in articles (REACH Regulation, Article 7):

5.2.1 Registration

- Producers of building hardware are not concerned with the obligation of registration according to *REACH Regulation*, Article 7(1), as such registration must be done for substances only (as lead is), and not for articles and complex objects.

5.2.2 Notification

No notification to ECHA:

A producer of building hardware products – which in most cases are *complex objects* (see under 2.3.3) – who is located in the *EEA* does not need to make a notification to *ECHA* if lead-containing *articles* (raw materials, as coils, profiles, etc, as well as components, semi-finished and finished products) are supplied to him by suppliers located in the *EEA* (details and conditions for a notification being required see bullet points below).

- *REACH Regulation*, Article 7(2) states: *Any producer or importer of articles shall notify the Agency (ECHA), in accordance with paragraph 4 of this Article, if a substance meets the criteria in Article 57 and is identified in accordance with Article 59(1), if both the following conditions are met:*
 - (a) *the substance is present in those articles in quantities totalling over one tonne per producer or importer per year;*
 - (b) *the substance is present in those articles above a concentration of 0,1 % weight by weight (w/w).*
- **According to REACH Article 7(6) a notification of a substance in articles is not required if the substance has already been registered for that use.** This refers to any registration of that use of the substance in the same supply chain or any other supply chain, i.e. for this exemption from notification to apply, the registrant does not necessarily need to be in the same supply chain as the potential notifier.
- A notification to *ECHA* shall be conducted not later than 6 months after a substance was added to the *Candidate List of SVHC*. In case of lead the relevant date is 27th December 2018. However, as it might be rather cumbersome to obtain all relevant information from suppliers – especially in case of imports – and also to firmly establish knowledge on whether a substances has already been registered for that use, it is assumed that submitting a notification after the six-months period has elapsed should not cause any problems with *ECHA* as long as the notification is made as swiftly as feasible.

- ECHA's 'Guidance on requirements for substances in articles' states on page 27 and 28 as follows: *The EU (EEA) producer of a complex object containing an article with a relevant concentration of a Candidate List substance does not need to notify the Candidate List substance(s) present in that article, if it has been supplied to him by an EU (EEA) supplier. In this case, the Candidate List substance must indeed have been notified upstream by the EU (EEA) importer or producer of the article already. Since it is the substance in the article that is notified, and not the article, a separate notification is required for each Candidate List substance in the same article if the conditions listed above are fulfilled. On the contrary, if an EU (EEA) actor produces or imports several articles containing the same Candidate List substance and triggering notification obligations, one notification for this substance is sufficient.*

Further information on notification to ECHA:

ARGE has prepared a brief intro on the obligation of notification: (document name: 'ARGE Recommendation REACH – lead (Pb) – Brief intro to notification to ECHA – v_1').

6 Duties and obligations of channel partners

- As a matter of completeness, reference is made to the fact that channel partners of producers of building hardware, as **wholesalers, retailers, installers, locksmiths, carpenters, etc., are under the same REACH Regulation duties and obligations concerning Article 33 and Article 7 as producers and importers.**

7 Other related obligations

7.1 Construction Products Regulation (CPR)

- The *Construction Products Regulation (CPR)* refers in its Recital 25 to the *REACH Regulation* (see extract of recital 25 below):

(25) Where applicable, the declaration of performance should be accompanied by information on the content of hazardous substances in the construction product in order to improve the possibilities for sustainable construction and to facilitate the development of environment-friendly products. Such information should be provided without prejudice to the obligations, particularly with regard to labelling, laid down in other instruments of Union law applicable to hazardous substances and should be made available at the same time and in the same form as the declaration of performance so as to reach all potential users of construction products. Information on the content of hazardous substances should initially be limited to substances referred to in Articles 31 and 33 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency ⁽¹⁾. However, the specific need for information on the content of hazardous substances in construction products should be further investigated with a view to completing the range of substances covered so as to ensure a high level of protection of the health and safety of workers using construction products and of users of construction works, including with regard to recycling and/or reuse requirements of parts or materials.

- Presently, ARGE is clarifying with CEN, whether existing *Declarations of Performance (DoP)* have to be amended, or whether such amendments will take place only after the *European Commission* will have revised the existing mandate M/101 to CEN, respectively when the respective harmonised standards will have been revised. As soon as ARGE will have received the required advice from CEN, this document will be updated accordingly.

7.2 Environmental Product Declarations (EPD)

- The present EN 15804 which provides the normative framework for the *Environmental Product Declarations (EPD)* for building hardware products (amongst other products) states that substances which have been included in the *Candidate List of SVHC* have to be declared in the respective EPD as well.
- The ARGE industry representative EPD were established in the second half of 2016, before lead was added to the *Candidate List of SVHC*.

- According to the *Institut für Bauen und Umwelt e.V. (IBU)*, the programme holder for the ARGE industry representative *EPD*, respective **amendments of published *EPD* are not required.**
- Presently, EN 15804 is under revision. It is expected that during 2019 the revision of EN 15804 will be completed.
- **The 14 ARGE *EPD* have their expiry dates between September and December 2021. Until then no action is required.**

8 Future of lead within EU (EEA)

- In general, **authorities can ban hazardous substances if their risks are unmanageable.** They can also decide to **restrict a use or make it subject to a prior authorisation.** Main elements of the options as defined under REACH Regulation are shown below.
- As a **first step**, which might or might not be followed by any further procedures, a substance is added to the ***Candidate List of SVHC.***
- *ECHA* regularly assesses the substances from the *Candidate List of SVHC* to determine which ones should be included in the *Authorisation List.*
- The **authorisation process aims to ensure that *Substances of Very High Concern (SVHCs)* are progressively replaced by less dangerous substances or technologies** where technically and economically feasible alternatives are available.
- As a result, **a substance might be added to the *Authorisation List.***
- In case a substance is added to the *Authorisation List* the *REACH Regulation* allows companies to apply for an authorisation to continue or start using and placing substances included in the *Authorisation List* (Annex XIV of the *REACH Regulation*) on the market. From the perspective of producers of building hardware products it is important to understand that **such an application to continue with the usage of lead has to be made by the manufacturers of the substances or mixtures (alloys) and not by the producers of articles and complex objects (e.g. building hardware).** Therefore, such an application would have to be filed by a rather limited number of companies only (e.g. by the manufacturers of the alloys) and would not involve the producers of building hardware products.
- **The most far-reaching step is the *Restriction of a substance.*** *Restrictions* are an instrument to protect human health and the environment from unacceptable risks posed by chemicals. *Restrictions* are normally used to limit or ban the manufacture, placing on the market (including imports) or use of a substance, but can impose any relevant condition, such as requiring technical measures or specific labels.

- Concerning lead, one can assume that on the one hand certain *EU member states* might further the ambition of a ‘lead-free society’, on the other hand there is also opposition against such a development. E.g., the *International Lead Association (ILA)*, www.ila-lead.org, has a vital interest that no further steps are taken towards *Authorisation* or even *Restriction* of lead within the EEA.
- Whilst ARGE is highly committed towards the protection of human health and the environment, ARGE supports efforts of other industry associations and stakeholders aiming at not taking lead any further towards *Authorisation* and *Restriction*.

9 FAQ

- On the subject of the *REACH Regulation* extensive information is available on *ECHA’s* website. A wide range of guidance documents, manuals, webinar documentations, tutorial videos etc. can be found there. Also many Q’s & A’s are published on *ECHA’s* website. They are structured according the subjects addressed.
- ARGE plans to update this document after having received feed-back as well as questions from members. Questions raised – together with the answers provided by ARGE – will be included in this FAQ section then.

10 Links for further reading

Below there are some links selected from the many available:

***REACH Regulation* in 23 languages:**

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006R1907>

ECHA (some of the documents are available in other languages than English as well):

- *ECHA’s* homepage: www.echa.europa.eu
- Guidance on REACH and CLP in a Nutshell: <https://echa.europa.eu/support/guidance-on-reach-and-clp-implementation/guidance-in-a-nutshell>
- Practical guides: <https://echa.europa.eu/practical-guides>
- REACH Support: <https://echa.europa.eu/support>

- ECHA – Q’s & A’s (general): <https://echa.europa.eu/support/qas-support/qas>
- Webinar – Communication and notification duties with complex objects: https://echa.europa.eu/documents/10162/23380230/021117_sia_webinar_complex_objects_en.pdf/7543d710-ce21-5b4e-d012-124d7eb4b2f6
- Guidance – Requirements for substances in articles: https://echa.europa.eu/documents/10162/23036412/articles_en.pdf
- Webinar – Substances in articles: <https://echa.europa.eu/-/communicating-about-substances-in-articles-what-you-need-to-know>
- Registered substances: Info card on lead: <https://echa.europa.eu/substance-information/-/substanceinfo/100.028.273>
- Q’s & A’s – Requirements for substances in articles: <https://echa.europa.eu/support/qas-support/browse/-/qa/70Qx/view/scope/reach/Requirements+for+substances+in+articles>
- Manual – How to prepare a substance in Articles notification: https://echa.europa.eu/documents/10162/22308542/manual_subs_in_art_notif_en.pdf/71b39d03-d140-418c-830e-896f281bb9bb
- Video tutorial – How to submit a notification in articles: https://echa.europa.eu/en/view-video/-/video_display/2cmS/video/13

ACEA Guideline (European Automotive Manufacturers Association)

- Automotive Industry Guideline on REACH: <https://www.acea.be/publications/article/updated-version-of-the-automotive-industry-guideline-on-reach-published>

11 Disclaimer

This document contains recommendations, explaining obligations of the REACH Regulation for the Building Hardware Industry and how to fulfil them. It is offered in good faith and reflects ARGE’s knowledge on this subject at the time of its publication. However, users of this document are reminded that the text of the REACH Regulation is the only authentic legal reference and that a binding interpretation of EU legislation is the exclusive competence of the European Court of Justice. Therefore, the information and guidance in this document are in no way legally binding.



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