

June 2010

REACH Fact Sheet

In December 2006 the European Community established a new program for managing all chemical substances either produced or used in member states. *Registration, Evaluation, Authorization and restriction of Chemicals* (REACH) has generated considerable interest and concern among a growing number of MWS customers. MWS presents this information for our customers who need to comply with REACH legislation.

Substances of Very High Concern (SVHC)

SVHC are specific human health hazards as defined in Article 57 of REACH. At this time 38 chemical substances have been placed on the Candidate List of Substances of Very High Concern for authorization. None of them are intentionally used or expected to be present in products supplied by MWS Wire Industries. The following link goes to the candidate list:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

For the current consultation and list of proposed substances follow this link:

http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp

Magnet wire and wire products are articles by definition

“Article means an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.”

REACH, Article 3(3)

MWS has examined this definition and determined that magnet wire and other wire products supplied to our customers meet this definition and qualify as articles. Article 7 of REACH states that the article producer or importer must register substances in articles only if the following conditions are met:

- The substances are intended to be released from the product or imported article(s) during normal and foreseeable conditions of use.
- The total amount of the substance present in the articles with intended releases produced and/or imported by that actor exceeds 1 ton per year per producer or importer.

Based on these requirements, there appears to be no obligation for a producer or importer of bare and insulated wire to register the substances in these articles unless they are used in a non-standard application that produces a substantial release under normal conditions. The NEMA Magnet Wire Section has published a white paper on this subject available at:

<http://www.nema.org/prod/ins/magnet/upload/Treatment-of-Magnet-Wire-under-European-Unions-REACH.pdf>

< One Ton Exemption

Substances do not need to be registered under REACH if they are manufactured or imported at less than one ton per year per manufacturer or importer.

This document does not constitute and is not intended as regulatory or legal advice. It may not be relied on solely to determine compliance status with REACH. The regulation and guidance on requirements and applicability for various operators in the supply chain are available on the European Chemicals Agency web site http://echa.europa.eu/home_en.asp which should be consulted when making specific compliance determinations.