



Are castings covered by the REACH regulation?

In principle, the manufacture of castings does not entail any obligations under the REACH regulation. Only in special cases manufacturers will have to fulfil certain obligations under REACH.

The manufacture of articles **does not entail any obligation to register and/or pre-register in principle**. According to the definition given in REACH (Art. 3.3), article means an object which during production is given a special shape, surface, or design which determine its function to a greater degree than does its chemical composition. Coming close to their final shape, there is no doubt that castings must be regarded as articles (on the special problem of ingots, → GN No. 5).

Registration is mandatory for articles only *in exceptional cases*. This applies whenever the following two conditions (Art. 7(1)) are met:

1. *the substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year, **and***
2. *the substance is intended to be released under normal or reasonably foreseeable conditions of use.*

As a general rule, the need for registration will be eliminated by the second condition, which postulates release under normal conditions of use. Under normal conditions of use, a substance will be released only if the article was designed for that function, meaning that the manufacturer foresaw and planned it. In the entire foundry industry, there is only one known case that meets the condition of intentional release, and that is the manufacture of graphite half-liners for plain bearings. Now, if graphite is present in the articles manufactured in the amount of more than 1 ton per year, the manufacturer will be obliged to register or pre-register the graphite contained in the bearing liners.¹ On the other hand, the condition of deliberate release will not be met if, for example, a primer or other coating flakes off or otherwise detaches itself from a casting in the course of its life cycle. Even if this should happen because the primer or coating was not properly applied or because the casting was inexpertly handled or machined afterwards, this would not entail an obligation to register because the foundry neither intended nor foresaw such release.

Apart from the obligation to register, a manufacturer may be **obliged to provide the recipient of the article with sufficient information** (Art. 33(1)). This applies whenever an article contains a substance of very great concern in a concentration above 0.1% by weight. What substances are actually regarded as being of very great concern will become clear only after the publication of the so-called 'list of candidates' developed by the EChA. This will probably happen some time between the autumn of 2008 and June 2009. This being so, the obligation to provide information can only be met after the list of candidates has been published.

¹ Contrary to the first published version of Annex IV (exemptions from the obligation to register), graphite C and carbon C are now subject to the obligation to register after all.