



Does an ingot made by continuous or permanent-mould casting constitute a preparation or an article under REACH?

Ingots made by the continuous or the permanent-mould casting process constitute articles, which is why they do not have to be registered.

Ingots made by foundries by either the continuous or the permanent-mould casting process constitute articles within the meaning of Art. 3.3 of the REACH regulation and thus do not have to be registered. In this, the ingots referred to here differ markedly from, for example, the semi-finished products made by steelworks which may be cast in any form (ingots, slabs, billets, etc.) for downstream processing by, for instance, secondary forming.

According to the legal definition given in Art. 3.3 of REACH, an object partakes of the quality of an article if, during production, it is given a special shape, surface, or design which determines its function to a greater degree than does its chemical composition. According to version 3.8 of the REACH implementation project (RIP), a casting constitutes an article if it can be used directly in a specific function.

Foundries routinely produce ingots in a variety of sizes and thicknesses in conformance with their customers' specifications. Thus, the choice of ingot pattern inextricably depends on the nature of the end product. Therefore, the shape of an ingot, unlike that of a semi-finished product, is not of minor but of critical importance to the customer, as the shape follows closely that of the end product. More importantly, material composition, meaning the kind of alloy used, is of secondary importance compared to the specific shape of an ingot. Consequently, ingots cannot be classified as preparations because they are very close to their ultimate function.

After casting, ingots made by the continuous or the permanent-mould process are normally finished by drilling holes or by machining to produce a smooth surface. Version 3.8 of the RIP draft classifies operations of this extent as 'light processing', indicating the status which the article has already reached.