

## Joint Position of BVGLAS, JEITA and ZVEI inside the Electrical Industry's Value Chain

View on SVHCs<sup>1</sup> in glass concerning the EU REACH regulation, including the handling of lead oxides and complex oxides containing lead added to the 8<sup>th</sup> revision of the SVHC candidate list

Lead oxides and complex oxides containing lead, which are well known constituents of glass, were added to the 8<sup>th</sup> revision of the SVHC candidate list of the EU REACH regulation ((EC) No 1907/2006) (published on December 19<sup>th</sup>, 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 regarding the management and transmission of substance risk information. It shall be noted that substances called SVHCs are specified as candidate substances for "authorization" based on Article 59(1) of the REACH regulation and are not regarded as banned substances.

The REACH regulation establishes requirements on the notification of SVHCs to ECHA (European Chemicals Agency) in accordance with Article 7(2) ff. and the transmission of information on 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 that includes multiple constituents, a particular SVHC used as a constituent can become part of the glass matrix. In this case, to determine whether it still constitutes an SVHC or becomes 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

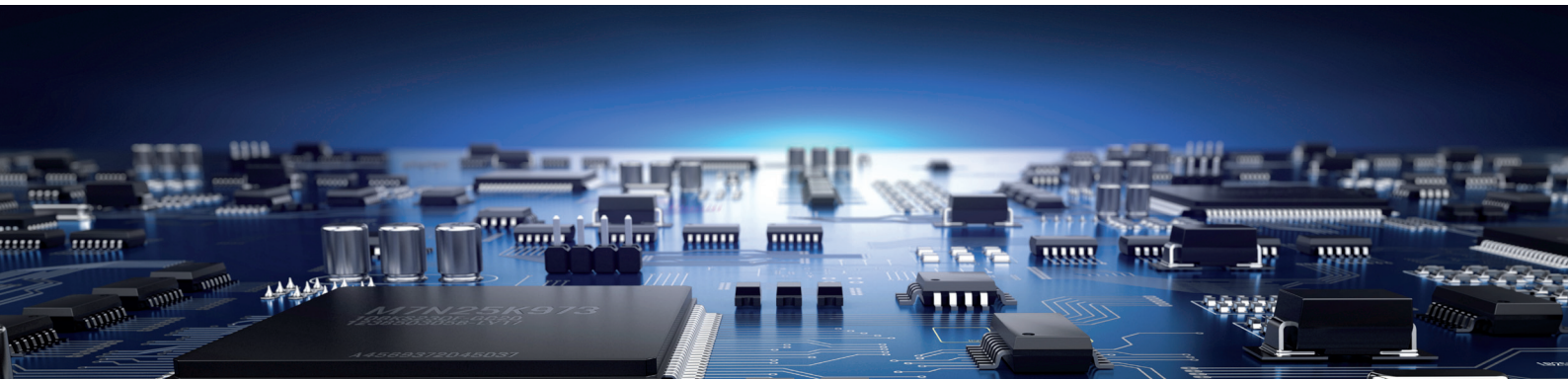
According to the EU Official Journal "Commission Regulation (EC) No. 987/2008" amending the REACH regulation, glass is one substance and not a mixture of several substances.

In terms of its chemical structure, glass is a solid solution comprising several metallic oxides in an amorphous state for which a crystal system cannot be specified. Thus, to simplify the process of communicating information on glass, it has

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May 2019

<sup>1</sup> SVHC: Substance of Very high Concern  
see also: <http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/substances-of-very-high-concern-identification>



become common to refer to the composition of glass (e.g. within the International Material Data System of the automotive industry) as a list of constituent metallic oxides rather than in terms of its actual chemical structure.

This information does not imply that the listed oxides themselves exist as constituents of the glass.<sup>2</sup>

### **3. View concerning lead oxides and complex oxides containing lead added to the 8<sup>th</sup> revision of the SVHC candidate List**

Based on the judgment criteria referred to in the view above concerning glass in general, we present our view concerning the notification and information duties based on the REACH regulation for lead oxides and complex oxides containing lead.

### **4. Handling of lead oxide (PbO, Pb<sub>3</sub>O<sub>4</sub>) noted as constituent of glass**

As such, the chemical characteristics, including risk to the environment and humans, of lead oxides (PbO, Pb<sub>3</sub>O<sub>4</sub>) as constituents of glass are not comparable with the properties of the final glass matrix.

The chemical compound created is not a Substance of Very High Concern (SVHC), but the new substance glass. Manufacturers/importers are not obliged to communicate information on the substance mentioned above according to Article 33(1) and in accordance with Article 7(2) ff. of the REACH regulation.

<sup>2</sup> See further information on the website of the European Alliance of Glass Industries: <https://www.glassallianceeurope.eu/en/reach>