

Couëron, 12/01/2017

Dear Valued Customer,

The NGK Insulators group is recognized as a world leader in the manufacture of beryllium-copper alloys. As such, we have always had a policy to provide our customers with safe and environmentally friendly products, which fully comply with current legislation in order to ensure the sustainability of our services. As a leading manufacturer in Europe, NGK BERYLCO actively participates in European environmental studies on substances used in our products.

**All our products are in compliance with European REACH Regulation  
and European RoHS and ELV Directives**

#### REACH Regulation

The main objective of the European REACH Regulation (Registration, Evaluation, Authorization, and restriction of CHemicals - 1907/2006/EC) is to improve the protection of the human health and the environment. Under the scope of the REACH Regulation, NGK Berylco is a manufacturer and supplier of **articles** ("object which is given a special shape which is more decisive for its function than its chemical composition") and we are not obliged to register the substances of our products. However, we registered the Beryllium substance (No. 01-2119487146-32-0003) in REACH because it is an opportunity for us to communicate positively about our products and to demonstrate that beryllium metal is, like many other metals, safe when used correctly.

#### **List of Substances of Very High Concern (SVHC)**

Note that since the 28<sup>th</sup> of October 2008, the European CHemicals Agency (ECHA) has published an initial list of Substances of Very High Concern (SVHC), candidate list, for possible inclusion in Annex XIV or XVII of the Regulation (authorization or restriction).

ECHA has published on **12<sup>th</sup> January 2017** the latest SVHC candidate list bringing to **173** the number of relevant substances, available on the ECHA website:

<http://echa.europa.eu/web/guest/candidate-list-table>

**Beryllium metal is not in the SVHC list. All our copper alloys are in compliance with the REACH Regulation.**

#### **Decision not to include Beryllium in the REACH Candidate list**

The BAuA, German Institute of Occupational Health and Safety, has presented in February 2016 and then published in December 2016 the outcomes of the Risk Management Option Analysis (RMOA) regarding Beryllium: **Beryllium will not be included in the REACH SVHC candidate list and will not be therefore subject to authorization and/or restriction.** For more information, don't hesitate to contact us.

We recall that the publication of the list of the Substances of Very High Concern (SVHC) creates legal obligations for all European companies that use any of these SVHC or incorporate them in their articles, mixtures or substances. We confirm that our products don't contain any substances included in this list. Our objective is to provide our customers with sustainable products, safe to use, non-hazardous to health and environmentally friendly. To this end, we are carefully monitoring any SVHC list update.

### **RoHS Directive**

The European RoHS Directive 2011/65/EU (Restriction of Hazardous Substances) applies to Electrical and Electronic Equipment (EEE). This Directive is addressed to manufacturers of electrical and electronic equipment. Beryllium is not in the list of the 10 controlled substances updated on 31<sup>th</sup> March 2015 (delegated Directive 2015/863 amending Annex II to Directive 2011/65/EU).

It should be noted that some of our alloys contain some lead, which is among the 10 substances subject to limitation, but none of our copper alloys has a lead content exceeding 4 % by weight (see annex III of the RoHS directive, exemption 6C for the copper alloys containing up to 4% lead by weight). There is no current or future restriction on the use of beryllium-copper as indicated by our "RoHS Ready" logo.

 *All our copper alloys are in compliance with the RoHS directive.*

### **ELV Directive**

The European ELV Directive 2000/53/EC (End of Life Vehicle) is addressed to manufacturers or importers of vehicles. Beryllium is not among the 4 prohibited substances (lead, mercury, cadmium, hexavalent chromium).

It should be noted that some of our alloys contain some lead, but none of our copper alloys has a lead content exceeding 4 % by weight (see annex II of the ELV directive, exemption 3 for the copper alloys containing up to 4% lead by weight, Directive 2013/28/UE (17<sup>th</sup> May 2013) amending annex II of the Directive 2000/53/EC).

 *All our copper alloys are in compliance with the ELV directive.*

### **Compliance and sustainability of Berylco Products**

Our beryllium copper alloys have unique properties that cannot be replaced by any other material. Their perfect compliance with current legislation, their essential uses, and the strong worldwide growing demand, ensure their continued existence and availability in future years.

Customers requiring more information on NGK BERYLCO products and their compliance with regulations and directives, are advised to contact **Angélique RENIER**, in charge of these issues in our organization:

Tel. +33 (0)2 40 38 67 64 - Mob. +33 (0)6 35 04 34 02 - E-mail [renier@ngkbf.com](mailto:renier@ngkbf.com)

Note that the latest information are available on our website:

<http://www.ngk-alloys.com/environment.html>

We thank you for your continued support and look forward to assisting you in the future. Yours sincerely,

**Angélique RENIER**  
Environment Manager

**Patrick COULON**  
President



**NGK BERYLCO FRANCE**

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