

Position paper on the status of the temporary protective/mechanical processing layers (e.g. oils) on coils

Firstly, the ECHA guidance on requirements for substances in articles (June 2017)¹ and consequently the EUROFER position paper dealing with the borderline between mixtures and articles define steel coils as articles. EUROFER and the European Association of Automotive Suppliers (CLEPA) consider the oil as a temporary corrosion inhibitor/processing layer on the coil (i.e. an integral part of the coil as an article – *like wax coating on an imported vehicle*) with no intended release. In most cases, the coil is cleaned via removal of the temporary protection/processing layer after it is received by the customer.

The ECHA guidance on requirements for substances in articles (June 2017)¹ indicates: *“If the release of a substance from an object fulfils the main function of the object (defined according to section 2.1), the release is not regarded as “intended release” for the purpose of REACH. In this case, the object usually would be considered as a combination of an article (functioning as a container or a carrier material) and a substance/mixture, and not as an article with intended release of a substance/mixture”*. A release occurs during processing of a semi-finished article, i.e. before marketing as a finished article. The example that is given: *“a size is added to a fabric to improve its processability, whereas the size is released again during further wet processing of the textile*. This is basically in line with the “washing off” or gradual removal of the oil or any other temporary corrosion inhibitor/processing layer from coil, prior to and during further processing. This is further supported by the fact that the temporary corrosion inhibitor/processing layer, once removed, is then disposed of as waste and is therefore exempt from REACH.

Coils with a temporary protective layer (e.g. oil, wax, as a corrosion inhibitor) or process oil (remaining rolling oil) on it are supplied with an information sheet on safe use in which adequate information from up- and downstream is incorporated, this to ensure a complete chain of information.

¹ https://echa.europa.eu/documents/10162/2324906/articles_en.pdf

Conclusion

EUROFER and CLEPA consider the oil as a temporary corrosion inhibitor/processing layer on the coil (i.e. an integral part of the coil as an article – like wax coating on an imported vehicle) with no intended release. This means, no registration duties related to substances. This is equivalent to the example given in the ECHA guidance for articles (May 2008) where the example of size in fabric is also also mentioned.

Adequate information – incorporating up- and downstream of the chain - about safe use of the article will be supplied.

This document was updated according to current legislation in force.

"Important Notice: This position paper is intended as a supplement to the REACH Regulation and the official REACH Technical Guidance Documents published by the European Chemicals Agency (ECHA). It is provided as an advisory document and, as such, has no legal standing. Therefore, in conjunction with this position paper, users are advised to consult Regulation EC 1907/2006 (for the legally binding requirements of REACH) and the official REACH Technical Guidance Documents (for detailed information on REACH implementation). It may also be appropriate to seek independent legal advice on matters related to pre-registration and registration. While every effort has been made to ensure the accuracy of this document, neither EUROFER nor the authors of this document accept liability for its content or for the use which might be made of the information herein."