

Couëron, 15/01/2019

Dear Valued Customer,

The NGK Insulators group is 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.

Our copper-beryllium and copper-nickel-tin alloys are in compliance with European REACH regulation, and European RoHS and ELV Directives.

Only our Berylco 33/25 alloy (CuBe2Pb in rods and wires) contains lead at a low content, included on 27th June 2018 in the ECHA candidate list.

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, in Europe, we import, process and supply **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 contained in our products. However, as an important actor of the beryllium industry, 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 scientifically that beryllium metal is, like many other metals, safe when used correctly.

List of Substances of Very High Concern (SVHC)

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

ECHA has published on **15 January 2019** the latest SVHC candidate list bringing to **197** 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. The other metals that we use in our alloys (cobalt, nickel, aluminum, tin, copper) are not included in the SVHC list neither. Our alloys Berylco 25, 14, 8 and 7 (CuBe2 and CuNi2Be), and our GMX96 and 215 alloys, are therefore in compliance with the REACH Regulation.

Please note that the BAuA, German Institute of Occupational Health and Safety, has presented in February 2016, and then officially 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 therefore not be subject to authorization and/or restriction.**

For more information, don't hesitate to contact us.



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Lead metal, present only in the Berylco 33/25 alloy (CuBe2Pb) is from now included in the SVHC list (from the 27th of June 2018).

The European CHEMicals Agency ECHA has decided to include Lead metal in the candidate list. We declare that only our free machining alloy Berylco 33/25 (distributed in form of rods and wires) contains lead at a level greater than 0.1 % by weight (0.4 %). The low addition of lead in this alloy is essential and not substituable to provide it a very good machinability.

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 31th March 2015 (delegated Directive 2015/863 amending Annex II to Directive 2011/65/EU).

As mentioned above in the frame of REACH, it should be noted that our copper-beryllium Berylco 33/25 alloy contains some lead, which is among the 10 substances subject to limitation, but at a content not 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).

As mentioned above in the frame of REACH and RoHS, it should be noted that our copper-beryllium Berylco 33/25 alloy contains some lead, but at a content not 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 (17th 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:

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Please 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

Christophe LE PORT-SAMZUN
President



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