



Summary for Customers on the European Union REACH Regulation (EC) No 1907/2006
as it relates to Beryllium and Beryllium-containing Materials
8 March 2011

Materion Brush Inc. and Materion Ceramics Inc. are committed to making our customers' transition into REACH as simple and straight forward as possible for all of our products, including beryllium, beryllium-containing alloys, and beryllium oxide, you purchase from us, so that you, and all downstream customers, can continue to take advantage of the beneficial properties, high performance and reliability you have come to expect.

We have determined that most of our products imported into the European Economic Area (EEA) are articles based on the Guidance Document on Substances in Articles http://guidance.echa.europa.eu/guidance_en.htm classifying metals in massive or wrought form as articles. According to this guidance document, substances in articles do not need to be registered unless a substance exceeds 1 metric tonne per year per manufacturer or importer and the substance is intentionally released from the article. Normal processing of our products such as machining, grinding, welding, etc., as well as, normal wear and tear is not considered as intentional releases. It must also be noted that if a metal product is in a form that is to be melted or is in the form of an ingot, whose shape is materially changed, is considered to be a substance (pure metal) or a special preparation/mixture (alloy) whose constituents are subject to the requirements relative to registration. Since most of our products are articles, we will not be preparing Safety Data Sheets although we will be preparing Product Information Sheets that will be similar in format to a GHS compliant SDS. For those alloys, that are melted, we will prepare SDS well before the compliance date of June 2015.

We have completed the REACH registration process for beryllium metal and beryllium oxide using an Only Representative (OR). Beryllium is imported into the EEA in the form of master and casting alloys which are melted to produce beryllium-containing alloys and therefore needed to be registered. Beryllium oxide is imported into the EEA in powder form, but is only sold to one customer. Beryllium oxide ceramics are imported as articles. We also have completed the REACH registration process for aluminium metal, copper metal and nickel metal using another OR and have also completed the additional classification & labeling (C&L) notification process for cobalt metal to the CLP inventory.

The European Chemicals Agency (ECHA) has concluded the completeness check of the respective registration dossiers. The registration numbers provided to us by the ECHA allows the import of beryllium metal and beryllium oxide, aluminium metal, copper metal and nickel metal into the EEA and also allows the substances to be used in the production of articles.

The REACH registration numbers are as followed:

Aluminium metal:	01-2119529243-45-0056	Beryllium metal:	01-2119487146-32-0000
Beryllium oxide:	01-2119487134-37-0000	Copper metal:	01-2119480154-42-0080
Nickel metal:	01-2119438727-29-0049		

The CLP Notification C&L submission number is:

Cobalt metal: JD180154-53

Communications: For articles containing a substance that is listed on the Candidate List of Substance of Very High Concern (SVHC) by the European Chemicals Agency (ECHA), the manufacturer or importer is required to inform the recipients of the article about the substance and how the article can be safely used if the listed substance is present in excess of 0.1 wt %. If any of our products contain a listed substance, you will be advised accordingly and we will ensure that your use is included in the substance registration dossier. *To date, none of the products produced by Materion Brush Inc. contain substances listed on the most recent Candidate Listing of SVHCs.*

Authorization: The aim of Authorization is to ensure that the risks from substances of very high concern are properly controlled or substitution is made if economically and technically viable. The European Commission has determined that substances in articles are not subject to Authorization. Therefore, our customers buying articles will not be subject to use authorizations unless they incorporate a listed substance into one of our products.

The above information is being provided based upon current knowledge of REACH interpretations and guidelines. Please be advised that new interpretations and guidelines may change the above guidance. We will strive to keep you informed of any future changes; however, it is highly recommended that those involved with REACH implementation periodically consult the European Chemical Agency website http://echa.europa.eu/home_en.asp.

If you have any questions regarding the information provided above, would like a copy of any of the documents described in this summary or wish to provide feedback, please contact Terence Civic, Director Health, Safety and Regulatory Affairs, our point of contact for REACH, via phone at +1 (216) 383-3698 e-mail: at Terence.Civic@materion.com or call the Product Safety Hotline at (800) 862-4118.