

EUROFER position paper on steel welding wire.

Background

The EUROFER “position paper determining the borderline between preparations/articles for steel and steel products” establishes the borderline between steel alloys (preparations) and steel products in the form of articles. In this paper it is shown that amongst others *slabs, billets, blooms, machined and dressed ingots, coils, sheets, bars, rods, strips, foils and wire rod* made of steel alloys have article status under REACH. This classification is in line both with the REACH regulation as well as with the ECHA guidance for articles dated May 2008.

All the above mentioned products of the iron and steel industry are articles which are directly or indirectly put on the market.

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This leads to the conclusion that the subsequent p article status. An article cannot be processed to a preparation, because following the regulation (Art. 3 (3)), a preparation means a mixture or solution composed of two or more substances.

As for the articles defined in the EUROFER “position paper determining the borderline between preparations/articles for steel and steel products” they are defined by their shape, surface and design by a greater degree than by their chemical composition.

One of the group of articles defined in this EUROFER position paper are wire rod and wires which are produced for different uses. Independently of the use they are articles as “an article is to be understood as the article as produced or imported”¹. Following this, the latter is also true for wires, which in some cases are used for welding. Welding wires have standardized dimensions, i. e. an exactly defined shape, which is the requirement for the function in the welding process. Steel welding wires are remelted – shape is being changed - to form the welded joint or surfacing in a metal construction. In this process, the article welding wire becomes part of another article, the construction or component. A release of substances (typically welding fume and particulates) is an unavoidable side-effect of the functioning of the article. Without the release, the article would not work, but the release is not directly intended².

Welding wires and rods are supplied with an information sheet on safe use in which adequate processing steps stay in the information from the Iron & Steel Industry as well as from the welding consumable manufacturer is incorporated, this to ensure a complete chain of information.

The conclusion of this position paper is that steel welding wires are articles.

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,

1 Out of ECHA guidance on requirements for substances in articles (see page 21 “3. Deciding what is an article under REACH“

2 Out of ECHA guidance on requirements for substances in articles (see page 68, 4th bullet point)

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."