



Assembled article is no longer

the reference for SVHC identification

Date : 2015-09-17

On 10 September 2015, European Court of Justice (ECJ) made a ruling regarding REACH Regulation that each single article rather than an assembled article is the reference for the identification of substances of very high concern (hereinafter referred as “SVHC”). So the testing result obtained when assembled article is the reference for SVHC testing cannot be applied to such identification and will be invalid after the ruling.

There are two conclusions in the ruling:

“1. Article 7(2) of REACH Regulation, it is for the producer to determine whether a substance of very high concern is present in a concentration above 0.1% weight by weight of any article it produces and, for the importer of a product made up of more than one article, to determine for each article whether such a substance is present in a concentration above 0.1% weight by weight of that article.

2. Article 33 of REACH Regulation, it is for the supplier of a product one or more constituent articles of which contain(s) a substance of very high concern in a concentration above 0.1% weight by weight of that article, to inform the recipient and, on request, the consumer, of the presence of that substance by providing them, as a minimum, with the name of the substance in question.”

The ruling expressly provides that the single article is the reference for SVHC identification. So the testing result obtained when assembled article is the reference for SVHC testing cannot be applied to such identification and will be invalid after the ruling. There is a possibility that products prove to be “PASS” when assembled article is the reference for SVHC testing may fail if taking single article as the reference.

Taking the bicycle as example, the difference between calculations based on final products and single article can be seen as below:

	Reference	SVHC Content	Calculation of SVHC present in the article	Result
Calculate according to previous REACH Regulation before the ruling,	Total weight of coating frame: 2.9Kg	Containing certain SVHC 1,500ppm	$1500\text{ppm} \times 2.9\text{kg} / 6.5\text{kg}$ =669ppm	<0.1%, PASS
Requirements of the ruling (i.e. previous requirements of six EU countries)	(Total weight of bicycle: 6.5kg)		Taking coating frame as the object, i.e., SVHC present in coating frame is 1,500ppm	> 0.1% (in coating frame) pass on relevant information

Reminder: Businesses shall scrutinize your testing reports (if obtained). A re-evaluation for risks is necessary to decide whether to test the products again.

Further information

[>> ECJ Judgement](#)

[>>Once an Article—Always an Article](#)

CONTACT US

C&K Testing-Hangzhou

Tel : +86-571-87206587

E-mail : test@cirs-group.com

Address : No.1180, Bin' an Road, Binjiang District, Hangzhou, Zhejiang, China

Web : www.cirs-ck.com/en

CIRS-Headquarters

Tel: +86-571-87206502

Email:info@cirs-group.com

Address: No.1288, Chunbo Road, Binjiang District, Hangzhou, China

Web: www.cirs-group.com/en

CIRS-IRELAND

Tel: +353-41-9806916

Email: louise@cirs-reach.com

Address : Singleton House, Laurence Street, Drogheda, Co. Louth, Ireland

Web: www.cirs-reach.com

Assembled article is no longer

the reference for SVHC identification

Date : 2015-09-17

About us

C&K Testing laboratory has built a management system according to ISO/IEC 17025 and has been keeping an effective operation.

Our service can meet the inspection requirements of different markets and regions worldwide, covering various industries such as electronics & appliances, toys, textiles, automobiles, furniture, cosmetics, food contact materials, environmental monitoring and chemicals etc.



CONTACT US

C&K Testing-Hangzhou

Tel : +86-571-87206587

E-mail : test@cirs-group.com

Address : No.1180, Bin' an Road, Binjiang District, Hangzhou, Zhejiang, China

Web : www.cirs-ck.com/en

CIRS-Headquarters

Tel: +86-571-87206502

Email:info@cirs-group.com

Address: No.1288, Chunbo Road, Binjiang District, Hangzhou, China

Web: www.cirs-group.com/en

CIRS-IRELAND

Tel: +353-41-9806916

Email: louise@cirs-reach.com

Address : Singleton House, Laurence Street, Drogheda, Co. Louth, Ireland

Web: www.cirs-reach.com