

# **EWA position in the context of ECHA's 6<sup>th</sup> recommendation to include borates in Annex XIV of the REACH Regulation**

The European Welding Association (EWA) is a branch organisation with members (directly or via National Associations) providing a high representation in Europe regarding the manufacture of welding and brazing consumables and equipment. Companies are involved in using borates in soldering and brazing technologies as well as applying borates in the manufacture of brazing and welding products.

EWA wishes to contribute to the public consultation regarding the ECHA 6<sup>th</sup> recommendation for the inclusion of substances in the REACH Regulation Annex XIV, this to express the serious concern and objections of our members. From information published by ECHA it is well understood that a major health concern involves the toxicity for reproduction. Despite no signs of health problems have been reported in our industry, most member companies worked on alternatives for boric acid and other borates in various applications. In (the manufacturing process of) welding and brazing consumables, the form in which boron is used is mainly either as alloy or in a silicate / glass form. The alloy form is not on the (Candidate) list of Substances of Very High Concern. CPIV (Standing Committee of the European Glass Industries) confirms that boron in boron silicates does not exist as boric acid, disodium tetraborate, nor as diboron trioxide in the silicate or glass. So the silicate form would not be on the (Candidate) list of Substances of Very High Concern neither. However, cases of use of borates in those manufacturing processes are indicated.

**For technical reasons alternative substances turned out not to be acceptable in all cases of application or formulation as expressed in communications from member companies and industrial associations.**

Research on suitable alternatives in flux agents, drawing soaps, welding and brazing consumable constituents are ongoing. **Despite this, it is clear that forbidding the use of boron as a constituent in fluxes, in particular brazing as a wide spread industrial application will be banned from Europe.**

**Conclusion: EWA supports the arguments of the European Borates Association against the draft ECHA 6<sup>th</sup> recommendation for the inclusion of borates in the REACH Annex XIV.**