



Answers to the questions about the article character of a material ECHA Guidance for articles, p. 24

Part 1 - blocks and panels

Question:

Does the material in question have a function other than being further processed? If the material predominantly has other functions (i.e. end-use functions), then this may be an indication that it is an article according to the definition of REACH.

Answer.

Yes, blocks and panels were not processed further.

Question:

Does the seller place the material on the market and/or is the customer mainly interested in acquiring a material because of its chemical composition or its shape/surface/design? If the material is mainly put on the market or acquired because of its shape/surface/design, this is an indication that the material is an article.

Answer

The shape/surface/design (physical) characteristics of blocks and panels are far more interesting than its chemical composition.

Question:

After which processing step is the function determined to a larger degree by the shape/surface/design (e.g. polymer pellet is converted to film)? A comparison of the material's properties and general shape before and after the different processing steps may be helpful to identify the transition point. "Light processing" such as drilling, grinding or bending may improve or modify a material's shape, surface or design for carrying out a function and is thus frequently applied to materials which are already articles.



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ASSOCIATION EUROPEENNE DES FABRICANTS DE BETON CELLULAIRE
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Answer

Autoclave curing is the final production step in the factory to obtain the AAC properties. There is no further processing of blocks and panels.

Question:

Does the chemical composition of the material as such remain similar in the next processing steps as a change may indicate the material being a preparation? The fact that the chemical composition of a raw material is significantly changed, e.g. additives are added to a polymer, may be an indication that the material is still a preparation. It should be noted, however, that the fact that a given material in itself does not change its chemical composition and properties cannot be used as an indication of the material being an article. Surface treatment of raw materials which are articles may result in a change in its overall chemical composition, however, not in the status of the material being an article. Examples are printing onto the surface, painting, applying coatings, etc. Some finishing other than surface treatment may change the chemical composition, but not the status of the material being an article, e.g. dyeing of fibres.

Answer

AAC remains constant after manufacturing, there is no change in the composition after autoclave curing in the production process. The construction process does not change the chemical composition of the AAC material itself.



Part 2 - Crushed AAC products

Question:

Does the material in question have a function other than being further processed? If the material predominantly has other functions (i.e. end-use functions), then this may be an indication that it is an article according to the definition of REACH.

Answer

Yes, crushed products: e.g. cat litter, oil binder, sub-base (Trockenestrich), medium for storage of water in green roof construction were not processed further.

Question:

Does the seller place the material on the market and/or is the customer mainly interested in acquiring a material because of its chemical composition or its shape/surface/design? If the material is mainly put on the market or acquired because of its shape/surface/design, this is an indication that the material is an article.

Answer

The shape/surface/design (physical) characteristics of crushed AAC products are far more interesting than its chemical composition. Bulk fillers were used as light weight aggregates because of its physical advantages, mainly its low density.

Question:

After which processing step is the function determined to a larger degree by the shape/surface/design (e.g. polymer pellet is converted to film)? A comparison of the material's properties and general shape before and after the different processing steps may be helpful to identify the transition point. "Light processing" such as drilling, grinding or bending may improve or modify a material's shape, surface or design for carrying out a function and is thus frequently applied to materials which are already articles.

Answer

Autoclave curing is the final production step in the factory to obtain the AAC properties. Crushed products afterwards undergo the "light processing" step: crushing and sieving to improve its shape and surface for intended use



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Question:

Does the chemical composition of the material as such remain similar in the next processing steps as a change may indicate the material being a preparation? The fact that the chemical composition of a raw material is significantly changed, e.g. additives are added to a polymer, may be an indication that the material is still a preparation. It should be noted, however, that the fact that a given material in itself does not change its chemical composition and properties cannot be used as an indication of the material being an article. Surface treatment of raw materials which are articles may result in a change in its overall chemical composition, however, not in the status of the material being an article. Examples are printing onto the surface, painting, applying coatings, etc. Some finishing other than surface treatment may change the chemical composition, but not the status of the material being an article, e.g. dyeing of fibres.

Answer

AAC remains constant after manufacturing, there is no change in the composition after autoclave curing in the production process. Cat litter absorbs liquids only and does not react with them. Also oil binder does not react with the absorbed liquids.