



The new REACH-Regulation and its consequences to AAC producers

The REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) came into effect on June 1st 2007. This regulation is amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC. The REACH regulation has also consequences to the producers of Autoclaved Aerated Concrete (AAC).

Blocks, elements and reinforced beams produced from Autoclaved Aerated Concrete display a specifically designed shape and are used for the construction of load bearing or non load bearing walls, floors and roofs, sometimes whole building shells are constructed entirely from AAC. The material properties of AAC allow this form of use. **Blocks, elements and reinforced beams are “articles” according to the definition of REACH.** This is important in this context, because, there is no registration, evaluation or authorisation of “articles” under REACH as long as there are no substances released while the products are being used as recommended. Contrary to this, as an example toilet deodorizers sublimate and release an odour during use and it is its chemical composition that determines its properties to a greater degree than its shape. AAC does not evaporate as used, hence there is no obligation to register according to REACH.

Some producers prepare thermal insulating products from crushed AAC for levelling purposes for use in the renovation of old buildings, sometimes called bulk fillers. The angular shape of the single grains is very important to ensure compaction and avoids dispersion. This material is produced by crushing and sieving AAC. A well defined grain size distribution is fundamental for this application. Some factories produce animal litter or absorber of chemicals from AAC. The open porosity of AAC is important as this assists in its ability to absorb and store liquids. Hence, the use of AAC as oil binder, in green roof constructions or cat litter is based on the physical properties of the material. These physical properties such as low density allows the use of crushed AAC material to be used in the manufacture of light weight concrete. **Therefore, these bulk materials are “articles” in the sense of REACH, because the grains shape and design determine its function to a greater degree than does its chemical composition.**

Producers of AAC are downstream users according to the definition of the REACH regulation. Hence, the AAC producers have to ensure that references are contained within the safety data sheets, including exposure scenarios, from their suppliers concerning the use of the raw materials in the production of AAC. This is also the case for the use of additional substances such as moulding oil and regenerating salt, again, the use of “releasing agent” and “regeneration of ion exchangers” has to be mentioned. These obligations have to be fulfilled without any compromise.