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Novacap's Position on the EU REACH Directive

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1. What is REACH?

REACH is a European Union directive dealing with the Registration, Evaluation, Authorization (and Restriction) of Chemicals. REACH reverses the burden of proof and puts all responsibility of demonstrating safety of chemical substances on industry, not government. REACH requires EU manufacturers and importers to register substances with the European Chemical Agency (ECHA) and to generate data to assess the risks related to these substances with subsequent risk management measures. REACH applies to ALL chemicals. ECHA will then mandate restrictions on Substances of Very High Concern (SVHC) requiring gradual replacement by safer substances. Those substances already restricted under RoHS will not be on the initial SVHC list. The EU wants to strongly restrict and control the use of SVHCs to protect human health and the environment. REACH deals with substances (i.e. a chemical element or compound), preparations (i.e. composition of substances), and articles (i.e. object of specific shape, surface, and design). Substances in articles that have an intended release as part of normal use and under reasonably foreseeable circumstances in the specific application need to be registered. REACH requires only that substances be registered that are in quantities exceeding quantities outlined in the REACH directive. REACH legally only requires and allows EU manufacturers or importers of substances to register them; a non-EU entity (typically one with global EU and non-EU manufacturing sites as an example) may appoint an "Only Representative" to legally coordinate registration of substances.

2. NOVACAP's Position on REACH

The European Commission clearly states that manufacturers outside the EU are not covered by REACH. However, an importer of a substance manufactured by a non-EU enterprise or an “only representative” of such an enterprise must, jointly with other EU manufacturers, importers, or only representatives as part of similar substance consortia, must submit the hazard information for the substance unless they do not meet specific tonnage criteria as outlined within the REACH directive. NOVACAP is a non EU manufacturer of articles. NOVACAP does not manufacture and sell substances into the EU. The articles (i.e. capacitors) that NOVACAP sells contain substances; these substances do not have an intended release from the capacitor in normal and ordinary use. Therefore, NOVACAP is not required to supply composition by weight for any of the chemical substances within the capacitors (articles) that NOVACAP manufactures as they are not intended to be released in application.

3. Technical Support

For technical support, please contact Novacap at:

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