

Milan, 24 October 2014

To The European Chemicals Agency (ECHA)

Copy to

- The Italian Ministry of Economic Development
- The European Welding Association (EWA)
- Orgalime

Position concerning the socio economic impact of the inclusion in the annex XIV of REACH "list of substances subject to authorization" of boric acid, disodium tetraborate and boric oxide (here after 'the listed borates') used for soft soldering, brazing and braze welding.

Soft soldering, brazing and braze welding are industrial processes to join ferrous and non ferrous metals (steels, copper, nickel, titanium alloys, etc.) that are executed without melting the base metal, but only the added metal. They are based on the wetting of the base metal, that is possible only on metals free of oxides because properly de oxidized by using mixtures containing 'the listed borates'.

According to our knowledge, for soft soldering, brazing and braze welding no substances alternative to 'the listed borates' are available for formulating de oxidizing mixtures.

Following is a list* of the most relevant industrial sectors where soft soldering, brazing and braze welding processes, and associated use of deoxidizing mixtures, are not technologically replaceable.

We consider useful to highlight that some of these sectors are directly linked to relevant European Objectives, like:

- greenhouse gas emissions containment
- pollution reduction
- generation of energy from renewable sources

Considered that alternatives to 'the listed borates' for formulating deoxidizing mixtures are not available, we ask:

- To not include boric acid, disodium tetraborate and boric oxide in REACH annex XIV "list of substances subject to authorization" and subordinately
- To exempt from Authorization the use of boric acid, disodium tetraborate and boric oxide in soft soldering, brazing and braze welding.

*List of the most relevant industrial sectors

- Chilling, heating and air conditioning
- Gas networks and transportation
- Goggles
- Hard steel tools
- House appliances
- Cooking tools
- Electro mechanics (transformers, motors, ...)
- Plumbing
- Machinery for cosmetic industry
- Drilling and offshore
- Solar panels
- Automotive
- Railway industry
- Valves Taps Fittings Industry