



WHITE PAPER

REACH Exemptions for Vanadium and Critical Minerals

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Under the EU's REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemicals), most substances imported into the EU in quantities over 1 tonne per year must be registered with the European Chemicals Agency (ECHA). However, several key exemptions can apply to vanadium and similar critical minerals, which are particularly relevant to Just-In-Time (JIT) operations.

1. Exemption for Substances in Articles (Not Released)

Vanadium used in articles (e.g. steel products or battery components) is exempt from registration if it is not intended to be released during normal use.

2. Exemption for Research and Development (PPORD)

Substances used in Product and Process Oriented Research and Development can be exempt from registration for up to 5 years, extendable to 10 years.

3. Re-import Exemption

Substances originally manufactured in the EU and re-imported without chemical modification are exempt from registration.

4. Exemption for Waste

Waste is not subject to REACH. However, once recovered into usable form, it may require registration unless already covered.

5. Exemption for Low Volume Imports (<1 tonne/year)

Imports under 1 tonne per year per legal entity do not require registration, ideal for small-batch or trial imports.

6. Exemption via 'Only Representative' (OR)

If a non-EU supplier appoints a REACH-registered Only Representative, the EU importer is exempt from registration duties.

7. Annex IV & V Exemptions

Some substances are exempt by listing in Annex IV or V, such as naturally occurring minerals not chemically modified beyond necessary processing.

Summary for EuStrategix

Use Case	Exemption Type	Applicability
Small R&D shipments	PPORD or <1 tonne/year	Yes
Import via registered exporter	Only Representative (OR)	Yes
Vanadium in alloy or VRFB	Article exemption	Likely
Recovered vanadium scrap	Waste exemption (initial)	Conditional
Raw ore/concentrate	Annex V	Possible

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