

**Summary for Customers on the European Union REACH Regulation (EC) No 1907/2006
as it relates to Beryllium and Beryllium-containing Materials
December 3, 2008**

Brush Wellman Inc. is committed to making our customers' transition into REACH as simple and straight forward as possible for all of our products, including beryllium, beryllium-containing alloys, and beryllium oxide, you purchase from us, so that you, and all downstream customers, can continue to take advantage of the beneficial properties, high performance and reliability you have come to expect. We will participate in the preparation and submission of the information and documentation as required by the REACH Regulation, including Pre-Registration, Registration, Communication, and Authorization of substances contained in our range of products.

Pre-Registration and Registration: We have determined that the majority of our metal products, as imported into the EU, are articles. This determination is based on the [Guidance Document on Substances in Articles](http://reach.jrc.it/guidance_en.htm) (http://reach.jrc.it/guidance_en.htm) classifying metals in massive or wrought form as articles. According to this guidance document, substances in articles do not need to be Pre-Registered or Registered unless a substance exceeds 1 metric tonne per year per manufacturer or importer **and** the substance is intentionally released from the article. Normal processing of our products such as machining, grinding, welding, etc., as well as, normal wear and tear are not considered as intentional releases. It must be noted that if a metal product is in a form that is to be melted, such as ingots whose shape is materially changed, it is considered to be a substance (pure metal) or a preparation (alloy) whose constituents are subject to the requirements relative to Pre-Registration and Registration.

Even though the majority of our customers buy articles, we have Pre-Registered all product constituents using the "Only Representative" process. We have engaged the services of Harlan Laboratories Cytotest Cell Research GmbH to pre-register and register beryllium and beryllium oxide and have engaged the services of UMCO Umwelt Consult GmbH to pre-register the other alloy constituents that meet the 1 metric tonne threshold. Brush Wellman will have the Only Representative(s) ensure that the uses of our products are registered and that Data Sheets will be developed and provided in accordance with REACH and the Global Harmonized System (GHS) requirements. We are doing this to ensure the integrity and availability of our products in the marketplace in the event there is a future change in the existing interpretations by the REACH Agency.

Communications: For articles containing a substance that is listed on the Candidate List of Substance of Very High Concern (SVHC) by the European Chemicals Agency (ECHA), the manufacturer or importer is required to inform the recipients of the article about the substance and how the article can be safely used if the listed substance is present in excess of 0.1 wt %. Beryllium was not listed on the first Candidate List that became effective on October 28, 2008. If any of our products contain a listed substance, you will be advised accordingly and we will ensure that your use is included in the substance registration dossier.

Authorization: The aim of Authorization is to ensure that the risks from substances of very high concern are properly controlled or substitution is made if economically and technically viable. The publication of the Candidate List is a first step to identify substances that could require that their use be Authorized. The first Candidate List of 15 substances to be considered for Authorization became effective on October 28, 2008. None of the substances in our products were on this list. Since the European Commission has determined that substances in articles are not subject to Authorization, our customers buying articles will not be subject to use authorizations unless they incorporate a listed substance into one of our products. Based on our understanding of the priorities being considered by the member states for identifying substances to be subject to Authorization, we believe that it is unlikely that substances in our metal products, including beryllium, will require their uses to be authorized.

The above information is being provided based upon current knowledge of REACH interpretations and guidelines. Please be advised that new interpretations and guidelines may change the above guidance. We will strive to keep you informed of any future changes; however, it is highly recommended that those involved with REACH implementation periodically consult the European Chemical Agency website http://echa.europa.eu/home_en.asp

If you have any questions regarding the information provided above, would like a copy of any of the documents described in this summary or wish to provide feedback, please contact Terry Civic, Manager of Environmental Health and Safety, our point of contact for REACH, via phone at +1 (216) 383-3698 e-mail: at Terence_Civic@brushwellman.com. You may also contact Hans Ulrich Büttner, Director Environmental, Health & Safety Europe at +49(0)711 83093-18 email: Uli_Buettner@brushwellman.com or call the Brush Wellman Product Safety Hotline at (800) 862- 4118.