

REACH* – Implications for the Supply Chain

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**REACH = Registration, Evaluation, Authorisation of Chemicals*

REACH – Implications for the Supply Chain

- REACH - Status Update
- Preparing for REACH
 - Supply Chain Challenges
 - Training Awareness

Major Components of REACH

Registration

Substances manufactured or imported in quantities of > 1tonne/yr (with exemptions)

Evaluation

Registration information (eg. Registration dossiers) by Member States

Authorisation

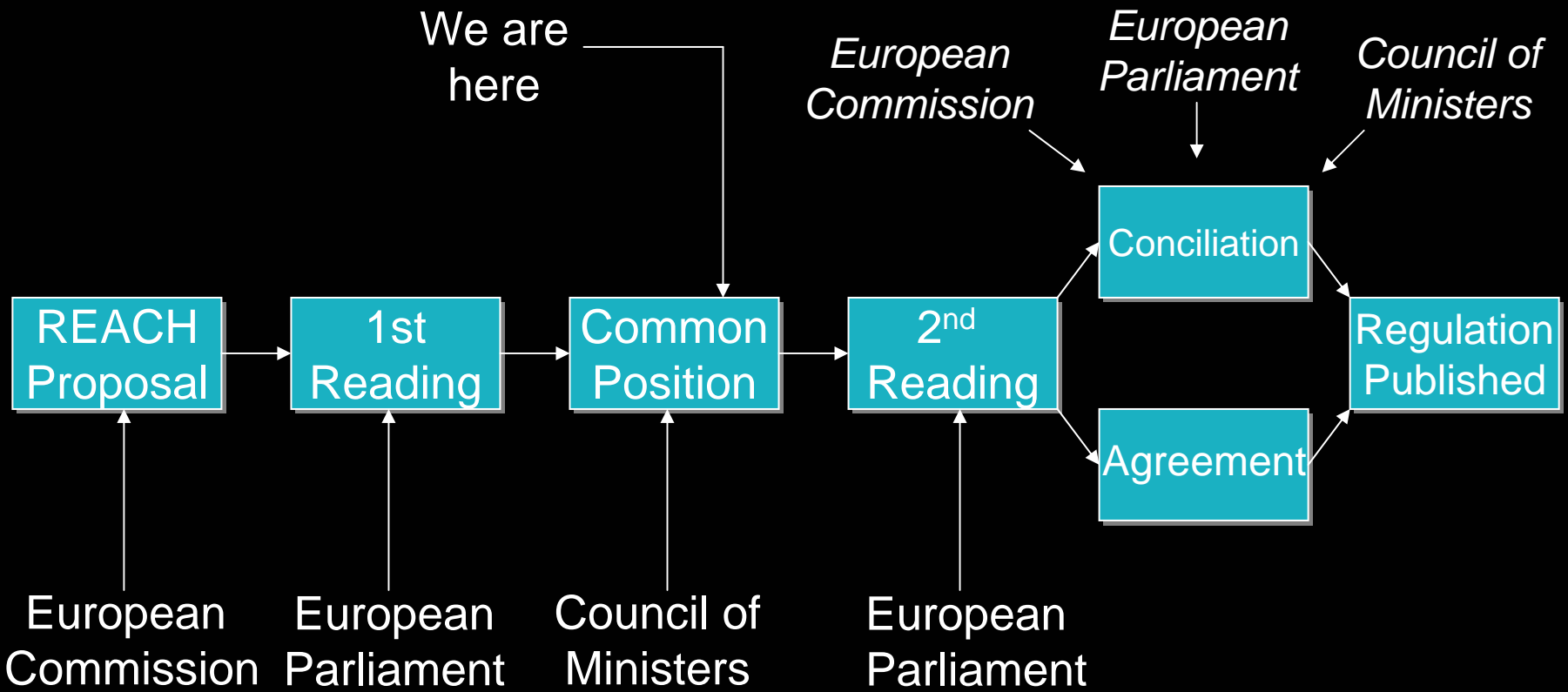
Substances of High Concern*. Restriction of certain dangerous substances



Sharing of hazard, exposure & risk data up & down the supply chain
Classification & labelling of all substances (Globally Harmonised System)

**Carcinogen, mutagen & toxic to reproduction (CMR) categories 1 & 2; persistent, bioaccumulative, & toxic (PBT) or very persistent, very bioaccumulative (vPvB); substances identified as causing serious & irreversible effects to humans or the environment – substances of equivalent concern*

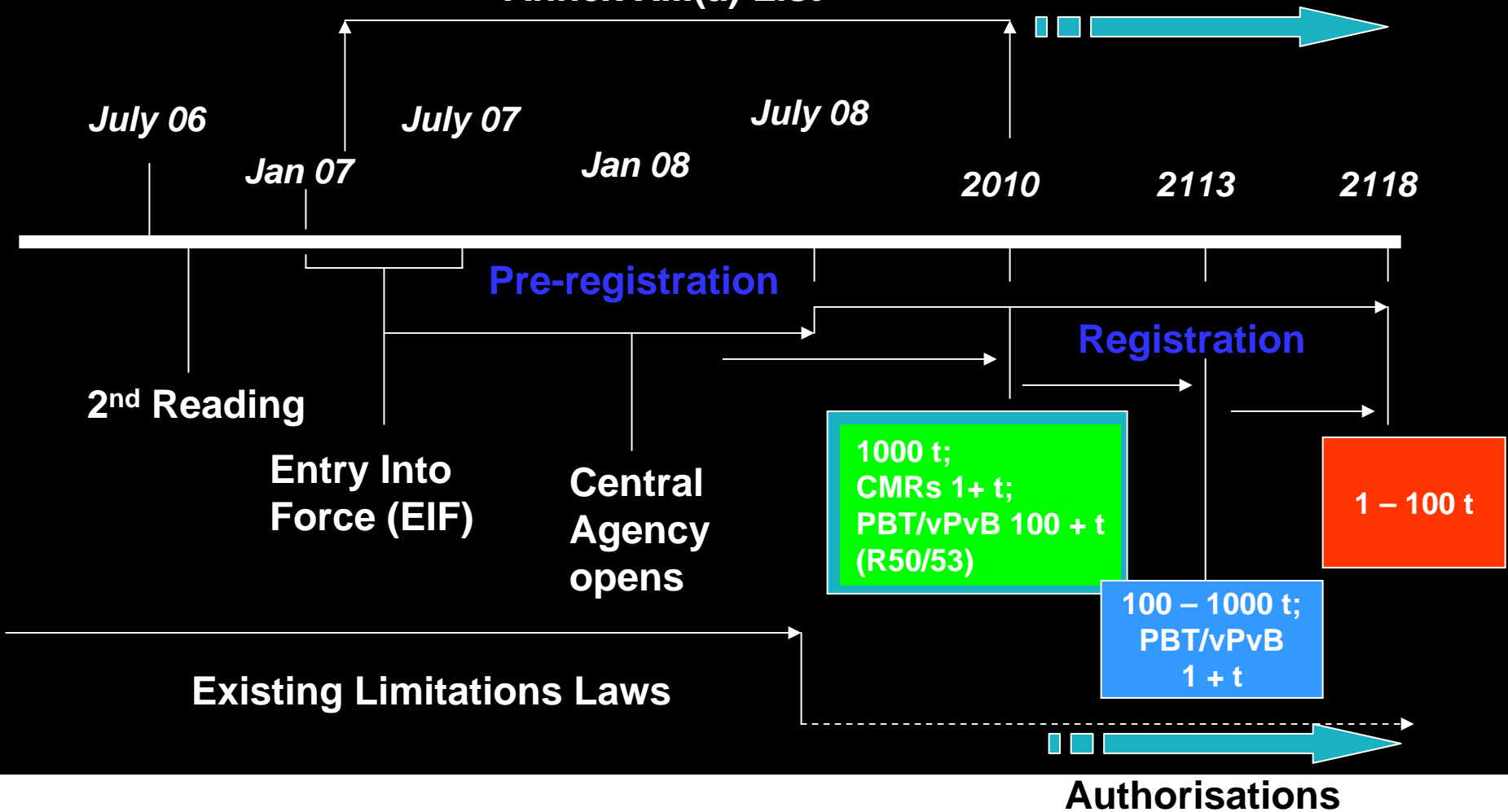
Overview of the REACH Political Process



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REACH Milestones

Substances for Authorisation Annex XIII(a) List

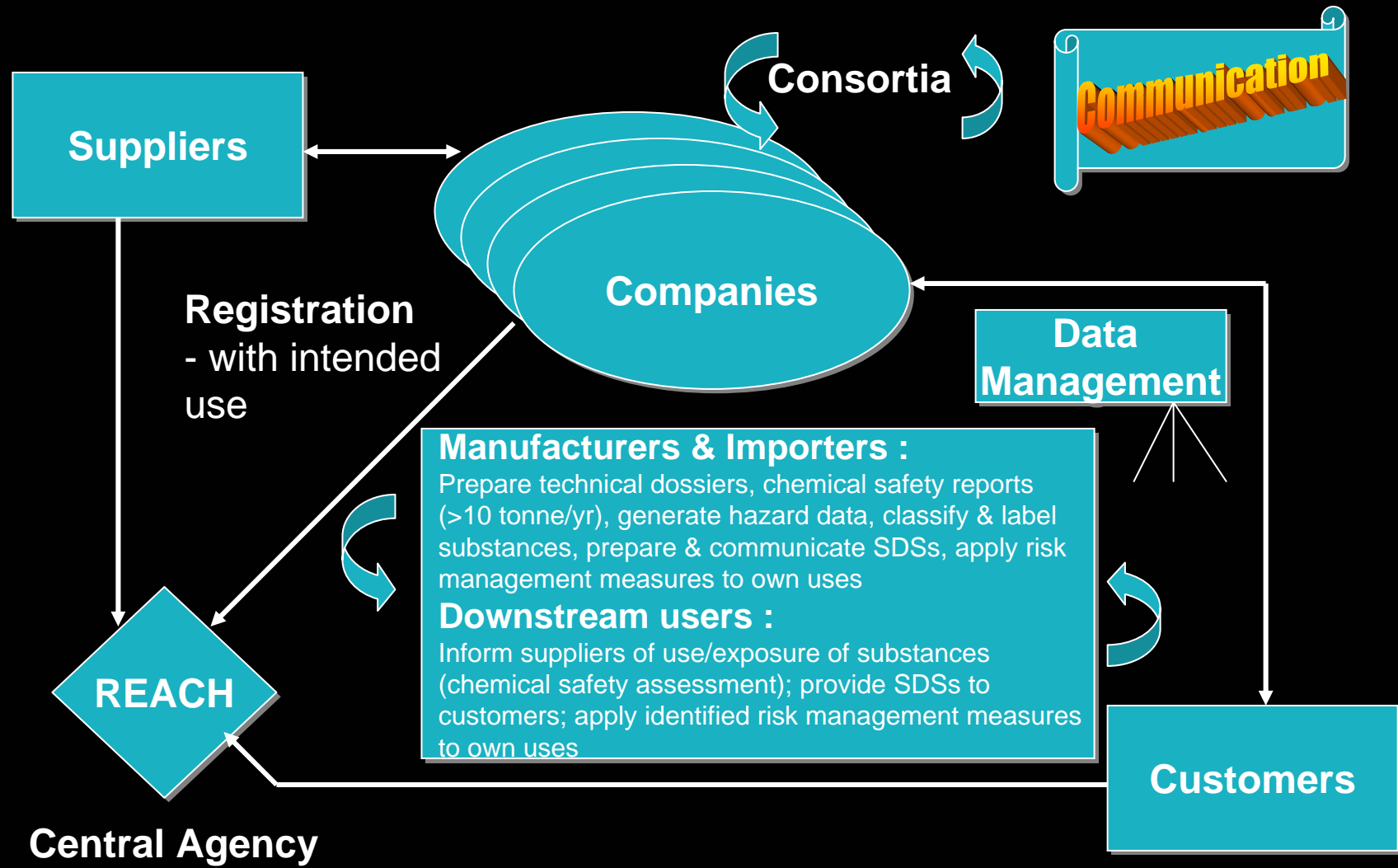


Preparing for REACH

What can I do to get started now? :

- **Understand** REACH & its potential implications across the entire chemical supply chain
- **Audit** complete product portfolio to identify applicable REACH requirements & specific impacts
- **Develop** a business strategy & action plan to achieve compliance, mitigate challenges & exploit opportunities
- **Prepare** communications plan for internal stakeholders, as well as users up & down the chemical supply chain

Supply Chain – Key Role



Supply Chain – Key Role in REACH

Early observations :

- Communication requirements **up AND down** the supply chain
- Materials Declarations
– complexity & conformity?

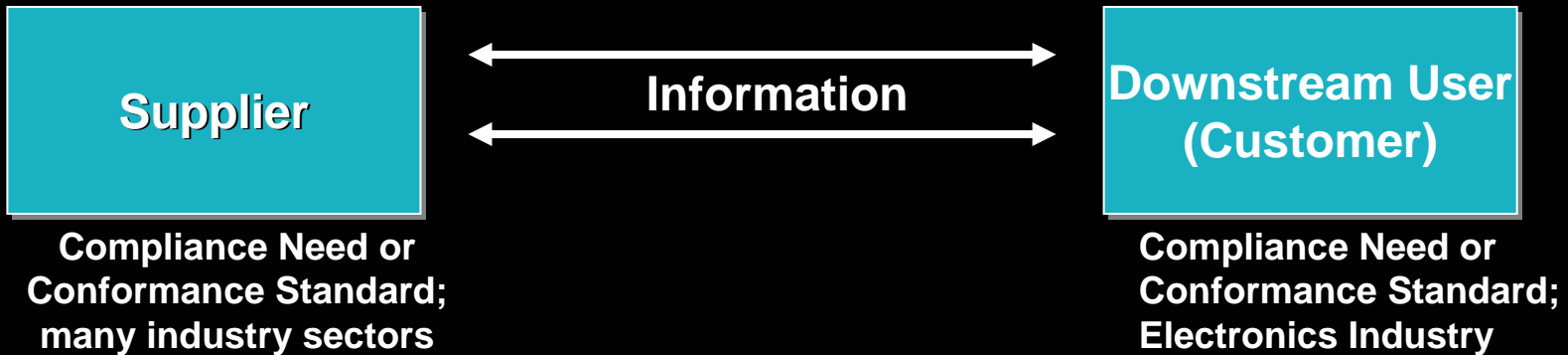
Supply Chain – Key Role

Traditional model (e.g. RoHS)



REACH

Same or different?



Supply Chain Conformance

Sector Specific

Multi-sector

Driver

RoHS
Directive

End of Life
Vehicle (ELV)
Directive

REACH
Regulation

Substances

4

6

2000??

Industry
List

JIG 101

GADSL

Annex XIII ??

Materials
Declaration
Response

IPC-1752

Eco-Compliance
Declaration (ECD)
Exchange Form

IMDS

AIAG ELV
Spreadsheet

????

REACH – Supply Chain Communications

- Simple in theory – more difficult in practice
- Many different industry sectors
- Variable level of expertise of actors involved
- Confidentiality issues – 100% Declarations?
- Complexity of supply chains
 - Linear/direct?
 - Matrix/net
 - who directly precedes or follows?

REACH – Supply Chain Challenges

- Calls to standardise MSDS's internationally
- Quality issues
- REACH requires more than any current format globally
- Additional information – easily accessible for Downstream Users (DUs) & communicated in standard format
- Standardise (electronic) information transfer
- Will MSDS content satisfy Materials Declarations demands?
- Due Diligence requirements

**NEED FOR DIALOGUE
& CONFORMANCE STANDARDISATION**

Preparing for REACH - Training

- Training Awareness Program
 - *Cross functional & integrated*
- Anchor within existing environment/ Product Stewardship programmes
- Balance between “what we know today & what we can influence for tomorrow”
- “Little and often” approach – long term need
- Balance between operational and strategic
- Internal first, then external (distribution, customers, suppliers etc)...**fight inertia or panic!**

Where to get help?

**REACH
Requirements**

**-National REACH Help Centres
-CEFIC REACH Centrum**

- <http://europa.eu.int/comm/environment/chemicals/reach.htm>

**Substance-specific
information**

**-Substance supplier and/or supplier consortia
(SIEF – Supplier Information Exchange Forum)**

**Context &
strategy**

- In house experts; consultants

REACH and RoHS

- **RoHS** has proved a significant challenge to the hi-tech sector

- Six substances restricted
- Huge supply chain & materials declaration challenges
- Supply chain information flow - primarily supplier to customer
- Not all suppliers have the same approaches (or standards)
- Lot's of valuable learning

- **REACH**

- Less sector-focused, impacts many other stakeholders
- Many more substances potentially impacted
- Estimated 1500 – 2000, although not all relevant to sector
- Don't underestimate classification & labelling impacts
- Supply chain information flow – both up AND downstream
- Compliance and conformance requirements now two-way
- Confidentiality issues & supply chain complexities
- **Supply chain dialogue essential for success**