

REACH - Views from a Downstream User perspective



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Society of Motor Manufacturers and Traders (SMMT)

UK REACH Competent Authority
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Overview

- About the SMMT
- The scale of REACH, **threat** to all business, **respond** accordingly
- Auto sector cooperation and the AIG:
Automotive Industry Guideline on REACH
- REACH is not 'too hard' – AIG **one pager**
- **Case studies**, resulting actions as DU etc.

About the SMMT

- Society of Motor Manufacturers and Traders, the trade association for the UK automotive industry
- 500 member companies: all the major **vehicle manufacturers, component and material suppliers**, power train providers, designers
- Manufacturing turnover £47 billion, >10% of UK exports, supporting around 800,000 jobs
- Active on **REACH for 5 years**

Understand the scale of REACH

- **Substance withdrawals/ restrictions can stop production** (yours & rest of chain)
 - 5-10% economic withdrawal
 - Reformulation means retesting downstream
- **End of Life Vehicle (ELV) Directive** restricted 4 substances. **REACH** likely to control **~1500**
- ▶ **Your customers (& theirs') need assurance you have REACH under control**
- ▶ **Budget and allocate resources accordingly**

Task Force-REACH

In preparation for REACH
all the major vehicle manufacturers

European, Japanese and Korean

and

the automotive supply chain

with **SMMT** (UK), **VDA** (Germany)

and **AIAG** (USA)

representing VMs and suppliers

...formed TF-REACH

and drafted the **AIG** (Annex A: list of manufacturers represented)



About the AIG

- Automotive Industry Guideline (AIG) aims to:
 - **Avoid duplication/confusion** in supply chain
 - Harmonise the sector's response to REACH
 - Establish a **common schedule** & external communication strategy
 - Address sector's **obligations, expectations**
- Based on Orgalime guide (engineering sector)
- Download AIG free: www.acea.be/reach (& updates)
- AIG is **global**: English, **Japanese**, more to follow

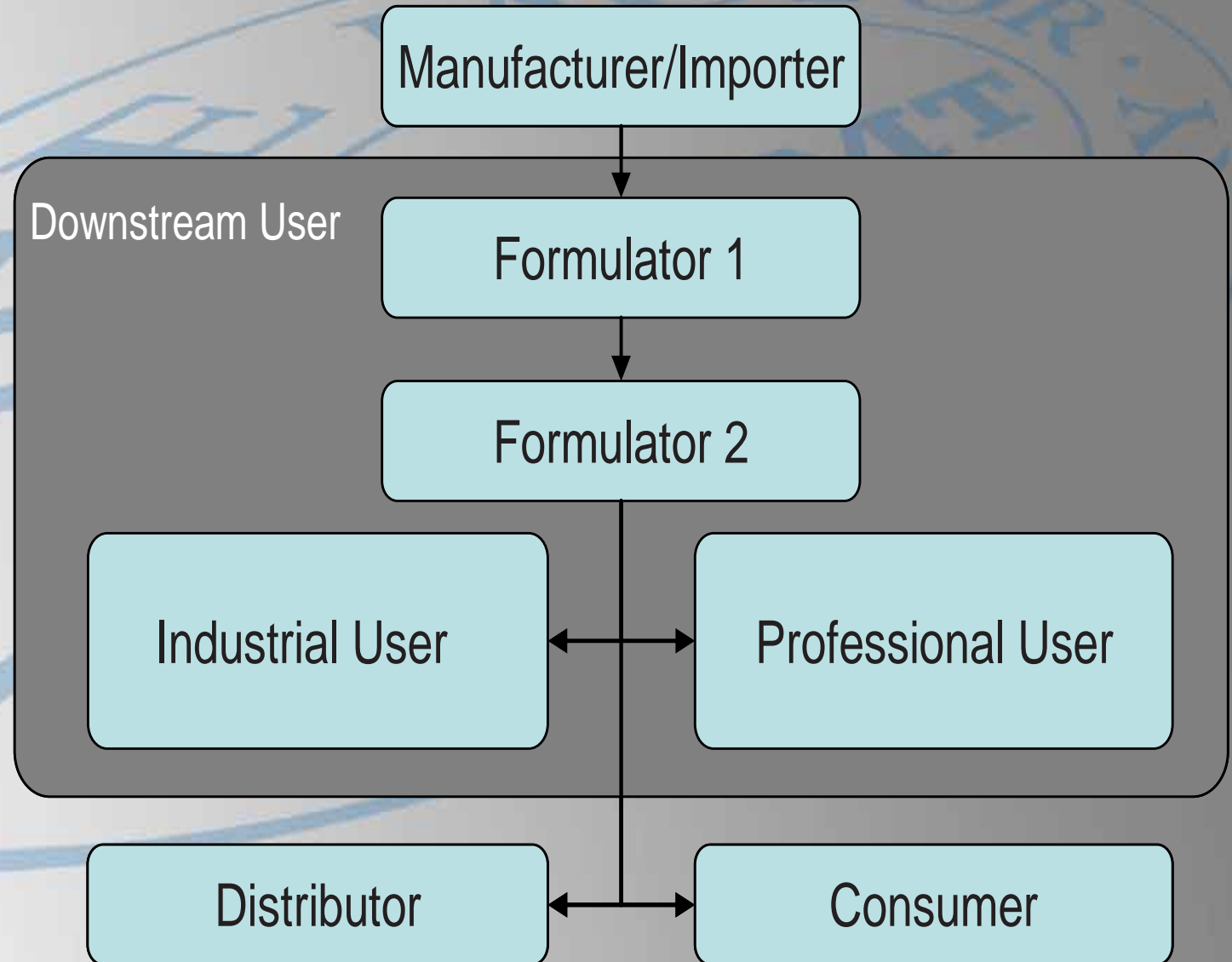
Chapter 1 - Intro: REACH and the Automotive Industry

- Requires immediate/ongoing action: OEMs/suppliers
- Importance of **pre-registration**
- Importance of “**only representative**” option
- Obligations on industry, **registration**
- Need for **communication** up/down the whole supply chain (data, uses, control measures for safe use etc)
- Need for each player in supply chain to have a **Strategic Action Plan**

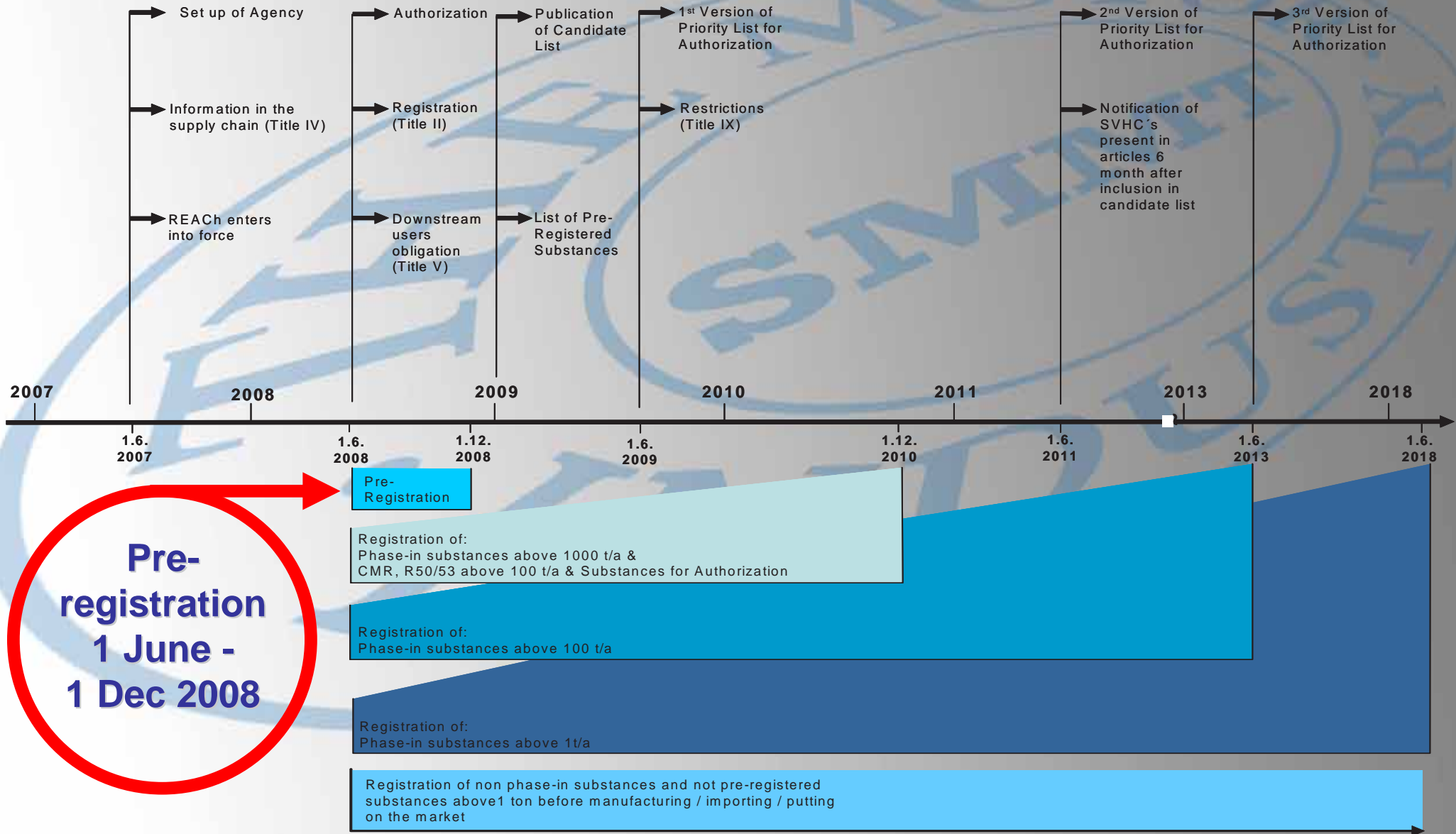
Chapter 2: Definitions/acronyms

Downstream

user: uses a substance, either on its own or in a preparation, in his **industrial or professional activities**. Not a manufacturer, importer, distributor nor a (non-professional) consumer

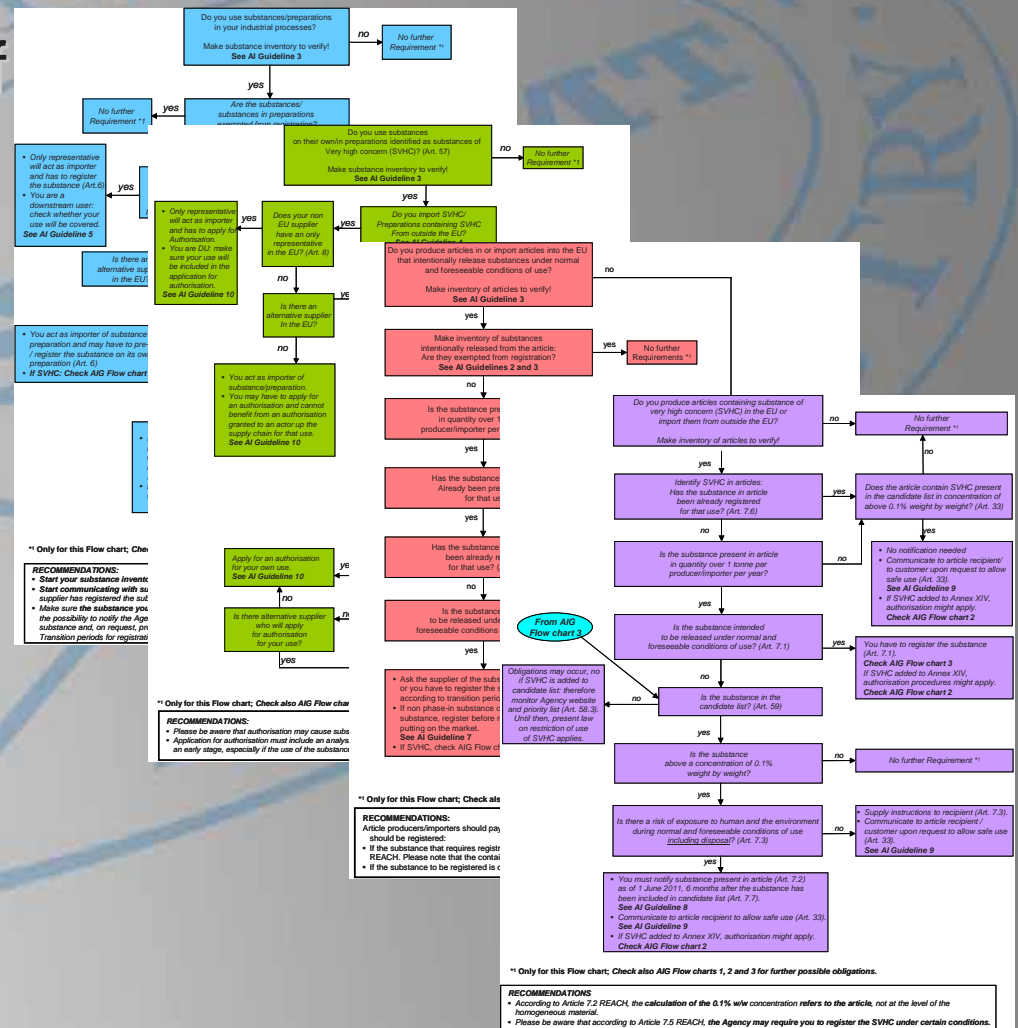


Chapter 3: Important deadlines



Chapter 4: How to comply - a step-by-step process

- Flow chart 1: Registration of substances/in preparations
- Flow chart 2: Authorisation
- Flow chart 3: Registration of substances intended to be released from articles
- Flow chart 4: Notification of substances in articles and obligation to communicate



Chapter 5: AI Guidelines

- 5.1 **Roles** in the supply chain
- 5.2 **Scope and Exemptions**
- 5.3 Substance **Inventory**
- 5.4 **Imports** of substances/preparations/articles
- 5.5 **Communication obligations** along the supply chain
- 5.6 DU chemical safety report & reporting to ECHA
- 5.7 **Registration of substances in articles**
- 5.8 **Notification of substances in articles**
- 5.9 **Communication** reqts for **substances in articles**
- 5.10 **Authorisation** procedures
- 5.11 List of RIPs (REACH Implementation Projects)
- 5.12 Helpdesks and Information tools
- 5.13 Industry-run helpdesks and Guidance

E.g. AI Guideline 3: Substance Inventory

To determine your obligations, need inventory:

- Substances/preparations you **purchase & use**
- Substances/preparations you **import**
- Substances **intended to be released from articles** you produce
- Substances intended to be released from ***imported articles***

Note: an inventory required for each legal entity

- ▶ **AIG includes matrix of data required for each role**

E.g. AI Guideline 4: Imports

Imports to the EU of substances/preparations/articles (with intended release) must be registered by either:

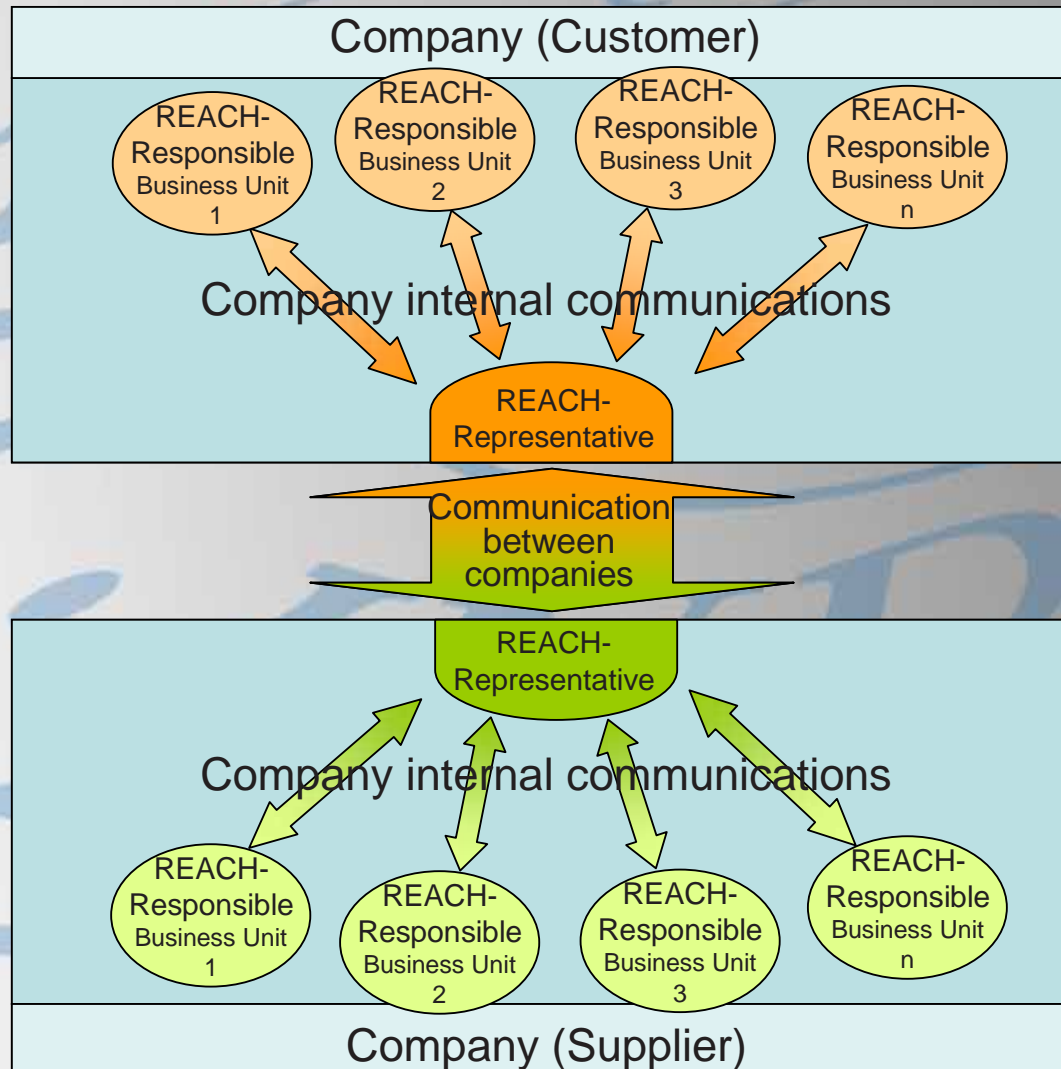
- The “**only representative** of a non-EU manufacturer”

OR

- **DUs** importing the substance, preparation or article into the EU **are ‘importers’ and responsible for pre- and full registration** (for every one of their legal entities)

- ▶ **Important to DUs that non-EU suppliers appoint an ‘only representative’ to minimise burden and avoid duplication**

E.g. AI Guideline 5: Communication obligations along the supply chain



Chapter 6: Summary of main obligations & recommendations

One pager with ten steps:

1. Define contact details for REACH representatives (all customers and suppliers)
2. Identify substances, preparations & articles in scope
3. " substances intended to be released from articles
4. " substances/preps not already registered for your use
5. " substances not pre-registered by a supplier
6. " SVHCs in articles
7. " imported SVHCs
8. " SVHCs used in EU production
9. " risk management measures in Safety Data Sheet
10. Check the exposure scenarios

Reworked for AIG v.2, with only 8 steps but more detail.

Automotive Industry Guideline on REACH (AIG)

Chapter 6: Summary of main obligations & recommendations

#	Which steps are necessary for a Downstream-User within the Automotive Industry (AI) to fulfil their REACH-obligations:	Main-Tasks	Recommended tools	Recommended Timing (Earliest starting date)	Recommended Timing (latest finish date)	Reference to AIG
1	Request/Define contact details of REACH-representative for each company (customer & supplier)	<ul style="list-style-type: none"> - Identify the REACH-representative (key contact) at each company - Recommend each legal entity for the company for which REACH is applicable - Recommend the REACH responsible for each applicable legal entity 	Letter for REACH awareness		Sep 07	Annex Awareness letter
2	Identify all substances, preparations and articles falling under REACH	<ul style="list-style-type: none"> - Establish & complete inventories 	Inventory	July 07	End of Pre-Registration phase: 1-Dec-08	Guideline 3
3	Identify all Substances intended to be released... from Articles	<ul style="list-style-type: none"> - Make sure, that those substances are Registered for use by the suppliers 	List of substances were registered		Not defined	Guideline 7
4	Identify all Substances / Preparations from inside EU OR which are imported from outside EU and have not already been registered for our use	<ul style="list-style-type: none"> - Make sure, that those substances are registered for that use by the suppliers 	Declaration of Intent (Supplier has to confirm, that he will pre-register and has the intent to pre-register. Supplier furthermore has to notify customer immediately if he will not register substances for the respective use)			Guideline 4 & 6
5	Identify all substances which will be pre-registered by a supplier	<ul style="list-style-type: none"> - Make sure, that those substances are registered 	Use results of inventory	Sep 09 (During Pre-Registration Phase)	Jan 09 (after Pre-Reg-list is published)	Guideline 5
6	Identify SVHC's in Articles	<ul style="list-style-type: none"> - Make sure, that those substances are Registered/Authorized for the use by the suppliers (Authorisation: in case of Annex 14 inclusion) 	GADSL, Material Reporting Systems (MS, others...)			
7	Identify imported SVHC's		Adopt a notification process necessary already existing in internal processes.	End 08 (first candidate list is available)	End 2011 (notification)	Guidelines 8, 9 & 10
8	Identify SVHC's used in EU-production					
9	Identify the Risk Management Measures in the SDS	<ul style="list-style-type: none"> - Apply the Risk Management Measures 	Adopt already existing internal processes (In the future, an internal tool will be available for communication up and down the supply chain.)			Guideline 5
10	Check the conditions described in the Exposure Scenarios	<ul style="list-style-type: none"> - Verify the conditions for your use and your customers uses 		As soon as possible	new SDS has been received	Guideline 5

Annex B: Awareness Letter

Step 1 (Chapter 6), promote REACH awareness via **standard communication letter**:

- Recommend **using this wording... do not to request further information** at this early stage
- **Sets out our expectations: suppliers will**
 - Pre-Register substances
 - Register substances for our uses
 - Meet registration deadlines
 - Get organised and have procedures for REACH
- **Contact details of REACH rep: give yours and request theirs'**

Case studies (from TRW)

- TRW - serves all major vehicle manufacturers & their suppliers
- Case study 1: Metalworking Fluids
 - Preparation, substances not all identified
 - Likely SVHC: No
 - Not critical to business (alternate products are available)
 - Supplier Location: EU
 - ▶ TRW Role: *Downstream User of Preparation*
TRW Actions:
 - Send *Supplier* REACH Awareness and Expectations letters
 - Inform *Supplier* of TRW's uses
 - Confirm that *Supply Chain* Pre-Registers substances
 - Confirm that *Supply Chain* Registers and *includes TRW's uses*



EXAMPLES ONLY!

DU	Communicate: <ul style="list-style-type: none">•Awareness•Expectations•Your uses	Check: <ul style="list-style-type: none">•Pre-reg•Registered•For your uses	
Substance importer (critical)	Ditto	Ditto	<ul style="list-style-type: none">•Follow up•“Only rep”•Seek contingency supplier
Article importer to EU	Ditto, plus intended release	Check anyone has pre/registered substance and your use	<ul style="list-style-type: none">•Follow up
Article producer	Communicate: <ul style="list-style-type: none">•Awareness•Not intended release	No pre/full registration reqd	

REACH AUTOMOTIVE SEMINAR



Are you ready for REACH (Registration, Evaluation and Authorisation of Chemicals)?
It WILL affect you!

"Attending the REACH seminar made us realise the impact it will have on our company. It will affect you as well"

Lawson Hunt

Works Manager, Tappex Group – SME Suppling components to Automotive and general engineering

How the automotive sector can comply - for your business, your customers and your suppliers

22 October 2007, Heritage Motor Centre, Gaydon (Jct 12, M40)

Info/booking via www.business-sustain.com

Summary

- No data, no market. Allocate resources accordingly
- Act now
- REACH is not 'too hard': AIG one pager
- AIG is free to download from www.acea.be/reach
- Have a REACH rep & a plan (ensure suppliers do too)
- Importance of standardised communication, pre-registration, 'only representatives' and inventory

Thank you for listening

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