Automotive Sector Approach to REACH Implementation

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Automotive Implications

- OEMS and Suppliers in Automotive Supply Chain can be Manufacturers, Importers, and/or Users of substances, preparations, and articles.
- All may have legal obligations under REACH.
REACH Requirements for U.S. Manufacturers

Operations in the EU
- For substances produced in or imported into the EU
  - Pre-Registration and Registration
  - Notification of Substances of Very High Concern (SVHCs)
    - Chemicals with significant human health and environmental concern (e.g. carcinogens, mutagens, reproductive toxins, persistent compounds)
- For substances purchased in the EU
  - Application of Downstream User requirements
- For products (articles) produced in the EU
  - Pre-registration and Registration of substances (if intentionally released)
  - Notification of Substances of Very High Concern (SVHCs)

Operations outside of the EU
- For products (articles) imported into the EU
  - Same as above
The Challenge for Global Manufacturers

- Auto manufacturers are currently specifying materials and parts for Model Year 2011 products
  - Won’t know which SVHCs to focus on until 2009 when EU publishes first candidate substances

- Complex global supply chain
  - Thousands of purchased parts imported into the EU from all global regions
  - Significant movement of materials from plant to plant, across regions
  - Approximately 3,000 parts delivered to a vehicle assembly facility

- Historically, no requirements for chemical data on parts
  - Auto industry ahead of most other manufacturing sectors as a result of EU End-of-Life Vehicle (ELV) Directive data collection requirements
Automotive Industry Action Group
AIAG - Activities

❖ REACH Work Group formed in March 2007

- Mission
  ➢ To facilitate and develop a common understanding of the EU REACH regulation and its application to AIAG members.
  ➢ To develop and implement an industry-wide approach to address REACH, ensuring compliance while minimizing impact and costs for members companies.
AIAG REACH Work Group

- Teams established to address key initial deliverables
  - Automotive Industry Guideline
  - Supply Chain education
AIAG REACH Work Group

- AIAG has established a collaborative relationship with the ACEA task force on REACH, including automotive industry groups from Asia, Germany, UK and EU Automotive Suppliers
  - Goal is for common supplier communications and requirements
AIAG REACH Work Group

- Supply Chain Education
  - Creating communication package for supply chain
  - Webinar/workshops for supply chain scheduled to begin January 2008