Getting REACH Information through Supply Chains: An industry-by-industry review

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Agenda

- What are the supply chain challenges for all industries?
- What are some of the common responses to these challenges across industry sectors?
- Selected examples of a few industry organizations’ REACH programs.
- What are some plans for the future?
Do you manufacture, import, or use product in EU?

NO

Do you sell into supply chain that imports into EU?

NO

Do you purchase out of supply chain that exports from EU?

NO

If all answers were no, REACH has no direct impact on you

YES

You may have legal obligations under REACH

YES

You may have to support your customers’ REACH data needs

YES

Supply of your substances may be vulnerable
This is an example of selling into a supply chain that imports into EU

Customer A
USA-based

Customer B
US-based

Customer C
Brazil-based

Customer D
EU-based

Customer E
Japan-based

Customer D requirements will be cascaded down to you via tier one supplier (Customer A).
You have a potentially vulnerable Material, since **Material C** is supplied by an EU-based supplier. You will want to know about substances in **Material C** and whether they are REACH-compliant. You may have to work via **Supplier D** who has the direct contractual relationship with **Supplier C**.

**You**

This is an example of purchasing out of supply chain that exports from EU
Industry Organizations working on REACH

- Automotive (AIAG, ACEA, SMMT, GADSL)
- Aerospace (AIA, ASD, GIFAS, SBAC)
- Chemicals (ACC, CEFIC)
- Electronics (SEMA TECH, AEA)
- Others (e.g. Orgalime)
- Standards organizations (ANSI, ASTM, SAE)
Common Approaches

- Creating an industry guide
- Creating a common list of substances
- Deciding on common data elements needed
- Creating a standard reporting form and/or format
- Finding/creating a common database
- Providing supplier training/helpdesks
Industry example: Aerospace

- Very, very similar to automotive
  - Significant presence in US
  - Complex supply chains
  - Articles

- Some differences
  - Larger substance list
  - Defense exemption
  - International collaboration
Industry example: Electronics

- Many similarities to automotive
  - RoHS, Compliance Connect history
  - Complex supply chains
  - Articles

- Some differences
  - Less concern, at first
  - Less centralized approach
Industry example: Pharmaceuticals

- Different from automotive
  - No Articles
  - Simpler supply chains
  - R&D and medicinal exemptions
  - Isolated intermediates, complicated issue
Industry example: Fragrances

- Huge impact
  - Intentionally release (right into your nose !)
  - Industry is working together in giant consortium approach
  - Exemptions for products, but very complex
  - Tricky integration of existing laws with REACH
Industry example: Chemicals

- Large companies, well-staffed, prepared
- Small companies, not so much
- Training programs, data requirements and software tools being developed by the big companies
What if you sell into lots of industries…i.e. surface coatings or packaging?

Standards organizations are sharing information on REACH developments, RIPs, exemptions

Developing standard guidelines and processes

Possibly formats, databases and tools
2008 and beyond

- Supply chain communication before and during pre-registration phase
- Industry consortia activities, meetings, websites
2009 and beyond

- SIEF activities via REACH-IT
- IUCLID 5 Data Exchange/Dossier Creation
- Continued Supply chain communication per Article 33 of REACH
Questions?

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