



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?

YES

You may have legal obligations under REACH

NO

Do you sell into supply chain that imports into EU?

YES

You may have to support your customers' REACH data needs

NO

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

YES

Supply of your substances may be vulnerable

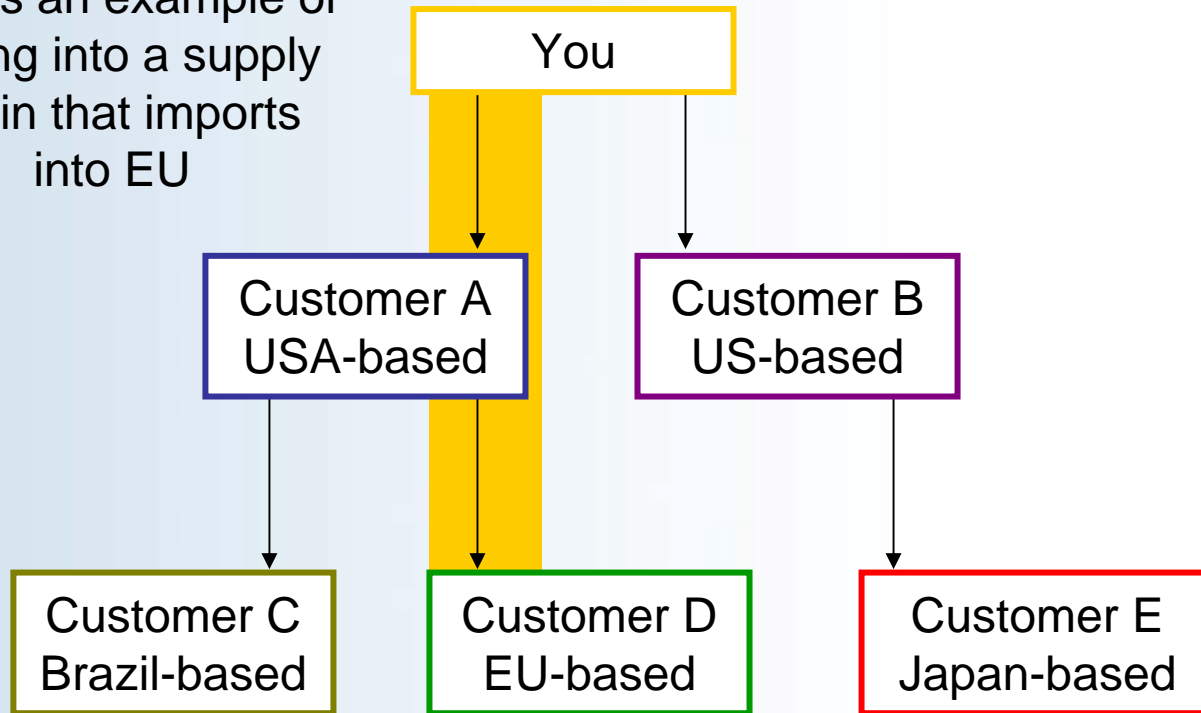
NO

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





This is an example of selling into a supply chain that imports into EU



Customer D requirements will be cascaded down to you via tier one supplier (Customer A).



Material A
Supplier A
USA-based

Material B
Supplier B
China-based

Material C
Supplier C
EU-based

This is an example of purchasing out of supply chain that exports from EU

Material D
Supplier D
Supplies Direct to You

You

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**.





Industry Organizations working on REACH

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



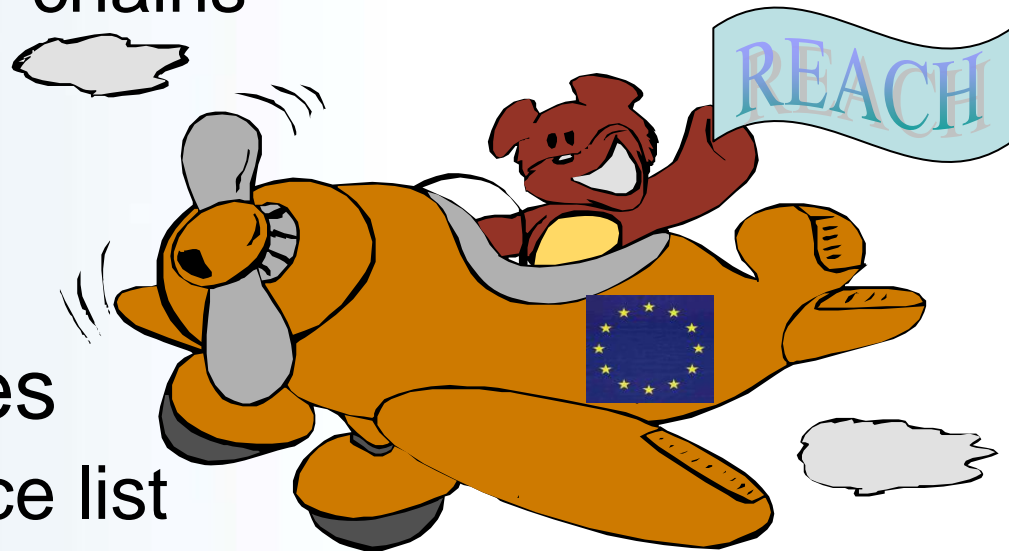
Common Approaches

- 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

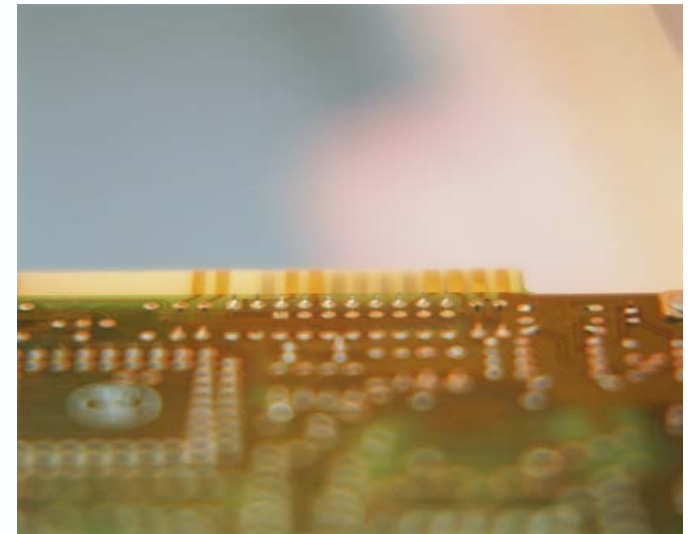
- Very, very similar to automotive
 - Significant presence in US
 - Complex supply chains
 - Articles
- Some differences
 - Larger substance list
 - Defense exemption
 - International collaboration





Industry example: Electronics

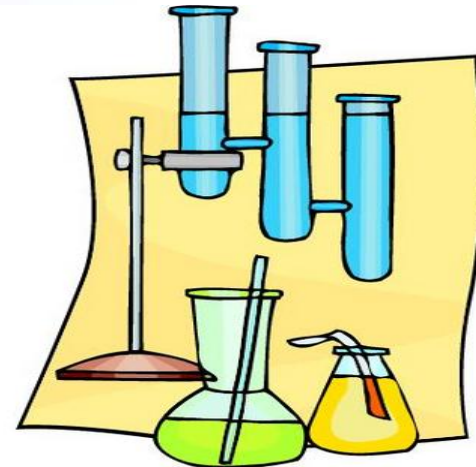
- Many similarities to automotive
 - RoHS, Compliance Connect history
 - Complex supply chains
 - Articles
- Some differences
 - Less concern, at first
 - Less centralized approach





Industry example: Pharmaceuticals

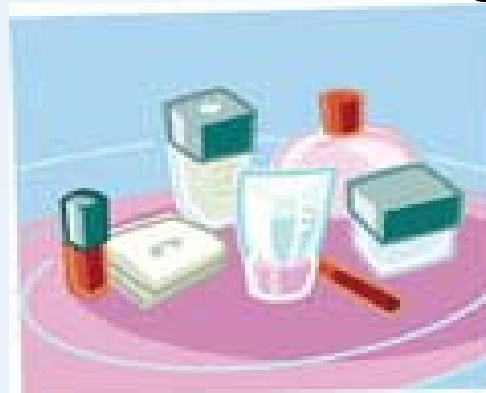
- Different from automotive
 - No Articles
 - Simpler supply chains
 - R&D and medicinal exemptions
 - Isolated intermediates, complicated issue





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





Standards Organizations

- 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



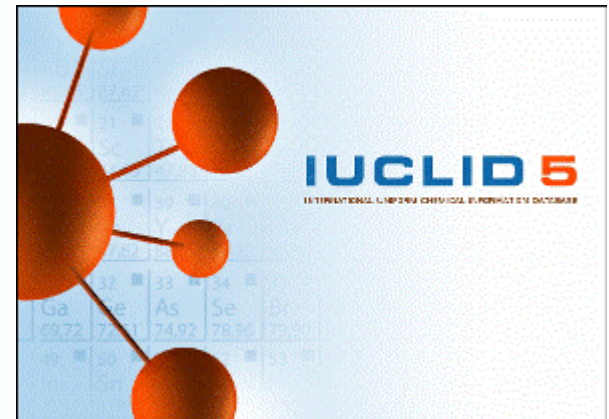
2008 and beyond

- 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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