Getting Information Through the Supply Chain

SI Group, Incorporated

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Privately held chemical manufacturing company
- Global headquarters in Schenectady, NY
- Former Schenectady International Inc.

Celebrated 100 years in business in 2006
- 20 operations in 13 countries, 4 EU manufacturing locations; 1 in Switzerland
- Approximately 2,200 employees worldwide with 400 in Schenectady area, 600 total in North America
Products

- Chemical intermediates for
  - Plastics additives / antioxidants
  - Surfactants
  - Lubricant additives
- Polymeric resin products for
  - Rubber chemicals
  - Binders for friction products
  - Adhesives
  - Foundry resins and coatings
- Electronic Chemicals for
  - Solder masks
  - Circuit board coatings
  - Insulation products
Why is REACH important to SI Group?

- Significant % of SI Group sales / physical assets located in the EU
- Global supply chain relationships mandates SI Group support its European customers
- Maintain market share with possible improved competitive presence in EU
- High likelihood of wider use of REACH data to satisfy other regulatory requirements
REACH defines downstream users (DU) as any natural or legal person established within the Community other than the manufacturer or importer who uses a substance either on its own or in a preparation, in the course of his industrial or professional activities.

Use is defined as any processing, formulation, consumption, storage, treatment, keeping, filling into containers, transfer of one container to another, mixing, production of an article, or any other utilization.

Transportation, providing storage excluded.
Chemical manufactures will be market actors having multiple roles in the supply chain. Each role has specific responsibilities that must be fulfilled.

- **Manufacturer**
  - Intermediate substances, preparations, monomers and polymers
- **Importer**
  - Non-EU intermediate substances, non-EU supply chain monomers
- **Purchaser**
  - EU produced intermediates and monomers
Role of the Manufacturer / Importer

- Assure our chemical safety reports include risk assessment scenarios relevant to all relevant customer end uses
- Communicate product safety information for all materials requiring an MSDS to all actors down the supply chain
- Assure that SI Group customers are expert users under controlled conditions to allow SI Group to register certain substances as transported intermediates.
Role of Customer (DU)

- Supply the manufacturer / importer (M/I) with enough information to carry out a chemical safety assessment
- The DU may conduct its own chemical safety assessment and any uses downstream as appropriate
- Has responsibility to use relevant information to assure the substance is used safely (risks to the human health & the environment)
- Must communicate supplier SDS information to its employees
- Must also comply with any authorizations or restrictions on the use of the substance
- Must report any uses outside the scope of the relevant exposure scenario to the Agency
As a manufacturer / importer

- Role of purchaser of raw materials
  - Communicate SI Group end uses to suppliers for each substance it purchases in the EU
  - Assure SI Group end use will be registered by our suppliers
  - Demonstrate that SI Group fulfills its potential obligation as a expert user under controlled conditions (allows reduced registration requirements for supplier)
  - Distribute hazard information received from suppliers to SI Group employees
Confidentiality
- Customers may not want to divulge their end use of a substance or details of their processes, waste treatment, etc. to suppliers

Use of distributors
- Distributor not Manufacturer owns relationship with customer
- Distributor has responsibility for communication

Language /Regional Barriers
- 27 EU countries with 23 languages in the EU
- Gathering required information and communication of hazard information will be challenging
- Level of professional expertise varies according to region

REACH guidance documents only available in English
Chemical expertise decreases going down the supply chain.

Large companies usually have greater resources and therefore a higher level of specialized expertise than smaller companies.

Relevant data comes not only from SDS documents but from:
- Direct contact between supplier and customer
- Trade associations
Communication Channels / Resources

- Customer / Supplier face to face meetings
  - Educated sales team with strong market knowledge & customer relationships
  - Customer technical visits / presentations

- Business to Business
  - Industrial Consortia
  - SIEF’s (Substance Information Exchange Forum)

- Written / electronic
  - Customer questionnaires
  - E-mail
  - Web portals
  - Direct mailing to customers

- MSDS (Material Safety Data Sheets)
Material Safety Data Sheets

- MSDgen® system as a part of corporate ERP system
- Updated software to GHS compliant system June 2007
- Capital project to provide REACH compliant SDS (approved end uses, extended format, GHS) November 2007
- EU Shipping labels
- All with multi-language capability
ΠΛΗΡΟΦΟΡΙΑΚΟ ΔΕΛΤΙΟ ΑΣΦΑΛΕΙΑΣ
2,6-DI-ΤΡΙΤΟΒΑΘΜΙΟΣ-ΒΟΥΤΥΛΙΚΟΦΑΙΝΟΛΕΣ (ISONOX® 133)

1. ΣΤΟΙΧΕΙΑ ΠΡΟΪΟΝΤΟΣ ΚΑΙ ΕΤΑΙΡΙΑΣ

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