



Getting Information from the Supply Chain

David M. Stiles
Starfire Systems, Inc.



Presentation
Overview

1. What's a Starfire System?
2. REACH in a Global Context
3. Implications for Companies Such as Starfire Systems
4. Options



“Starfire Systems, Inc. develops and manufactures high performance nano-structured advanced ceramic products and materials, enabled by the unique processing and design advantages of our proprietary ceramic forming polymers.”

Starfire Systems:

What We Do



“Starfire Systems, Inc. develops and manufactures high performance nano-structured advanced ceramic products and materials, enabled by the unique processing and design advantages of our proprietary ceramic forming polymers.”

- **The Ultimate Properties of Ceramics with the Design Freedom and Processing Ease of Polymers**
- **Same Processing as a Fiberglass Boat Yields a Tough, Reinforced Ceramic Matrix Composite**
- **Competitive Advantage Through Unique Expertise in Silicon/Polymer Chemistry and Materials Science**

Portland Cement:Masonry :: Starfire:Advanced Ceramics

It's a Complicated Regulatory World:

- **Nine Distinct Substance Inventories: USA, Canada, Japan, Australia, New Zealand, Philippines, South Korea, China, EU (EINECS/ELINCS)**
 - Varying Requirements
 - Varying Exemptions
 - More Local Regulations (CA Prop 65, e.g.)

REACH Is a New Level of Rigor

- **Phased In Registration**
 - Pre-Registration Dec 2008
 - Volume and Risk-Based Registration Requirements through 2018
- **Reflects EU Principles of Precaution, Proportionality, and Substitution**
- **Unique REACH Problems for Non-EU Entities**
 - Only Representative (OR)
 - OR and Non-EU Status of Pre-Registration, SIEF, Consortia, and Study Compensability
 - Mixtures
 - Polymers and Monomers
 - Articles – Recycling Non-EU Materials Becomes Harder



- **Downstream Supply Chain Impact**

- OR a Practical Necessity for Many
- Intended Uses Must be Registered
- May Supply Starfire Materials for EU from EU

- **Broader Implications**

- May Consciously Limit Sales to EU
- Proprietary Materials Can Have Large Compliance Costs
- IP Protection

- **Things To Do Now:**

- Learn
- Organize to Manage – Don't Underwhelm It
- Train Organization, Especially Senior Management
- Compile Lists of Substances
- Supplier Commitments
- Understand Customer Use and Exposures

Specific
Implications of
REACH

• Resources:

- EU Website:
 - http://ec.europa.eu/enterprise/reach/links_en.htm
- REACHcentrum:
 - <http://www.reachcentrum.org>
- RIPs (REACH Implementation Projects)
 - Projects with Supplemental Guidance Documents
 - <http://ecb.irc.it/REACH/>
- Training Courses/Workshops
 - NYSDEC
 - American Chemistry Council
 - SOCMA
- Consultants



Final Thoughts

Questions?

stilesd@starfiresystems.com

NYSDEC
REACH
Workshop
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D. Stiles