Getting Information from the Supply Chain

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Starfire Systems, Inc.
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.”
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- 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
General Implications of REACH

- **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
Specific Implications of REACH

- 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
Resources:

- EU Website:

- 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?

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