



# REACH

Intertek Group PLC  
July 2009

By Ms. Sunanda Kadam





## About Intertek

- Global leader in Testing. Inspections and Certifications
- We support our customers in their global and local trade
- We provide quality, environmental and safety services for a wide range of products, commodities and industries
- Outsourcing these services to Intertek brings increased value to customers' products and processes
- Allows our customers to focus on their core business and processes
- Website : [www.intertek.com](http://www.intertek.com)



Supporting our customers in their global trade.....

## Our organisation

**CONSUMER GOODS**

**COMMERCIAL &  
ELECTRICAL**

**INDUSTRIAL**

**OIL, CHEMICAL, AGRI &  
Minerals**

**GOVERNMENT**

## The industries we operate in

Agriculture  
Automotive  
Chemical  
Consumer Products  
Electrical & Electronic  
Energy & Fuels  
Food  
Government  
Industrial  
IT & Telecom  
Minerals  
Pharmaceutical  
Retailers

## What we do

**Testing**  
**Inspection**  
**Certification**  
**Auditing**  
**Quality Assurance**  
**Advisory**



- **Laboratories** > 450
  - **Offices** > 630
  - **People** > 26,000
  - **Countries** > 110
- Competitive know-how for our customers in diverse markets
  - FTSE 250
  - Market capitalisation at £1.5bn





# REACH and Article Details

Substances of Very High Concern







## Definitions of Articles

### Article :

**An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.**



# Requirements for SVHC

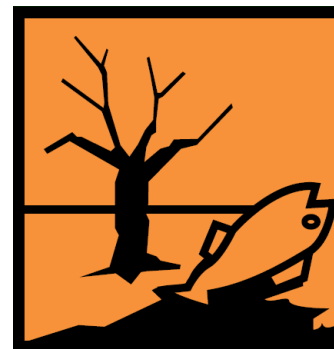


## Definition

- Substance of Very High Concern (SVHC)
  - **CMR**: Carcinogenic, mutagenic and toxic for reproduction



- **PBT** : Persistent, Bioaccumulative and Toxic
- **vPvB**: very Persistent and very Bioaccumulative substances
- Similar substances, e.g. **endocrine disrupter**







## 15 SVHC published in October

- Anthracene
- 4,4'-Diaminodiphenylmethane
- Dibutyl phthalate (DBP)
- Cobalt dichloride
- Diarsenic pentaoxide
- Diarsenic trioxide
- Sodium dichromate
- 5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)
- Bis (2-ethyl(hexyl)phthalate) (DEHP)
- Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified ( $\alpha$ -HBCDD,  $\beta$ -HBCDD,  $\gamma$ -HBCDD)
- Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)
- Bis(tributyltin)oxide
- Lead hydrogen arsenate
- Triethyl arsenate
- Benzyl butyl phthalate (BBP)

[http://echa.europa.eu/chem\\_data/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/candidate_list_table_en.asp)

# SVHC Basics



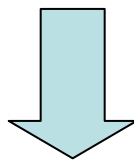
- **SVHC = Substance of Very High Concern**
- **REACH Definition**
  - **Substances on the candidate list for authorisation**
- **Details**
  - **Additional responsibilities for preparations and articles containing >0.1% w/w of an SVHC substance**
  - **SVHC need to be identified in MSDS documents**
  - **Articles**
    - **Legal obligations of Article 33 and Article 7(2)**
    - **Communication obligations**
    - **Notification obligations**
    - **Plus industry related obligations (outside of regulation)**



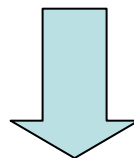


## Duty to communicate down supply chain - Article 33

Apply to **ALL** articles



If **SVHC** present  $>0.1\%$



Inform **customers** minimum

- Chemical Name
- Information on safe use

**Consumers may request information about presence of SVHC in articles  
(must reply within 45 days)**



# Sample Letter Suggested by NGO

Date

Dear Sir/Madam

In accordance with the new European regulation on Chemicals, REACH, I am writing to ask you to inform me about the presence in the product XX or its packaging of any chemical from the group of "substances of very high concern" as specified by REACH.

Should any of these substances be present in the product XX or its packaging, I wish to be informed about the name of this substance, and receive sufficient information on how I can protect myself and the environment from it.

I would be grateful to receive this information within 45 days as required by REACH.

I would be grateful if you would inform me about steps you are taking to provide products intended for the same use but which do not contain such potentially hazardous chemicals.

Yours faithfully,

cc: European Chemicals Agency - P.O. Box 400,  
00120 Helsinki, Finland, phone: +358-9-686180  
e-mail: [info@echa.europa.eu](mailto:info@echa.europa.eu), [www.echa.europa.eu](http://www.echa.europa.eu)





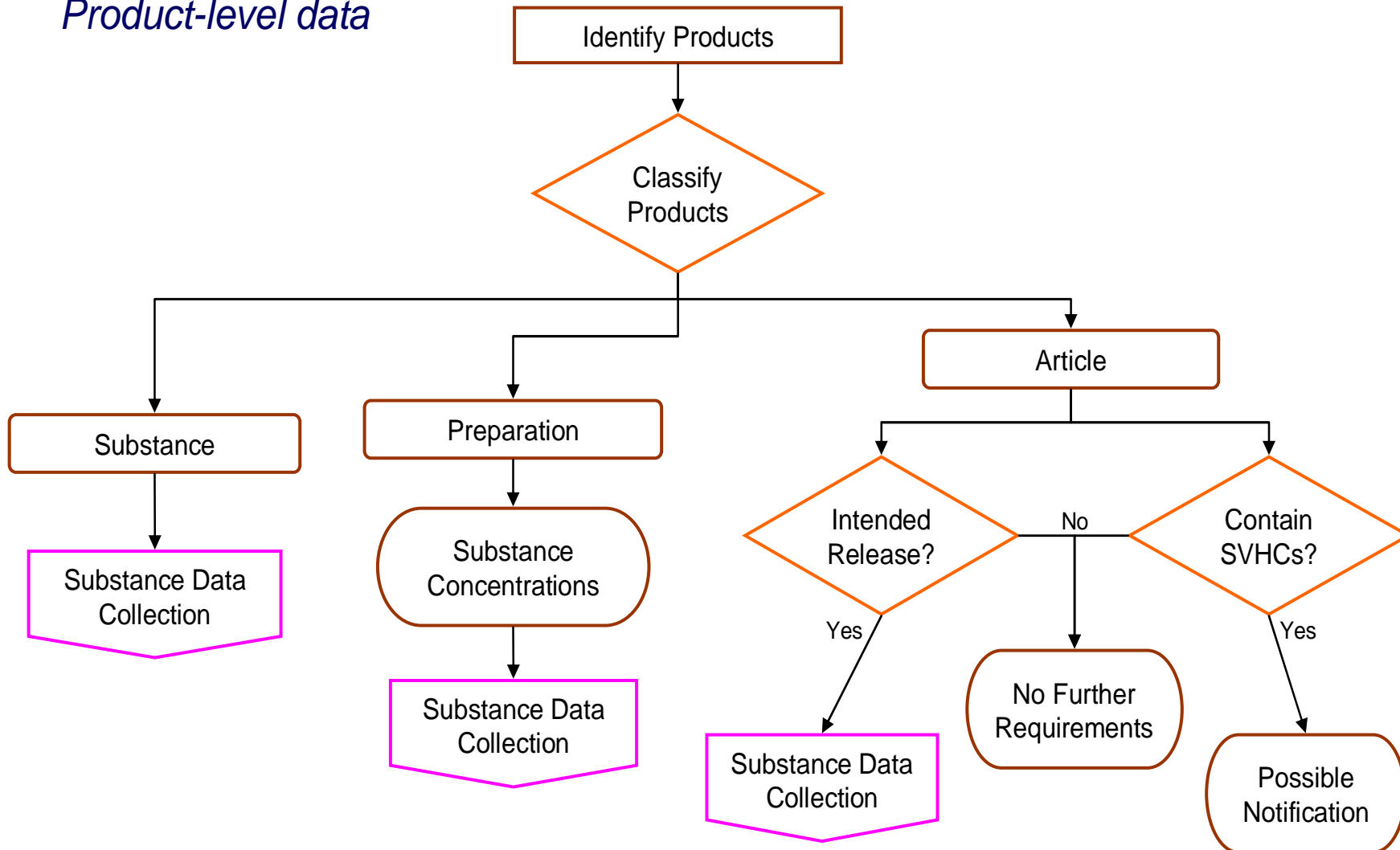
## Notification for Articles

- If **SVHC** present in **Article** > 0.1% & amount of **SVHC** > 1 tonne/year, **Notification** is required.
- Volume is sum up of all products
- Time Frame:  
SVHC before Dec 2010: by 1 Jun 2011  
SVHC after Dec 2010: within 6 months after the inclusion



# Data Gathering and Analysis

*Product-level data*







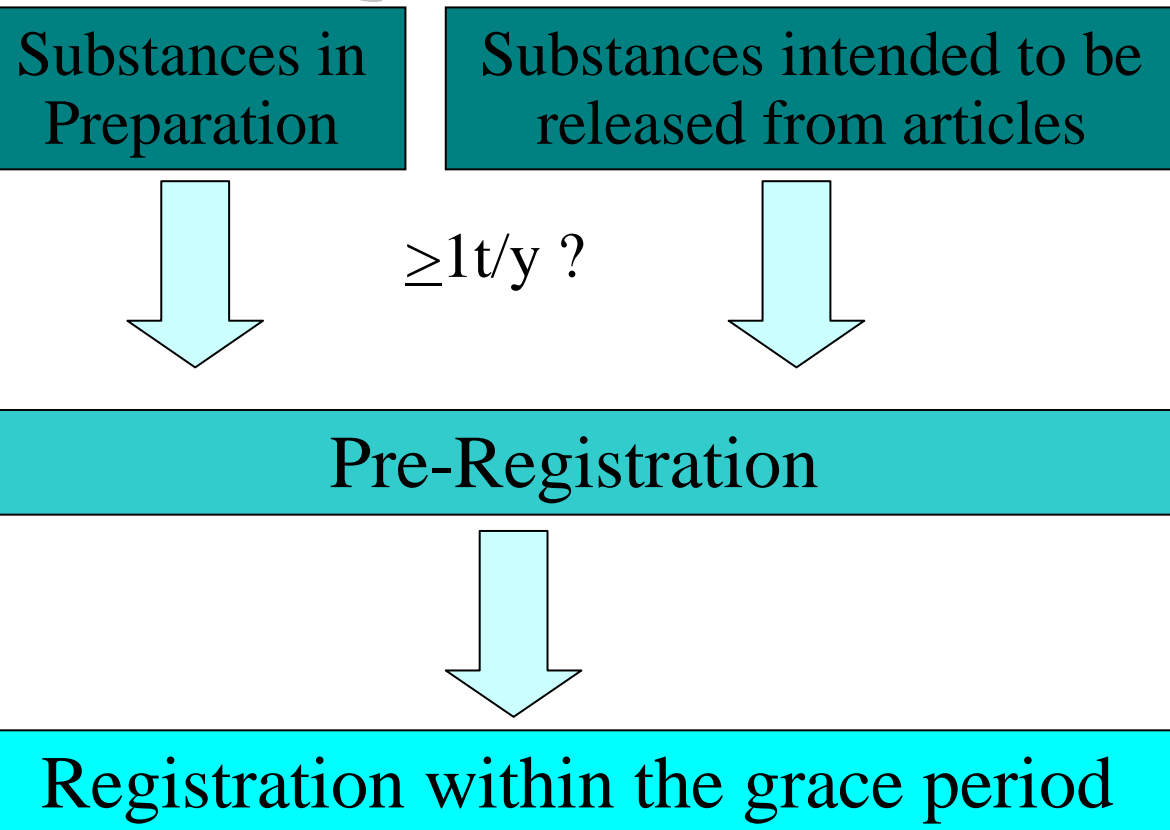
## **SVHC – Example Approach** *Consumer good Industries*

- **Uniform approach adopted by European Buyers**
- **Includes**
  - **Common letter to suppliers**
  - **Common REACH questionnaire to suppliers**
  - **Common schedule and deadlines**
- **SVHC commitment (to be signed by supplier)**

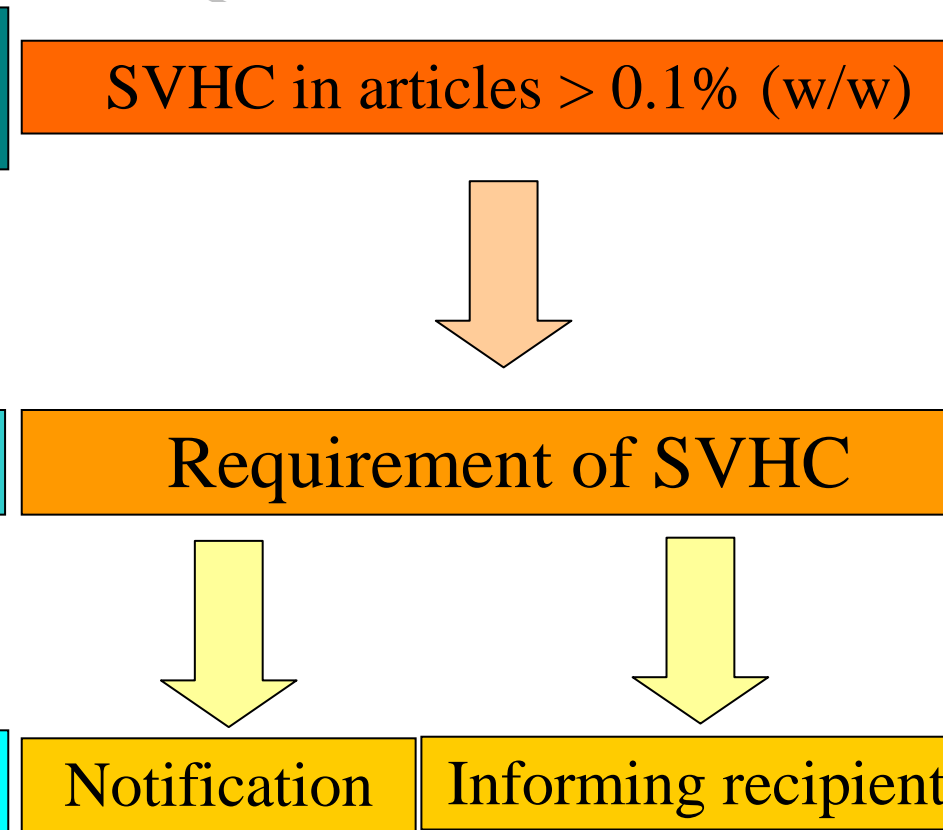


## Requirement Summary

### Registration



### Requirement of SVHC





# Supply Chain



## Communication in supply chain

- Industry need to improve the communication through its supply chain
- Suppliers have to assist to provide information on substances
- Safety information communicated also to the downstream users & distributors
- Information include health, safety & environmental properties, risks, risk management measures
- Primary tool – **Safety Data Sheet** (SDS) based on identified uses



# Supplier Declaration

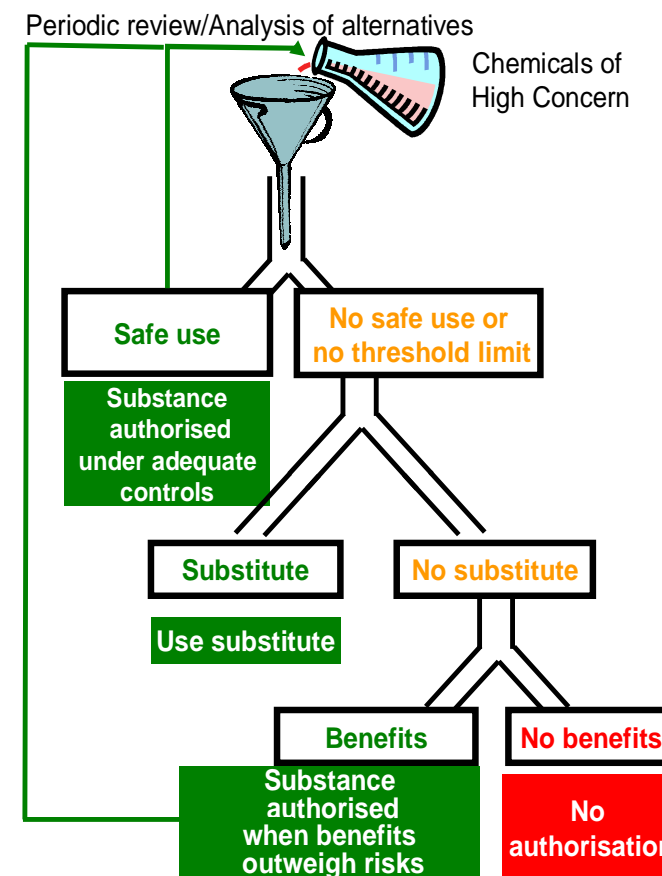
- Difficult to demonstrate that supplier has the knowledge – too many SVHC
- Likely to fail on supplier audit
- **NOT** a means to demonstrate due diligence
- Use in combination of chemical analysis if necessary, e.g. XRF or GC-MS screening



# Authorization Requirement for SVHC

Ensure risks from SVHC are properly controlled or substituted

- SVHC only, **~1500 substances**
  - Applicant to show:
    - **Adequate control of risks**, or
    - Social and economic **benefits outweigh the risks** (no substitution)
- Applicant requires to **analyse alternatives**





# How we can help...



- **Chemicals**
  - Product assessment and data gathering
  - Only Representative
  - Pre-registration
  - Dossier Creation
  - Registration
  - Testing
  - Supplier auditing
  
- **Products**
  - Product assessment and data gathering
  - SVHC (Substance of Very High Concern) Declaration
  - Product Testing
  - Supplier auditing





- Determine Client's REACH requirements detailing
  - Companywide responsibilities
  - Product-level responsibilities
- Determine Client's REACH position (i.e. manufacturer, importer, DU, formulator, etc)
  - Recommendation on EU status
    - Can Client take responsibility?
    - Should Client take responsibility?
- Review against definition of Articles
  - Determine risk of intentional release of substances
- Review candidate list of SVHCs
  - Review Product Information provided by Client
  - Assess areas of risk for SVHC substances
- Prepare Client REACH Positional Statement
- Determine dates/deadlines for product responsibilities
  - Assess long-term requirements such as Authorizations and possible Restrictions
- Overview responsibilities within the supply chain
- Strategy Guide and plan for SVHC Compliance



## REACH SVHC Testing

- Processing of product to create uniform sample for laboratory testing
- Laboratory testing and screening for SVHC chemicals applicable to product
- Testing report
- Assessment report



- **Product Checklist Review**
  - Review of client information against checklist requirements of either articles, preparations, or substances
  - Corrective action report issued if additional compliance steps are required
- **Creation of REACH Compliance Certificate**
  - REACH Compliance Certificate issued to client for product/ substance based on all REACH requirements being met
  - Contact information for Intertek REACH team for Client customer verification of basis of compliance



## Websites:

- <http://www.intertek.com/reach/>

## Solutions:

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Q & A