



Update on EU REACH



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- About ERA
- Overview of REACH and key obligations
- Latest developments
 - SVHCs
 - Authorisation



- Founded 1920, ~120 employees
- Independent specialist engineering technical services
 - power systems and earthing
 - forensic engineering
 - design and materials
 - electrical testing
 - EMC design/testing
 - system safety assessment
 - **regulatory compliance**



- We track regulatory issues



- We advise
 - industry
 - policy makers
 - EU
 - UK government
 - enforcement bodies



November 12-13, 2014, Heathrow, UK


ERA CONFERENCE 2013





REACH

- overview and key obligations

- **R**egistration
 - **E**valuation
 - **A**uthorisation of
 - **C**hemicals
-  Affects
- Chemical manufacturers
 - Chemical importers
 - Users of chemicals
 - Distributors of chemicals
 - Manufacturers and suppliers of hardware and components

~~Chemical manufacturers will deal with it – REACH has nothing to do with us~~

- *Scope*

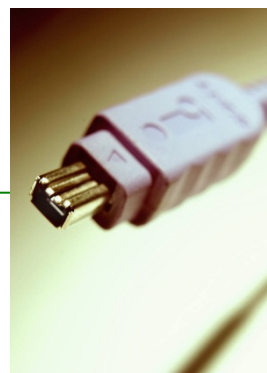
- Scope - almost everything

- Substances



- Mixtures of substances

- 'Articles'



- Principal obligations
 - Registration of chemicals
 - Only use of certain chemicals where authorised
 - Substance restrictions
 - Providing information and safe use
- Impacts
 - Big increase in supply chain communications
 - Obsolescence of chemicals and products

- There is no blanket exclusion of military applications
 - Member States can choose to make an exception
 - But this is very exceptional
 - No automatic mutual recognition
- Growing obsolescence issue
 - No “repair as produced” clause
 - Pressure to phase out irrespective

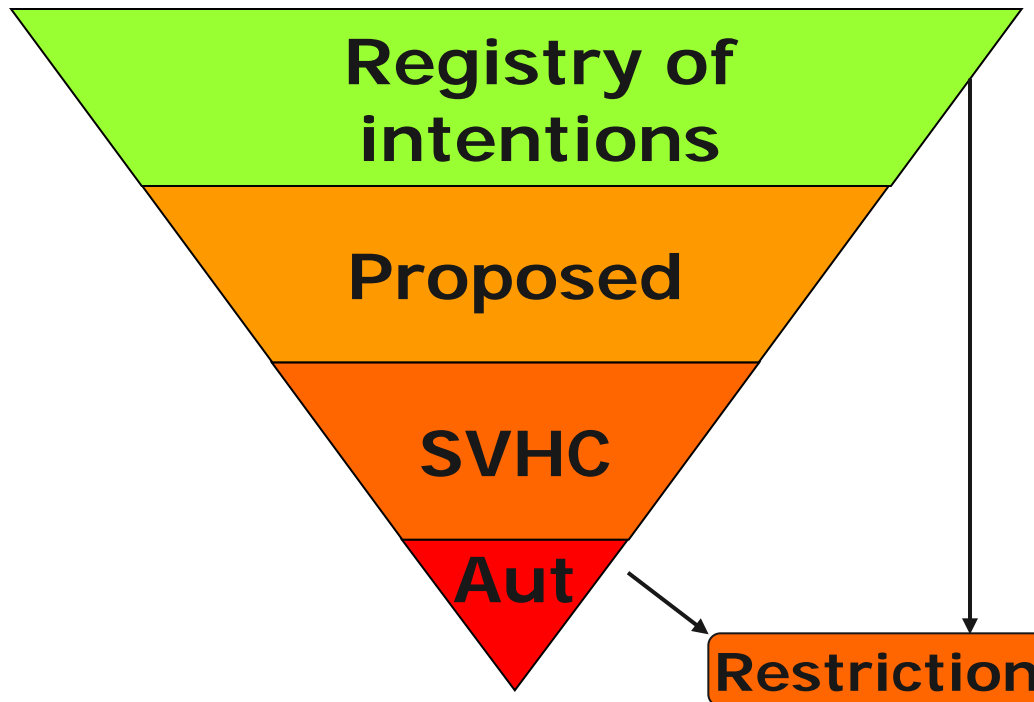


Latest developments

Authorisation and restriction – the process

Lobby lists

CoRAP list/Roadmap



Legal Requirements

None but increasing pressure on supply chain, from customers, NGOs and investors

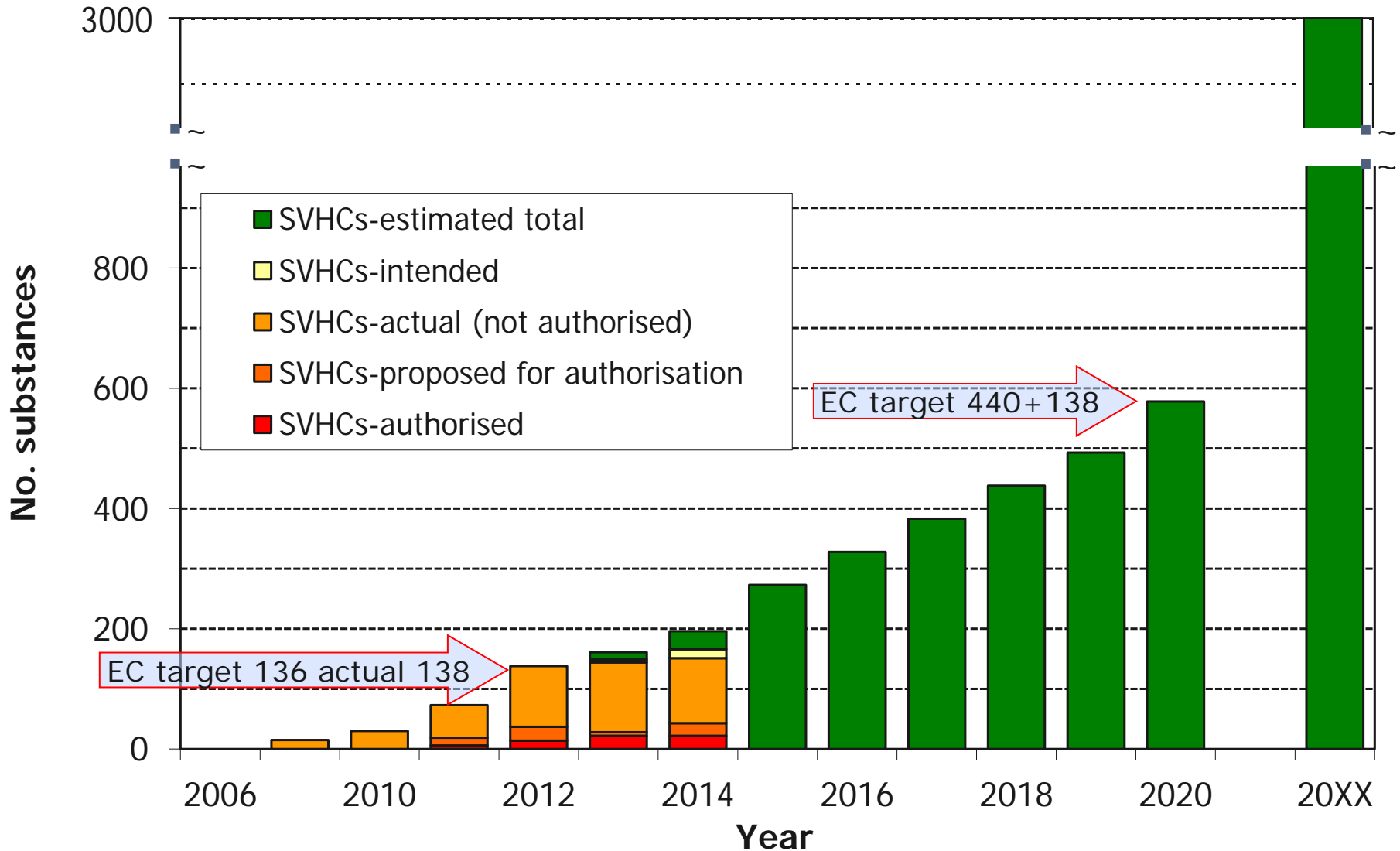
Provide data (+notification)

Only allowed in authorised "uses"

| SVHC | Main uses |
|--------------------------------|---|
| cadmium sulphide | Bright yellow and in photo-electronics (solar cells etc.) |
| di-n-hexylphthalate (DnHP/DHP) | Plasticiser in cellulose esters and PVC. |
| C.I. Direct Red 28 | None known. |
| C.I. Direct Black 38 | None known but has been used in plastics and textiles |
| ethylene thiourea | Unlikely (vulcanisation agent) |
| lead di(acetate) | Coatings and paints, thinners, paint removers. Fillers, putties, plasters |
| trixylyl phosphate (TXP) | Fire retardant for some plastics, FR in hydraulic fluids (e.g. for industrial generators) |

Obligations regarding articles

- Projected growth of SVHCs



- Evolution of the candidate list of SVHCs
- “SVHC Roadmap 2020”
published 9 December 2013
 - Screening
 - Risk Management Option (RMO)
Analysis
- Industry stakeholder visibility
 - Annual reports
 - Public ‘Activities Coordination Tool’
(ACT) - PACT
 - Consultation?



- SVHCs placed on the Annex XIV list are not be allowed on the EU market (as chemicals) after a “sunset” date unless the “use” is authorised
 - This will directly affect:
 - Producers/importers of chemicals
 - Downstream users of chemicals
 - Producers of articles (if unable to use chemicals)
 - And indirectly:
 - The world market
- “Uses” include
 - storage, transfer between containers, processes and disposal
- But authorisation is not be required by importers and users of articles that contain these substances as integral parts which are made outside the EU

- So far, 22 substances are listed in Annex XIV

| Substance | Uses | Sunset date |
|--------------------|---|-------------|
| DEHP | Plasticiser | 21/02/2015 |
| DBP | Plasticiser | 21/02/2015 |
| HBCDD | Flame retardant in HIPS | 21/08/2015 |
| MDA | Epoxy resin hardener | 21/08/2014 |
| Most chromates | In plating baths for anti-corrosion finishes | 21/09/2017 |
| Sodium dichromate | Passivation, hard chromium plating | 21/09/2017 |
| Trichloroethylene | Metal degreasing | 21/04/2016 |
| (Cobalt compounds) | Surface treatment-hardening, anti-corrosion > being considered for restriction instead | |

- More are proposed for inclusion, e.g.
 - Refractory ceramic fibres – MAJOR substitution problem

- Bis(2-ethylhexyl) phthalate (DEHP), Dibutyl phthalate (DBP)
 - Rolls-Royce
 - DEHP – Request viewed favourably by Risk Assessment (RAC) and Socio-economic Analysis (SEAC)
 - Further requests
 - DEHP – formulation of polymer feed-stocks (virgin sources and recycled materials), manufacture of capacitors and lambda sensors and as rocket propellants.
 - DBP – absorption solvent for maleic anhydride, propellants, speciality paints for rocket motors and missiles and manufacture of capacitors and lambda sensors.

- REACH is continuing to drive changes in substance use globally
 - Early engagement is crucial
 - Obsolescence a growing issue
- So
 - Work with others where possible
 - Keep up to date



Thank you!

Any questions?



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