

REACH Out And Stay Safe

REACH stands for Registration, Evaluation and Authorisation of Chemicals. It puts the onus on business to show that the chemicals it uses are safe. It is also meant to



encourage the replacement of hazardous chemicals with safer ones and to spur the chemicals sector into researching and developing more new products. The legislation aims to protect human health and the environment, through better identification of the properties of chemical substances. REACH only applies to chemicals manufactured in, or imported into the EU. It does not apply to the use of chemicals in finished products

The new legislation addresses several specific issues:

Safety

Industry currently uses thousands of chemicals that have not been tested for their effect on human health and the environment. It is left to public health authorities to test those that they think may be hazardous - but only 140 chemicals have been selected for risk assessment since 1993, and even fewer have completed the process.

REACH says: Any chemical produced or imported in significant quantities has to be tested unless sufficient safety information already exists. The cost should be borne by the producer or the importer.

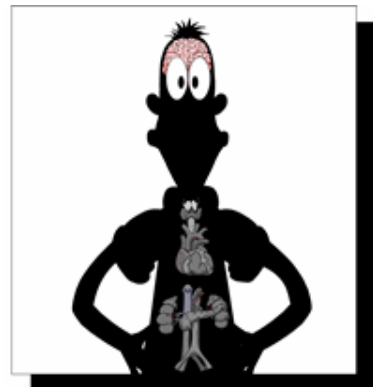
Replacement of Hazardous Chemicals

While some hazardous chemicals, such as DDT and PCBs, are banned, others are still widely used, despite evidence that they may cause cancer, or damage the body's hormone system.

REACH says: Business will be able to use "substances of very high concern" only if they have authorisation from a new European Chemicals Agency. Authorisation will be granted under specific conditions, and will have to be regularly renewed, encouraging companies to seek safer alternatives.

What are "substances of very high concern"? As defined by REACH, these are chemicals that:

- Cause cancer, or mutation or interfere with the body's reproductive function
- Take a long time to break down, accumulate in the body and are toxic
- Take a very long time to break down and accumulate in the body
- Have serious and irreversible effects on humans and the environment, for example substances that disturb the body's hormone system



Encouragement of Innovation

Existing rules oblige companies to test new chemicals - even if they only produce 10kg - but the 100,000 "old" chemicals that were on the market before 1981 are exempt. So it is easier and cheaper to stick with the old, untested chemicals than to develop new ones. Only 3,000 chemicals have been introduced since 1981.

REACH says: Many of the old chemicals would have to be tested, too; so innovation would become more worthwhile. Chemicals produced or imported in quantities less than one metric ton would be exempt, while those used for research would not have to be registered for five or 10 years. Registration would also be cheaper and quicker than in the past.

So a product like a television, or computer or shampoo made outside the EU could contain chemicals that are not registered under REACH - providing they are not banned under specific safety regulations (such as lead).



Will REACH affect me?

If you are a manufacturer/importer and you manufacture and/or import substances in quantities greater than 1 ton, you may have to register that substance. Under the Regulation, the European Chemicals Agency, which will be formally established on June 1st, will be based in Helsinki. It will become operational on June 1st 2008.



REACH regulations do not only apply to chemical companies. Many Irish workplaces, ranging from dry cleaners to offices, will have new legal obligations. If you are a downstream user, you will need to supply information up the supply chain to your manufacturer/importer on how you use a substance supplied by them. The immediate impact on most workplaces will be the changes to Material Safety Data Sheets (MSDS), which will have to change to conform with REACH and GHS (Globally Harmonised System). While the REACH Regulation will come into force on

June 1st, it will, apart from the changes to SDS, take about 1 year before the full impact begins to be felt.

Preparing for REACH

- Develop a database for all your substances, whether they are on their own or in a preparation. Include details on substance name; EINECS, CAS or ELINCS numbers; hazard classification and labeling; % of the substance in a preparation; use of the substance etc.
- Determine the current tonnage levels per year and anticipate future levels, if possible
- Determine your status for each substance on the database - are you the manufacturer, the importer, the downstream user, the distributor etc.
- Identify any gaps in information
- Identify the substances that may be substances of high concern
- Examine how your downstream users use your chemicals
- Examine how you use chemicals supplied by a manufacturer or importer
- Identify an appropriate contact person for REACH in your organisation and make them the focus for communications with suppliers and customers
- Liaise with all suppliers to establish their familiarity with REACH and intentions regarding the essential elements of REACH, such as registration
- Communicate with your suppliers and your downstream users
- Take stock and think about possible implications for your business.



HSA & IBEC Publicity Campaign

The Government has appointed the Health and Safety Authority as the National Body (Competent Authority) for REACH. A publicity campaign to raise awareness of the implications of the impending REACH Regulations was launched last month by the HSA and IBEC.

For general queries on REACH, contact the Health and Safety Authority Helpdesk on 1890 289 389 or email reachright@hsa.ie. The European Chemicals Bureau web-site <http://ecb.jrc.it/REACH>