

Preparing for REACH 2013 in the Plastics Industry

On 31 May 2013, the REACH registration deadline will be upon us, meaning that companies wishing to register their products for REACH compliance need to be making the necessary changes now. For polymer suppliers and their clients, this may well involve altering the way safety data sheets (SDSs) are distributed, as well as a host of other administrative responsibilities. Malcolm Carroll, Director of REACH Delivery, a company specialised in bringing regular updates on REACH compliance to a global audience of manufacturers offers his thoughts on the change, and gives some suggestions for companies who wish to make the transition a little less bumpy...

At the European Commission's REACH Registration conference in September last year a new campaign — 'REACH 2013 — ACT Now!' — was launched by the ECHA. This campaign was aimed at manufacturers, importers and downstream users to focus their attention on the 31 May 2013 REACH registration deadline and urge them to start preparing now. Last year, we saw manufacturers, importers and distributors of over 1,000 tonnes register their chemicals with the ECHA successfully. We have moved on however, and in 2013 companies will be required to register all phase-in substances

above 100 tonnes a year which are manufactured or imported in the EU.

This time around, many more SMEs will be affected by REACH including companies in the plastics industry. For many companies complying with the regulations will prove challenging and time consuming. SMEs are less likely to have experience of the REACH process; they have budget constraints and tend to have fewer resources to handle the complexities and administrative challenges involved.

Manufacturers and importers that will be affected by REACH need to start planning ahead. One of >



Malcolm Carroll, Director of REACH Delivery

the ways they can gear up for 2013 now is to address the new rules concerning the way Safety Data Sheets (SDSs) and associated documents are sent to customers as there are big changes required under REACH.

Under REACH, any company importing and distributing chemicals to and within the EU now needs to ensure the direct delivery of SDS and associated documentation to customers. REACH wants to promote the consistent use of safety data sheets within organisations to ensure that everyone involved with the chemicals is using them correctly and safely. Therefore, companies are also responsible keeping SDSs and their customers up to date if there are any changes or clarifications.

Understandably, for most companies the new requirements will be considered an administrative and logistical challenge, as well as a potentially costly exercise. Traditional methods of sending SDSs by email or post may not be considered robust enough to stand up to regulatory scrutiny so new ways of sending SDSs to customers and ensuring they are kept up to date are needed. >



Already affecting the chemical sector, by 2013 REACH will begin to have a real impact on the plastics industry.

One way round this is to automate the entire SDS delivery process using REACH Delivery, a new industry-wide SDS delivery service. This secure online service enables the electronic delivery, receipt, control, update, audit and tracking of SDSs in line with REACH. It automates the entire SDS delivery process including the monitoring, tracking and reporting on all documents that are sent to customers and provides a delivery status that is ideal for auditing purposes. If there are any changes or clarifications to the SDS, then the new version is sent to customers and it replaces the previous version automatically. This means organisations no longer have to worry about out of date version being in circulation and managers can be confident all employees are using the most up to date SDSs at all times.

The system also stores all documents in an electronic database, allowing users a single consistent point of access for the latest version of a SDS. The service is simple to access and operate, and importantly, it is cost effective.

Companies can use REACH Delivery free of charge by registering for a Free (low use)

account and upgrade to the paid service at any point when their volumes increase. The service operates on a 'many-to many' basis, allowing companies, no matter where they are located, to be able to manage and automate the sending and receiving of SDS, and other documents and messages, within a fully secure and audited environment. It is international and multi-lingual as well as being easy to use.

In addition to the fact that REACH affects companies throughout the world, similar legislation is now being considered in other countries, most significantly in the USA. REACH Delivery has been designed to meet the requirements of new international legislation as and when it is required. The system already functions on an international basis. Non-EU firms can use it to comply with REACH by securely delivering SDS to their customers in Europe. They can also use it outside of Europe and in their own countries, as it supports the delivery and receipt of SDS and any other documents worldwide, or to distribute SDS throughout their company. There is no doubt that REACH compliance

is a hugely complex issue for companies — particularly those smaller companies who are now gearing up for 2013 registration. However, automating the sending of SDSs in line with REACH is one way of alleviating some of the supply chain challenges and reducing the administration and costs involved and most importantly, ensuring compliance in this area. There seems little point in jeopardising all the hard work that has gone into registration by failing to comply with these regulations. One thing is certain, these challenges won't go away. According to the Chemical Logistics 2020 Report published recently by Cefig and Deloitte, the chemical industry will see even more complex supply chains in the future and it also highlighted the industry's continued focus on sustainability; safety and security could lead to even more regulations. So, this is one area where regulatory challenges can be easily and cost effectively solved ahead of 2013.

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