

Be prepared for REACH:

- keep an eye on the UK regulatory situation
- sign up for free email newsletters from reliable sources
- don't commit to any investment or business decision on REACH until the UK regulations have been published
- make a list of your own products which are likely to come under REACH
- check with your suppliers and importers to see if any raw materials or other chemicals may be withdrawn

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REACH at August 2006

Who's responsible for achieving REACH status? (E.U. regulations)

There will be three types of responsibility:

1. Manufacturers and importers will have to produce dossiers of information (like new product registration, although historic data will be accepted); The level of detail/ cost of dossiers will be shared by consortia, and will depend on hazards/ volumes used. There are some exemptions, eg polymers. With EU regulations, the devil is in the detail.
2. Formulators will have to produce REACH-compliant information on their products, once the manufacturers have got registration (like the situation with CHIP-compliant MSDSs)
3. All chemical users will need to ensure their suppliers provide REACH-compliant information

You should go through the EU regulations and your product and raw materials lists now, to see where you are likely to have REACH liability.



More paperwork from the EU

Some chemicals will be withdrawn

Some substances will be withdrawn because the cost and hassle of registration is too much, as happened with biocides under the Biocide Directive.

Every company which uses chemicals needs to check with their suppliers and importers to see if essential substances are going to be supported, or may be withdrawn.

If there is any doubt, start thinking about whether other suppliers can help, or substituting chemicals which may be taken off the market, or whether your own product range may have to change.

UK regulations may be tougher

We've all seen how the UK interprets legislation like IPPC more stringently than the rest of Europe.

Don't make any final business decisions based on REACH until the UK regulations have been published and discussed.

Where to get basic advice

We recommend that everybody who manufactures chemicals should sign up to the CIA's ReachReady service at www.reachready.co.uk (the free Silver service), which has email alerts to keep you up to date.

Importers of chemicals should also contact the BCDTA, www.bcdta.org.uk and look at their REFAC service at

www.chemical.org.uk/listDetailPage.asp?listDetailID=60

Chemical users should sign up to a free environmental e-newsletter like edie.net at www.edie.net/registration/index.asp

A second opinion

If you need a second opinion on your REACH position at the moment, or have any quick queries, TT Environmental will be happy to help.



Helping you cut through red tape

We also hope to provide briefing documents via our website at www.ttenvironmental.co.uk.

Once the UK regulations are finalised, we will be able to give more detailed advice and consultancy support similar to our IPPC services.

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