

Presented by

JULIE HILLS – OCCUPATIONAL HYGIENIST
AIRBUS UK

PRACTICAL IMPLEMENTATION OF REACH

Acknowledgments

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- SBAC (Society of British Aerospace Companies)

Overview

1. Company overview
2. REACH overview
3. Preparing for REACH - Airbus approach
4. REACH Interpretation guidelines – some implementation examples (made simple?)
5. UK sites involvement and project roll out:
Present Status & Next steps in the implementation process
6. Summary

1- Overview of Airbus Business

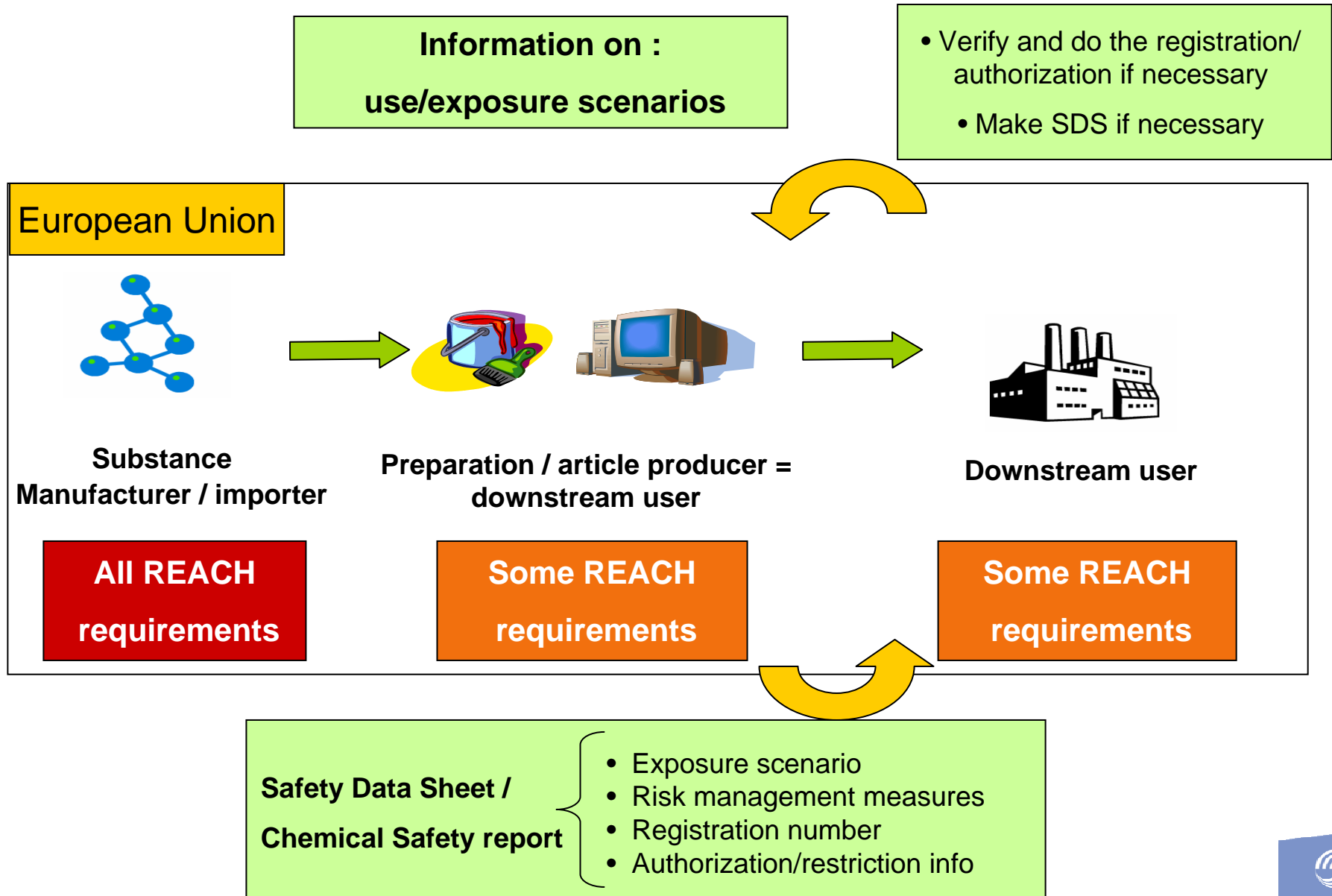
- Airbus UK Ltd, a legal entity with 2 sites:
 - ▶ Filton – South West, ca 3000 employees.
Wing manufacturing A400M military A/C
Engineering projects and design.
 - ▶ Broughton – North Wales, ca 7000 employees
Wing manufacturing A320, A340 and A380 A/C series
Wings and fuselage manufacturing of Hawker Beechcroft aircraft.
- Three sister companies throughout Europe (France, Germany, Spain)
(all use similar substances and will need to be REACH compliant)
- Part of EADS consortium
- Part of SBAC
- Many potentially hazardous substances required in A/C production.
- Change cannot be done quickly for product safety reasons.
- REACH Status:
 - 1- **Downstream user** (production of articles)
 - 2- **Importer** (of preparation and articles)

1 – Challenges to our business

REACH is a real business risk.

- REACH will result in some of the substances used to make our products becoming:
 - ▶ More costly to buy (because of the registration and authorisation costs, reduction of market offer)
 - ▶ Increasingly difficult to obtain and to use in the long term, especially if they are hazardous
 - ▶ Unavailable if our suppliers (manufacturers/ importers) fail to register substances or fail to get an authorisation
- REACH will require various departments to work together inside our companies
- REACH will require new information to be collected within companies, and to be passed up and down supply chains.

2 - REACH and the supply chain – general case



2 - Obligation of a downstream user

• **Definition** : Downstream users are users of chemical substances in preparations or articles that are neither produced nor imported by the company > *Main status of Airbus*

• **Downstream users have the right :**

- ▶ To make their “uses” known to manufacturers/importers:
 - for inclusion of DU “uses” into manufacturer CSA/SDS
- ▶ To carry out their own Chemical Safety Assessment (confidentiality reasons, no support from supplier)
- ▶ To contribute to SIEFs (Substance Information Exchange Forum)
- ▶ Apply the risk management measures identified in the Safety Data Sheet

Major risk for downstream users:

- ▶ **obsolescence of preparations/articles**
- ▶ **Expensive increase in control/protection measures**

2 - Downstream User – Suggested Actions

1. Supply chain management :
Gathering of lists of substances for preparations, in particular VHC

Proposal : Provide the full quantitative list of substances containing VHC >0.1% or substances used in volumes > 1 tonne per year

2. Draw up List of specific and generic uses/applications of products in the Company to ensure our uses are included in the **registration dossier** of each substance

3. Check that suppliers/producers have planned to register all SVHC used by the company by 2010

Support compilation of Chemical Safety Report (for SVHC and/or > 10 Tonnes)

4. Determine all product containing SVHC for which alternatives can be deployed before 2009, and develop appropriate substitution plan

5. Identify substances for which authorisation will be required, and collaborate with consortium to compile **authorisation dossier**

Provide information to justify adequate control and social-economic dossier or substitution plan so authorisation can be granted

2- Obligations of a substance manufacturer/importer

- The majority of the REACH requirements apply directly to manufacturers and importers of chemicals :

- ▶ Substances registration
- ▶ Chemical Safety Assessment and Report (CSA and CSR)
- ▶ Classification and labelling inventory
- ▶ Safety Data Sheet (SDS)
- ▶ Authorisation of VHC substances

- COST** (only the administrative ones here: fees)

 - Registration – 1200€-24000€

 - Authorisation – 58000 €

2 - Importer - Suggested Actions

- Supply chain management : Compile lists of substances, in particular VHC, in preparations imported from outside EU
- Encourage non-EU suppliers to appoint a legal EU representative to assume REACH obligations
- Register all relevant remaining substances to Chemical Agency

**Provide Technical Dossier and
Chemical Safety Report (for
SVHC and/or > 10 Tonnes)**

- Compile authorisation dossier when applicable

3 - Preparing for REACH

Airbus Corporate Approach

Corporate responsibility and implementation

REACH is a business risk. It needs senior management buy-in and resources. Top Airbus Priority Objective for next 5 years

- ▶ Corporate project team formed. Team chaired by the European corporate director of environmental affairs.
- ▶ Project initiated – Acronym CARMEN (Corporate Advanced REACH Management and Efficient Networking)
- ▶ Senior Management representative nominated for each NATCO and each Business Units(e.g. Procurement, communications, EHS, HR, IT, Legal resources, etc)
- ▶ Regular meetings to progress actions, define roles and project needs such as additional staffing and budget.
- ▶ Timelines and 9 step process defined with NATCO and resource allocations and presumed involvement set.

3 - Project organisation

REACH Project TEAM

Central
Entity

T9 – Costs
validation

T1 - Project
Management

T2 -Tools &
processes

T3 - Compliance
dossiers

T4 – Gathering of
information

T5 – Awareness &
Communication

T6 – Current
Management
Anticipation

T7 – Business
Strategy

T8 – Develop Green
Alternatives

EHS Input and Support

> Local site involvement

(including Occupational Hygiene, Safety and Environmental specialists)

3 - Benchmark & Partnership

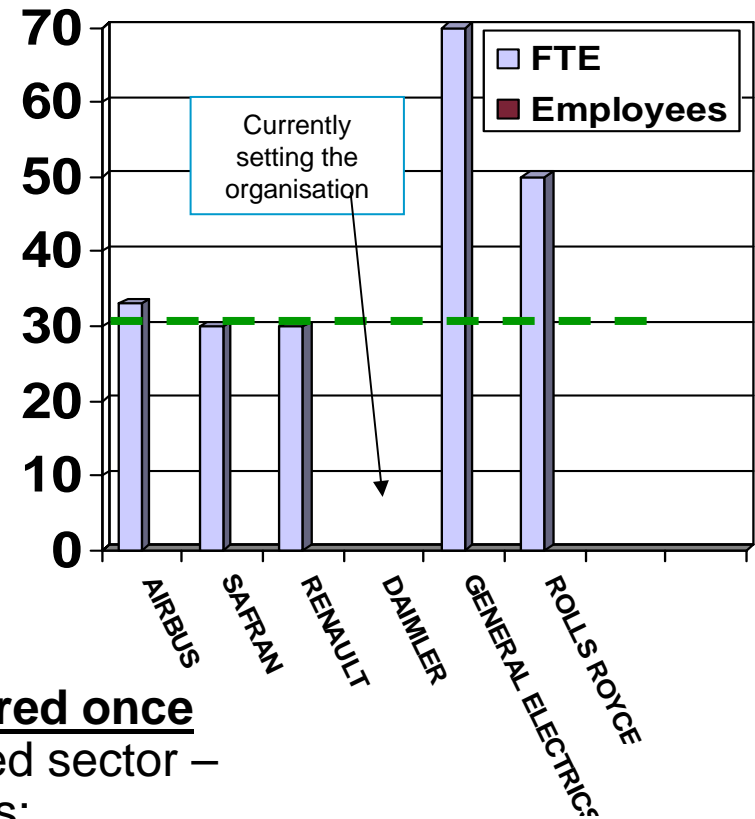
• Benchmark with

- ▶ main aeronautical companies through direct contacts within ASD, AIA
- ▶ automotive industries (Renault, Daimler, Volkswagen)
- ▶ chemical industries (BASF,...)

• Partnership

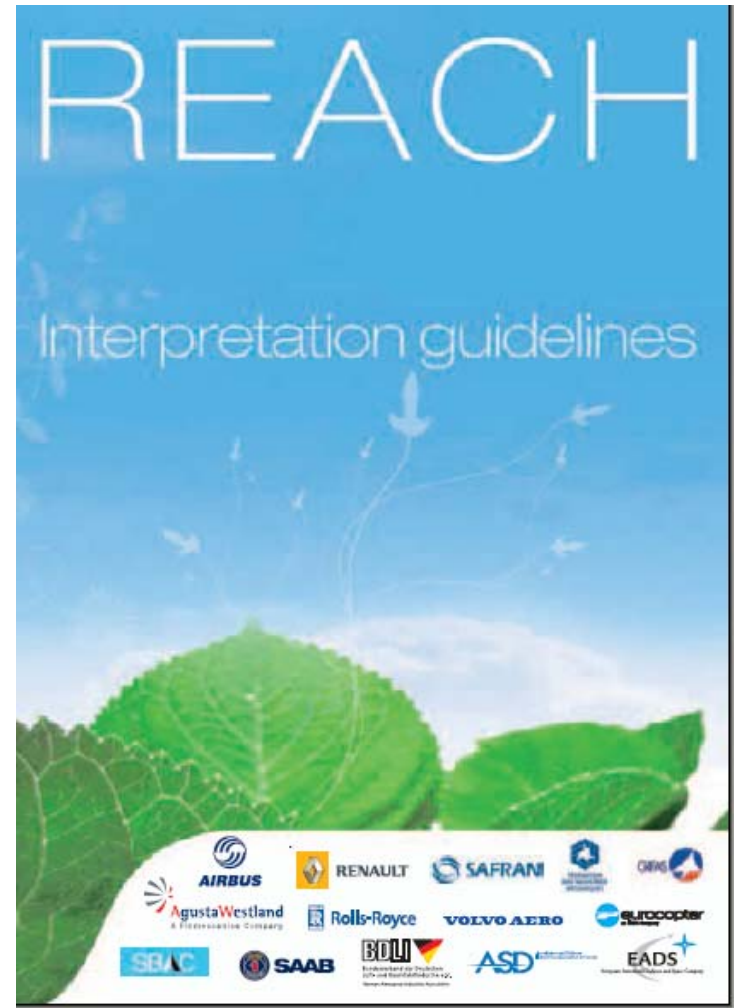
All administrative actions/dossiers to be **prepared once** and shared wherever possible with all interested sector – no duplication & integrated tools and processes:

- Creation of a REACH Implementation Task Force within ASD, co-chaired by Airbus / Rolls-Royce
- Standardisation of the requirements towards supply chain is being performed together with AIA, ASD
- Sharing of efforts within EADS through appropriate created network



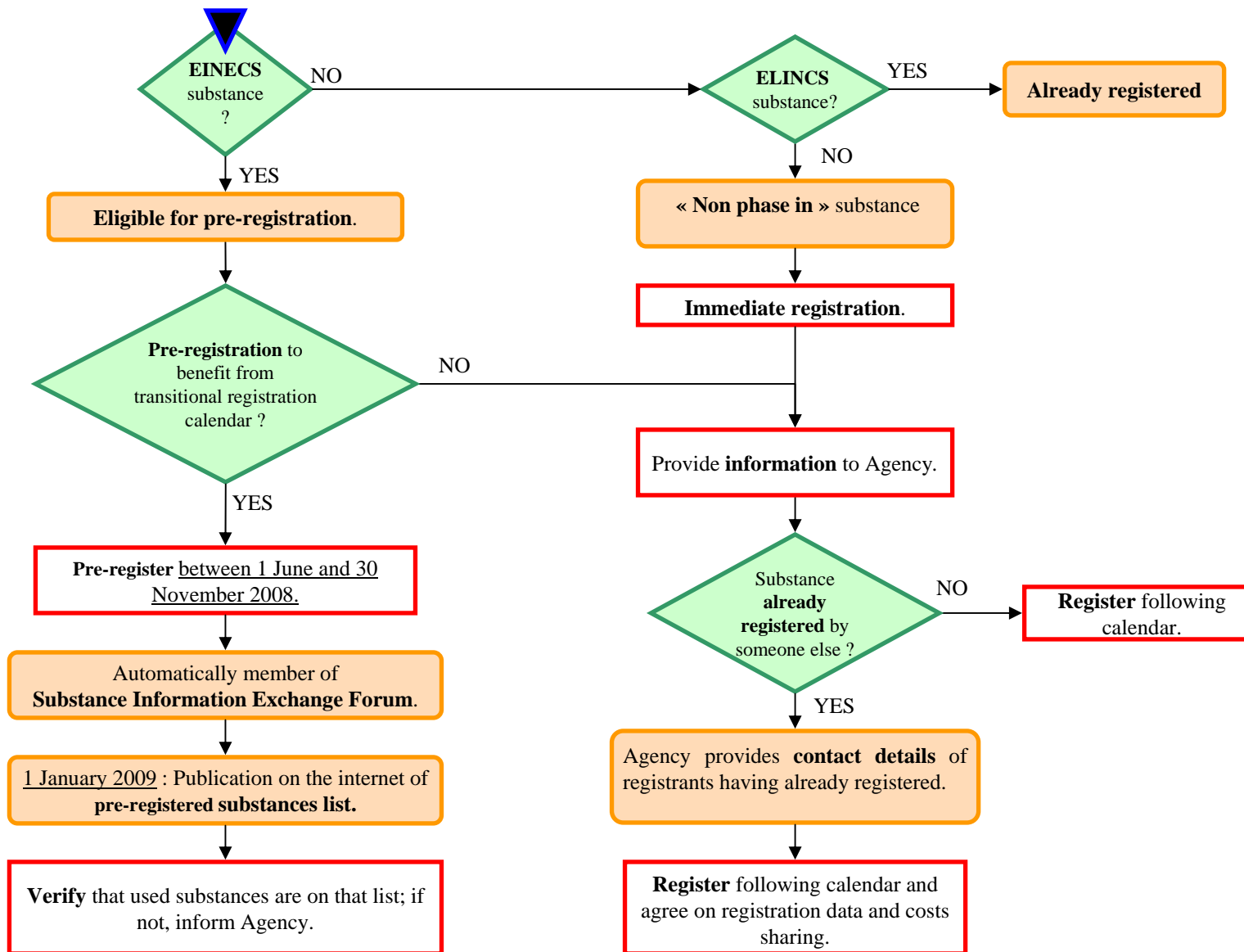
3- Other initiatives and REACH related projects

- Involvement in RIP's (REACH Implementation projects)
- Collaboration via SBAC with other industry partners in producing the REACH interpretation guidelines for Engineering Industries – particularly the Automotive and aviation sectors
- Several worked examples from the guide follow:



4 - REACH in practice

E1 : pre-registration and registration of a substance

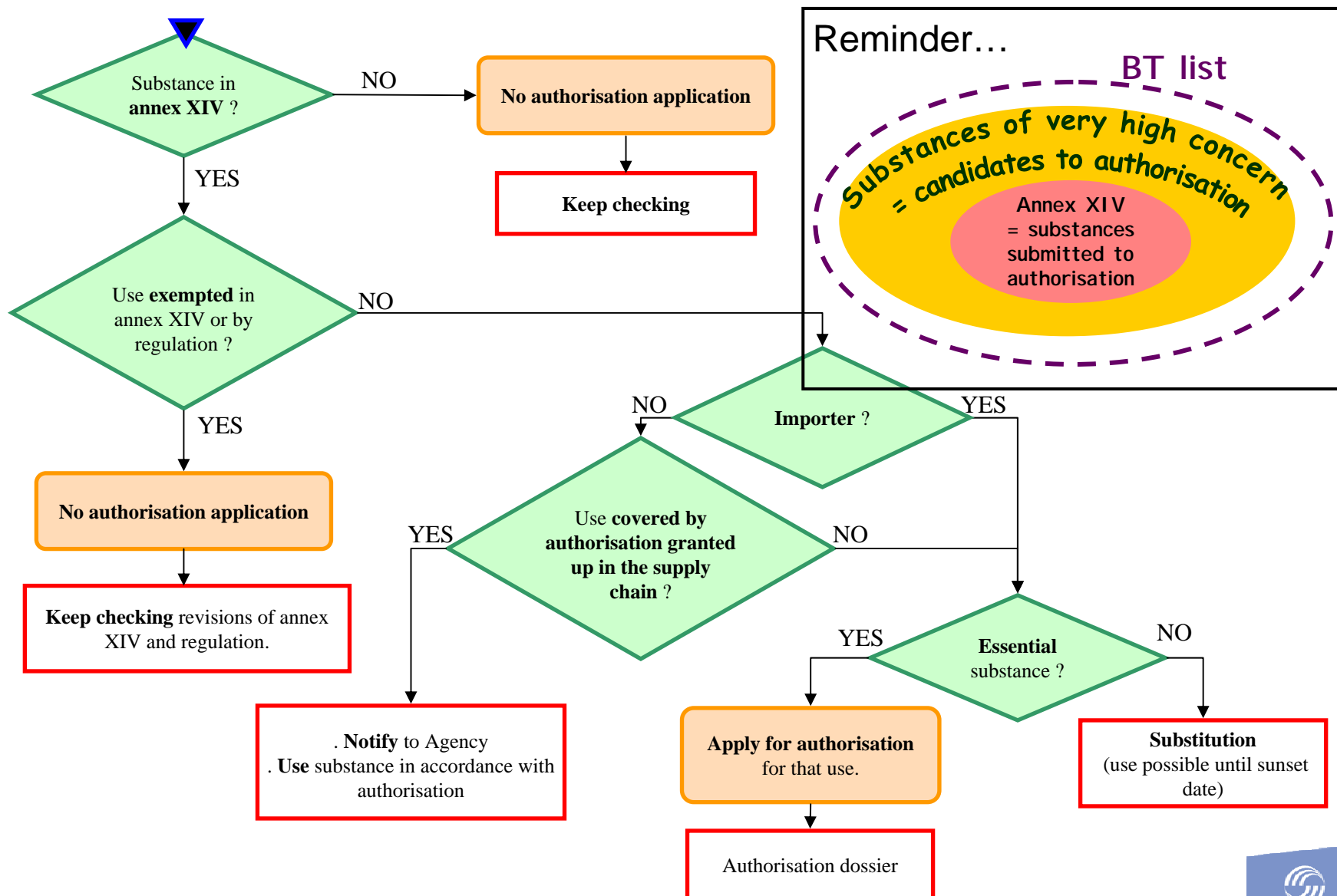


4 - E1 : which substances can I pre-register?

Substance > 1T/y*	EINECS	ELINCS	CAS	Category	Registration?
cadmium oxide powder (stabilised)	215-146-2		1306-19-0	R45 (Carc . 2)	Pre-registration
hydrazine-tri-nitromethane		414-850-9	?	R45 (carc. 2)	Already registered
sodium cyanide	205-599-4		143-33-9	#	Pre-registration
cadmium powder (stabilised)	231-152-8		7440-43-9	R45 (Carc. 2)	Pre-registration
dicyclohexyl phtalate (DCHP)			84-61-7	(endocrine disrupter)	Immediate registration
lead(II) methanesulfonate		401-750-5	17570-76-2	R61 (repr.1)	Already registered

4- REACH in practice

E 3: use of a substance submitted to authorisation



5 - UK involvement and Roll out – present status

- Identification of all suppliers inside and outside EU
- Gathering of all MSDS and related information
- Implementation and population of a SAP based Hazmat chemical data base (Designed & Developed for all Natco's)
- Review of Substance database and identification of all substances used in volumes > 1 T/year per legal entity
- Identification of the SVHC chemicals (easy for preparations but harder for articles)
- Review and check availability of COSHH and risk assessment data for main processes and substances of concern
- UK REACH team meets and shares data via regular video conference (Filton and Broughton sites).

5 - Next steps in REACH Process

- Supply chain management for pro-active data exchange
 - ▶ Meetings to be set up with suppliers/ manufacturers, initiation of information sharing and registration responsibilities.
 - ▶ Communication sessions for suppliers, customers, workforce, managers and other interested and effected parties being rolled out.
 - ▶ Verify pre-registration status for identified substances.
- Identify show stoppers: critical chemicals, single source, low volume...as manufacturers may opt not to register due to cost implications – identify substitute materials or alternate supplier.
- Support preparation of registration dossiers where required.
- Participate in SIEF (Substance information exchange Forums)
- Work on green issues – eliminate or substitute for safer alternates.

5 - Next steps in REACH Process, continued

- Identify situations where we may be legally required to initiate registration or authorisation (as director importer or supplier of articles)
- Preparation of Authorisation dossiers where supplier, manufacturer or third party has not already applied for authorisation of our use.
- Modify COSHH assessments to ensure additional information and format of required Chemical Safety Reports/ Chemical Safety Assessments for our use and processes are included in the supplied MSDS data.
- Ensure recommended exposure control measures are implemented at site level – full legal compliance
- Check and update regulatory situation for each site on a regular basis and communicate changes to the authorities.

Loads to do, within our companies, our industry sector and within the broader supply chain, in a fairly short time frame.

- Attend workshops and training courses to develop greater understanding of REACH implementation.
- Need to communicate REACH requirements to all interested and affected parties – at varying levels of complexity
- Need to ensure you work as a team with a project plan for REACH – share data and avoid duplication where same substances are used.
- Work with Industry partners and within SIEF's to share data and reduce cost.
- Ensure you generate required chemical lists, process and use data and chemical safety data as required.
- Speed up implementation of elimination and substitution of SVHC with safer alternates.
- Share learning.

Thank you

Any questions ?

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