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**REACH is not just for the  
Chemical Industry**

**An Implementation Case Study**

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# Different roles within REACH

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## What do we do?

- We import from outside of the EU
- We manufacture articles from components sourced in the EU and from the Far East
- We act as a distributor for products made in the EU
- We are an end user



# Articles and Preparations

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## What do we supply?

- Articles (only consider the following)
  - Articles where substance is intended to be released
  - Contains one or more SVHCs
- Preparations

# Substances

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What is in our products?

- Use the following:
  - Bills of materials
  - Information from suppliers
  - MSDS

to create a substance inventory

# Substances 2

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## What do we need to include?

- Include all substances not just the hazardous ones
- Use lateral thinking. For example, flame retardants on fabrics
- Do not forget packaging. Packaging is treated as an article

# Obligation to Pre-register (Articles)

How much of a substance do we supply?

Substance	EINICS	Product A (2g pens)			
		ARTICLE			
		%	substance weight	annual volume(units)	weight supplied (t)
Naphtha(Petroleum), Hydrotreated Heavy	265-150-3	90.00%	1.80	1000000	1.80
2-methoxy-1-methylethylacetate	203-603-9	10.00%	0.20	1000000	0.20

Product A is an article so will need to pre-register Naptha with the ECHA because weight of substance supplied >1t



# Pre-registration

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## What can be pre-registered?

- Existing substances can be pre-registered      ie those with an EINICS number
- Our substance inventory only contains these phase-in substances.
- No pre-registration, no market

# Essential tasks

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What should we be doing now?

- Completing the substance inventory
- Talking to our suppliers
- Identifying key substances
- Looking for alternatives

# Some examples

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## How we approached different products

- **Aerosol spray paints**

Made in the EU on our behalf. We act as a distributor, have checked that our vendor is pre-registering substances, does not contain likely SVHCs

- **Racing sets**

Components and packaging from China. Packed in the UK. We act as an importer. Have checked and there are no substances for intentional release and no likely SVHCs.

# Help and Support

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Where have we found out about REACH?

- HSE
- Trade association
- Other trade bodies
- Suppliers
- ECHA website

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**Thank you for your attention**

