



**SPECIAL METALS
WIGGIN LIMITED**

SPECIAL METALS WIGGIN REACH UPDATE

Or how we've climbed the foothills, only
the mountain to go!

**Special Metals
serves many
different
end-markets**



Oil & Gas



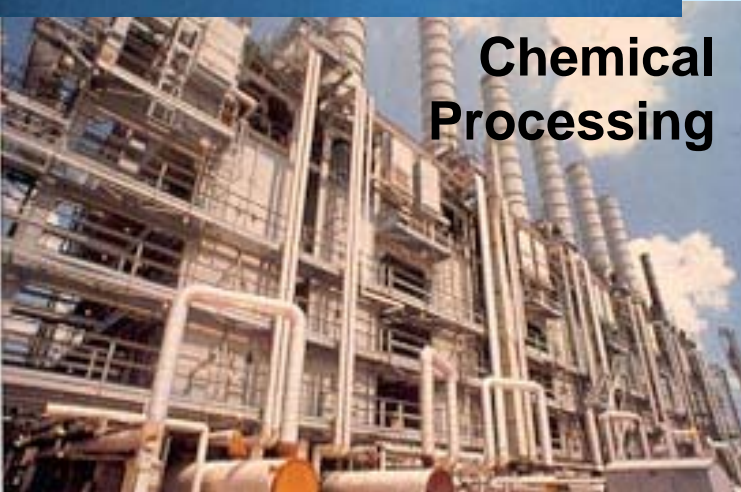
Automotive



Aerospace



Pollution Control



**Chemical
Processing**

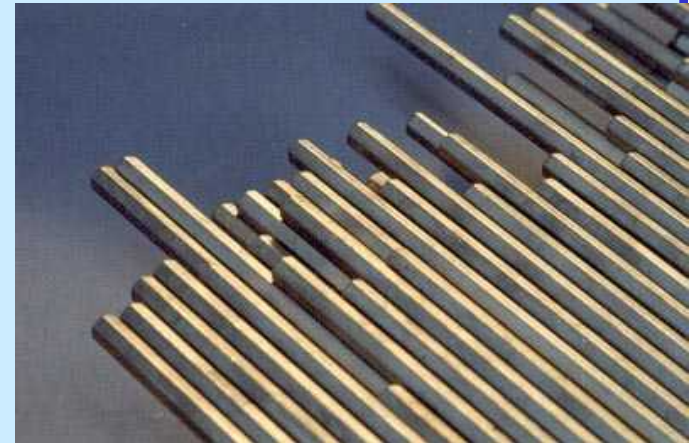
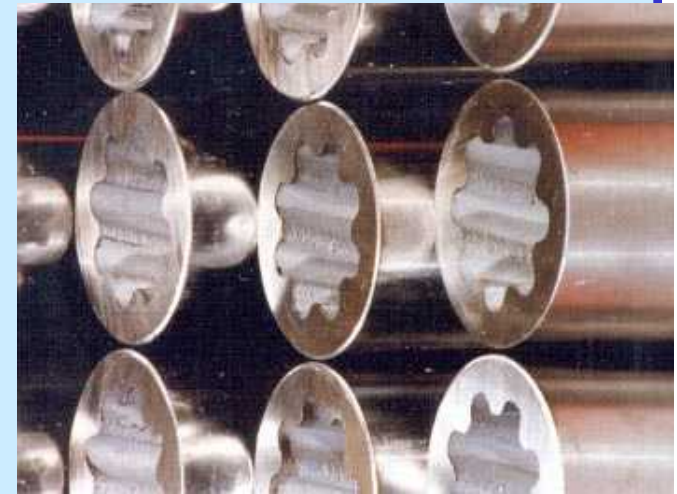


**Power
Turbine**

Tubular and Bar Products



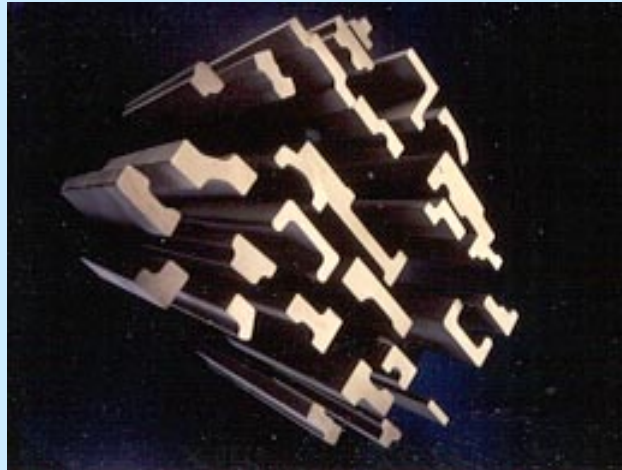
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Extruded Shapes



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Pre-registration



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Pre-registration / Registration begun for 28 metals required to continue alloy production

5 others on database will not require registration by us as we use them in quantities of less than a tonne a year. We intend to pre-register them, however, as this will allow them to remain on the market until their due registration date no matter what others do

Possible issue that low volume metals and other chemicals will be withdrawn from the market as the “cost” of registration may be deemed too great

Special Preparations



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Still issues with “Special Preparations” –
Recognised as special cases in legislation but
no guidance forthcoming.

Relevant to alloys, ceramics and rubbers

173 Discrete Alloys identified for inclusion

124 entered onto data base

49 to be entered

Importer Issues



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We are also an importer:

Metals bought on the world market through LME – There may not be a European supplier in the accepted sense

Metal forms (sheet, plate, bar, billet etc) from our USA partners where we arrange EU customs clearance and then add the items to our own European distribution network

As yet no clear indication as what will be the criteria for “competency” for an “only representative”

Likely to be me!

Additional Resource



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Undergraduate Chemistry student employed during university vacation to input data onto IUCLID 5 software database and perform other REACH related duties

Able to concentrate solely on REACH with no distractions

Through Company H&S manager able to engage expertise from across the Company when required

What Will Pre-Registration Require?



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Pre-registration software still not available but IUCLID5 database sections:

- 1.1 - Item, contact details, where produced
- 1.2 - Composition
- 2.2 – H&S data, classification & labelling
- 3.2 – Estimated tonnage

Will be the required fields for pre-registration and a plug-in piece of software will apparently be provided to assist with the transfer across from current to pre-registration database

SIEFs- How Will They Work?



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Following on from pre-registration will be the substance information exchange forums (SIEFs)

Will we want / be able to be part of 33 SIEFs?

For large volume chemicals trade associations will probably take the lead but what about smaller volume chemicals?

How will costs be divided and possibly re-divided as organisations join a SIEF late?

MSDS Changes



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Identifying and including all internal processes to all our alloys to create a significant number of uses / exposure scenarios / risk management measures for ourselves.

Intention is that the scenarios will also cover our customer's processes (and therefore their uses, exposure scenarios and risk management measures).

So far 73 processes identified – melting / grinding / welding etc. Details passed to Rolls-Royce to get additional processes from aerospace industry

Intention to spread process to automotive / chemical industry trade bodies to include their uses, exposure scenarios and risk management measures

MSDS Changes (Continued)



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We still need information from our customers. Several challenges:

Stockists don't necessarily know themselves what the alloy they sell is going to be used for

Much of our material is used for cutting edge applications. Customers do not want to reveal their manufacturing processes – essential for exposure scenarios

If a use / exposure scenario / control measure is not on the MSDS that use will not meet the legislation

SMW Progress Continued



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Still awaiting the detail of socio-economic case
“defence” i.e. why a particular alloy should be exempt
some aspects of REACH because its withdrawal would
have too much of an adverse socio-economic impact:

Aero-engines

Tie rods in nuclear reactors

Significant Safety implications with substitution +
excessive development / testing time + other
regulatory authorities – FAA & CAA for example

Probable Intention to Join a Consortium



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Either one of those being organised by the European Nickel Industry Association (ENIA)

Or

Joining the Nickel Institute and having them represent our interests in a consortia

Currently considering which will be most beneficial

A GOOD SOURCE OF ADVICE



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USEFUL INFORMATION SOURCE

REACHReady Ltd

Kings Buildings

Smith Square

London

SW1P 3JJ

Tel: 020 7901 1444

E-mail: enquiries@reachready.co.uk

Silver Member – Free

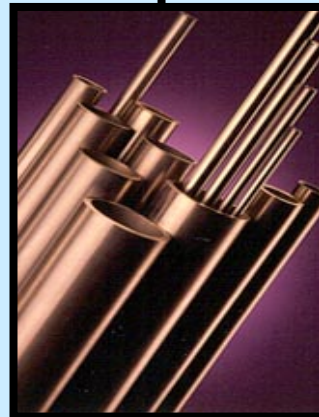
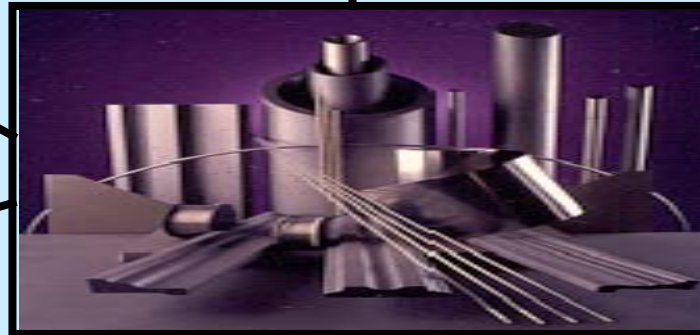
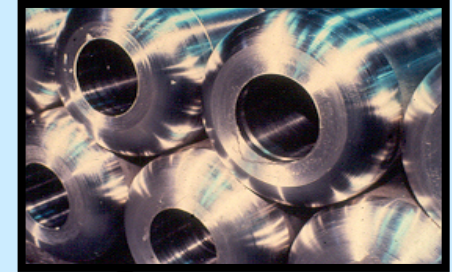
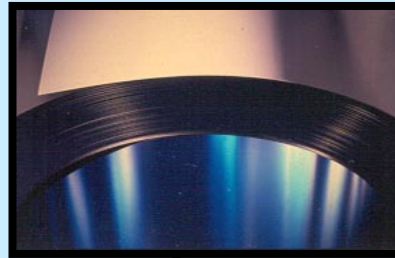
Gold Member - £250 +VAT /person / year

ALSO HSE HELP DESK WHICH IS FREE!!





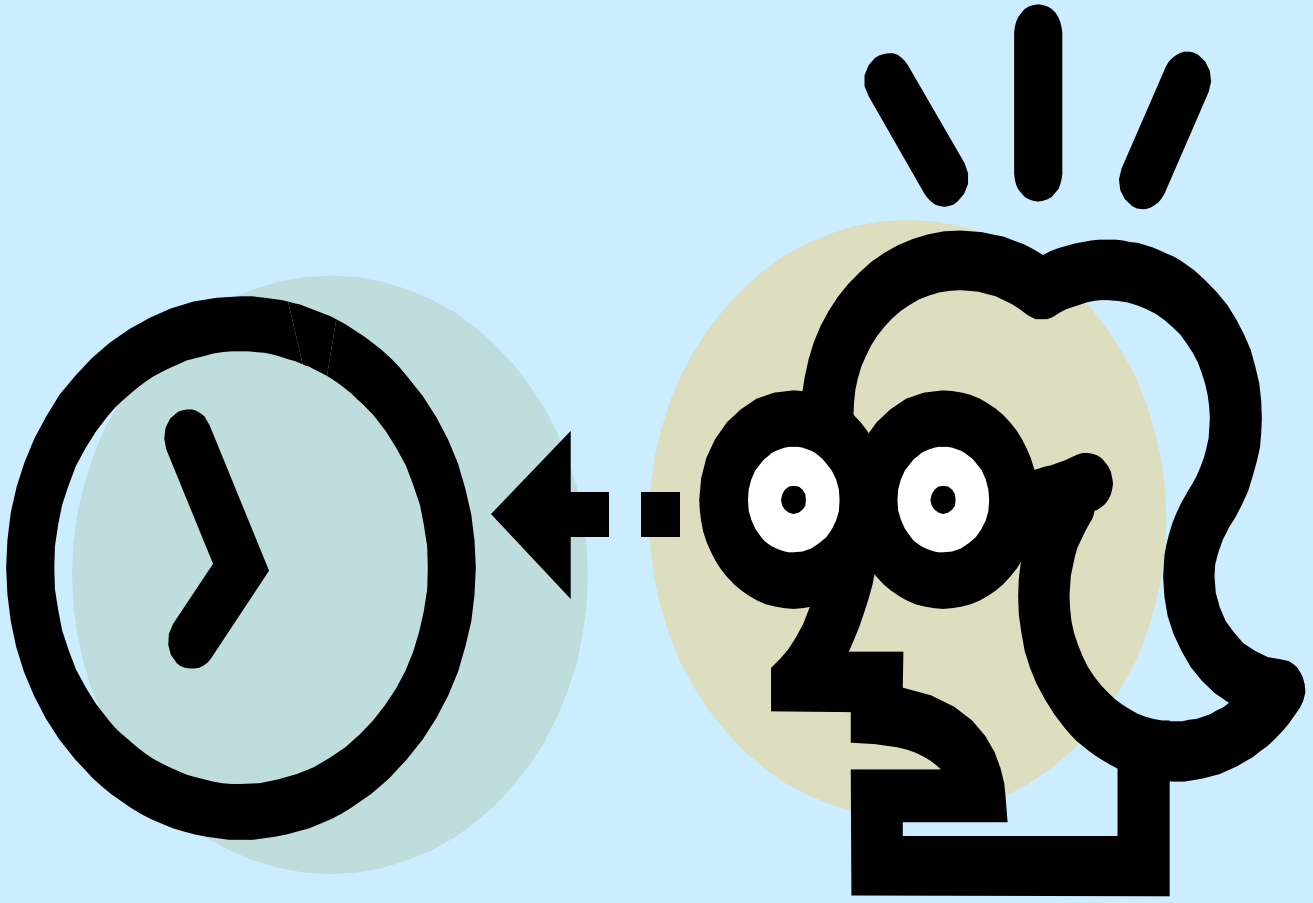
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The Clock Is Ticking



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• **ANY QUESTIONS?**