

# BRITISH RETAIL CONSORTIUM

for successful and responsible retailing



Dr. Nick Farrar  
REACH Manager – ASDA  
Representing the views of the BRC

# ASDA



**ASDA**

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# What you may have already heard:

- REACH - new EU chemicals regulation responsible for evaluating and authorising the use of chemicals in the EU.
- Integrates 42 existing pieces of chemical related legislation.
- Came into force 1st June 2007 and will be phased in over a period of 11 years.
- Deals with highest risk, highest tonnage chemicals first then progressively moves onto lower risk, lower tonnage chemicals.

# Why Retailers support REACH

- UK Retailers have supported REACH since its inception
- Without a trusted regulatory system, retailers and their suppliers would increasingly have to ‘self-regulate’ their use of chemicals
- Retailers can never return to a situation where it was assumed the regulatory authorities and chemical industry would manage this issue for us
- Retailers must play a role in better chemical management

# The BRC position

From the British Retail Consortium's position paper on REACH:

*The BRC supports the objectives of REACH and sees it as an opportunity to rebuild societal trust in chemicals and maintain consumer confidence. However, we believe that the workability of REACH in particular relating to consumer articles, imports of preparations and the definitions can be further improved.*

# How have the BRC been preparing retailers for REACH?

- Chemical Working Group
- Chemical Toolkit
- Supply Chain Leadership Group



# 1) Chemical Working Group

- Provide retailer input to the EU chemicals strategy, communicating the BRC's position at EU and UK level.
- To provide an early warning mechanism to members on new product stewardship/chemicals issues, to pool knowledge and to assist members in responding.
- To develop an understanding of NGO priorities and to enter the debate with NGOs on behalf of members.

## 2) Chemical Toolkit

A tool for members to develop their own priority list of chemicals based on already established national and international agency lists assessed.

- Review this list by providing information on:
  - frequency chemicals appear on both national and international lists
  - availability of scientific evidence to justify their inclusion on the lists
- Liaising with BRC members to identify research already undertaken in this field to identify end-use applications

### 3) Supply Chain Leadership Group - BRC/CIA initiative

- more transparent and useful communication along the supply chain on product safety matters
- chemical industry - better understanding of the markets it is ultimately selling into & trends that are shaping them
- downstream users - better understanding of chemical risk and management / more confident in the use of chemicals in their products
- more efficient control and understanding of complex supply chains

# How does REACH affect the retailers supply chain?

- REACH regulates chemical substances on their own, in preparations (such as paints) and in articles (such as toys); it captures most of our ranges
- Obtaining the right information is critical, but the complex legislation makes this challenging
- Substances of Very High Concern in articles (very challenging)

# How does REACH impact consumers?

- REACH establishes a duty to provide information on the presence of certain high concern chemicals in articles to ensure safe use of the product.
- Consumers will request information from the supplier of the article on the presence of the substances appearing on the EU candidate list for high concern chemicals.

# What should retailers do next? Pre-registration... (1<sup>st</sup> June 2008)

## Build your inventory (IT systems...)

1. Decide which products are in scope
  - preparations, articles with intended release
2. Map your supply chain
  - varied, complex and increasingly outside of the EU
  - the retailer as importer
3. Talk to your suppliers!
  - are they registering the ingredients? Only-reps?

# What should retailers do next?

## Notification of SVHC's...

4. Substances of Very High Concern
  - need to anticipate what will be on the candidate list
  - information requests
  - huge array and diversity of products
  - wide variety of materials/chemistries
  - potential loss of some chemicals
  - can these be substituted?

# What are our concerns?

1. The understanding of REACH by smaller companies and non-EU suppliers within our supply chain – training program
2. Expectation of the supply chain regarding information
  - information may not be easy to retrieve
  - looking to trade associations for guidance
3. Loss of raw materials - continuity of supply issues
4. Information exchange and the information that must be provided to consumers
  - concern that timings of regulation will cause difficulties

## Summary

BRC supports the responsible use of chemicals in consumer products and welcomes the development of the revised EU chemicals policy and support its general principles:

- the requirement for data on the safety of chemicals to be made available
- the highlighting of the worst chemicals
- the more open approach to the availability and sharing of information to support the right to know

and hope the regulation will:

- encourage the use of substances in supply chains that provide the best protection of public health and the environment
- encourage innovation to produce safer and more sustainable products
- minimise the requirement for animal testing and to centralise the oversight of data-sharing to prevent duplication.

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The ASDA logo, consisting of the word "ASDA" in a bold, green, sans-serif font.