

Preparing for REACH – a downstream user perspective

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UK Food and Drink Industry

- The food and drink manufacturing industry is the single largest manufacturing sector in the UK.
- The industry employs some 500,000 people.
- FDF members represent a very board range of sectors and manufacturing processes.
- FDF members classified as downstream users under REACH Regulation
- Supply chain and contingency issues key

- (b) in food or feedingstuffs in accordance with Regulation (EC) No 178/2002 including use:
- (i) as a food additive in foodstuffs within the scope of Council Directive 89/107/EEC of 21 December 1988 on the approximation of the laws of the Member States concerning food additives authorised for use in foodstuffs intended for human consumption¹;
 - (ii) as a flavouring in foodstuffs within the scope of Council Directive 88/388/EEC of 22 June 1988 on the approximation of the laws of the Member States relating to flavourings for use in foodstuffs and to source materials for their production² and Commission Decision 1999/217/EC of 23 February 1999 adopting a register of flavouring substances used in or on foodstuffs drawn up in application of Regulation (EC) No 2232/96 of the European Parliament and of the Council³;
 - (iii) as an additive in feedingstuffs within the scope of Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition⁴;
 - (iv) in animal nutrition within the scope of Council Directive 82/471/EEC of 30 June 1982 concerning certain products used in animal nutrition⁵.

Food and Drink Manufacturers as Downstream Users

- Downstream User requirements identified as priority
- Main requirements will centre around risk identification and notification, communication in the supply chain and storage of information
- FDF guidance on downstream user obligations developed for members' use in preparation for REACH

FDF Guidance on REACH

- FDF ‘easy to follow’ downstream users flowchart
- Guidance notes to accompany flowchart
- FDF quick check list for conducting a REACH line walk
- Q&A

Key Considerations for Food and Drink Manufacturers

- Check if classified as manufacturer or importer for any processes or operations
- Assess actual chemical use within company
- Check if all uses are within supplier specifications
- Assess how critical chemical substances/preps are to process. Could contingencies be made?
- Start early!

FDF Members Practical Activities (1)

- Information gathering – liaison with FDF and contact with national helpdesk
- REACH issues communicated throughout company technical community and executive
- Conducted “line walks” to evaluate position in manufacturing environment
- Followed up to evaluate risk of delisting – cross ref with suppliers’ documentation.

FDF Members Practical Activities (2)

- Line walks - visited and audited typical site activities and areas such as intake, mixing, cooking, transfer, despatch, hygiene, engineering and technical
- Chemicals were principally for hygiene or engineering use
- The bulk of the chemicals fall into three categories: detergents/soaps, lubricants or sterilents
- Food specific applications

FDF Members Practical Activities (3)

- Follow up discussions with suppliers to assess need for action
- REACH groups established to co-ordinate company planning
- Preparations to co-ordinate throughout company structures.

Outstanding Areas

- Administrative – e.g. storage of information and data
- Awaiting further RIFPs guidance
- UK enforcement:
 - Allocation of enforcement responsibilities
 - Scale of penalties
 - Preparing for REACH inspections