



PREPARING FOR REACH

The McBride Experience So Far

McBride plc

- Largest manufacturer of Retailer brand Household & Personal Care products in Europe
- Contract manufacturer
- 20 factories
- Production in 7 countries
- Manufacturing across 8 legal entities

Robert McBride Ltd

- UK operations
- 8 factories
- 2 manufacturing legal entities
- Product development on each site
- 2 Purchasing groups
- 1 Technical Services group

REACH Roles Within the Business

- Senior Management - ***Commitment***
- REACH Implementation Manager - ***Co-ordination***
- Steering Group: Product Development
Purchasing
Information Technology
Technical Services Group
Product Safety Group
Sales/Marketing - ***Actions/ Information***

Why Me?

- Chemist by background
- Legislation involvement >25 years
- Experience of surfactant manufacture and detergents/toiletries/aerosols mixing/filling
- Involvement with Customers and Suppliers
- Long term McBride employee
- ⇐ REACH Implementation Manager

REACH Understanding

- Regulation
- Technical guidance documents
- Help desks
- Seminars
- Supplier presentations
- News alerts/magazine articles
- Trade Associations

Inventory

- Chemicals for mixes & processing - >1500
- Perfumes - >1300
- Packaging - >3500
- Traded goods - >30
- Data: Composition
 EINECS/ELINCS/CAS numbers
 Quantities
 Supplier details

Initial Contact

- Establish respective contacts
- Agree materials purchased
- Confirm composition
- Establish substances of concern
- Manufacturer or Distributor
- Country of origin
- REACH intentions
 - ↳ ***Position in supply chain***

Status : Downstream User

- Ensure continuity of supply
- Maintain dialogue
- Ensure uses accepted
- Downstream user CSAs
- Exposure scenarios

Status : Manufacturer

- Identify in-situ substances
- Annex IV / V exemptions
- Tonnage bands
- Legal entities
- Consortia membership
- Data collection/purchase
- Contract products transfer

Status : Importer

- Only representative
- EU supplier options
- Traded goods : Articles or Preparations
- Start pre/registration preparations

Communication

- Internal
 - via Steering Group
 - Departmental e.g Sales Management
 - Briefing documents
 - European co-ordination
- Customers
 - Presentations
 - Updates

For Consideration

- Data management
- IUCLID 5
- Adapting business processes
- ESDS

Initial Conclusions

- Generates masses of data/information
- Resource hungry
- Costly
- Good communications essential
- Still a lot of uncertainties

