

Background

Large parts of the European Chemicals Regulation on the Registration, Evaluation and Authorisation of Chemicals, known as REACH for short, came into force on 1 June 2007. The aim of REACH is to eliminate deficits in data relating to the properties of virtually all chemical substances and to the effects they have on humans and the environment. One possible implication of the REACH process is that certain chemicals will no longer be available in the medium term. The objective of the guidelines presented here is to provide you with support in implementing REACH within your company.

Even if you do not manufacture or import chemicals in your capacity as a plastics processor, REACH may still affect you. As a so-called “downstream processor”, you are responsible for the safe handling of the materials to which REACH relates. This creates obligations for you within the scope of communication in the delivery chain.

We recommend that you adhere to the following guidelines in respect of the implementation of REACH.

Initial steps

➤ Find out about REACH

For basic information, we recommend that you consult the [German language] brochure “Initial steps to be adopted under the new EU REACH regulations” issued by the German Federal Institute for Occupational Safety and Health (Bundesanstalt für Arbeitsschutz und Arbeitsmedizin, BAuA). This is an extremely clearly presented brochure which is well worth reading. Pro-K is in possession of a PDF version of this publication, which may be ordered by contacting Ute Bonn (ute.bonn@pro-kunststoff.de).

➤ Nominate a REACH representative in your company

The REACH representative should act as a conduit for all information, both internal and external. Further information relating to REACH, such as brochures, articles and standard questionnaires, is made available to REACH representatives on an ongoing basis.

➤ Draw up an inventory of materials

Drawing up an inventory of materials is one of the most important and useful steps you can undertake. Such an inventory lists the materials used in a company. We will be happy to provide you with an appropriate template for the establishment of an inventory of materials. Once again, this may be ordered by contacting Ute Bonn (ute.bonn@pro-kunststoff.de).

➤ **Collect all available information**

One of the paramount tasks for a REACH representative is the collection of as much information as possible on the materials used in a company (material safety data sheets).

➤ **Draw up a list of priorities**

Determine what the most important materials for your company are and draw up an appropriate list of priorities.

➤ **Draw up an action plan**

Develop an action plan for your company for the eventuality that certain materials are no longer available in the future.

➤ **Open up a dialogue with your customers and suppliers**

As part of the information flow required under REACH, you should also contact your suppliers in respect of the registration of raw materials and additives and obtain information from your customers on the planned use of your products. Special questionnaires, which have already been agreed within the sector, have been developed for this purpose. These are also available and again may be ordered by contacting Ute Bonn (ute.bonn@pro-kunststoff.de).

➤ **Keep yourself in the picture**

Take part in the events staged by our association such as the REACH contact group or the meetings of the technical committees. Many current open questions are capable of clarification by seeking dialogue within the branch.

We will keep you informed on the latest development in REACH on an ongoing basis.