

Managing REACH within YOUR business

Identifying the risks that REACH poses to your business.

Every senior manager needs to understand the effect REACH could have on the continued supply of products to your business.

Supply chain business risk	Risk management
Changing formulations	If the make-up of the processing chemicals you use changes, what will this do to the quality of your product?
Withdrawal of formulation	If the supplier ceases supplying one of the formulations you use, how will it affect your business? Do you have any 'Strategically important' formulations, without which you cannot manufacture your product?
Failure to register / Failure to check that the substance is being registered for their use: Substance could be lost for your application	How will you ensure that the substances within your strategically important formulations are being registered by someone upstream in your supply chain?
The manufacturer / importer doing the registration may put too specific or too general information on uses in the Chemical Safety Report, resulting in a general use being legal, but not your specific use.	Do you have any unusual uses of a formulation that may not have been identified by the manufacturer or importer, and therefore you may not be able to continue using it legally?
Lack of information about substances in formulations resulting in you being unable to check that your formulation is being used legally	It is necessary to know the substances within formulations you are using, particularly imports (even below 1 tonne) as the formulations may contain 'substances of very high concern' (SVHCs). The substances SHOULD BE listed on the materials safety data sheet (MSDS), but often MSDS do not contain the information you need – such as the CAS NUMBER for the substance. Because many chemicals have more than one name for the same thing, it is important to be able to search lists like the candidate list (for authorisation) or the restricted substances (banned) list by CAS, which is unique to each substance. Therefore if the MSDS you receive from your supplier does not show CAS numbers, you should insist that they supply them.
Lack of information about substances in articles. Article 33 of REACH requires suppliers of articles to inform customers (and in some cases ECHA) of SVHCs at >0.1%w/w within the product they supply. If component suppliers do not provide compositional data, it means you may be unable to meet legal obligations to provide information on SVHCs to customers. Without this information, EU customers should refuse to accept the product.	You need to discuss this requirement with your component suppliers (and subsidiary system suppliers). There are standards such as the Declarable Substances Standard that will help manage this risk.