

## **REACH Club meeting at EH on 13 December 2010 commencing 10:00**

**Attendance:** C Phillips (CP), R Woodward (RW), J Archer (JH), David Fenn (DF), Alison Atkins(AA), Keith Tucker (KT), M Wild (MW), A Zhecheva (AZ) and K Hoare (KH)

**Apologies:** D Elliot (DE), Stephen Barker (SB), G Armstrong (GA), Jillian Humphries (JH1), B Gay (BG), A Phillips(AP)

**\*Please note that these are not minutes as such but a series of notes and observations and represent only a fraction of the extensive dialogue that took place\***

The 1 December deadline has now passed and it was believed that there will be a 6 week period bedding in period for it to settle down. It was suggested that some companies will then try to purchase chemicals to test the legislation. One major impact was that many companies have decided to stockpile certain chemicals but this may cause them problems under IPPC!

The ECHA website is continually being updated and registered substances are in the Green column. They have differing classifications causing concern. Intermediate classification will have an impact on the supply chain.

Sodium Dichromate and Potassium Dichromate have been registered by Brentag.

MSDS's are being delayed and it will be interesting to see what they eventually look like. The administration associated with the paperwork will tax many companies and impact on small companies.

Concern was expressed by the meeting that the Nickel Institute, the Cobalt Institute and the Chromium Consortium are producing case studies of exposure scenarios (i.e machining of Stainless Steel and thermal spraying of nickel alloys) which could inhibit manufacturing processes. These could make capital investment very expensive and could have liability and insurance implications. Other scenarios within the surface finishing arena could cause controversy especially for solid nickel compounds.

It was stated if chemical did not comply with SDS then the supplier must be contacted.

The administrative software systems can not cope with the new MSDS requirements so action in this area is needed.

The meeting agreed that it was important to be aware of chemicals that could be on the next phase of registrations since long term risk analysis is undertaken by the EU enforcers.

It was reported that China REACH had become active on 15 October and was very draconian.

With the change of Government in the USA, state legislation was going to be the order of the day, rather than federal law-some states will be more draconian than others.

Concern was expressed that March/April will see the beginning of enforcement within the EU. It will be interesting to see what happens.

It was believed that in the UK there will be 12 inspectors but that this could change with the impact of government cuts!

The aerospace industry are in the process of forming a global international consortium of large companies with a view to lobbying the EU in order to obtain funding to research new technological innovations to successfully replace coatings that will not be available.

Issues are also arising on CLP for samples and labelling.

**Next meeting 28 February 2011 at 10:00**