



Implementing REACH in Höganäs

- Höganäs' current approach to REACH
 - how we started
 - supply chain example
 - views on questionnaires and consortia
 - impact of REACH
- Tips for large and smaller organisations
- Summary and conclusions



Summary and conclusions

1. Detail a substance inventory. If in doubt, list it!
2. Focus on the supply chains for your business – you know it best
3. Identify your REACH role (M, I or DU) for each substance
4. Communicate with customers - identified uses
5. Keep on top of your suppliers – ensure they understand their REACH obligations
6. Identify critical and vulnerable substances early
7. Aim to pre-register to gain time



Recall some basics

- The AIM of REACH is “... to ensure industry adequately manages risks from substances”
- How?
 - M/I obtains/generates substance info
 - dossier submitted (electronically) to Agency
 - info passed down the supply chain (SDS)
 - check uses are covered and DU's can comply with risk management measures
- NOT driven by chemicals ...all about substances, including metals
- Remember, no registration no market !



What has Höganäs done?

- Board level input and commitment
business continuity, regulatory issue, cost, consortia/competitors
- Inform within the organisation
increase awareness (production, purchasing, R&D, sales/marketing)
- Formal Project status, 2 years to mid 2008
justification, objectives, budget, steering group, project team, receiver
- Dedicated (100%) project manager
focus, driver, internal 'expert', trainer
- Aim:
 - Detail the supply chain for each substance
carefully determine REACH role(s)
 - Identify areas of concern
critical and vulnerable substances, 'weak' suppliers



5 Project Goals

1. Substance portfolio for the European operation
2. REACH strategy for each substance
 - 2.1. registration data needs and data gaps
 - 2.2. identified uses to include in registration
3. Ensure our suppliers...
 - 3.1. pre-register and register
 - 3.2. include our identified uses in registration
4. Database for REACH information and system for managing it.
5. Procedures updated; incl. managing new suppliers, new substances (eg new imports), new identified use,



Kick-off...

- Two sub-project teams, one each dedicated to:
 1. pre-registration (substance list, tonnage, SC role, identified use)
 2. registration (data needs, data gaps, strategy to fill gaps)
- Teams to highlight problems on a regular basis, with proposed actions for Board approval;
(supplier issues, data gaps, significant costs etc)
- Understand our customers' aims
(identified uses and registration needs)
- Understand our suppliers' plans
(vulnerable supplies, support needs, supply chain disruption)



Project Timetable

Assuming entry into force (EiF) is June 2007

- Pre-registration team finishes at EiF 6/07
- Registration team finishes June 2008



Pre-registration

- To use the phase-in period, pre-registration is necessary.
- Pre-registration info:
 - Company name and contact details
 - Substance name (CAS no. etc)
 - Tonnage band / registration deadline
- Pre-registration window is 12-18 months after EiF
- Each registrant will be given the names of all other entities that have pre-registered the same substance (to facilitate data exchange).

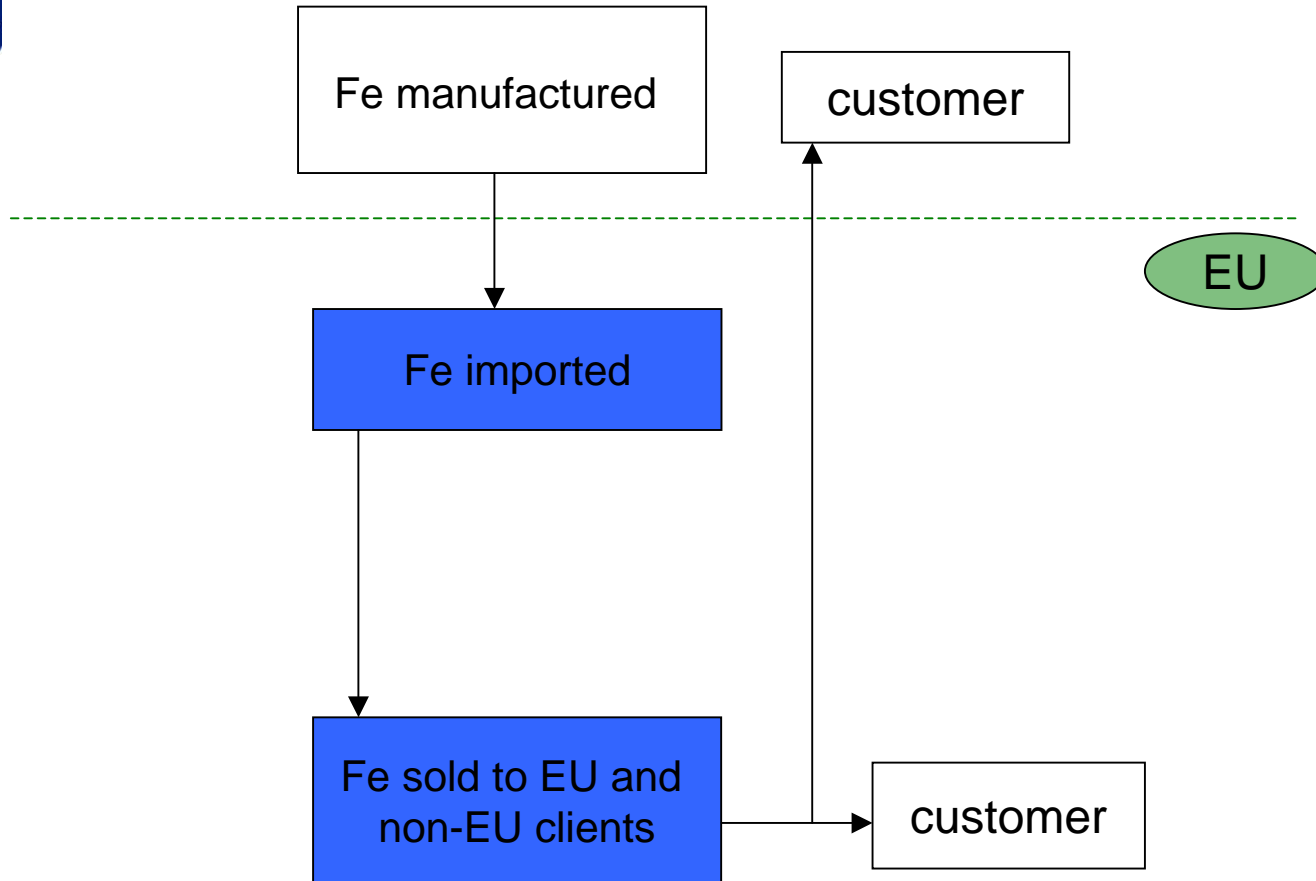


Höganäs' M/I substance list

Substance	REACH volume / tpa	Registration Deadline
Fe	>1000	2010
Mo	>1<100	2018
Mo oxide	>100<1000	2013
Cu	>100<1000	2013
MnS	>100<1000	2013



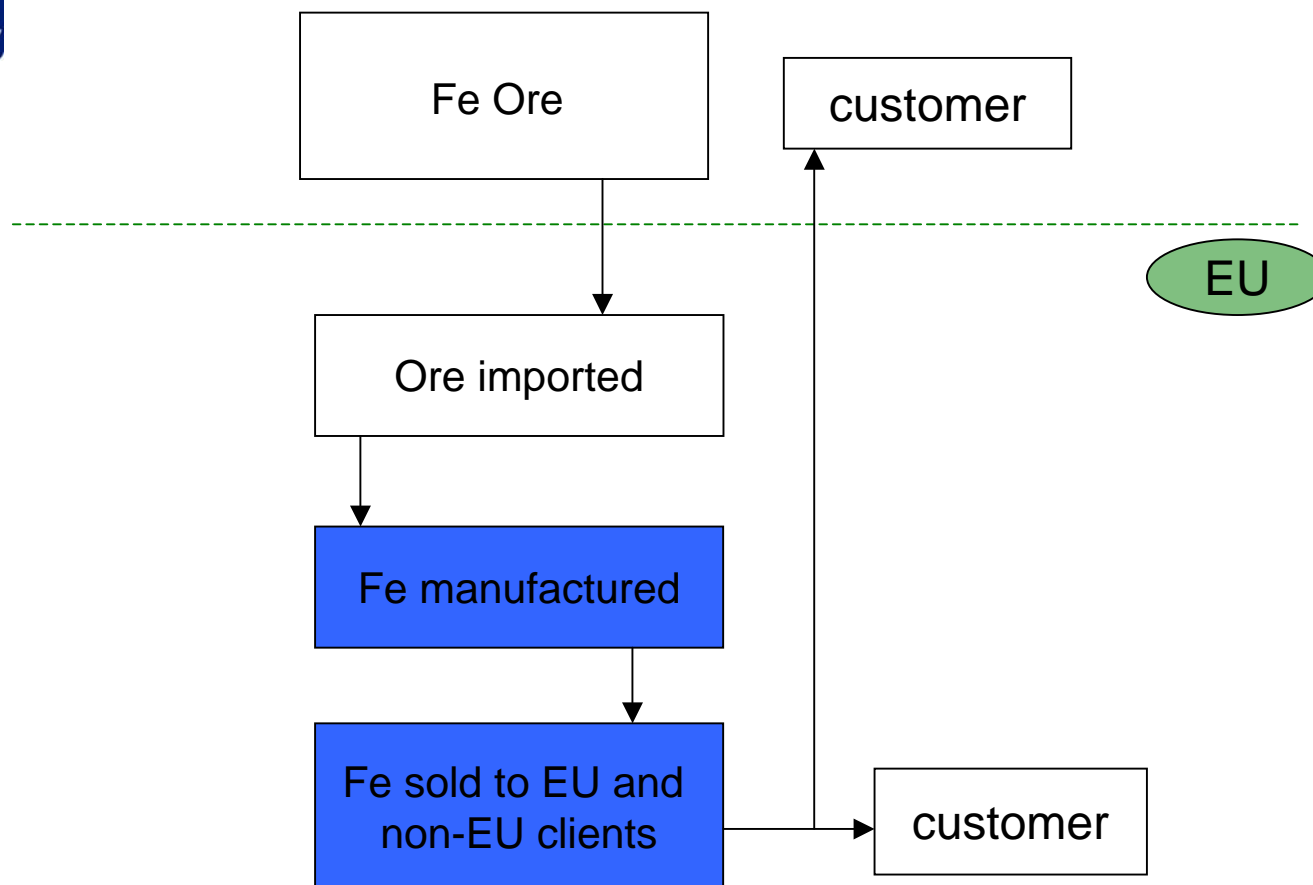
Fe supply chain #1



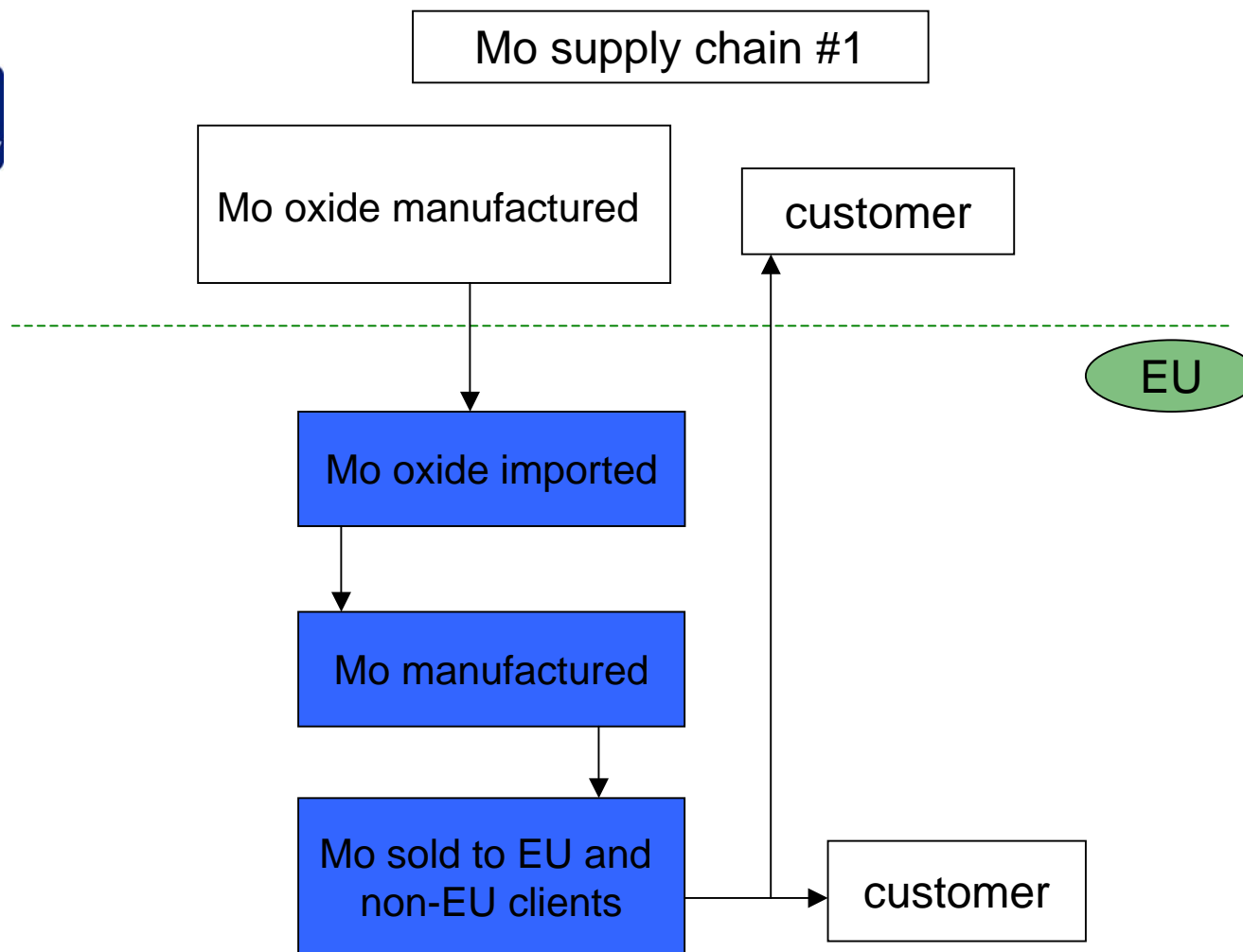
- Höganäs is an *importer* of Fe



Fe supply chain #2



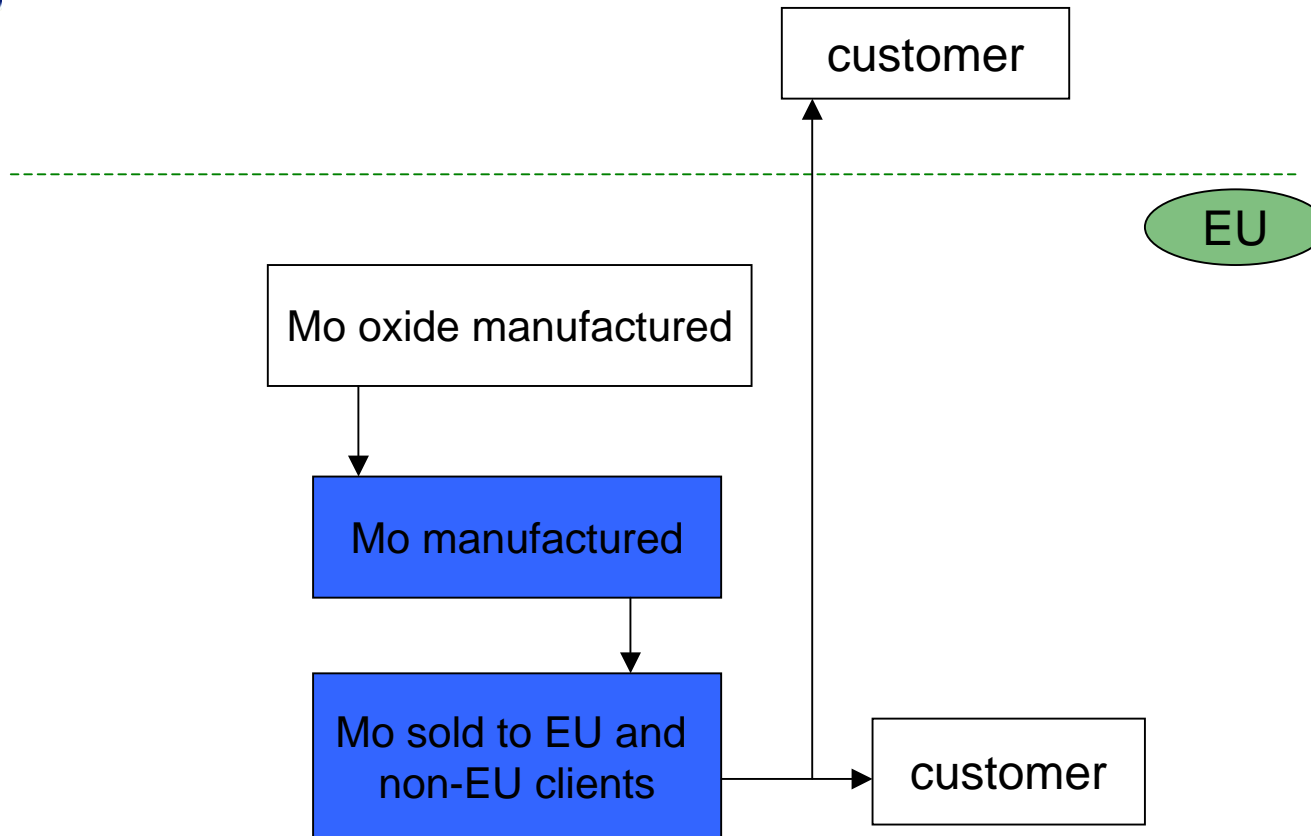
- Höganäs is an **importer** of Fe ore – exempt!
- Höganäs is a **manufacturer** of Fe



- Höganäs is an **importer** of Mo oxide
- Höganäs is a **manufacturer** of Mo



Mo supply chain #2



- Höganäs is a **downstream user** of Mo oxide
- Höganäs is a **manufacturer** of Mo



REACH supply chain role...

Define and clearly understand your supply chain with respect to your REACH role(s):-

- ✓ An EU manufacturer (**M**) and/or
- ✓ An EU importer (**I**) and/or
- ✓ An EU downstream User (**DU**)

...can your role be changed?



Impact of REACH?

- Suppliers will want to know how you use their substances. Do you want to tell them?
- Certain identified uses may not be supported
- Some substances may disappear from EU
- You may need to reformulate your product or re-engineer your process
- Attempts to pass on cost increases throughout the supply chain should be anticipated
- Watch out for unauthorised changes to materials



Questionnaires?

- Current advice is too soon to do these
- Höganäs has completed one for suppliers, why?
 - let supply chain know we're aware of REACH
 - identify weaknesses early, time to plan
 - helps with learning curve for us
 - wake-up our suppliers!
- Keep the questionnaire simple!
 - contact name
 - simple measure of REACH awareness / readiness
 - expected changes to materials supplied
- Customers' questionnaire next



Consortia – join the club!

- Höganäs – decided not to make a decision for the moment. Why?
 - Benefits unclear (eg data ownership)
 - With whom? (anti-competitive)
 - Cost of consortia (internal resource, legal)
 - Time to agree and form (12 months+)
 - SIEF will be available anyway
 - Buy /exchange data to fill gaps
- Looking at changes to our REACH role (from I to DU)



Tips for all:

- Get involved (lots of seminars now)
- Prioritise and focus on issues important to your business
- Aim to pre-register, even if uncertain
- Contact your customers to confirm identified uses
- Contact your suppliers - ensure they understand their REACH obligations and responsibilities
- Identify data needs, available data and data gaps
- Don't spend too much money – yet!.



Tips: small organisations / traders

- Don't get blinded by detail of REACH
- Internet is useful, but time consuming
- Look to change your REACH role in the supply chain; eg from M/I to DU?
- What data do you own? Data owners can enter SIEF, share costs, ownership rights preserved
- Consortia - only if benefits outweigh the costs.
- As a distributor, you will have to pass-on information up/down the supply chain



Summary and conclusions

- Start by listing all substances. If in doubt, list it!
- Detail supply chains for your business – you know it best
- Look to pre-register - to buy time
- Identify your REACH role for each substance (M, I or DU) and registration timetable
- Clarify your customers' identified uses
- Keep on top of your suppliers
- Identify critical and vulnerable substances early (supplier, margin, small market etc)

Thank you

...and good luck!