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# REACH Regulations

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**A Code of Practice**

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## Introduction

This is a practical guideline for Downstream Users in the automotive industry and is intended to promote effective communication within the supply chain.

It will assist organisations in developing a compliance strategy in line with European Regulations EC 1907/2006

This document has been created by Unipart and their customer Jaguar Land Rover with regulatory advice provided by The REACH Centre and Lancaster University. It has been endorsed by the UK REACH Discussion Group comprising OEM's and major first tier suppliers.



## REACH stands for

- Registration
- Evaluation
- Authorisation & Restriction
- Of Chemicals



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# Reach Code of Practice

This document has been created by the by the UK REACH Discussion Group to assist downstream users with the communication obligations from and to suppliers in the Automotive Industry.

It is intended as a practical guideline that aims to clarify and secure the process of data gathering. It is a voluntary code and does not guarantee the accuracy of any information in the supply chain. The validity of data made available by suppliers is the responsibility of the provider.

## 1. Record Keeping

- 1.1. Maintain records of supplier correspondence in connection with REACH including possibly the Declaration of Intent as advised by the AIG in 2008. If AutoREACH was used, these archived records may serve this purpose.
- 1.2. Maintain a database of suppliers' REACH contact details. Ideally this data shall be added to the core IT business system, however storage of records on individual spreadsheets is acceptable. Contact details on Material Reporting Systems (e.g. IMDS, MACSI, SDS) may be used instead if this covers all suppliers.
- 1.3. Regularly contact suppliers to confirm their REACH contacts are still in place, perhaps annually. Again Material Reporting Systems can be used if this covers the entire supplier base.
- 1.4. A policy statement outlining the organisation's role as defined in the AIG REACH document is to be published and displayed on corporate intranet or internet sites.
- 1.5. The individual responsible for REACH and supporting management structure is to have their contact details made available. An internal email address may suffice.
- 1.6. The legal obligations of REACH are included in the terms of trading, supplier correspondence and any contracts that exist for all suppliers.

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## 2 SVHC Identification

- 2.1 Utilise a standard process for supply chain communication and SVHC (substances of very high concern) identification. In most cases, the Material Reporting Systems or internal systems (e.g. for packaging or vintage parts) can be used.
- 2.2. Periodically remind all of your article suppliers of their Article 33 obligations and ask them to communicate with you.
- 2.3 The information received from suppliers shall be checked for plausibility. To achieve this, a qualitative risk analysis is to be devised to identify part numbers or components that could possibly contain SVHC's that have not been recognised or reported by the supplier. These can be considered high risk.

Suggested risk categories may be;

- articles containing relatively high proportion of adhesives, resins, PVC and electronics.
  - articles manufactured in non EU countries where REACH awareness is low
  - suppliers no longer a legal entity
  - poorly performing suppliers
  - non responsive suppliers
- 2.4 Information received from suppliers to be checked for completeness. If there are any gaps, then a four- step approach devised by the REACH Task Force can be deployed.
- Firstly, ask the relevant high-risk article suppliers whether any SVHC content >0.1% by weight.
  - Secondly, ask an internal expert for a judgement on SVHC content. If the supplier cannot be contacted (e.g. is not existing any longer) or will not respond, an internal expert may be appointed.
  - Thirdly, as above, but appoint an external expert. An investigation of the constituent material of each of the questioned articles is the next step, so an external expert from outside the organisation (may come from a competitor of the original parts supplier) can undertake a more detailed analysis. Again, the criteria used to select this expert is to be recorded
  - And fourthly, as a last resort undertake selective chemical screening and analysis.

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## 3 Article 33 Compliance

3.1 Instances when SVHC's have been identified in reportable quantities are to be communicated to customers in either of the following manner.

- a letter to be sent to all customers showing the part number, name of SVHC and if available safe handling data.
- same details can be loaded on a networked sales catalogue that covers the entire customer base.

3.2 The recent documents devised by the Federation of German Industry (BDI) that detail the properties and risks of SVHC's are recommended. Further information available from [reach-jaguar-aftermarket@unipart.co.uk](mailto:reach-jaguar-aftermarket@unipart.co.uk).

3.3 A robust and demonstrable process is to be embedded to ensure that enquiries from consumers or employees are responded to within the required 45 days. If judged worthwhile, undertaking a dummy or trial letter may test this.

## 4 Supplier Communication

The role of OEM's and first tier suppliers is one of educators of the supply chain. We are to market the benefits of regular and detailed communication amongst the suppliers. This can be achieved by periodic bulletins, the format and wording of which will vary each time, but can be topical messages.

Themes may be;

- reminders of importers duties if supply moves to non EU countries
- request for action regarding substitution of SVHC's/non registered
- updates on SIEF developments
- chart progress on registration
- particular change points in regulations to be communicated.

Some have the view that it is the role of trade associations or government authorities to undertake these activities. This style of communication is optional.



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## 5 Reach and Recycling

No specific actions. An awareness of the chemical content of waste that is a revenue source may be advisable as the purchaser may request this type of data in the future.

## 6 Miscellaneous Recommendations & Comments

- 6.1 The Automotive Industry Task Force has discussed the REACH Code of Practice. The Task Force a trade organisation that involves major Europe based OEMs and where appropriate, and published the AIG Guide to REACH in 2008. The code can be updated and amended in line with any conclusions agreed upon by this body.
- 6.2 The AIG REACH document is at [www.acea.be/index.php/news/category/reach](http://www.acea.be/index.php/news/category/reach)
- 6.3 The UK REACH Discussion Group consists of the following organisations;
  - Honda
  - Nissan
  - Ford Europe
  - Aston Martin
  - Tata Motors
  - Jaguar Land Rover
  - The Reach Centre, Lancaster University
  - EPR Consulting Limited
  - Sumitomo
  - Lear
  - Unipart
  - Yazaki
  - GKN Driveline
- 6.4 Attend UK REACH Discussion Group Meetings and contribute to industry forums.
- 6.5 Subscribe to relevant sources of information
- 6.6 Specific corporate REACH email address to be established
- 6.7 Monitor and influence end use descriptors as this may impose further duties to communicate with suppliers.
- 6.8 This may be considered Version 1 of the Code of Practice.
- 6.9 Feedback on the content of the Code is welcome, contact Mick Conmy on [REACH-jaguar-aftermarket@unipart.co.uk](mailto:REACH-jaguar-aftermarket@unipart.co.uk)