



ANSI/NAM Network on Chemical Regulation

Second Meeting
January 22, 2008
Hosted by ASTM International

executive summary

The ANSI/NAM Network on Chemical Regulation is an issue-driven group created to enable industry to speak with one voice when addressing chemical-related regulations and regulatory controls. The Network was formed in 2007 by the American National Standards Institute (ANSI) and the National Association of Manufacturers (NAM). The group meets regularly via teleconference and periodically at face-to-face meetings.

Meeting Overview

Since the October 2007 inaugural meeting, a core group of participants has been cataloging and prioritizing an identified list of chemical-related interests and concerns. This inventory helped to shape the development of a Work Group structure that was launched during the second in-person meeting of the Network on January 22, 2008. The five Work Groups (Global Supply Chain Issues, Policy, Standards and Conformity Assessment, Consortia, and Legal and Intellectual Property (IP) Issues) will position the Network to strategically and tactically address the imminent requirements of REACH implementation, as well as future chemical-related concerns. Active participation by the attendees and exceptional subject matter offerings contributed to the success of a full-day meeting that was hosted by ASTM International in West Conshohocken, PA.

Discussions during the general sessions focused on a broad range of chemical-related issues. Many of the concerns and needs identified were repeated across industry sectors, including: tools for compliance and conformity assessment assistance, education and communication awareness for the supplier and consumer, direction on materials that already exist, and processes to avoid duplication of efforts. During the breakout sessions, each Work Group (WG) prioritized items of concern related to REACH implementation and identified potential action items within their respective areas of focus.

Participants agreed that, in order for the U.S. to make significant progress with REACH Implementation, industry and government representatives will need to be proactive and resourceful to develop the tools and resources considered necessary to address this global concern. Participation is vital.

Interested parties are encouraged to join the Network and play a part in building a solid foundation for the U.S. For more information or to join, visit www.ansi.org/chemicals.

Working Group Summary Reports

Global Supply Chain Work Group

Co-Chairs: S. Danenberg, M. Kirschner, M. Taubitz

Team: S. Chang, S. Danenberg, AJ Guikema, B. Hamilton, M. Kinter, N. Pratt, K. Tuohy

Key Issues Identified

- Q&A and guidance documentation
- Self-assessment tools
- Standard for consistent communication between customers and suppliers

Deliverables

1. Develop draft REACH applicability tool
 - Design layout – February 1, 2008
 - Develop content – March 1, 2008
 - Share draft for review – March 15, 2008
 - Discuss comments within Global Supply Chain WG
 - Confirm suppliers use of tool before moving forward (send to industries for comments)
 - Revised draft – May 15, 2008
 - Final tool – June 1, 2008
2. Identify needs and share tools for customers (short-term)
3. ANSI to create listserve email distribution for the Global Supply Chain WG (*complete*)

Policy Work Group

Co-Chairs: P. Beattie, J. Cooper

Team: J. Cooper, J. Wishneff

Key Issues Identified

- Message development
- Montebello/NAFTA chemical project
- SME awareness campaign/toolbox on REACH

Deliverables

1. Create three (3) sub-groups to focus on REACH messaging, the [Montebello Agreement](#), and the [Toxic Substances Control Act \(TSCA\)](#)
 - ANSI listserv email distributions for each sub-group (*complete*)
 - Need chair for REACH messaging (immediate)
 - Call for additional participants for all sub-groups (immediate)
2. REACH message development
 - Establish timelines for Q1 and Q2 meetings (immediate)
 - Get consensus on prioritization of messages (short to long-term)
3. Montebello Agreement
 - Distribute 1-pager and slide deck to group on Montebello (immediate)
 - Create discussion draft that includes conceptual framework for a tiered, targeted and risk-based approach to chemical evaluations and management (short-term)
 - Circulate discussion draft to the Policy WG with request for comment (long-term)
4. ANSI to create listserv email distribution for the Policy WG (*complete*)

Standards and Conformity Assessment Work Group

Co-Chairs: R. Forselius, B. Murphy

Team: B. Mahone, B. Murphy, R. Schneider

Key Issues Identified

- Development of a list of existing documents/activities and standards needs related to REACH
- Encouragement of harmonization and gap analysis

Deliverables

1. Develop a list of standards needs and a draft of existing documents and activities related to REACH
 - Invite key individuals involved in existing activities (short-term)
 - Inquiry to standards developing organizations (SDOs)/Network participants to identify which current activities to include (short-term)
 - Distribute to WG for feedback and comments (long-term)
2. Identify areas of overlap/perform a gap analysis
 - Develop criteria to evaluate overlap (industry-led case-by-case basis efforts) (short-term)
 - If a gap is identified, determine if current expertise exists or if there is a need to create a new group (long-term)
3. ANSI to create listserve email distribution for the Standards and Conformity Assessment WG (*complete*)

Consortia Work Group

Co-Chairs: P. DeLeo, M. Goode, T. Helmes

Team: M. Goode, D. Uyesato

Key Issues Identified

- Communication of existing consortia and relevant resources in ECHA, CEFIC and national trade associations
- Direction and guidance on how to participate – ultimately leading to more active participation of U.S. companies in consortia (pre SIEF)

Deliverables

1. Develop a list (or determine if one already exists) of current consortia – March 1, 2008
2. Provide direction on how to discover the existence of a confidential consortium for a particular chemical – March 1, 2008
3. Draft a guidance document with issues and potential benefits associated with consortia formation and agreement – March 1, 2008
4. Launch a website (or utilize an existing website) to house a listing of companies who are able to offer resources (legal, regulatory, training, Only Representative, etc.) – March 1, 2008
 - Advertise the existence of this site via trade associations, etc.
5. ANSI to create listserve email distribution for the Consortia WG (*complete*)

Legal and Intellectual Property (IP) Issues Work Group

Co-Chairs: H. Estreicher, M. Marrapese, B. Matthews

Team:

Key Issues Identified

- Identification/flagging of legal issues in RIP and all REACH related efforts
- Recruitment of the trade industry legal representatives to aid in our efforts

Deliverables

1. Expand WG to include industry and association legal representatives who may have REACH experience (short-term)
2. Flag legal issues (short-term)
 - CBI issues (uses, product sameness and exposure scenario)
 - Due diligence issues (requirements and consequences)
 - Contracts (up and down supply chain)
 - Only representative
 - Product defense (listing/appeals processes)
 - Article 33 – safe use instructions
 - Nanotechnology
 - Data and cost sharing
3. Develop a Q&A guidance document for identifying issues in RIP (long-term)
4. ANSI to create listserv email distribution for the Legal and IP Issues WG (*complete*)