Manufacturers Network on Chemical Regulation

Small Group Discussion Report Outs

Wednesday, October 17, 2007
The Fairmont Washington Hotel
Washington, DC
Areas of Concern and/or Need

- Consistent Interpretation
  - clarification of treatment of articles and testing requirements
- Standardized Communication Across Supply Chain
  - data sharing, data mining, materials declaration, etc.
- REACH Harmonization
- Information Management
- Risk in the Supply Chain
  - demonstration of conformance
- Different Industry Perspectives
- Duplicate Efforts
Areas of Concern (continued)

- Cost Concerns
  - registration
  - Consortia and SIEFs
  - penalties to pre-register
  - compliance
- Need for REACH implementation Team in U.S. Government
- Lack of “Voice” by SMEs
- Protection of Proprietary Information
- Formation of SIEFs (Substance Information Exchange Forum)
- Identification of SVHCs (Substances of Very High Concern) Early On
- Resources
  - required vs. available capacity of supporting resources
Best Practices/Current Work Underway

- Auto Industry’s IMDS (International Material Data System) and Guidelines
- Electronics Industry (IEC/TC 111 and IPC 1752)
- ASTM F40 Activities
- Industry Association Collaborations (AIA, AIAG, ASTM, ACEA, NEMA, AHAM, SOCMA)
- Consolidation of REACH Management into Project Teams
- Lessons Learned from RoHS/ELV and HPV
- U.S. Commercial Service Webinars
Commonalities Across Sectors

- Need for More Communication and Education for:
  - Supply Chain
- Need Confirmation of all EU Compliance Related Guidelines
- Standard Interpretations and Data
- Early Warning of Policy Focused Issues by Business, Engineering and Students
- No Exemptions for Specific Chemicals/Articles
Leveraging Resources and “Getting Common”

- Common Format for Reporting
- Workshops
- Possible Association Membership in Consortia Groups
- Increased SDO (Standards Development Organization) Coordination of Related Activities
- Identify Where Sectoral Differences can be Addressed
  — specifically with an “umbrella” organization to engage on issues multi-sectorially