



# 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