



ANSI/NAM Network on Chemical Regulation

Focused on REACH Implementation

executive summary

Conference Overview

On October 17, 2007, the American National Standards Institute (ANSI) and the National Association of Manufacturers (NAM) convened the inaugural meeting of a Network on Chemical Regulation (Network) in Washington, DC. More than ninety public- and private-sector experts, including manufacturers in the aerospace, automotive, consumer and household goods, and telecommunications industries, along with representatives of the U.S. federal government, convened to discuss the pressing and significant implications of REACH, the European Union legislation on the *Registration, Evaluation, Authorization, and Restriction of Chemicals*.

Key Points of Discussion

REACH implementation costs are already expected to run into billions of dollars for U.S. industry and could escalate significantly unless companies work together to harmonize registration procedures and share best practices. As a result, discussions during the half-day event focused primarily on cross-sector issues, concerns and commonalities, and leveraging resources.

The majority of the plenary session was devoted to an interactive dialogue that helped to identify areas of need and possible solutions. Participants agreed that the shared intent was to learn from past experiences (e.g., RoHS implementation) and focus on issues related to harmonization and cost minimization.

There was also widespread agreement that a template-driven, “common” approach to implementation would be helpful. A “common” document would be used across sectors and tailored as appropriate for unique industry-specific needs. Meeting participants also called for standardized communication across the supply chain, data and information sharing/protection, consistent interpretations of the legislation, and clarification of the EU’s willingness to accept test results from other jurisdictions. As a means to further harmonization within the U.S., a suggestion was also made that federal agencies designate REACH implementation points of contact within each department and that a cross-agency REACH implementation team be formed.

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Prepared by ANSI Staff
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IMMEDIATE ACTION ITEM:

A small group is working to compile and prioritize the key issues raised during the first meeting. Going forward, teams of subject matter experts and interested Network members will be established to address the strategic, supply chain, information dissemination and other issues that have been identified.

LONG-TERM OR ONGOING ACTION ITEMS:

Strategic Issues

- Develop high-level “common process” implementation guidelines that can be customized to meet the needs of different industry sectors
- Establish a comprehensive due diligence process for articles (i.e., regulation discovery, identification of consistent interpretation(s) and treatment across sectors, etc.)
- Identify the costs of REACH implementation and focus action on the most significant elements
- Encourage the development of a cross-agency REACH implementation team within the federal government and identify designated points of contact within each agency

Supply Chain Issues

- Develop an inventory of chemicals in the supply chain and the related methods to evaluate REACH compliance (e.g., standard nomenclature for chemicals)
- Create a standard template that can be used throughout the supply chain to document information required for the demonstration of compliance (e.g., common request and response forms, etc.).
NOTE: new documents may be based on experiences gained during RoHS implementation.
- Promote consistency and standardization of communication across supply chains (including materials declaration)

Information Dissemination

- Identify acceptable mechanisms that manufacturers can use to certify that their suppliers are also REACH compliant
- Confirm whether foreign (i.e., non-EU) test results will be accepted by the EU as a demonstration of compliance and whether the groups responsible for developing implementation guidance documents are open to representation from non-EU countries
- Develop a fact sheet and elevator remarks to educate and inform business leaders and government officials about the impact of REACH implementation, activities currently underway, and how to become involved
- Investigate and communicate issues relating to the formation of and participation in a REACH Consortia
- Provide input to the U.S. government for a “North American Chemicals Management Model” that builds on work already underway (*reference*: NAFTA leaders meeting in Montebello – Appendix A)
- Conduct ongoing teleconferences, plus other meetings, events, workshops and/or webinars as needed

