GE Healthcare Approach to REACH

Purpose: Information
Submitted by: GE Healthcare
GE Healthcare
Approach to REACH
“Registration, Evaluation & Authorization of Chemicals”
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A global company
GE is a family of businesses aligned with our customers' needs.

Operations in over 100+ countries
Manufacturing facilities in 40+ countries

Commercial Finance
Healthcare
Infrastrucure
NBC Universal
Industrial
Consumer Finance
GE Healthcare

GE Healthcare brings the world medical science and technologies that are helping to transform healthcare. We are working with our partners in healthcare to help them predict, diagnose, inform, and treat disease earlier than ever.

$15B business, 42,000 employees

EU REACH…the Requirements

Registration, Evaluation & Authorization of Chemicals

REACH… a very complex comprehensive chemical management regime

- Managed by New European Chemicals Agency (ECHA)
- Impacts the entire supply chain in EU and across the globe
- Information gathering & reporting for next 10 years
- To effectively manage…must focus on immediate critical time frames

Purpose of REACH

1) Protection of human health & environment
2) Substitute substances of high concern
3) Focus on risk management
4) Single chemical system for existing and new substances
5) Shift responsibility from authorities to industry and downstream users
EU REACH…1st Deliverables

Critical timing:

- **May 16 2008**: PPORD notifications, Product and Process Oriented Development
- **June 1 – November 30, 2008**: GE and or suppliers have obligations to submit pre-registrations
  - Registration tasks and obligations
  - Preparation of Registration Dossier
- **June 1 2008**, Provide SDS’s in REACH format
- If manufacturing or importing more than 10 tons per year, must also provide:
  - Chemical safety assessment & chemical safety report
  - Customer must communicate to GE how will utilize chemical.

Ongoing supply chain obligation - Modify registration to account for new uses as long as not represent huge risk to human health & environment

GEHC REACH Program Strategy

**Strategy**

- Awareness
- Interpret
- Impact on GEHC
- Program
- Sustain/Operationalize

**Engagement**

- Global Program Mgr
- One Global Manager
- P&L’s Leaders
- Functional Leaders
- Experts

**Op Mechanisms**

- Monthly Core and functional mtgs
- Monthly GE Corporate meetings

**Tools & Processes**

- GE Corporate Framework
- Trackers
- By Business
- By P&L

**Sustainability & Operationalization**

- Digitized tool for tracking
- Incorporate into new product program
Global REACH Organization…by Business & function

Global Leader

Core Team

REACH Business Leaders

Functional Leaders

Experts

Program consistency across GEHC …common timing, tools, org structure, op mechanisms

Internal Communication & Operating Mechanisms

Communication of regulation to stakeholders
Training on the regulation
Monthly operating mechanisms for affected functions
GE Corporate & business programs on how to comply
Roll out of Company wide tools
Communication with suppliers & customers
Business and leadership reviews
Trackers for Compliance
Supplier Communication & Compliance

Education of suppliers on REACH
Letters to suppliers
REACH in supplier contracts
Track pre-registration compliance
New supplier if not compliant

…Enhance processes for change control & new product programs

Ensuring Compliance - Tracking Key Milestones

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GE Process and Integration with ECHA System

GE Tool- REACH Tracker

Interface for GE businesses & sites to create & manage tracking, building chemical substance inventories, & facilitating REACH compliance activities

• Create, manage, and assign ownership for REACH tracking
• Integrated data mining
• Build CSIs using the web-based interface or Excel based upload template
• Facilitate REACH compliance activities and supplier/customer communications
• Track pre-registration/registration targets, ownership, and followup
• Data mine and analyze across and within business units and compare tonnages against thresholds
GE Healthcare Areas of Risk…
Requiring Greatest Focus

…Complete list pre-registered
…No impact on supply chain
…Registration completed by GEHC or suppliers…accuracy/timely/complete
…Cost for registration & testing reflected in price of supplied parts
…Compliance…far the biggest risk is suppliers
   If not in EU, not familiar with REACH
…Time & effort to convert MSDS into REACH format

Where to find more information:
ECHA

  – Guidance updated
  – Software tools: IUCLID 5
  – REACH Navigator → REACH Status
  – REACH FAQs
  – Helpdesks (REACH, ECHA & IUCLID)
Thank You