



## A guide to REACH

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The current proposal for the EU legislation, Registration Evaluation Authorisation of Chemicals (REACH) is complex, and it will be onerous for industry to comply. The date of implementation looks likely to be Spring 2007; although the legislation is likely to change somewhat before it finally enters into force, the main principles are unlikely to change.

It is now time for ELGI members to begin their actions to implement REACH in their companies, such as compiling lists of substances manufactured, imported and purchased in the EU. This is vital because REACH will oblige most, if not all, ELGI members to do one or more of the following: register manufactured and imported substances, carry out chemical safety assessments, upgrade their own Safety Data Sheets, and act upon their suppliers' SDSs. Furthermore, REACH might lead to disappearance of some substances from the supply chains of ELGI members, so it could be wise to begin dialogue sooner, rather than later, with key suppliers about key and/or vulnerable components.

An ELGI working group is currently preparing a "Guide to REACH for ELGI Members". This guide will give a broad overview, rather than a line-by-line review, of the REACH proposal as it currently stands after its first reading in the European Parliament and Council in December 2005. In particular the likely impact on the lubricant and grease industry will be discussed. The guide will examine the process of REACH as it applies to a 'simple' grease formulation including the necessary actions and information requirements to market this product if it is manufactured in or imported to the EU. It will also include a review of the different scenarios faced by all players in the supply chain, including non-EU manufacturers, importers of raw materials for manufacture, end users etc. Some suggestions will be given for what ELGI members can do NOW in order to prepare for REACH.

The "Guide to REACH for ELGI Members" will be published on the ELGI website in mid-July.

**Stephen Harley**

**BP**

**UK**

[stephen.harley@uk.bp.com](mailto:stephen.harley@uk.bp.com)