Countdown To REACH — Complying With Document Delivery Challenges

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The countdown to the next Registration, Evaluation, Authorisation and Restriction of Chemicals [1] (REACH) deadline of 31st May is underway. This is the deadline for companies that manufacture or import in the EU phase-in (those already pre-registered) substances in quantities above 100 tonnes a year to register their chemicals with the European Chemicals Agency (ECHA). At this time, many SMEs will come under REACH this time and many of these companies will no doubt be finding the process of compliance complex, time consuming and challenging.

The aim of REACH is to improve and ensure the safe use of chemicals, and the one of the things that REACH does is make all parties in the supply chain — from manufacturers, distributors through to downstream users — directly responsible for the safety of the chemical substances they handle. One area where this has caused changes is the shipping of chemicals and in particular, the requirements for documentation in the supply chain.

Under REACH, the responsibility is firmly on suppliers to ensure that their customers are supplied with Material Safety Data Sheets (MSDS), exposure scenarios and other

critical safety information, often with the requirement to actually deliver and update at regular intervals, rather than simply sending these documents. In addition, the requirement to ensure that all employees that may come into contact with hazardous materials are also provided with the most current MSDS and exposure scenarios has increased record keeping and increased time-consuming tasks.

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[1] http://en.wikipedia.org/wiki/Registration,_Evaluation,_Authorisation_and_Restriction_of_Chemicals
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