Downstream Users & REACh

(Registration, Evaluation, Authorisation & Restriction of Chemicals)

What you need to know

Who is a Downstream User? (DU)

The basics

Any industrial/ professional user of substance/preparation who is not a manufacturer or importer of a chemical.

Downstream users are therefore:

Formulators of preparations of substances

Industrial users in production processes

Industrial manufacturing of articles

Not regarded as DU are:

Distributors, retailers & Consumers

D U Obligations what do we have to do (1)?

Firstly, we have to ask ourselves: how does this affect Glenair?

We do not produce chemicals,
We do not import them, and
We do not sell them either.

D U Obligations what do we have to do (2)?

So what do we actually do? & how does it affect us?

We use products (adhesives, potting etc.) or we surface treat some of our products (sub contracted) which in part become part of an article.

I will explain the meaning of an article later in this presentation.

REACh is very similar to CoSHH (1)

(Control of Substances Hazardous to Health)

- ✓ We need to know what we are using and where,
- ✓ We need to know how to use substances safely,
- ✓ We need to have Material Safety Data Sheets for all substances (MSDS) with no exceptions,
- ✓ We have to carry out & make available CoSHH assessments (In the world of REACh this is called an exposure scenario ES), to identify and manage risk,

REACh is very similar to CoSHH (2)

- ✓ We need to be able to provide appropriate information to any customer who requests safety information on a substance we use, more so if it's classified as an SVHC,(Substance of Very High Concern)
- ✓ We also need to be aware of any SVHCs which may become a banned substance & the potential impacts on Obsolescence,
- ✓ We have to take account of the impacts on the environment regarding safe and appropriate disposal,
- ✓ We need to have, and maintain an inventory of what we use.

What is different with REACh & CoSHH?

Not a lot!

REACh is concerned with the controls and licenses the chemicals/substances produced,

CoSHH provides information on the safe use of substances or a combination of the bi – products from substances e.g. adhesives,

Safety signs under CoSHH have under CLP also been replaced (slide 9).

How do we manage this?

Every chemical/substance has either a CAS or ENICS classification code,

We keep up to date with these via a REACh alert system.

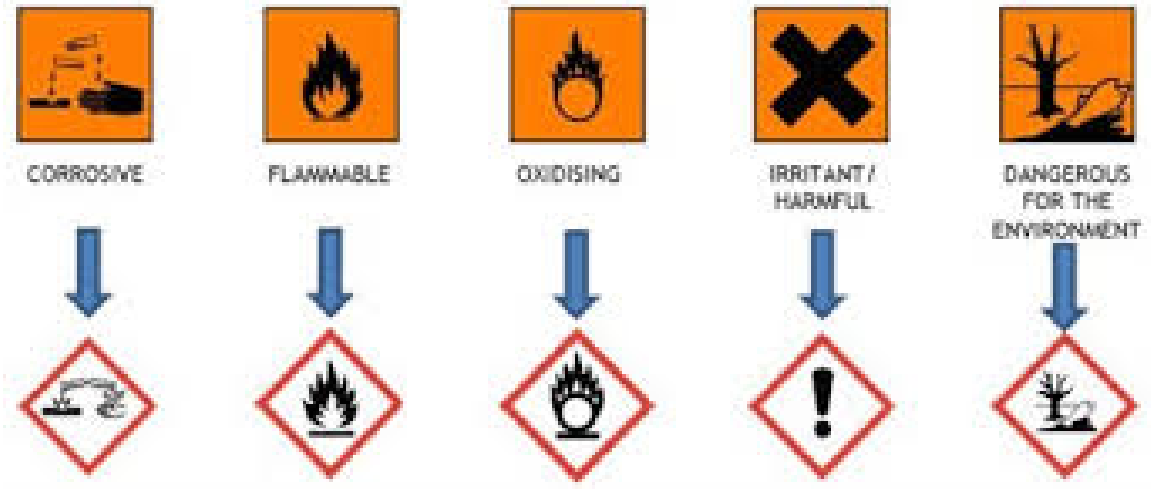
We have created and maintain a joint REACh & CoSHH database capturing these codes,

The database automatically alerts us when both codes are aligned to a product we use.

Latest List of Substances of Very High Concern 2014

CLP (Classification, Labelling Packaging) labels

Current CoSHH signs



Replacement CLP signs

Who manages REACh?

ECHA

(European Chemicals Agency)

Whilst ECHA's role has no direct impact on Glenair, producers of substances that eventually become products that we use are.

All substances/chemicals now have strict manufacturing licensing controls to which classification codes are given.

How do we know what a REACh substance is?

This is an issue for the chemicals industry and users of chemicals who produce the items we use every day like adhesives, epoxy resins etc.

EHCA does publish these lists (catalogue) which are in effect licensed products.

In the context of REACh what is an Article (1)?

An article is simply a product which has been produced from a variety of materials or substances to create something else.

If a product composition uses more than 0.1% of a substance classed as being an SVHC we have to advise the end user.

If a product contains an SVHC and it is designed to release it, then we have to create an MSDS (if appropriate) a Risk assessment or an ES

In the context of REACh what is an Article (2)?

Are we affected by this? Yes

Recently, Cadmium has been included on the SVHC list the impact of this is illustrated in the table below

REACh, SVHC's & Articles

Cadmium Plating Evaluation

Sample	Part No.	Bin ref	Trace No.	Weight before Cad plating	Weight after Electroless nickel	Weight of Electroless nickel %	Weight after Cadmium plating	Weight of Cadmium %
1	G79502-08	BH492	1416269	4.0133 g	4.0791g	1.6	4.2039g	3.0
2	G79502-14	BH399	1890378	8.1389 g	8.2783g	1.7	8.5201g	2.8
3	G79502-18	BH406	1389232	10.9914 g	11.1806g	1.7	11.4342g	2.2
4	G79502-22	BH428	1107117	14.6128 g	14.8356g	1.5	15.2035g	2.4
5	G79502-61	BH402	646287	15.6952 g	15.9557g	1.6	16.3067g	2.2

The samples taken will have an element of electroless nickel applied.

This means that if the customer asks we have a duty to provide a risk assessment or exposure scenario

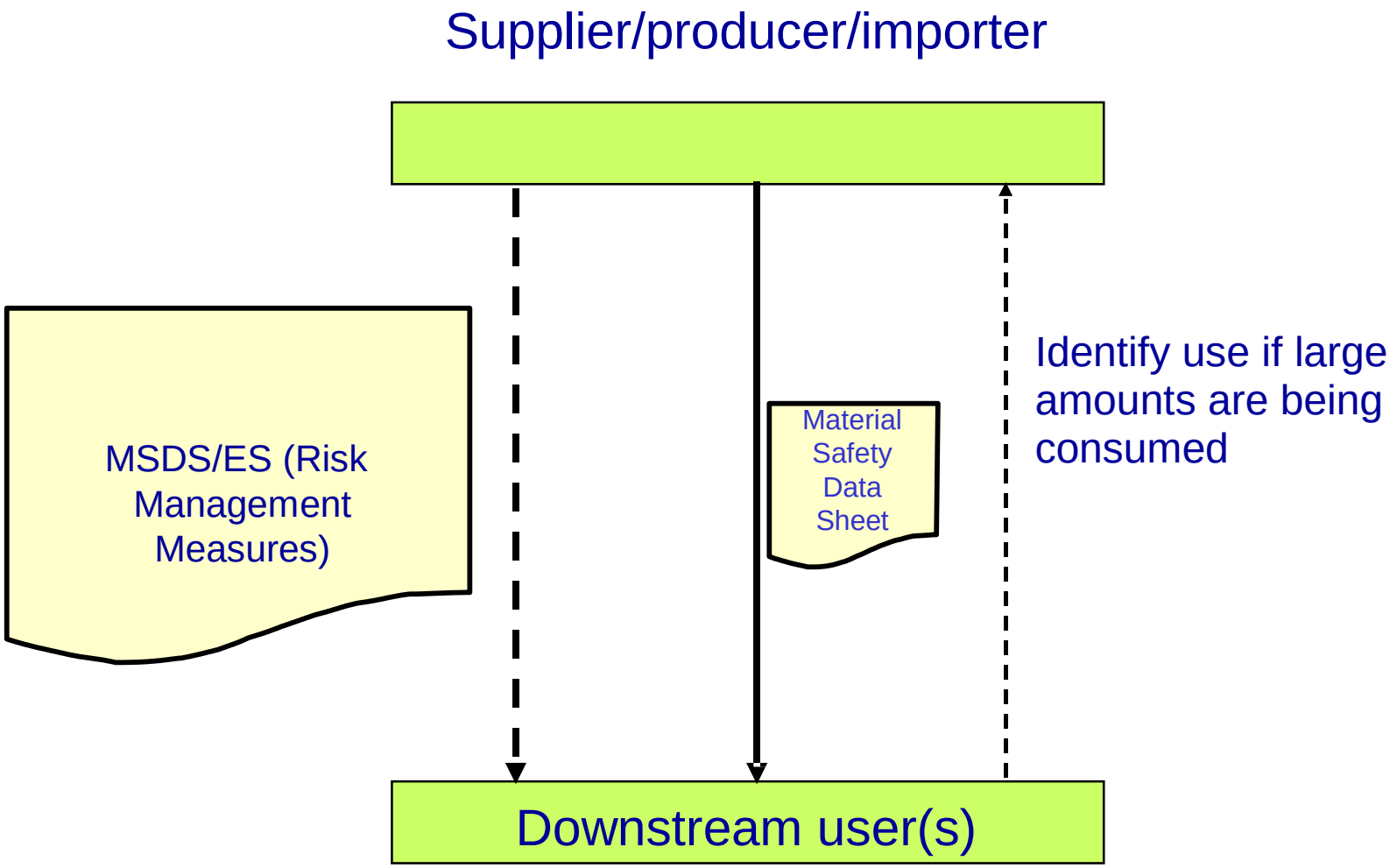
In the context of REACh what is an Article (3)?

If we were to use more than a tonne of an SVHC annually producing these articles then the volume used has to be reported to ECHA

Do we use this amount?

No

Supply chain communication



Summary

REACh, SVHC’s and Articles does have an indirect impact on us, namely:

Obsolescence,

Advising customers where an SVHC used in an article exceeds the max allowed limit of 0.1%,

Maintaining an up to date register of substances being used,

Keeping abreast of ongoing inclusions to the SVHC list,

Where required, produce an MSDS/ES,

Consult and ask our supply chain to advise us if there are any SVHC’s in the products we purchase.