



REACHING A SAFER FUTURE

IMPACT ANALYSIS (SIMPLE INVENTORY) & PRE-REGISTRATION

SGS



BRINGING COMPLIANCE WITHIN REACH

Your obligations under REACH can vary greatly depending on a number of factors, such as your role in the supply chain, the way you use chemical substances, their origin and the properties of products your organisation purchases, manufactures or sells. A single organisation can have multiple roles under REACH.

SGS recognises the complexity of the REACH regulation and offers pragmatic solutions enabling all organisations impacted by REACH to concentrate on the immediate priorities and proceed step-by-step with the implementation of their compliance strategy. Our aim is to help your organisation define its roles under REACH, identify key priorities to focus on ahead of each compliance phase and to deliver these services cost-effectively.

REACH IMPACT ANALYSIS

Each company impacted by REACH will first have to determine what role or roles it plays in the regulation. SGS can determine the total impact of REACH on your company by performing a REACH Impact Analysis.

The Impact Analysis consists of both a Simple Inventory and a Complex Inventory. The Simple Inventory enables you to determine which substances to Pre-register from the first of June to the 30th of November 2008. The Complex Inventory is an additional phase to prepare for entering the Substance Information Exchange Forum (SIEF) and for registration of chemical substances.

Simple Inventory

- Inventory of substances, preparations and substances in articles
- Assess role(s) within REACH
- Substance identification
- Tonnage calculation
- Assess obligations under REACH
- Prepare detailed action plan for Pre-registration

Complex Inventory

- Analysis of the supply chain
- Collect public domain data
- Data gap analysis
- Review and revise classification and labelling
- Prepare detailed action plan for entering SIEF

Simple Inventory and Complex Inventory are modular, and each of them can be selected separately. This means you have full cost control and the opportunity to perform a conclusive cost-benefit analysis.

SIMPLE INVENTORY

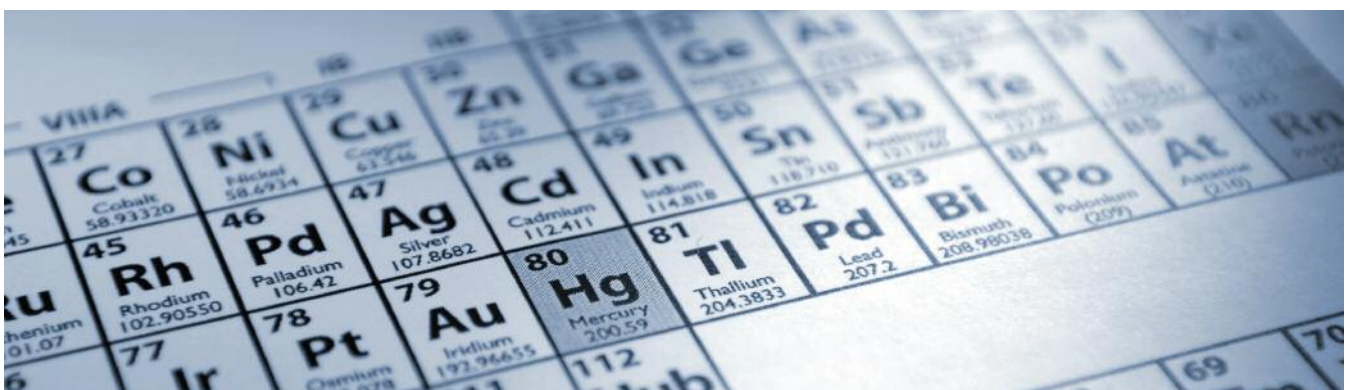
The Simple Inventory consists of an inventory of all the substances used in your organisation's products and processes and subsequently assessing your role(s) under the regulation.

Benefits

Conducting a Simple Inventory is essential for your company to prepare for the Pre-registration phase. The key outcome of this step is a practical action plan for Pre-registration. Pre-registration is not only an opportunity to get ahead on REACH compliance, but is also absolutely necessary for business continuity, as you will only be allowed to make, import, use and distribute existing (phase-in) chemical substances that have been pre-registered. The deadline for Pre-registration is the 30th of November 2008.

How is a Simple Inventory conducted?

- SGS has developed a manual to assist you in establishing Purchase and Manufacturing lists. It contains all objects (Articles / Preparations / Substances) purchased and manufactured at each of your sites.



- After this inventory, SGS will determine your roles within REACH concerning each substance and identify which ones will potentially be subject for Pre-registration.
- If a substance cannot be identified, SGS can also provide testing or other laboratory services that can be used to identify any substance. These services are supplemental and not part of the standard Simple Inventory service.
- SGS will then perform a tonnage calculation which needs to be submitted during Pre-registration. For this, you will need to provide all tonnage-information for the last three years.

Already performed Simple Inventory?

In the event that you have already identified the chemical substances used by your company and clarified your roles under REACH, SGS can perform a review of the information acquired for the Pre-registration.

What are the next steps?

After the Simple Inventory or the review, SGS will prepare the Pre-registration for the phase-in substances.

PRE-REGISTRATION

Information included in the Pre-registration can be submitted between the first of June and the 30th of November 2008. To benefit from the transitional regime until the registration deadline, manufacturers and importers must pre-register phase-in substances which exceed the level of 1 ton per year.

Benefits

Pre-registration is essentially an administrative task. SGS has both the expertise and capacity to handle such a task effectively on your behalf. SGS will pre-register the substances which gives your company the opportunity to benefit from the transitional regime until the respective registration deadlines of the substances. No fee is charged by the European Chemicals Agency (ECHA) for Pre-registration. In addition, the fact that you pre-register a certain substance does not obligate you to register it later on.

The Pre-registration process

Pre-registration is only the actual administrative submission of data to the ECHA. The information required for Pre-registration consists of the following:

- Name of the substance and number (EINECS / CAS)
- Name and address of the contact person
- Envisaged deadline for registration and estimated tonnage band

What happens after Pre-registration?

After Pre-registration, SGS can help you prepare for entering SIEF (pre-SIEF discussions, Complex Inventory). SGS can also enter SIEF on your behalf as your third-party representative and discuss with other SIEF members the exchange of data on substances and the cost of sharing these data. With the help of SGS expertise, your company can actively participate in SIEF in a confidential manner and protect your business interests.



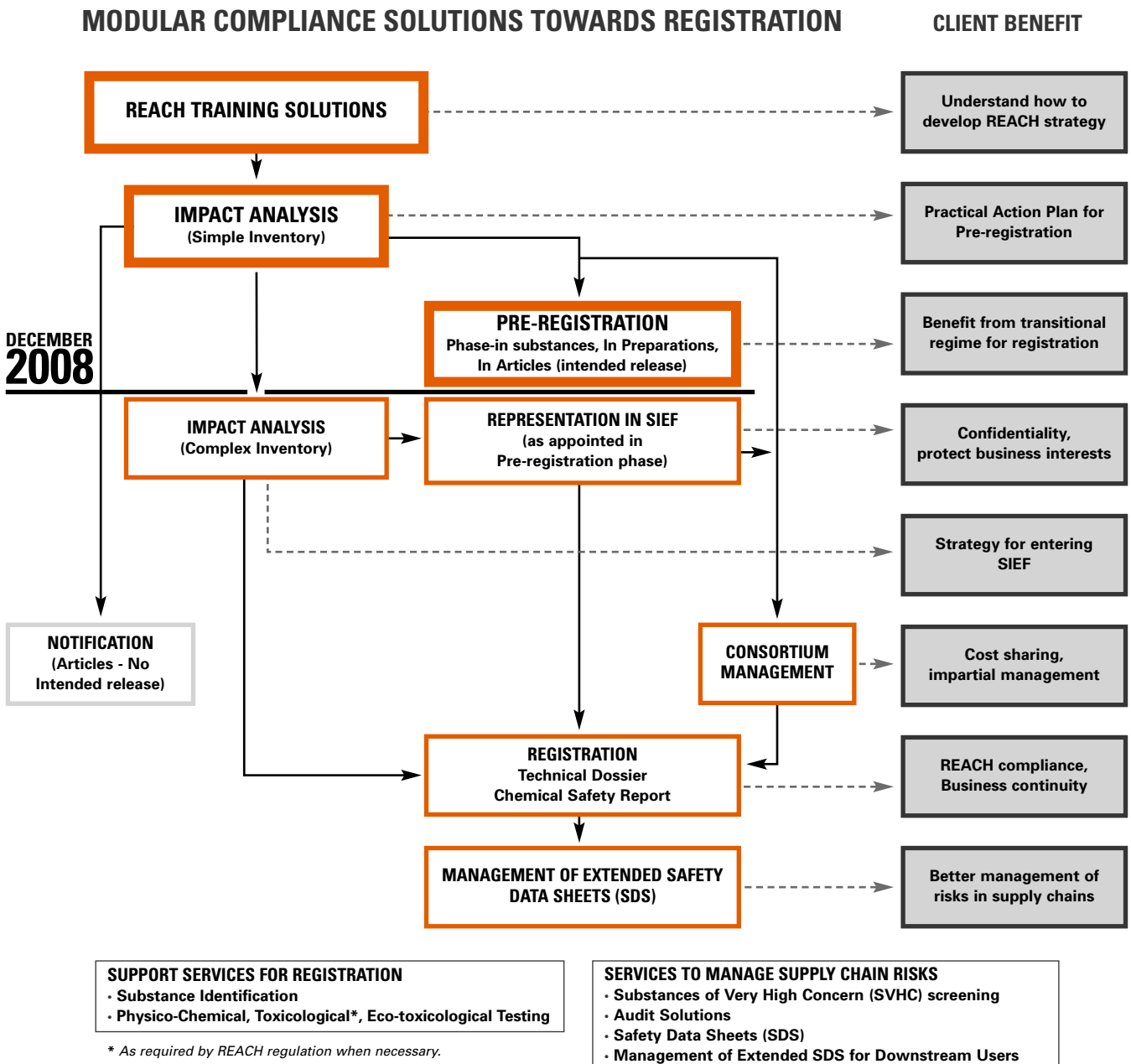
WHY SGS?

SGS offers a cost-effective and customised solution to help you comply with REACH. Our expertise across a wide variety of industries and disciplines gives us the know-how to help you navigate all aspects of complying with the key milestones of REACH.

To learn more about how SGS can help you with Simple Inventory and Pre-registration or later during the REACH process, contact REACH@SGS.COM or visit WWW.SGS.COM/REACH.

MODULAR PORTFOLIO OF REACH SERVICES

SGS has developed a comprehensive set of solutions towards becoming REACH compliant. SGS can help customers in the EU and around the world manage their responsibilities at each critical step within this far-reaching regulation. Our services range from offering training or helping to assess the impact of REACH on your organisation to assisting you throughout the entire process. SGS also offers a comprehensive portfolio of services for manufacturers, suppliers of articles, importers, distributors, and downstream users to help manage the risks caused by chemical substances within supply chains.



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