

REACH/GHS

and what this means for you



Over the past few years there has been much discussion within the EU on developing a new management system for chemicals whereby more responsibility is shifted from authorities to the industry. The outcome of this discussion is called the REACH Regulation, and will have a significant impact in Europe over the coming years.

In parallel a new (global) system for the classification and labeling of chemicals and chemical mixtures was developed under the auspices of the UN, called GHS. The EU has committed itself to implement GHS into EU legislation together with REACH.

The following is a brief summary of REACH and GHS as it currently stands and the potential impact on both JohnsonDiversey and its customers.

REACH (Registration, Evaluation and Authorisation of Chemicals)

REACH was agreed by the European Parliament and Council of Ministers on 18th December 2006 and came into force on the 1st June 2007. It is the biggest EU legislation initiative in the last twenty years and will form the EU's framework legislation for the management, control and use of chemicals, replacing much of the current patchwork of over 40 pieces of legislation.

In principle REACH applies to all chemicals: not only chemicals used in industrial processes but also in our day-to-day life. For example in cleaning products and paints as well as in articles such as clothes, furniture and electrical appliances.

The objectives of REACH are to;

- Improve the protection of human health and the environment from the risks that can be posed by chemicals.
- Enhance the competitiveness of the EU chemicals industry, a key sector for the economy of the EU.
- Promote non-animal testing and alternative methods for the assessment of hazards of substances.
- Ensure the free circulation of substances on the internal market of the European Union.

How will this be achieved?

All manufacturers and importers of chemicals must identify and manage risks linked to the substances they manufacture and market. The Human and Environmental safety of these substances against their "downstream use" should be demonstrated by means of a registration dossier, which shall be submitted to the new European Chemical Agency (ECHA), responsible for handling REACH. The most dangerous chemicals will have to go through an authorization stage.

It will become a duty to recommend and/or apply Risk Management measures, if any, for the safe use and disposal of the chemicals. This information will be passed downstream from the chemical supplier to the formulator of products, such as JohnsonDiversey, and they in turn will pass the information relevant for their cleaning product to the eventual end user via Safety Data Sheets.

United Nations Globally Harmonised System (GHS) agreement

As the trade in chemicals is global, suppliers have to meet different requirements around the world, and the levels of protection enjoyed by both people and the environment in the EU are not the same the world over. The GHS is the UN's proposed system to establish a single harmonised process for classifying the hazards of products, the production of safety data sheets and for labelling. Although it is a UN Guideline, referred to as the Purple Book, it is expected that GHS will increasingly become accepted as the world standard and that countries and regions throughout the world will implement GHS in their legislation.



REACH/GHS *continued...*

What is the Timescale for REACH and GHS?

There are specific deadlines for registration of chemicals, but the first key deadline (the period six months from 1st June 2008 to 30th November 2008) is the window for all suppliers to pre-register their raw materials. The objective is to complete the REACH implementation programme and have a “clean” EU by 2018.

With regards to GHS, the EU regulatory process started at the end of June when the EU Commission issued a draft proposal for a GHS regulation with a view to implementing GHS in 2008. This proposal is now being studied by the European Parliament and the member states (The Council).

GHS is likely to have a 3 year transition period for substances and a 4-5 year transition period for chemical mixtures, such as JohnsonDiversey cleaning and hygiene products. It is likely therefore that you will see classifications and labelling changes on our products by 2012 /2013.

What is the impact for end-users of our products?

There will ultimately be impacts to both suppliers of chemical materials, chemical products and for end users. The precise impact on end-users is at this stage unclear; however as the aim of this legislation is specifically to increase the level of awareness “top to bottom” (raw material supplier, through formulator to end user) of the intrinsic hazards of chemical substances, the likely impacts are;

- Many more substances and preparations being classified and labeled as hazardous in the future as more becomes known about the substances.
- The information on safety data sheets will develop or change.
- Users will need to be aware that symbols depicting hazards on labels will change with the current orange hazard squares used as a visual hazard symbol being replaced by hazard diamonds. There will be a period where both “traditional” and “new” symbols can co-exist in the market place.
- There will be a duty on end users to carry out increased levels of Risk assessments and implement any necessary controls based on the Risk Management Information passed down to them via the Safety Data Sheet .
- There may need to be changes to method cards, training cards and disposal instructions and there will be a need for increased end-user staff awareness training.
- Although the aim is to provide consistency of approach and drive down costs of multiple registration systems, it would be naive to suppose that there will not be an increase in the cost of certain raw materials used in detergent formulations, as the cost of any additional testing or registration will have to be recovered.

Our commitment

JohnsonDiversey supports the basic objectives of REACH to better regulate the chemical industry. As a key player within the supply of chemicals, we continually strive to increase users’ confidence in their safety and sustainability.

Through our Global Product Safety Group we already apply strict rules well above current legal requirements on the chemicals we use. Many of the chemicals under threat from the new REACH regulations have already been voluntarily replaced in JohnsonDiversey products by safer alternatives.

We will ensure that all the chemicals we purchase are registered and that the downstream use is included in the registration. This will cover the normal handling and use of our products as outlined on the label, safety data sheets (SDS) and/or product information sheets (PIS). By working closely with our suppliers our aim is to share in their plans and so keep any business disruption to a minimum.

We have been working closely with member state Trade Associations and the European Trade Association, AISE, to follow the progress of REACH and GHS since the initial white papers, and we will continue to do so to ensure that the legislation is handled smoothly with minimum impact for our customers.

