Information & Recommendations to the supply chain

Is the aerospace industry affected by “REACH 2018” for the registration of chemical substances?

How to avoid the supply chain disruption?

How to prepare for 31 May 2018 deadline?
All industrial sectors are affected by the REACH regulation and not only the chemical industry. This regulation must be applied in Europe by all companies that manufacture, import or use substances, mixtures and articles in their business, irrespective of the size and position of the company in the supply chain.

This applies not only to substances as such but also in mixtures (adhesive, paint, resin, ...) or contained in an article (component, semi-finished or finished product).

As downstream users of substances or mixtures, aerospace and defence companies are rarely involved in the registration phase of substances, but care must be taken to ensure that these substances are registered within the regulatory deadlines by the upstream manufacturers/importers. Information is not easily available.

Without registration, the substance can no longer be put on the market nor be used. There is a risk of supply chain disruption in the aerospace industry.
Is your company concerned by the deadline of 31 May 2018, as specified in the frame of REACH regulation for the last REACH registration step?

**YES if** you manufacture chemical substances or import them from outside the EU **above one tonne and below 100 tonnes per year.**

Additionally, if you manufacture or import a mixture, it may contain substances that need to be registered individually.

Examples of substances: pigments, chemical additives (thickening agents, lubricants, flame retardants, ...)

The last REACH registration deadline dedicated to low-volume chemicals is **31 May 2018.**

**If you have pre-registered substances above one tonne but not more than 100 tonnes per year and have not already registered them, the REACH registration deadline of 31 May 2018 concerns you.**

**If you haven’t yet pre-registered your substances, late pre-registration is still possible until 31 May 2017.**

Why worry now about the 2018 registration phase?

Without registration, the substance can no longer be put on the market nor be used in Europe.

“REACH 2018” will result in a large number of substances being registered. The date of **31 May 2018** is in fact now very close, given the length and complexity of the registration procedure. **The joint involvement of all actors in the supply chain is essential to succeed.**

**ISSUE:** AVOID THE SUPPLY CHAIN DISRUPTION

Real risks of supply disruption for our sector

- **Because of ignorance of REACH**
  Many small and very small companies are concerned for this last registration step.

- **For economic reasons**
  The registration cost makes the substance unprofitable.

The non-registration of a substance will lead to its disappearance from the European market. Consequently, mixtures in which the substance is incorporated have to be reformulated or will vanish from the market. In case of reformulation, substitution can be transparent (without technical and economic consequences) but very often it may require expensive validation/qualification/certification in the aerospace and defence industry at all levels of the supply chain.

It is necessary to clearly identify these cases in order to **take the right decision (registration or substitution)** without forgetting to assess the sustainability of the alternative substance. The late identification of these cases may generate significant additional costs or irrelevant choices.

**Effective communication at all stages in the supply chain is absolutely necessary.**

As often as possible, the decision on whether or not to register a substance should be a shared decision between the customer and its supplier.
RECOMMENDATIONS

I AM a Substance/Mixture Importer/Manufacturer in the EU (registrant):
- I inform my customer as soon as possible on whether I will register my substance or not.
- I assess the substance importance for my customer and ask his advice.
- I take my registration decision based on technical and economic impacts and my customer’s opinion. I inform him of my decision.

I AM a mixture formulator:
- I check that the substances I use are registered. If not, I check if a supplier will register it for my uses.
- I assess the substance importance in my material formulation.
- I share my risk assessment conclusion with my customer.

I AM a mixture downstream user or I assemble or make articles or I am a distributor:
- I pay close attention to the risk assessment conclusions my supplier shares with me. A supplier raising a risk should not be stigmatized. This risk could also exist for other suppliers.
- I ask my suppliers about REACH 2018: “How do you manage the risk?”, “Did you ask your own suppliers?”, ...

IN ALL CASES:
If a risk is identified, I assess the options with my customer/supplier:
- The cost/benefit of a new formulation (substitution, validation, qualification…). In this case, make sure that the substitute is sustainable.
- The cost/benefit of the registration (security of the supply).

CONTRARY TO COMMON BELIEFS

“The aerospace and defence industry is a large market, substances have already been registered according to the earlier deadlines!”
FALSE: The aerospace and defence industry uses a large panel of chemical substances for providing specific properties (lubrication, anti-corrosion, …) but substances are used in small quantities.

“Let the market regulate itself”
TRUE, but what about the risk of: supply disruption, reformulation, revalidation, extra cost/sales margin reduction, …?

“Registration is the job of the upstream suppliers”
FALSE: Although registration is the responsibility of European substance importers or manufacturers, the security of supply remains the shared responsibility of the supply chain.

“I am an importer of a substance already registered for a volume above 1 tonne per year, therefore I have no registration obligation”
FALSE: I must update the registration dossier if the substance is already registered by another company with the same substance use; otherwise I need to register the use of my substance.

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MANUFACTURER

If you make chemicals, either to use yourself or to supply to other people (even if it is for export), then you will probably have some important responsibilities under REACH.

IMPORTER

If you buy anything from outside the European Economic Area, you are likely to have some responsibilities under REACH. It may be individual chemicals, mixtures for onward sales or finished products.

DOWNSTREAM USER

Each company, other than manufacturers or importers, who use chemical substances as such or included in a mixture. It could be:
• A formulator who produces mixtures.
• A producer of articles who assembles or makes articles.

Most companies use chemicals, sometimes even without realising it, therefore you need to check your obligations if you handle any chemicals in your industrial activity. You might have some responsibilities under REACH.
REACH is a regulation of the European Union (n°1907/2006) adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. It entered into force on 1 June 2007.

15 000 substances have been registered between 2008 and beginning of 2017. The last deadline will be very different from the two previous ones (2010, 2013), in terms of both the number of registrations and the type of registrants (many SMEs).

For more information
Your national helpdesk point of contact: https://echa.europa.eu/support/helpdesks
The European Chemicals Agency (ECHA) website: https://echa.europa.eu/reach-2018

Registration in the REACH regulation
Companies are responsible for collecting information on the properties and uses of the substances they manufacture or import. They also have to assess the hazards and potential risks presented by the substance. This information is communicated to ECHA through a registration dossier containing the hazard information and, where relevant, an assessment of the risks that the use of the substance may pose and how these risks should be controlled.

<table>
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<tr>
<th>Deadline</th>
<th>Manufactured or imported substances</th>
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<tbody>
<tr>
<td>30 November 2010</td>
<td>Above 1,000 t/year</td>
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<tr>
<td></td>
<td>R50/53* substances above &gt; 100 t/year</td>
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<td></td>
<td>CMR** 1 &amp; CMR 2 substances above 1 t/year</td>
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<tr>
<td>31 May 2013</td>
<td>Above 100 t/year</td>
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<tr>
<td>31 May 2018</td>
<td>Above 1 t/year</td>
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* R50/53: substances dangerous to aquatic organisms or the environment
** CMR: carcinogenic, mutagenic or toxic to reproduction

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