

# Position Paper REACH

April 2010

## REACH – the new EU chemical regulation

As of 1 June 2007 a new EU ordinance (EU 1907/2006) for the Registration, Evaluation, Authorisation and Restriction of Chemicals - called REACH - has come into effect, with elementary changes on the existing regulations on chemicals in Europe. Solely for the implementation of the new requirements the European Chemicals Agency (ECHA) was established in Helsinki and started operations as of 1 June 2008.

The declared aim of REACH is to improve the level of knowledge about the dangers and risks that chemicals may pose, to achieve a higher protection level for man and environment. REACH affects all chemicals, as well those which are in use for a long time. Moreover, REACH will shift the responsibility for the risk assessment of chemicals in large part from the authorities to the producers and importers.

In the centre of the new ordinance is the registration and evaluation process, in which communication within the supply chain is playing an essential role. Nearly all companies in the supply chain, like producers, importers, downstream users, are affected by REACH and have to fulfil particular obligations.

The entire implementation of REACH will last a couple of years. The timetable set by REACH included a pre-registration phase running from 1<sup>st</sup> June 2008 to 1<sup>st</sup> December 2008. The schedule for the following registration is depending on the production volume and risk potential of the particular substances. Until 1 July 2018 all substances are supposed to be registered.

Substances of Very High Concern according to Annex XIV of the REACH ordinance are required to be approved separately and may be subject to restrictions on use. A first list of such substances was planned to be announced by midyear 2009 (whatsoever, a first “candidate list” was already issued by ECHA on 28.10.2008 followed by additional listing of “candidates” in January 2010 and March 2010).

## GROHE

As leading manufacturer of sanitary faucets and systems we have been closely engaged for a long time already with the new requirements.

As we are neither producing chemicals or preparations (mixtures of chemicals) nor importing them to the EU, we are only affected by REACH as a downstream user. Registration obligations are inapplicable.

In this role, we depend mainly on the declarations of our suppliers for securing our future supply with chemicals and preparations. For this we are in close contact with our suppliers and have obtained from them confirmations on compliance with REACH requirements, too.

Substances of Very High Concern according to the “candidate list” for Annex XIV of the REACH ordinance (current status: 01.04.2010 – 30 substances), are not included in our products ( $\geq 0,1$  % per substance and product).

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