



**REACH -
Implementation within
GM Europe**



**Dr. Frank Haberberger
Global REACH Manager
General Motors**

Main Objective: Safeguarded actions by common approaches !!!

As REACH is a very complex topic, it is possible to forget important issues in the development of a strategy

➔ **This has to be avoided!**

The most efficient way to do so is a co-operation with other OEM's as well as with suppliers and service providers.

➔ **Objective: A REACH-guideline for the AI**

➔ **TF-REACH** (ACEA, JAMA, KAMA, CLEPA members)

- The TF-REACH has more than 35 participants coming from all over the world (USA, Japan, Korea, Europe)
- Within the last year the TaskForce (TF-REACH) successfully finalized the second version of the Automotive Industry Guideline on REACH (AIG) in Dec.07.

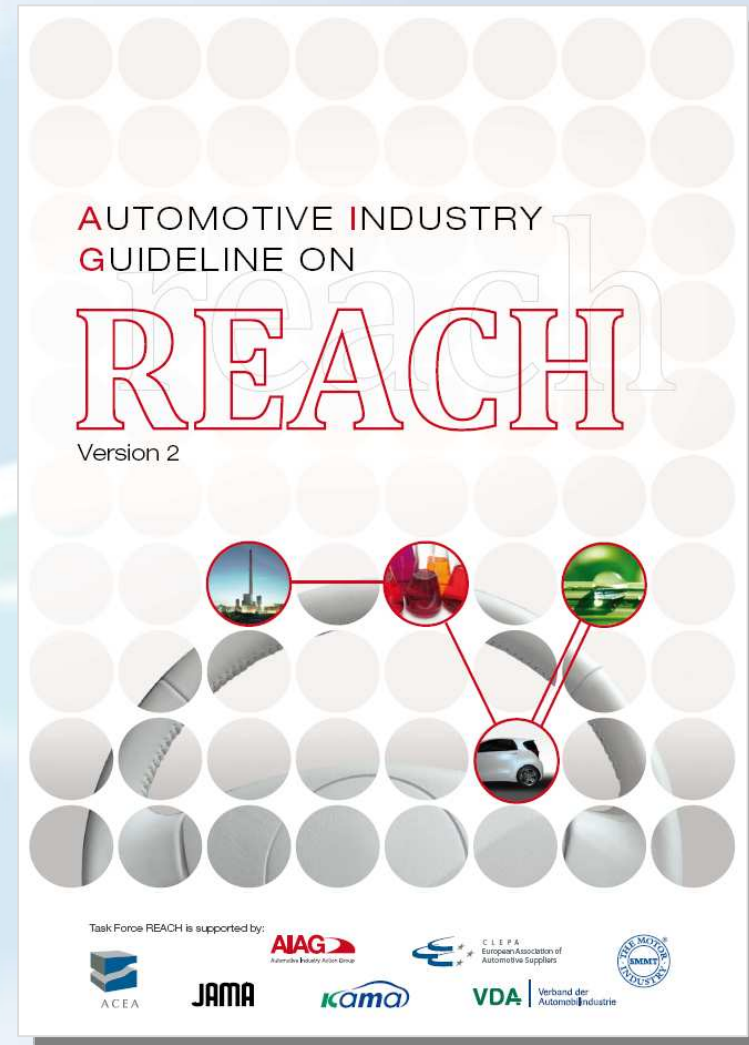


REACH

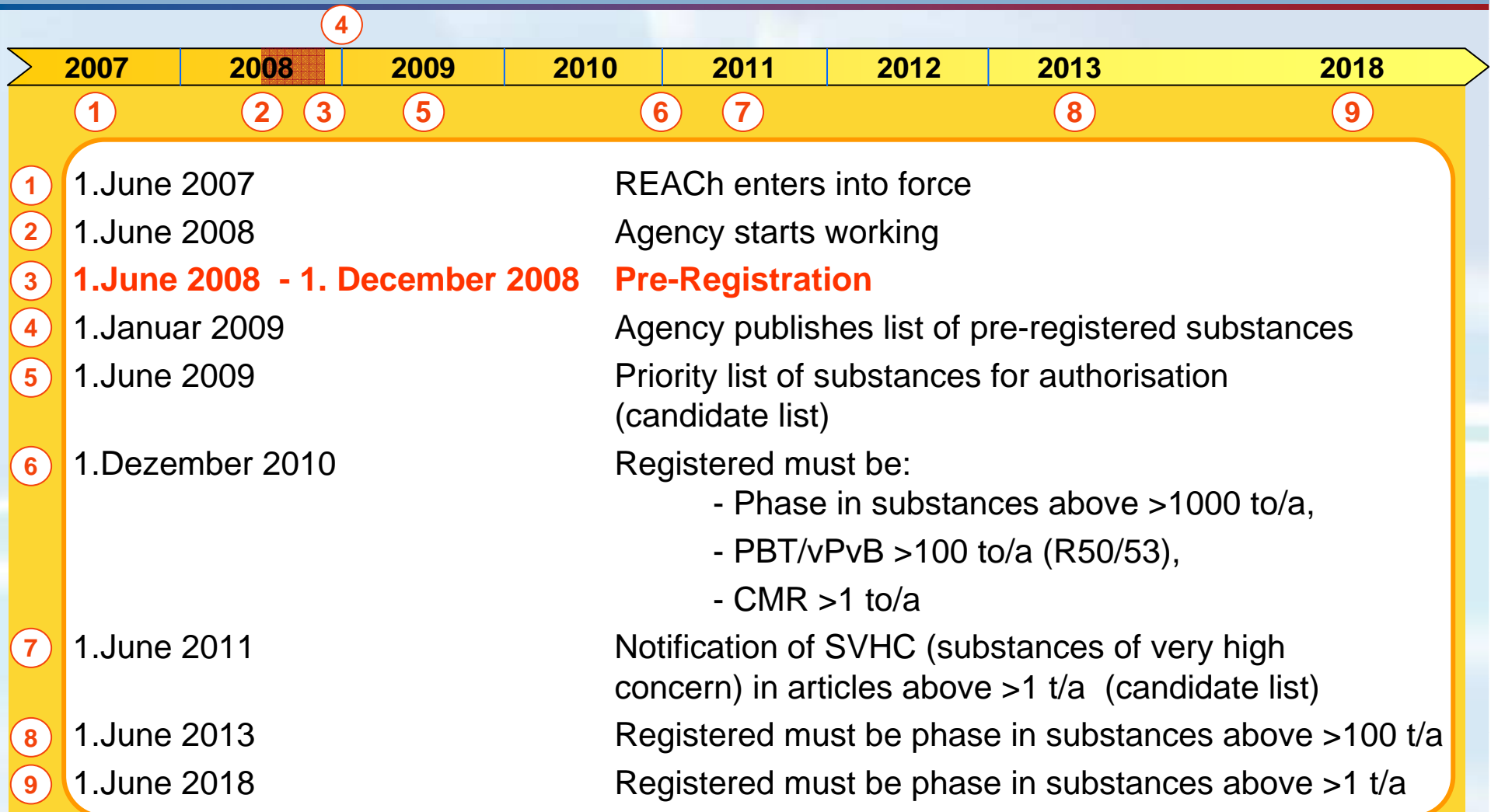
- ➔ **What are your main tasks?**
- ➔ **What is the recommendation to fulfil your tasks?**

The AIG will guide you!

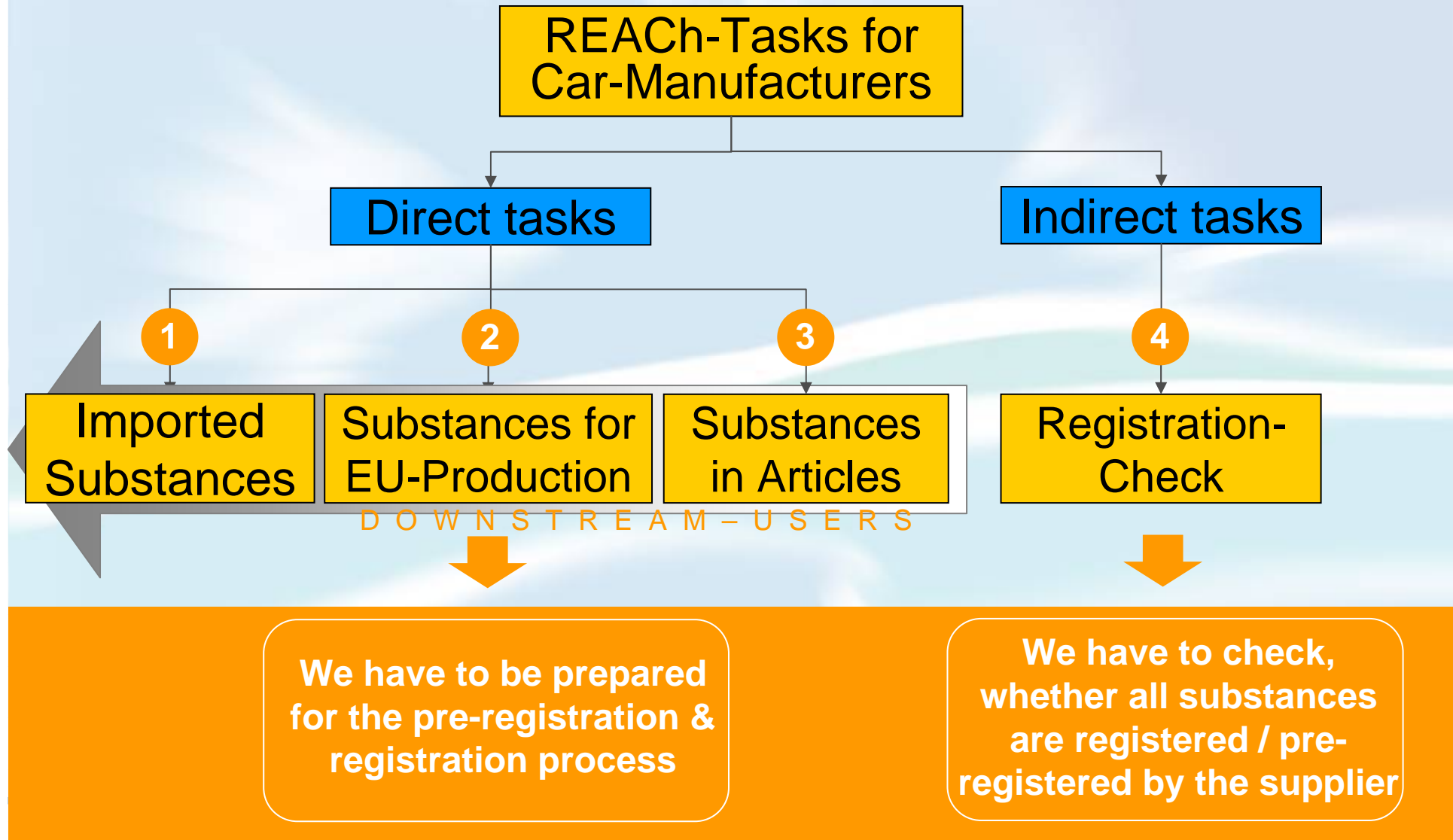
Free Download under:
<http://www.acea.be/reach/>



REACH Implementation Timeline



Independant from that dates, each substance can be registered at any time before that dates from 1. June 2007 onwards under the REACH regime (at the national regulatory body).



Legal Obligation - Article 6 of REACH:

General obligation to register substances on their own or in a preparation:

- **Article producers may import substances on their own or in preparations for the production of their articles.** In that case they have to register the substance (on its own or as part of preparations) if it is imported in volumes above 1 tonne/year and if not already registered by their suppliers.
- When the article producer buys his substances from within the EU, he is of course a downstream user. Here usually the chemical producer has to register.

Next question: Do we receive Material Safety Data Sheets?

2

Key question: Do we receive Material Safety Data Sheets?

If **NO**: Only very limited obligations under REACH

➔ **We have to be careful not to overlook that we also may be an importer!**

If **YES**: Apply the Risk Management Measures identified in the SDS
communicated to us via the Exposure Scenarios (ES) in the SDS Annex

- **If we use the chemical outside the conditions described in the ES, we:**
 - **have to Inform our supplier of this use to make it an identified use**
 - **Alternatively:**
 - *Conduct a safety assessment for our own use (and for our downstream uses if we are a supplier)*
 - *Implement ES from own safety assessment*
 - *Report to the Agency*

What are the next steps?

Next Steps:

- Identify Subject Matter Experts for collecting product information for all legal entities
- Analyzing the portfolio of chemicals, usage and amount
- Obtain MSDSs (Material Safety Data Sheets) for all products
 - Consider country specific regulations
 - Consider specific technical review requirements
- Establish one common IT tool for data provision –



Hazardous Materials Control System (HMCS)

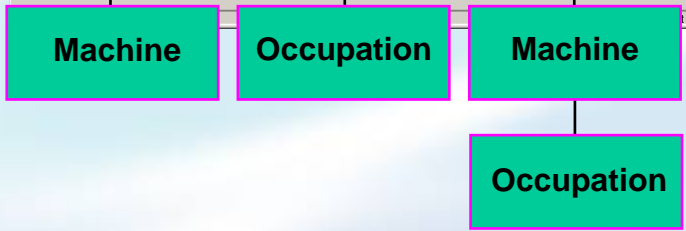
Focus: Determine the substances a pre-registration has to be done

REACH Hazardous Materials Control System (HMCS)



Department

- GM Opel GmbH
 - Fuel Cell Activities (FCA)
 - GM Test Center Dudenhofen
 - GM Test Center Pferdsfeld
 - Maschinen, unzugeordnet
 - Opel Eisenach GmbH
 - Opel Rüsselsheim
 - ITEZ
 - Logistics Europe
 - OSV
 - Stillgelegte Maschinen
 - Supply Operations Europe
 - Werk Rüsselsheim
 - Standort Bochum
 - Bochum Caterpillar
 - Bochum Gefahrostofflager Bottrop
 - Bochum OSV
 - Bochum Powertrain
 - Bochum Vertragsfirmen
 - Bochum V
 - Bochum V
 - Test Bochum
 - Caterpillar Logist
 - GM Powertrain Gr
 - GM Powertrain
 - Fertigung
 - Unprodukt
 - Vertragsfir
 - GM Powertrain Fertigung Rüsselsheim
 - GM Powertrain Produktentwicklung & -engineering



Product

- Purpose of use
- Consumption
- Supplier

Name	HMCS ID	Hersteller	Externe Nr.	ArtikeInr.
GM Foto Mount - Sprühkleber für d...	1138853	GM De...	B0412047	
GM Spraymount	1074011	GM O...	B0410741	
Aceton zur Analyse ACS, ISO	1008913	Be...	B0431513	100014
AIR LINE XTRA Quick Drying Solv...	1181042	Be...	B0410436	
AKTIVATORSPRAY	1181272	Be...		
Anstrich-Fluid "diamant" (drucklos...	1181328	Mittelwerk Kahl Ar...	B3010889	
ARDROX 9D1B	1011897	metall GmbH	B0410358	1975
ARDROX 9D1B AEROSOL	113409	metall GmbH	B0410358	
ARMAFLEX HT 625	1011897	metall GmbH	B0412086	
CLOU Ölühlpentapentachlack rot	113409	Wlfred Clouth, Lackfabrik	B3001470	15911

MSDS

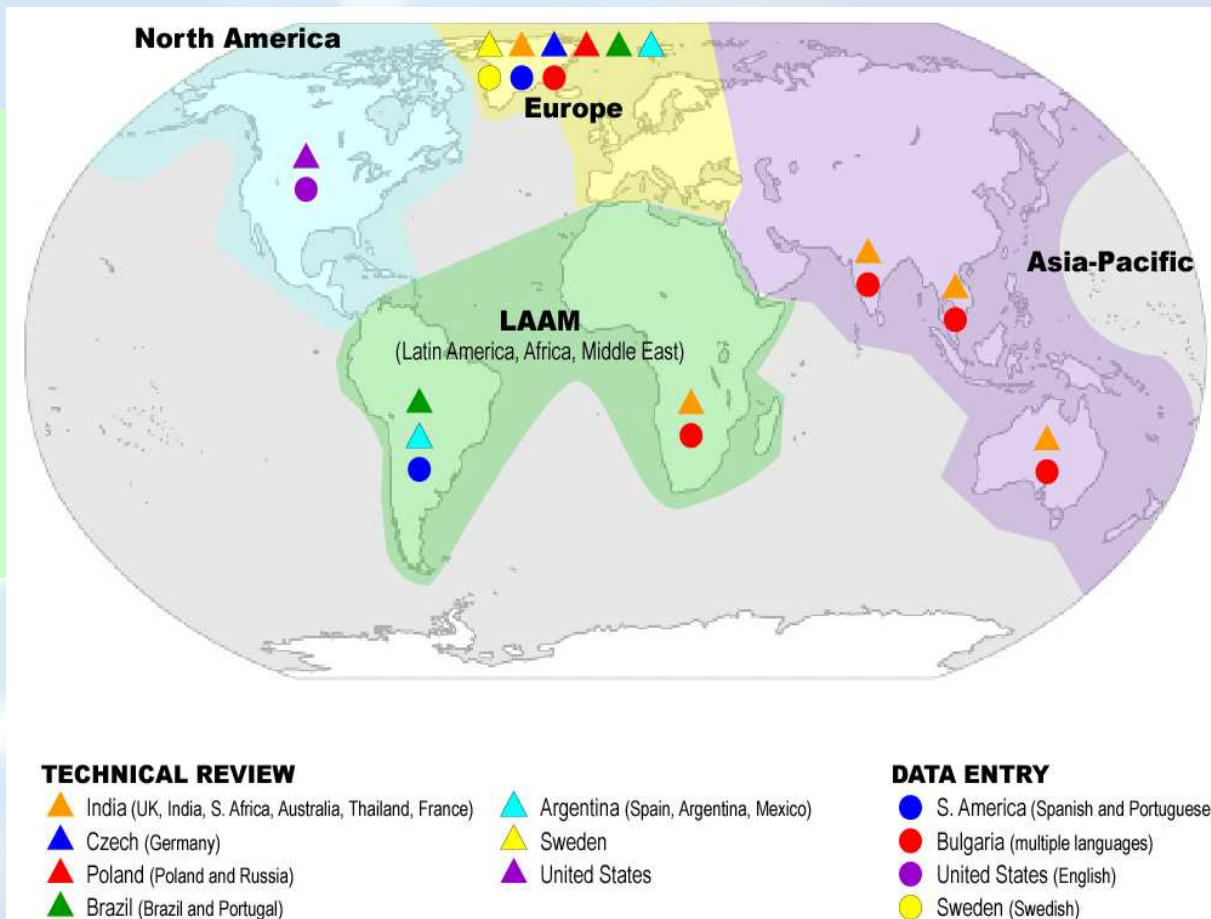
- Ingredients
- Safety Information

Safe Use Instruction

- Material Names
- Hazards
- Protection Measures
- On Accident
- First Aid
- Disposal

Using a
Global MSDS Service

- Check MSDS
- Insert MSDS into HMCS
- Maintain Product Module
- Maintain Chemicals Module
- Maintain MSDS



What about articles?

3 Direct tasks: Article 7 of REACH-Registration and Notification

REGISTRATION

As producer or importer of articles we have to pre-/register substances in articles if

- the substance is present in those articles in quantities totalling over 1 tonne per year per legal entity and
- the substance is intended to be released under normal or reasonably foreseeable conditions of use

NOTIFICATION:

We have to notify the Agency if the imported substances in articles are classified as:

- carcinogenic, mutagenic, toxic for reproduction (CMR) as category 1 or 2 in accordance with 67/548/EEC;
- persistent, bioaccumulative and toxic

but only, if these substances are:

- present in those articles in quantities totalling over 1 tonne per producer or importer per year
- the substance is present in those articles above a concentration of 0,1% weight by weight (w/w), and if...
- the producer or importer can **NOT** exclude exposure to humans or the environment during normal or reasonably foreseeable conditions of use including disposal.

Ingredients
DP A FR RH BLA/VI... 80372069 / 1 (Node ID 80372069)

Search: GADSL

Details

Type	Corr
ID / Version	80372069 / 1
MDS Supplier	IAC
Description	DP A FR RH BLA/VI... 80372069 / 1 (Node ID 80372069)
Part/Item No.	127
Measured Weight per Item	2.79
Tolerance	+/- 2
Calculated Weight per Item	2.79
Deviation	0.00
Development	
Sample Report	No

Legend:

- System (Red square)
- Part (Red square)
- Material (Green circle)
- ▲ Substance (Blue triangle)

IMDS – International Material Data System

Global automotive system used to track materials in vehicles through submitted Material Data Sheets (MDS's)

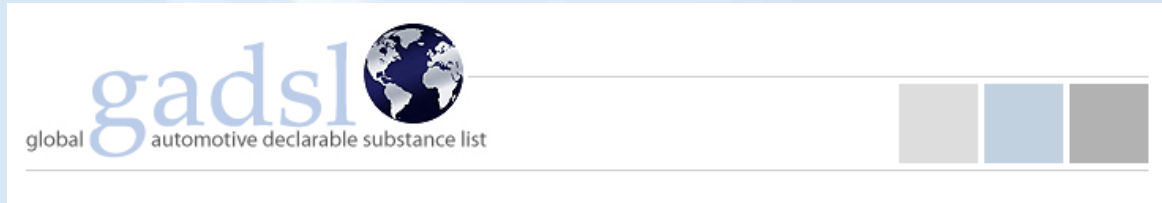
System developed to support in fulfilling the heavy metal ban of the EU-directive 2000/53/EC on End-of-Life Vehicle

Describes each single part number in

– System : Part : Material : Substance

Currently over 300 000 MDS submitted to GM

www.gadsl.org



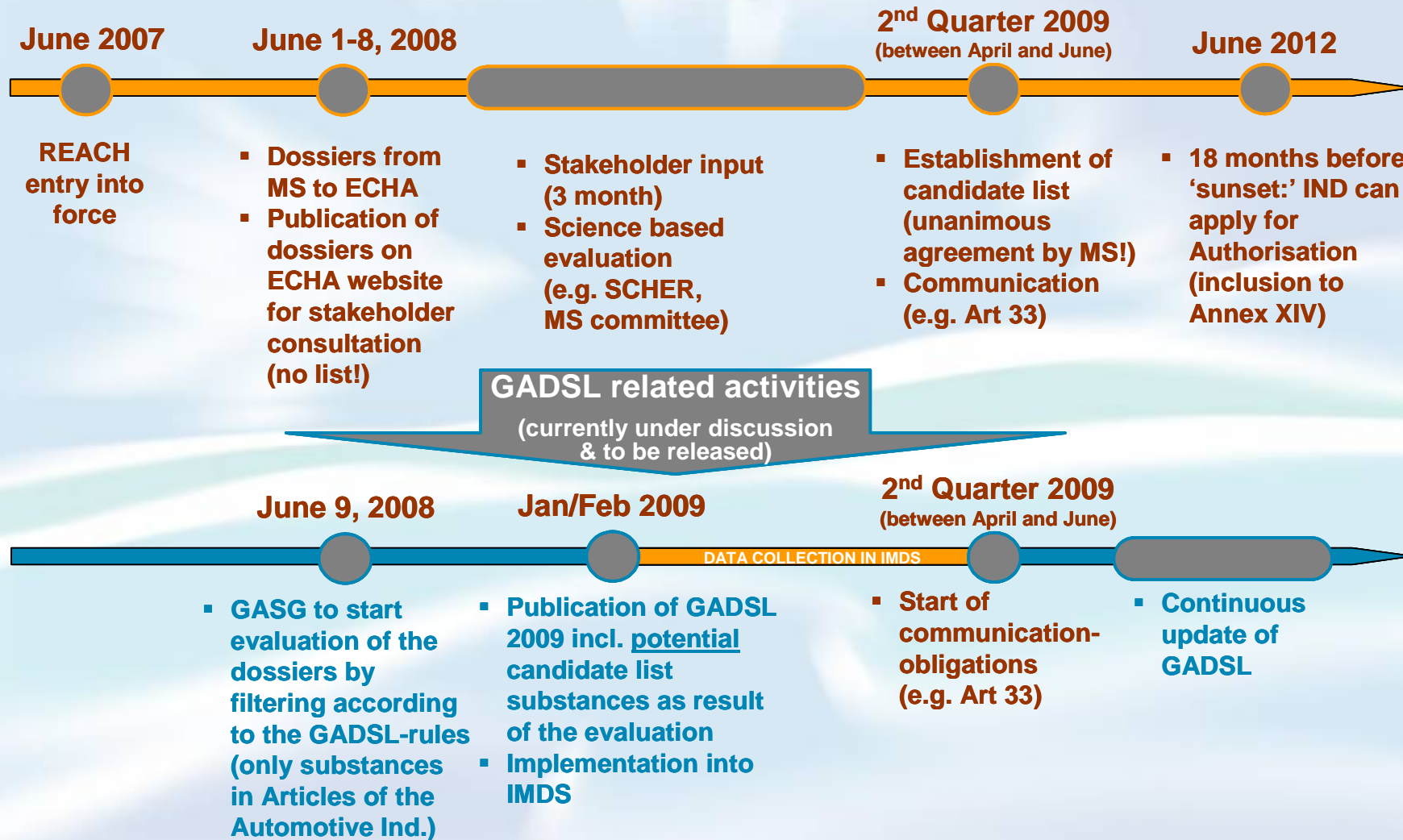
Global common automotive list of substances that are of concern for the automotive industry

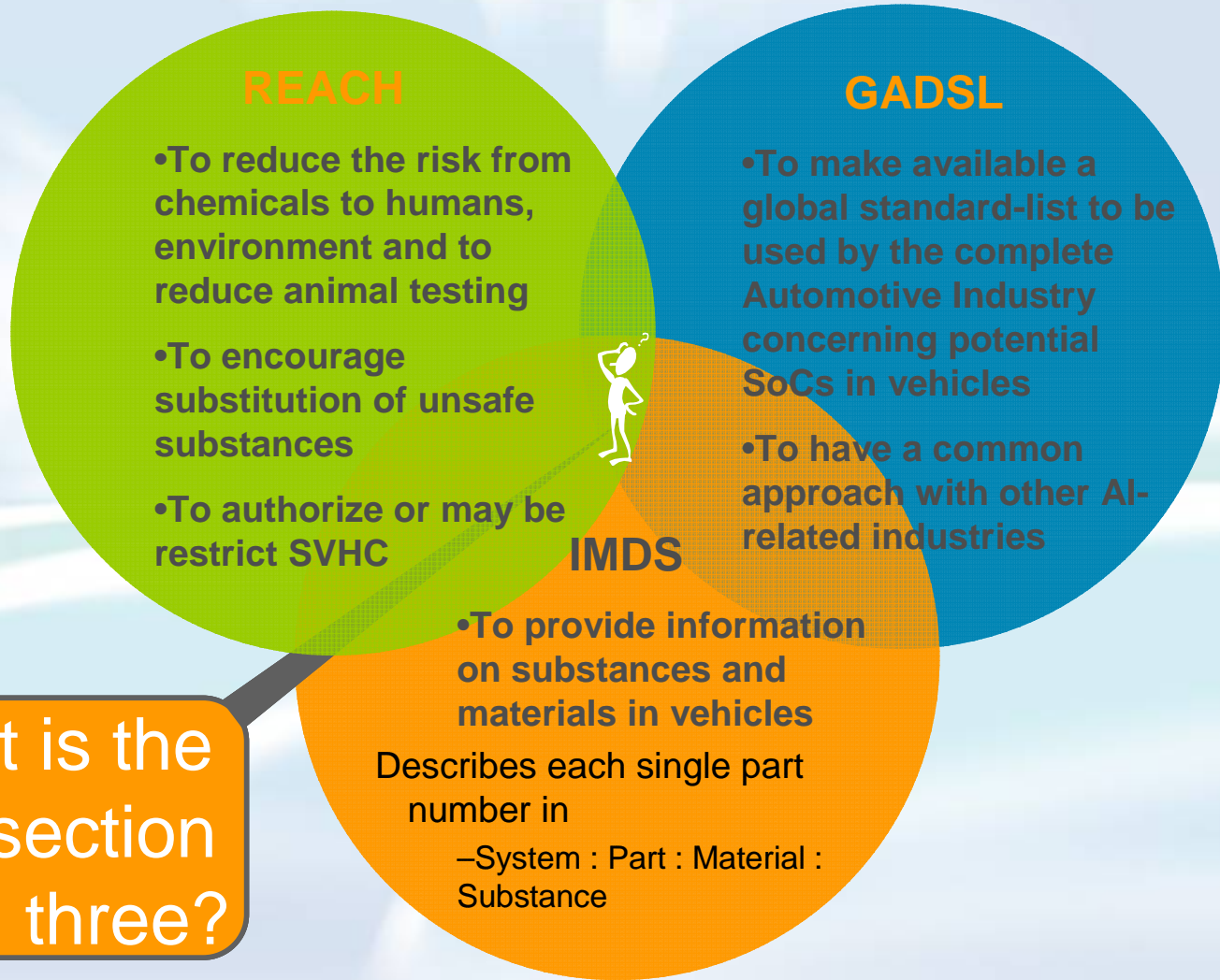
- Substances are either
 - Prohibited to be used or
 - Needs to be declared if used

List is developed in cooperation between automotive producers, major suppliers and chemical/plastics industry

Any substances that have a classification specific for General Motors are presented in GMW 3059 – Restricted and reportable substances for parts.

- GMW 3059 overrides GADSL

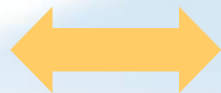
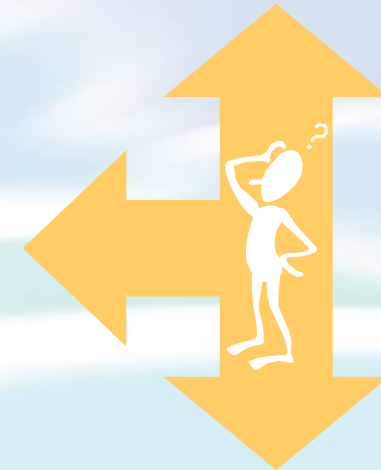
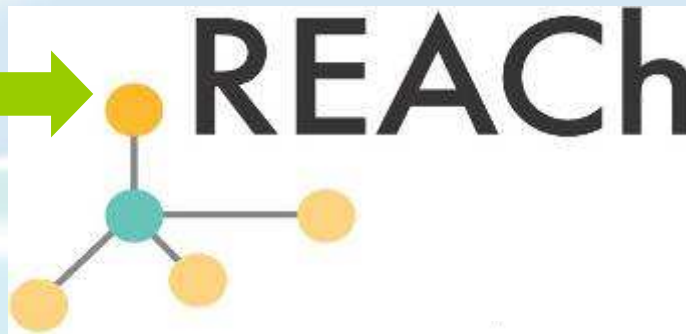
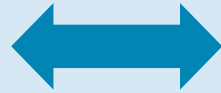




What is the intersection of all three?

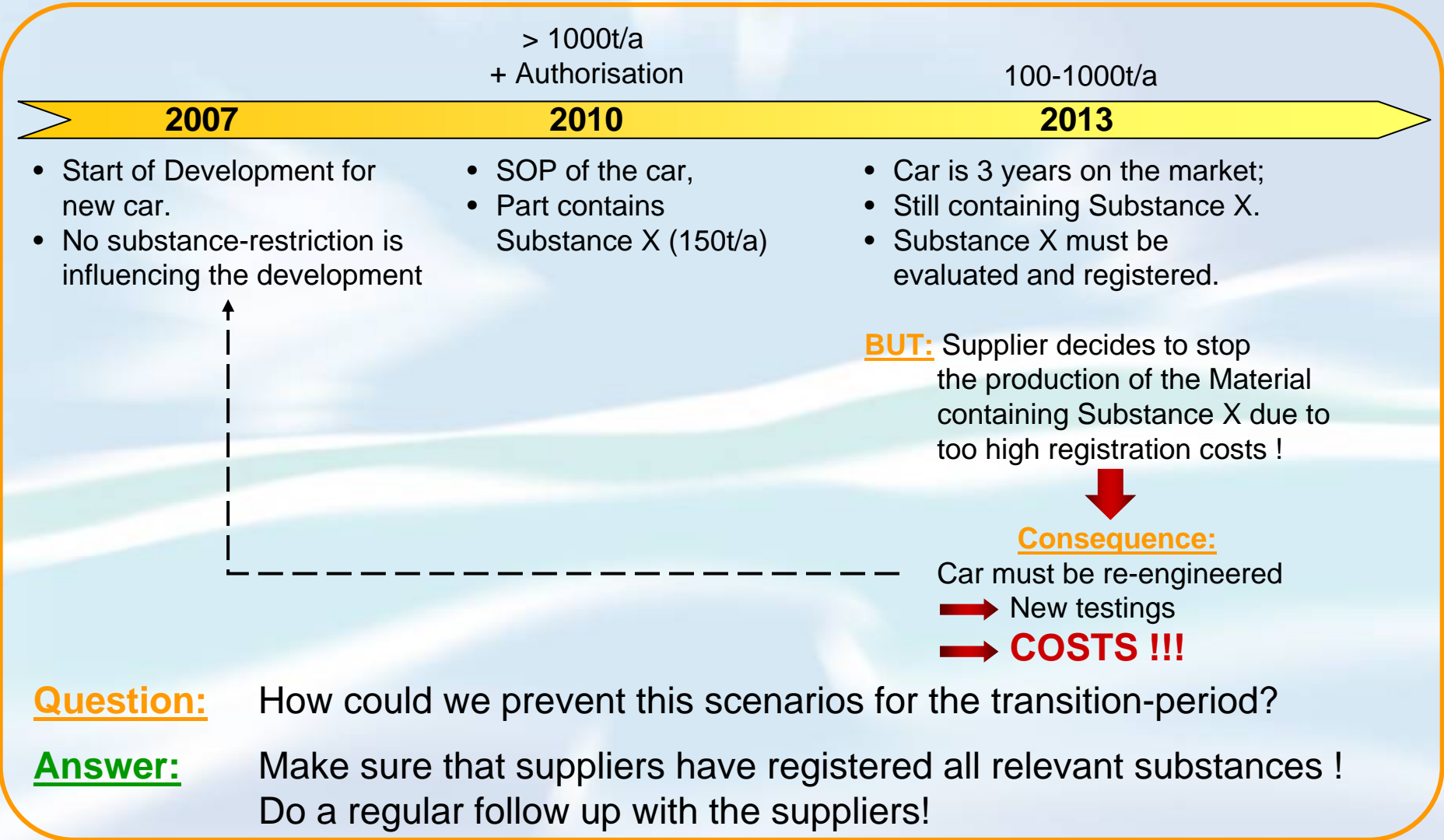
REACH

What is the relation between REACH, IMDS and GADSL ?



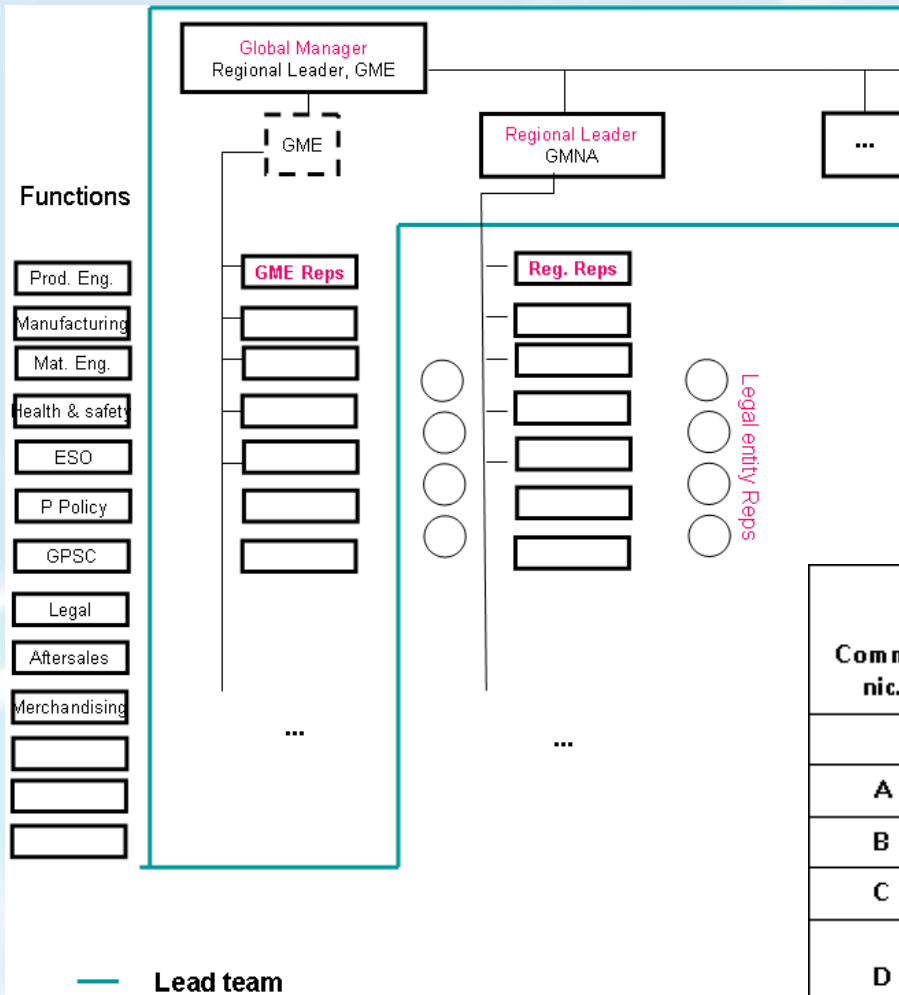
All are dealing with substances ending up in Articles

4 Indirect tasks: Potential Scenario for the transition-period



REACH

Global REACH Team established



Global REACH Manager appointed on October 1, 2007

- presented REACH in different workshops and to GM leadership to gain awareness
- established Global REACH Implementation Team
- established Global Communication Structure

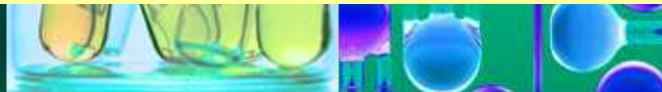
Communic.	Global Mgr	GME Reps	Regional Reps	Leg. Entity Reps	Regional Mgrs
	A	B	C	D	E
A		×			×
B	×		×		
C		×		×	×
D	×	×	×		×
	(Eur)	(Eur)			
E	×		×	×	

GMREACH.com website programmed and established

- to manage all GM related REACH data
- to serve as GM's communication and information tool on REACH
- Information-only English site live 19 Dec 2007
- German, Spanish, Mandarin Chinese, Korean translations live 20 Feb 2008



Welcome
to
GMREACH
.com



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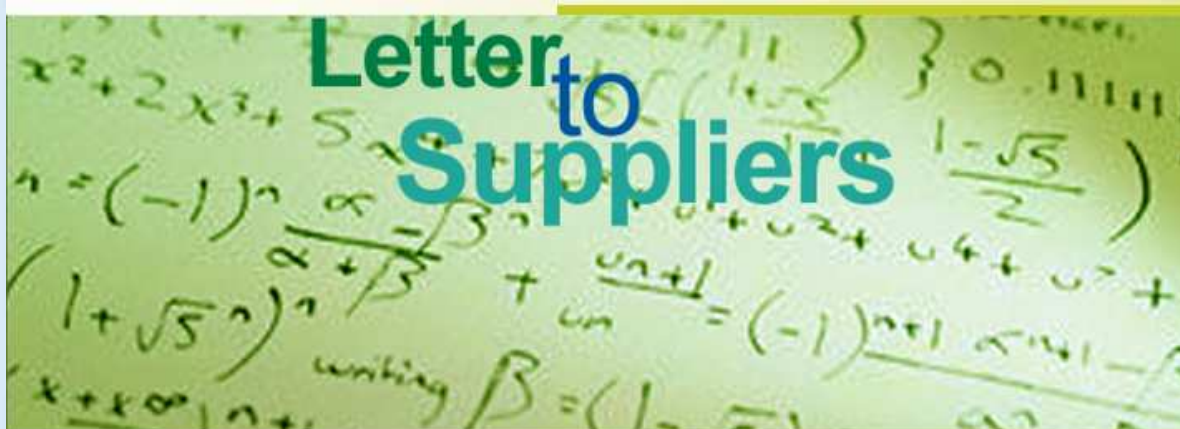
[Contact Us](#)

Welcome to GMREACH.com.

A new chemical regulation in the European Union (EU) called REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) (Regulation (EC) No 1907/2006) was published late in 2006. REACH came into force on 01 June 2007 and will have a major impact on chemical and associated industries worldwide which manufacture and/or import chemicals, preparations and articles to the EU. This includes the automotive industry.

General Motors has created this website for two reasons: to begin its own compliance process with the REACH legislation and to assist in the education of its suppliers regarding REACH.

GM suppliers need to prepare now to manage this new legislation. It is expected that REACH will affect supplier communication up and downstream, create challenges in supply of materials and customer demands and generate substantial administrative and technical tasks. It is important to note REACH compliance will involve more than regulatory managers, but also purchasing, information technology, product planning, engineering and more.



Provided Awareness Letter adjusted to GM needs to the Suppliers CEO's

The Awareness Letter

- was posted on Supply Power and GMREACH.com on Jan 28, 2008
- is available in German, Spanish, Mandarin Chinese and Korean language
- requests REACH contact data from 32,119 suppliers (Feb 14,08)
- requests suppliers to pre-/register all relevant substances
- requests to establish an "Only-Representative in the EU" for non-EU suppliers

- Home
- GM Supplier Letter
- Submit Contact Info
- Links/Resources
- FAQ
- Email News
- Edit My Information
- Contact Us

To: CEOs of all suppliers – for delegation to Materials Management

From: Eric Alstrom, GM Europe Vice President, Global Purchasing and Supply Chain

Subject: New European Union (EU) Regulation on Chemicals (REACH)

As of June 2007, the European Regulation (EC) 1907/2006 concerning the

GMREACH helpdesk established at GM India for answering supplier questions

- email address: gmreachhelpdesk@rgbsi.com
- GM Tech Center India supports activity by contacting the suppliers that do not respond on request (started Jan 29, 2008)



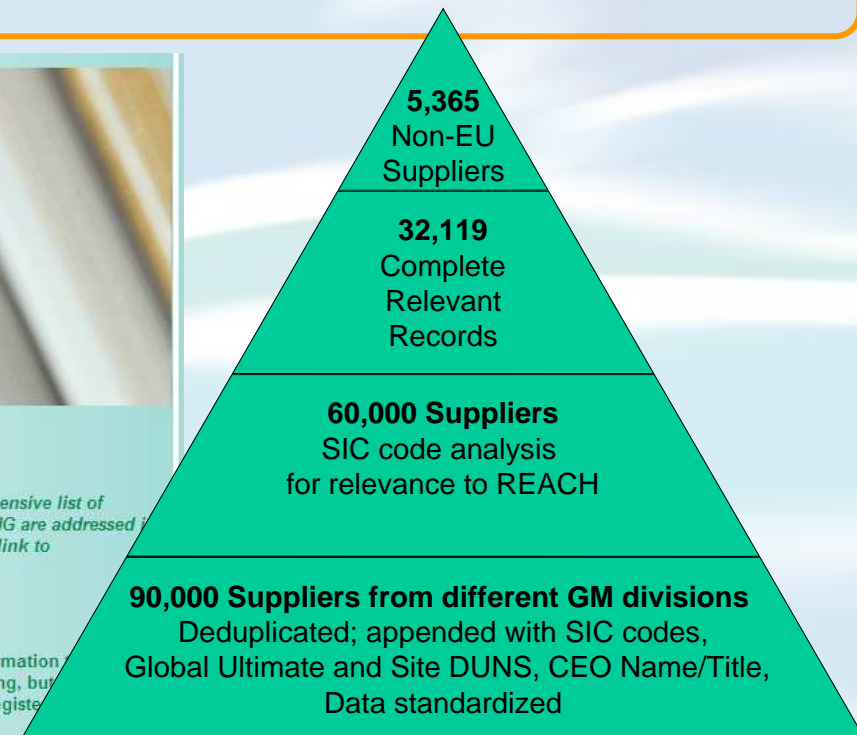
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FREQUENTLY ASKED QUESTIONS

The Automotive Industry Guidelines (AIG) on REACH contains a comprehensive list of Frequently Asked Questions. Only questions that do not appear on the AIG are addressed in this FAQ. You may download the Automotive Industry Guidelines here. (link to <http://www.acea.be/index.php/news/category/reach/>)

1.) The GMREACH.com website notes that "submitting your contact information to GMREACH.com does not constitute fulfillment of your REACH obligations, including, but not limited to, pre-registration or registration." How and where will suppliers pre-register?

Pre-registration and registration of substances and preparations will take place online through the European Chemical Agency's website (<http://echa.europa.eu/>). In order to benefit from extended deadlines for phase-in substances, potential registrants under REACH must pre-register their substances with ECHA between 1st June 2008 and 1st December 2008 (inclusive).



REACH Supplier Registration on GMREACH-Website



The screenshot displays a supplier registration profile on the GMREACH website. The profile is divided into several sections:

- Table Header:** Global Duns Number, Supplier Duns Number, Company Name, Email Address, Verified, Date Registered.
- Table Row 1:** View 001009, [redacted], [redacted] ptt co., ja3@ccmod.com, Yes, 2/26/2008.
- Table Row 2:** View 001149, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 3:** View 001288, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 4:** View 001319, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 5:** View 001317, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 6:** View 001338, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 7:** View 001338, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 8:** View 001338, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 9:** View 001349, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].
- Table Row 10:** View 001349, [redacted], [redacted], [redacted], [redacted], [redacted], [redacted].

The profile details for the selected supplier are as follows:

- Your Profile:**
 - Date: 3/6/2008
 - User Name: test
 - Password: imds123
- Contact Information:**
 - Title: Mr.
 - First Name: abc
 - Middle Initial:
 - Last Name: cde
 - Suffix: Jr.
 - Job Title: test
 - Contact E-mail address: test@test1.c
- Company Information:**
 - Name of Business: GENERAL MOTORS BELG
 - Global Ultimate DUNS Number: 00535661
 - Supplier DUNS Number: 370009938
 - Business Address Line 1: cvhg
 - Business Address Line 2:
 - Post Office Box:
 - City: vjn
 - State:
 - Country: US
 - Postal Code: 25689
 - Business Phone Country Code:
 - Business Phone Number: 1234587966
 - Extension:
 - Business FAX Country Code:
 - Business FAX Number: 1245869966
- About the Products your Company Supplies:**
 - Wish to receive automatic e-mail updates about compliance with REACH from GM: True
 - Which products your company supplies to GM:
 - Substances on their own: False
 - Substances in preparations: False
 - Articles: True
 - Who will pre-register the products that your company supplies to GM:
 - Your Company: False
 - Only Representative: False
 - Not Yet Decided: True
 - Our company does not intend to pre-register any substance on its own, any substance in preparations, or articles: False

Annotations: An orange arrow points to the GM logo in the profile header. A green arrow points from the 'Contact Information' section to the 'Company Information' section. Another green arrow points from the 'Company Information' section to the 'About the Products' section.

But very poor Response Rate

- Finalize the Supplier Responses and execute an internal Supplier Risk Assessment to minimize the risk for GM regarding Product Availability
- Establish a material assessment process that encompasses REACH criteria prior to sourcing
- Make sure that all suppliers with contracts affecting GME materials and processes have to ensure REACH compliance
- Evaluate a strategy as basis for decision about
 - Only-Representative Function (One GM Legal Entity act as OR for the non-EU GM Legal Entities)
 - Third-Party-Representative (supporting the EU-based GM Legal Entities)

A long way to go!!! Let's do it!

