



REACH Compliance

RINA advises on all aspects of the EU's REACH regulation. Our team has in-depth knowledge of the materials, processes and chemistries used in the manufacturing of a wide range of products. With the number of Substances of Very High Concern (SVHCs) now exceeding 200 and growing, it is increasingly difficult and time-consuming to obtain and process the information for compliance. RINA's extensive SVHC database, combined with our science-based approach, means we can provide a range of bespoke product-specific solutions. This greatly simplifies the process by helping to prioritise and focus efforts on specific suppliers or parts where SVHCs may occur.

Services

- Assess likelihood of presence of SVHCs to meet requirements of REACH Article 33 and Article 7 (Notification) to increase the level of due diligence and reduce cost by targeting either
 - Substances likely to be present, or
 - High risk suppliers
- Authorisation requests and support documentation such as analysis of alternatives and socio-economic analysis
- Inform your obsolescence strategy
- Assessment and recommendation of substitutes
- Chemical analysis for SVHCs and restricted or declarable substances (including California Proposition 65)
- Compliance with emerging Brexit-related obligations (e.g. UK REACH)

Project experience includes

- Processing of tens of thousands of individual part items for major manufacturers and smaller businesses
- Interpretation of REACH scope and obligations for a wide range of clients
- Identification of likelihood of presence of SVHCs across multi-sectors:
 - Industrial
 - Oil & Gas
 - Medical
 - Instrumentation and general engineering
 - Components

SIMPLIFYING COMPLIANCE WITH REACH ARTICLE 33

RINA has extensive capabilities in the area of environmental regulatory compliance, including:

Legal Requirement

The EU REACH Regulation (1907/2006) applies to virtually all hardware and chemicals manufactured, imported or used in the EU, including restrictions on use and many other obligations. In particular, all suppliers located in the EU must provide recipients of "articles" (any item with a specific shape such as equipment, components, spare parts, packaging, etc.) with information on any Substances of Very High Concern (SVHCs) present at more than 0.1% by weight. The addition of Lead to the Candidate List in 2019 greatly increases the likelihood of an SVHC being present - even in RoHS compliant parts as many will use Lead in an exempt form.

The conventional approach to compliance

A 2015 European Court of Justice ruling means that the SVHC content of all simple articles within the article supplied needs to be collected. This ruling made life even more difficult for suppliers as they can no longer rely on dilution of small parts in larger items of equipment. In addition, the Court ruled that importers should obtain data on all simple components within complex equipment. The standard way to obtain SVHC information is to ask suppliers. As even small manufacturers can have many thousands of parts in their products, and tens of thousands of simple articles within them, this is a costly and time-consuming task with typically low response rates and poor quality data obtained. This is a critical area of due diligence for those operating in the EU/UK supply chain from both a regulatory and contractual perspective.

The RINA approach

Our approach is to narrow down to only those SVHCs which are likely to occur in each type of material, component and complex assembly. This analysis can cover all types of items that are used and supplied including packaging, batteries and chemicals such as adhesives. Our engineers have spent many thousands of hours gathering information on where SVHCs are used and whether they are likely to exceed 0.1% in simple articles based on their knowledge of processes, chemistries and the materials used in articles. Using this extensive database as a foundation and backed by our in-house chemical expertise, we have developed a range of solutions which are designed for individual client's specific types of products.

Customised Solutions

RINA delivers a tailor-made analysis for each customer to specifically include only the types of materials and components the customer uses. There are also several levels of sophistication available ranging from indicating if an SVHC is likely to be present to providing an individual analysis of the likelihood of presence of an SVHC for every individual component part or material in the client's inventory. We have experience of processing inventories in excess of 80,000 parts.

Benefits to you

RINA's customers have found that this approach enables them to prioritise their efforts on parts and materials where SVHCs are likely to occur, setting aside those which will not contain them. It also significantly reduces the number of SVHCs about which to request information because process chemicals can be ignored when considering components. Overall this reduces costs and the time required for compliance. All of RINA's work of this type is strictly confidential.



RINA consists of the parent company RINA S.p.A., the holding which controls the main sub-holdings RINA Services S.p.A. and RINA Consulting S.p.A. In order to ensure compliance with the applicable recognition, authorization, notification and accreditation rules, including those relevant to the management of impartiality, RINA has adopted a governance and organizational model. According to this model, the sub-holdings are subject to direction and co-ordination by the holding in the finance, administration, strategic, organizational, managerial and business continuity fields, while technical and operational decisions remain under the exclusive responsibility of the sub-holdings and their controlled companies.

The strict separation of duties in the governing bodies and the impartiality risk assessment, which identifies and manages the impartiality and conflict of interest threats coming from the company relations, ensure compliance with the applicable impartiality rules.