

REACHReady Case Study

Re-branding chemical products for professional & domestic use



Challenge

A company supplying floor coverings, bathroom equipment and other specialist furnishings also supply ancillary chemical products such as adhesives, sealants, dyes etc. These are bought in and labelled to their own brand for sale to professional fitters or to domestic DIY market through retailers. They wanted to better understand the impact of REACH / CLP, especially on SDS and labelling, and some concern about whether specific uses are covered by supplier's registrations.

Solution

An on-site review of the company's product inventory and sources of goods demonstrated that they had no obligations to register under REACH themselves, as all chemicals were sourced within Europe. This also meant that CLP notification was not an issue.

All chemical products being supplied would not need CLP labelling initially as they were mixtures, but it was advised to be prepared for the issues concerning CLP labelling from 2012. As the products are made by external formulators, the classification process and labelling would be the responsibility of the suppliers. Logistical issues were discussed with purchasing and marketing managers.

It was also apparent that some hazardous products were supplied to professional users for fittings and floor sealants. Suppliers of some components were suggesting 'uses advised against' by the general public or suggesting keeping children and animals away for 48 hours. These products would need special control and should not be used in home installations. The sales and marketing team would need to be responsible and the SDS / labelling make these restrictions on use very clear.

The day ended with an analysis of the formal legal obligations being given.

Results

Many of the issues for labelling and SDS preparation will be logistical as the technical processes are covered by suppliers. To maintain a professional corporate image, it was decided that changes in labelling would be applied simultaneously leading to potential issues with supplier liaison.

A need was identified for the sales and marketing team to be trained to ensure that chemical products were not to be sold for uses not covered by registrations and to ensure that hazardous products designed for the professional market were not sold to the consumer by retailers.

Further information

REACHReassurance support can take place at any point during an organisation's work towards compliance. Our technical experts can work with your managers to develop a tailored plan for your business.

Following an initial free telephone consultation, the pricing for consultancy is based on a standard day-rate of £1300 plus VAT and any associated expenses. We aim to provide a value-for-money service of the highest quality and the flexibility to fit your budget.

For more information please call +44 (0) 20 7901 1444 or email enquiries@reachready.co.uk.