

ADS HazMat

Working Group Newsletter, Quarter 4 2017

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About ADS HazMat

The ADS HazMat (Hazardous Materials) Working Group reviews chemical substance regulatory impact to the aerospace, defence, security and space industries and communicates key messages to ADS members in order to help their management of regulatory obligations and risks. This newsletter is a quarterly publication.

REACH Registration Guidance: Deadline 31st May 2018

ADS recently supported a webinar hosted by the Engineering Employers Federation (EEF). The webinar focused on potential impacts to the supply chain and offered guidance and routes to obtain further help. You can navigate to a recording of the webinar by clicking on this [link](#).

Additionally there are a number of guidance documents that have been issued to aid companies and their suppliers to identify and meet their registration requirements:

The International Aerospace Environment Group (IAEG) has published guidance containing useful information and tools. This can be found at:

http://www.iaeg.com/elements/pdf/iaeg_reach_chemical_report_06_09_17.pdf

The UK Government Chemical Stakeholder Forum (UKCSF) has worked with representatives from various industries to produce the following guidance for SMEs and downstream users on REACH 2018 registration:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612042/UKCSF-guidance-REACH-2018-registration.zip

Key considerations:

1. If you need to register, start preparing as soon as possible as the deadline for completion is 31 May 2018.
2. Assess your supply chain business continuity risk. (There are tools to help in the IAEG guidance document).
3. Be aware of product reformulation or product obsolescence.
4. Communicate with sub-tier suppliers to ensure they are managing their risk

The material and views expressed in this briefing are not necessarily those of ADS or individual organisations, and do not constitute legal advice. In this respect, you should always satisfy yourself that the actions you take are covered by taking appropriate professional legal advice.

HSE Consultation on changes to WEL's

The HSE is consulting industry on the introduction of various new and revised WEL's. The consultation remains open until 2nd Feb 2018.

The new WEL's have originated from EU data recommended by the Scientific Committee on Exposure Limits (SCOEL), and implemented through EU Directive 2017/164/EU. The list includes changes to 31 substances, with the revisions mainly leading to tightening of the limits.

The initial assessment is that the changes will not produce a significant impact for the majority of industrial users. However six substances may have a cost impact, and of those, three of the substances are mainly specific to the mining industry.

The full consultation document can be found on the HSE website, www.hse.gov.uk/consult/condocs/cd283.htm

Reminder on leak testing frequency for Fluorinated Greenhouse Gas (F-Gas) on stationary equipment

This reminder is applicable to facilities with such stationary equipment and should be communicated to Facilities/Maintenance Departments or any users of F-gases.

Changes to regulation (EU) 517/2014 (OJ:L150/195/2014) on fluorinated greenhouse gases & the UK Fluorinated Greenhouse Gases Regulations SI 2015/310 have resulted in alterations to the calculation involved in determining leak testing frequencies for certain stationary refrigeration equipment:

- refrigeration equipment
- air-conditioning equipment
- stationary heat pumps

Previously, such leak check frequencies were based on the kg charge of the unit whereas now it is based on the Global Warming Potential (GWP) of the gas and its equivalent in CO₂ emissions.

Leak checks must be carried out with the following frequency, for the above equipment that contains fluorinated greenhouse gases in quantities of:

- 5 tonnes of CO₂ equivalent or more, but of less than 50 tonnes of CO₂ equivalent: at least every 12 months, or where a leakage detection system is installed, at least every 24 months;
- 50 tonnes of CO₂ equivalent or more, but of less than 500 tonnes of CO₂ equivalent: at least every six months or, where a leakage detection system is installed, at least every 12 months;
- 500 tonnes of CO₂ equivalent or more: at least every three months or, where a leakage detection system is installed, at least every six months.

Hermetically sealed equipment that contains fluorinated greenhouse gases in quantities of less than 10 tonnes of CO₂ equivalent will not be subject to leak checks, provided the equipment is labelled as hermetically sealed. There are also some other exemptions to leak check requirements depending on the application of use.

<https://www.ior.org.uk/app/images/downloads/2014%20FGAS%20Regulation%20&%20GWP%20Values%2030.5.14.pdf>

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Proposed Changes to the UK Ionising Radiation Regulations

The UK proposes to repeal and replace the Ionising Radiation Regulations SI 1999/3232 with the Ionising Radiations Regulations 2017 in early 2018 in accordance with Directive 2013/59/EURATOM (Basic Safety Standards Directive - BSSD) laying down basic standards for protection against the dangers arising from the exposure to ionising radiation. A non-exhaustive list of industrial ionising radiation sources include:

- X-ray machines (non-destructive testing applications)
- Electron beam welders
- Grinding or pointing of thoriated tungsten electrodes for Gas Tungsten Arc welding

The main changes implemented in the new UK Regulation would be:

- Dose Limit for exposure to the lens of the eye, with the reduction of equivalent dose from 150 mSv to 20 mSv in a year which will require re-calculation of individual dose limits.
- Graded Approach - an introduction of a new three-tiered risk-based system of regulatory control - notification, registration and licensing. The higher the radiation protection risk associated with the work, the greater the permission requirements.
- Record retention to change from 50 years to at least 30 years.
- Definition of “outside workers” to be amended to include those who work with radiation to be afforded same protection as those employed by the employer responsible for the radiation work.

The conclusions of the consultation & the draft to the forthcoming 2017 Regulations can be viewed on the UK HSE website. <http://www.hse.gov.uk/consult/condocs/cd282.htm>

Regulatory Calendar

	Date	Event
2018	31/05/2018	Deadline for final registration – substances supplied at >1 tonne per annum
2019	22/01/2019	REACH Sunset date for potassium hydroxyoctaoxodizincatedichromate CAS: 11103-86-9: strontium chromate CAS:7789-06-2 , pentazinc chromate octahydroxide CAS: 49663-84-5 and dichromium tris(chromate) CAS:24613-89-6. REACH Authorisation will be required to use these substances within the EEA, (including the incorporation of the substance into an article) after this date.
	23/07/2019	RoHS-2 – Extension expires for new Category 11; includes anything not covered by categories 1-10.
2020	01/01/2020	Consumer products with a hazard classification greater than 0.1% w/w to be registered at the National Poison Centre.
2021	01/01/2021	Industrial products with a hazard classification greater than 0.1% w/w to be registered at the National Poison Centre.
2024	01/01/2024	Professional products with a hazard classification greater than 0.1% w/w to be registered at the National Poison Centre.
2025		End of Poison Centre transition period.