

Marshall CIV John C

From: Marshall CIV John C
Sent: Tuesday, November 18, 2008 2:11 PM
To: M_HQMC_MCFCS_Directors/Deputies
Cc: M_HQMC_LB; Romano CIV Mark; Oliver CIV R. Kaye; Daise CIV Stanley C; 'yeider_jbrooke@bah.com'
Subject: APM 09-02: Registration, Evaluation, and Authorization of Chemicals (REACH)
Signed By: marshalljc@hqmc.usmc.mil
Attachments: REACH Supplier Letter DoD DLA 31Oct08.pdf



REACH Supplier
Letter DoD DLA ...

To All,

POLICY: Registration, Evaluation, and Authorization of Chemicals (REACH)

ACTION: By 21 November 2008, MCFCS activities should provide the attached DLA memorandum of 31 October 2008, Subj: Registration, Evaluation, and Authorization of Chemicals (REACH), to any of their suppliers with whom they have contracts for chemical substances and that involve a European Union (EU) Member State (see below for list). The scope of this REACH effort covers all chemicals manufactured in, or imported into, EU Member States plus Norway, Iceland and Liechtenstein.

DISCUSSION:

1. This initiative is all about cleaning up the environment. It is starting with Europe. The EU will limit what substances will be allowed to come into the EU. The substance can be part of a weapon system, be used in maintenance, be a flame retardant, etc. Anthracene, cobalt dichloride, cyclododecane, etc are examples.
2. The European Union (EU) is composed of 27 independent sovereign countries which are known as Member States as follows: Austria, Belgium, Bulgaria, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Republic of Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the United Kingdom. In addition, the REACH effort includes Norway, Iceland and Liechtenstein.
3. DLA is the lead for implementation within DoD, and developed the attached DLA memorandum of 31 October 2008. DLA systems in Richmond and Philadelphia have already sent the letter to all of its suppliers. In doing so, DLA expects its distribution to have captured more than 95% of Marine Corps suppliers that are in the DLA data base. To ensure that any awards that the Marine Corps has made (or expects to make) locally are captured, DLA has asked the Marine Corps to provide a copy of the attached DLA letter to any Marine Corps EU-based suppliers of chemicals, or if Marine Corps contracts require shipments of chemicals to any of our customers within EU Member States.
4. The EU regulation includes a 30 November 2008 date by which pre-registration must be accomplished by DoD suppliers. Accordingly, Marine Corps contracting offices are requested to provide a copy of the attached DLA memorandum to any of its suppliers who might be affected by the new EU regulation described herein. Further information on REACH compliance, including pre-registration details, is available on the European Chemicals Agency's website at: http://echa.europa.eu/home_en.asp.

Please let us know if you have any questions.

V/R John

John Marshall
Contracts Policy and eBusiness Team



DEFENSE LOGISTICS AGENCY
HEADQUARTERS
8725 JOHN J. KINGMAN ROAD, SUITE 2533
FORT BELVOIR, VIRGINIA 22060-6221

IN REPLY
REFER TO

J-7

OCT 31 2008

MEMORANDUM FOR DEPARTMENT OF DEFENSE (DoD) SUPPLIERS

SUBJECT: Registration, Evaluation, and Authorization of Chemicals (REACH)

As a DoD supplier, you may be aware that the Department of Defense may use some of your products in European Union (EU) Member States, and that a new EU regulation called the "REACH" regulation may affect the ability of customers to import your products into, or use them in, EU Member States.

"REACH" is an acronym describing the EU regulation for the Registration, Evaluation, and Authorization of Chemicals. REACH standardizes the regulation of chemical substances, including those contained in products, and their uses throughout the EU. REACH has been adopted by the 27 EU Member States plus Norway, Iceland and Liechtenstein. Your company may have direct responsibilities under REACH if you are an EU-based supplier. Non-EU-based companies may also have direct REACH compliance responsibilities if you furnish supplies to a customer within the EU. Of particular near-term importance is your determination as to how you wish to proceed with respect to "pre-registering" one or more chemicals (either as a product or as a part of a formulated product) in accordance with the REACH regulation. The regulation includes a November 30, 2008 date by which pre-registration must be accomplished.

It is in DoD's interest for its suppliers to effectively adapt to any REACH requirements that affect the products they sell to DoD. Doing so should avoid issues regarding deliveries under current contracts, as well as continuity-of-supply problems that might otherwise arise with EU interfaces in your global supply chains. Therefore, DoD encourages you, as one of our suppliers, to evaluate your product lines and determine if you produce in the EU, or import into the EU, chemical substances that may be regulated under REACH.

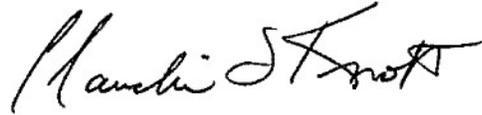
The European Chemical Agency (ECHA) implements and coordinates REACH, and compliance is overseen by each EU Member State. Information on REACH compliance, including pre-registration details, is available on ECHA's website at:
http://echa.europa.eu/home_en.asp.

The DoD is not able to provide legal advice to you regarding your compliance with REACH requirements. DoD recommends that you consult with your legal advisors



to obtain appropriate guidance regarding the REACH regulation as it pertains to your dealings with the DoD.

Additional information may be obtained by contacting: Mr. Marvin Williams at (703) 767-3620 or DSN 427-3620.

A handwritten signature in black ink, appearing to read "Claudia S. Knott". The signature is written in a cursive style with a large initial "C" and a stylized "K".

CLAUDIA S. KNOTT
Director, Acquisition Management