

REACH is a European Union regulation concerning the Registration, Evaluation, Authorisation and restriction of Chemicals. It came into force on 1st June 2007 and replaced a number of European Directives and Regulations with a single system.

Sil-Mid Limited is a distributor of a wide range of sealants, adhesives, coatings and other specialised products used in aerospace and aviation. We recognise the role that we have under REACH as a distributor and importer. We also recognise that the REACH regulation places a heavy burden of communication within the supply chain and we fulfil our requirement to “pass” information downstream to our customers.

Sil-Mid Limited is working with our upstream supply chain to ensure that products that are passed through to the downstream user meet the requirements of the REACH legislation and to avoid any loss of supply continuity.

Sil-Mid Limited is working in partnership with our suppliers to maintain supply of materials; we have already seen that manufacturers are withdrawing and discontinuing products due to REACH requirements, often with little or no notice. This is particularly true of some niche small volume materials that have been in use within our industry for many years. The main product groups affected have been Sealants, Jointing Compounds, Coatings and Metal Treatments.

In response to our obligations under the regulation and enquiries from our customers, Sil-Mid Limited can confirm the following:

Supplier Compliance Information

We require all suppliers to provide updated Safety Data Sheets and REACH Compliance statements. Not all suppliers are willing or able to do this and as such some products may need to be withdrawn from sale. We are engaging with those suppliers to try and confirm compliance and will notify affected customers if products are then withdrawn.

REACH Registration

Sil-Mid Limited require that all substances within products have been registered when required under REACH. As a distributor Sil-Mid Limited is reliant on its suppliers to ensure that the appropriate compliance action is taken on their products. Sil-Mid Limited will ensure all substances in imported products comply with the registration requirements under REACH.

SVHC Notification

Upstream suppliers to Sil-Mid Limited are required to advise us of any products that contain SVHC in concentrations above 0.1% (weight/weight), so that we can fulfil our obligations to inform our customers. Suppliers are expected to monitor changes to the candidate list of SVHC and inform Sil-Mid Limited of any affected products. We will pass this information to our customers in writing and will also add information to our website.

Safety Data Sheets

Safety Data Sheets are provided by Sil-Mid Limited to customers free of charge. We require our suppliers to provide us with SDSs that are updated in accordance with the REACH regulation and classified under the CLP. If a supplier makes changes to a product that affects the SDS they are required to provide Sil-Mid Limited with an updated SDS without undue delay.

If you require further assistance, clarification or technical support please contact us on 01675 628660 or e-mail info@silmid.com

Brexit

Following the decision to leave the EU, the United Kingdom will need to replace the functions of EU REACH with it's own version referred to as UK REACH. It is not at this time clear what the full implications will be of this change. Our status will change to that of IMPORTER for certain goods and our customer will also change to this status if based in the EU. UL Safeware is our support partner for all compliance issues around REACH and the subject is kept under review.

PO10 REACH Policy

Document Control

Owner	Operations Director
Reviewer	Compliance Officer

Version Control

Reason for Change	Date Updated
Original revision	31/02/2017
Updated, reviewed and added to BMS	21/06/2018
Reviewed with no changes at QBR	17/04/2019
Reviewed with new Brexit section added	22/04/2020