

DRAFT REACH IMPLEMENTATION GUIDE

1. PURPOSE:

The purpose of this document is to identify:

1. REACH processes and timelines that the South African mining products will be subject to;
2. Guidance documents relevant to various SA mining products; and
3. Commodity associations that may assist companies with their preparations for REACH compliance

2. PROCESSES, IMPLEMENTATION TIMELINES AND GUIDELINES

2.1 METALS, METAL COMPOUNDS & SALTS

Metals, Metal Compounds and Salts will be subjected to the various processes of REACH depending on the volumes that will be imported into to and/or produced in the EU. If a material has Carcinogenic, Mutagenic or Reprotoxic properties it will be subjected to Authorisation. Radioactive materials such as ‘yellowcake’ are excluded from REACH. The tables and flowchart below give details of the timelines and guidelines for the processes.

Process/ Guide	VOLUME				
	0 – 1t	1t – 10t	10t – 100t	100t – 1000t	>1000t
Pre-registration	Excluded	Oct '08	Oct '08	Oct '08	Oct '08
Registration	Excluded	Yes	Yes	Yes	Yes
§ Chemical Safety Report (CSR)	Excluded		Yes	Yes	Yes
Evaluation	Excluded			Yes	Yes
Completion Date	Excluded		2017	2012	April '09
Risk Assessment methodologies	Excluded		HERAG (health), MERAG (env)	HERAG, MERAG	HERAG, MERAG
REACH Implementation Projects (RIPs)	Excluded	3.1, 3.4, 3.6, 3.10	3.1, 3.2, 3.3, 3.4, 3.6, 3.10	3.1, 3.2, 3.3, 3.4, 3.6, 3.10	3.1, 3.2, 3.3, 3.4, 3.6, 3.10

Process/ RIPs	Is it Carcinogenic, Mutagenic or Reprotoxic (CMR)?
Authorisation	April '09
RIPs	3.2, 3.3, 3.4, 3.6, 3.7, 3.9 & 3.10

List of REACH Implementation Projects (RIPs)

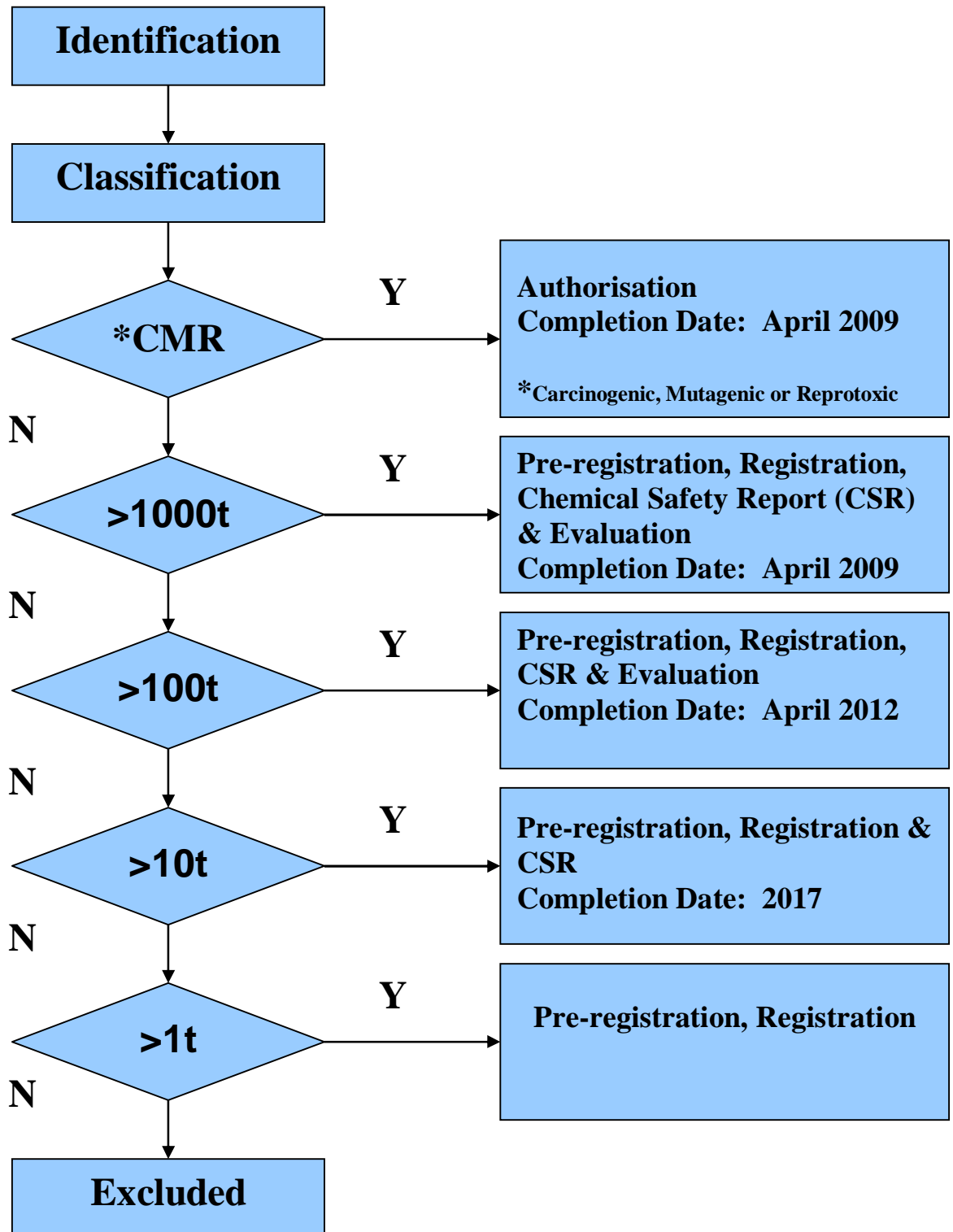
A. Industry RIPs

- 3.1 Technical Guidance Document (TGD) on preparing Technical dossier for Registration
- 3.2 TGD on preparing the CSR (2 Guidance Development)
- 3.3 TGD on Information Requirements (2 Guidance Development)
- 3.4 Guidance Document on Data Sharing (pre-registration)
- 3.6 Guidance on Classification & Labelling under the Global Harmonised System (GHS)
- 3.7 TGD on preparation of application for Authorisation
- 3.9 Guidance on carrying out a socio-economic analysis (SEA)
- 3.10 Guidance on performing the substance ID check

B. Relevant Government RIPs

- 4.1 TGD on dossier evaluation
- 4.2 TGD on substance evaluation
- 4.4 TGD on the preparation of Annex XIV dossiers

Flowchart for Metals, Metal Compounds and Salts



2.2 ORES, CONCENTRATES & MINERALS (INCLUDING ORGANICS) (OCM)

If the Ores, Concentrates and Minerals, including Organics, (OCM) do not occur in nature or all chemically modified* then it will be treated the same as Metals, Metal Compounds and Salts (and follow the processes as described in 2.1). If the OCM is used as fuel in combustion plants then it will be excluded from REACH. Other than these exceptions, OCM will be subjected to Authorisation if the Material has Carcinogenic, Mutagenic or Reprotoxic properties but OCMs will be exempted from Registration and Evaluation. The table and flowchart below aims to summarise the above.

Process	
Authorisation	If Carcinogenic, Mutagenic or Reprotoxic (CMR)
Registration and Evaluation	Excluded
Completion Date	April '09
RIPs	3.2, 3.3, 3.4, 3.6, 3.7, 3.9 & 3.10

List of REACH Implementation Projects (RIPs)

A. Industry RIPs

- 3.1 Technical Guidance Document (TGD) on preparing Technical dossier for Registration
- 3.2 TGD on preparing the CSR (2 Guidance Development)
- 3.3 TGD on Information Requirements (2 Guidance Development)
- 3.4 Guidance Document on Data Sharing (pre-registration)
- 3.6 Guidance on Classification & Labelling under the Global Harmonised System (GHS)
- 3.7 TGD on preparation of application for Authorisation
- 3.9 Guidance on carrying out a socio-economic analysis (SEA)
- 3.10 Guidance on performing the substance ID check

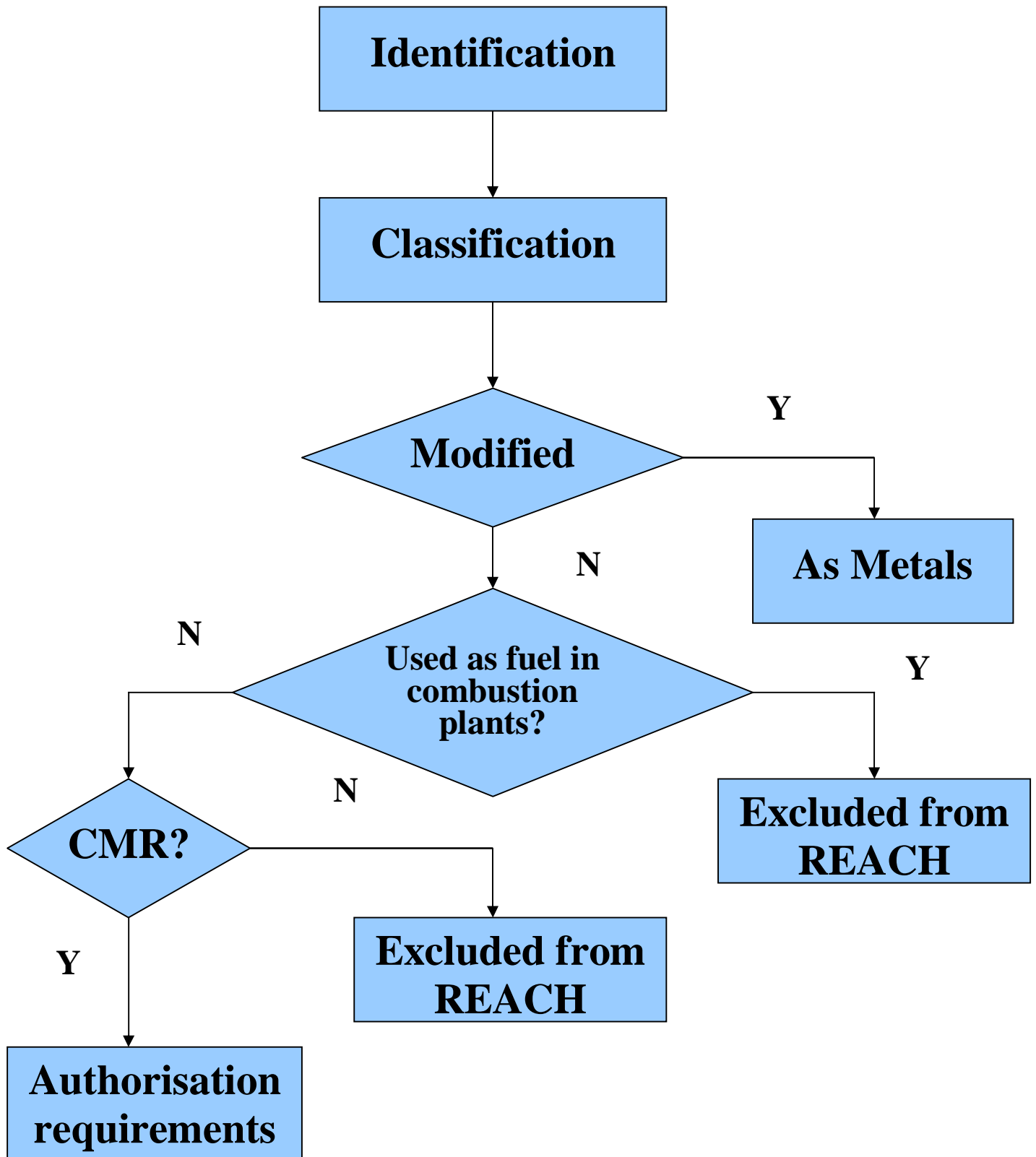
B. Relevant Government RIPs

- 4.1 TGD on dossier evaluation
- 4.2 TGD on substance evaluation
- 4.4 TGD on the preparation of Annex XIV dossiers

***Occur in nature** means a naturally occurring substance as such, unprocessed or processed only by manual, mechanical or gravitational means; by dissolution in water, by flotation, by extraction with water, by steam distillation or by heating solely to remove water, or which is extracted from air by any means;

Not chemically modified substance means a substance whose chemical structure remains unchanged, even if it has undergone a chemical process or treatment, or a physical mineralogical transformation, for instance to remove impurities.

Flowchart for Ores, Concentrates & Minerals (Including Organics)



3. COMMODITY ASSOCIATIONS

SUBSTANCE	ASSOCIATION	CONTACT DETAILS
Aluminium	<u>International Aluminium Institute</u> http://www.world-aluminium.org/	Address : 8th Floor New Zealand House Haymarket London SW1Y 4TE United Kingdom Telephone: +44 (0) 20 7930 0528 Fax: +44 (0) 20 7321 0183 <u>Enquiries & Comments on the Website</u>
Antimony	<u>International Antimony Oxide Industry Association</u> http://www.iaioia.org/	info@iaioia.org webmaster@iaioia.org
Arsenic		
Barium		
Beryllium		
Cadmium	International Cadmium Development Association, www.cadmium.org	168 Avenue Tervueren / Box 4 B-1150 Brussels, Belgium Tel: 32(0)2 777.05.60 Fax: 32(0)2777.05.65 E-mail: info@cadmium.org
Chromium	International Chromium Developers Association http://www.chromium-asoc.com/	45, rue de Lisbonne, 75008 Paris, France Tel: (33.1) 40 76 06 89 - Fax: (33.1) 40 76 06 87 mailbox@chromium-asoc.com
Coal	<u>World Coal Institute</u>	Katie Mills Email: info@worldcoal.org Tel: +44 (0) 20 8940 0477 Fax: +44 (0) 20 8940 9624
Cobalt	<u>The Cobalt Development Institute</u>	Dr Ryan Welton 167 High Street, Guildford, Surrey, GU1 3AJ Telephone: +44 1483 578877 Fax: +44 1483 573873
Copper	<u>International Copper Association (ICA)</u>	International Copper Association, Ltd. 260 Madison Avenue 16th Floor New York, NY 10016-2401 Phone: (212) 251-7240 Fax: (212) 251-7245 E-mail: info@copperinfo.com
	International Wrought Copper Council	6 Bathurst Street, Sussex Square, London, W2 2SD Tel: 020 7723 7465 Fax: +44 (0)20 7724 0308 Email: iwcc@coppercouncil.org
Gold	<u>World Gold Council</u>	55 Old Broad Street London EC2M 1RX United Kingdom Tel. +44.(0)20.7826.4700 Fax. +44.(0)20.7826.4799
Iron and Steel	<u>Eurofer - European Confederation of Iron and Steel Industries</u>	Rue du Noyer, 211 B-1000 Brussels

		BELGIUM Tel. +32 (2) 738 79 20 Fax +32 (2) 736 30 01
Lead	<u>Lead Development Association International</u>	17a Welbeck Way London W1G 9YJ Tel: +44 (0)20 7499 8422 Fax: +44 (0)20 7493 1555
Manganese	International Manganese Institute http://www.manganese.org/	17 rue Duphot 75001 Paris, FRANCE Tel: +33 (0) 1 45 63 06 34 Fax: +33 (0) 1 42 89 42 92
Mercury		
Nickel	<u>Nickel Institute</u>	168 Avenue de Tervueren Box 4 B – 1150 Brussels – Belgium Email : info@iza.com Http://www.iza.com Tel : + 32 2 776 00 70 Fax : + 32 2 776 00 89
Precious metals (Silver, gold and platinum group metals)	Eurometaux http://www.eurometaux.org/	Lena Perenius, Violaine Verougstraete Avenue de Broqueville 12, B-1150 Brussels Tel: +32-2-775.63.11 Fax: +32-2-779.05.23 Email: eurometaux@eurometaux.be
Platinum Group Metals (Platinum, Palladium, Rhodium, Ruthenium, Iridium and Osmium)	International Platinum Association http://www.platinuminfo.net/	Kroegerstrasse 5 60313 Frankfurt am Main Germany e-mail: info@platinuminfo.net Tel. +49 (0)69 287 941 Fax. +49 (0)69 283 601
Selenium	Selenium-Tellurium Development Association (STDA), www.stda.net	Daniel T. Hisshion Cavite Economic Zone Lot 6, Blk 1, Phase II Rosario, Cavite Philippines Telephone Numbers +63 46 884 1098 +63 46 884 1101 +63 46 437 2523 Facsimile Number +63 46 437 2524 Email: dth@info.com.ph
Thallium		
Vanadium	Vanadium International Technical Committee – Vanitec (Int)	Tel: (+)44 01959 563400 Fax: 0044 1959 562563 E-mail: vanitec@btconnect.com Winterton House, High Street, Westerham, Kent TN161 AQ, England
Zinc	<u>International Zinc Association</u>	168 Avenue de Tervueren Box 4 B – 1150 Brussels – Belgium Email : info@iza.com Http://www.iza.com Tel : + 32 2 776 00 70 Fax : + 32 2 776 00 89