



Standards as Barriers to Trade

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SFSA Spring Management Meeting

5.2.12



Pressure Equipment Directive (PED)

- Established by EU in 1997 to eliminate trade barriers
- Only allows CEN to write standards
- US companies can obtain approval for all products/materials or obtain a Particular Material Approval (PMA).
- Approval by auditor with an office in the EU.



PED approval

- Best/least expensive approach use an auditor that authorises your ISO 9000 system.
- Get approval for everything – not just a PMA.
- Some auditors more expensive than others – look for an auditor that does not split responsibility of ISO 9000 and PED between two separate divisions or offices.



Comparison of PED and USA system

- No reciprocity on standards approval
 - ASTM standards are not approved directly by the EU.
 - ASME accepts CEN(EN) material standards.



Source of Information

- http://ec.europa.eu/enterprise/sectors/pressure-and-gas/documents/ped/materials/index_en.htm



Unintended Consequences of PED

- Trace element levels, particularly S and P are lower in EN 10213 than in ASTM material standards.
- ASTM standards in many circumstances do not recognize current industry performance levels.
- If the ASTM standards are revised then this could limit the penetration of low cost producers.



SVHC and REACH

- Call from a member 4 weeks ago.
- Complete SVHC form?
- What is SVHC?
- What is REACH



REACH

Registration, Evaluation,
Authorization and Restrictions of
Chemicals



REACH – what is it?

REACH is a major reform of EU chemicals policy, affecting ALL global supply chains that produce and use chemicals.



REACH Categories

- Substances – Chemicals, Fibres
- Articles



REACH Articles

- REACH defines an article as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition.
- Potential problem for suppliers of plate, bar or similar product forms.



REACH – Substances Information

- Found on European Chemicals Agency (ECHA) website
- Producers and importers of articles can get information on the substances present in their articles and their concentration from actors in their supply chain, such as article suppliers outside EU and suppliers of substances and mixtures.



List of Substances (SVHC)

- List of 73 substances
- This is updated from time to time, there is a need to review the list before making a declaration.



Where to get information on REACH

<http://export.gov/europeanunion/reachclp/index.asp>



Where to find REACH Information

- Department of Commerce -
<http://export.gov/europeanunion/reachclp/index.asp>
- Webinars -
http://export.gov/webinars/eg_main_046619.asp
- Ecomundo Consultants –
http://www.ecomundo.eu/en/regulatory/clp_regulation/obligations.html
- REACH/CLP Guidance from ECHA
<http://echa.europa.eu/web/guest/support/guidance-on-reach-and-clp-implementation>



REACH reaches back into your supply chain

Not likely that your MSDS sheet will
be adequate.