

Experience with the process of national defense exemptions from the REACH regulation in Germany

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In Germany the REACH regulation is implemented by the chemical law. The MoD has authority of implementation of the chemical law in his own area of operations. At the last years a special procedure was introduced and coordinated with all stakeholders. Against the REACH-legislation we choose a Top-down approach to get a good traceability, evidence and an optimal way of the industrial inspection by the authority of the federal states. Therefore the contractual partner of the Bundeswehr apply a request to the federal office of Bundeswehr Equipment, Information Technology and In-Service Support (BAAINBw). In this request, which is counted to one agreement, the company must give all safety information of substance and of the product, it must be shown that there is no unrulable risk along the supply chain. In the last two years 18 request were approved by the German MoD. All requests are about the same substance, lead chromate. At the beginning we do not have enough safety information for lead chromate. So that the federal office assigns some F&T studies to the Fraunhofer Institutes. At the end we can a DMEL for lead chromate and so we could calculate different exposure szenarios. In some special cases this new data was used to get new safety regulation for our soldiers, for example in one case they must wear gloves. It was shown that the REACH information could be used very easily for employment protection.