



March 2008 Edition

EU CHEMICAL POLICY (REACH) SET TO IMPACT THE UNITED STATES AS PRE-REGISTRATION LOOMS

As the commencement date for pre-registration of substances under the EU Registration, Evaluation and Authorisation of Chemicals (REACH) policy looms large, its impact upon the U.S. chemical industry threatens those unwilling to pay the compliance costs. Pre-registration of substances commences on 1st June 2008, until November 30th 2008. Whilst this in itself is a comparatively simple procedure, a missed deadline then requires immediate registration of chemical(s) rather than waiting until the relevant tonnage registration deadlines. Pre-registration effectively buys industry time before having to fully register their substances.



Estimates of U.S. chemical exports to Europe that are subject to REACH amount to about \$14 billion per year (Ackerman et al, 2006). Revenues of this magnitude dwarf the estimated costs of compliance with REACH, which will amount to no more than \$14 million per year. Regardless of opinion over REACH, it will be far more profitable for the U.S. chemical industry to meet compliance costs than to lose access to the European market.

New Carbon (GHG) Accounting and Management Training Course

CRA chose the ENDS Corporate Climate Change conference on 4th March to launch the first of its professional training programme courses "Carbon (GHG) Accounting and Management". This three-day course is aimed at individuals who manage their organisations' carbon dioxide and other greenhouse gas emissions. The course is structured to deliver the latest information regarding greenhouse gas emissions accounting and management, and focuses on the following areas:

- Background to climate change
- Developing a carbon accounting system
- Managing greenhouse gas emissions
- Options for reducing greenhouse gas emissions

On completion of the course, delegates should be equipped not only to develop carbon accounting systems and quantify their organisations' footprints, but also be able to communicate effectively the imperative for reducing the emissions of greenhouse gases. This course is being submitted to IEMA for approval.

The course will be held in London in April, and then throughout the UK in 2008. For a booking form, please click [here](#) or contact carboncourse@cra.co.uk.

Headline Stories

New Standards for Bulk Hazardous Fuel Storage

As highlighted in CRA's *Winter '07* newsletter, the new policy to improve the bulk storage of hazardous liquids has been published. It applies to all oil and fuel storage installations across Britain covered by the Control of Major Accident Hazards (COMAH) regulations. The policy was published by the Competent Authority (CA), composed of the Environment Agency, the Health and Safety Executive (HSE) and the Scottish Environment Protection Agency (SEPA), that is responsible for all COMAH installations. A copy of the policy is freely available for download [here](#).

Health & Safety

CRA Europe's continued commitment to the health and safety of its staff is being further strengthened by the ongoing adoption of CRA's Safety Means Awareness Responsibility Teamwork (SMART) programme. The SMART program was developed to provide the foundation for continuous improvement in our safety performance and serve as a vehicle by which we sustain the importance of health and safety management in our daily activities. Further details are available [here](#).

British Standards Update

Recent publications include:

BS ISO 18512:2007 *Soil Quality - Guidance on long and short term storage of soil samples.*

DD BS/TS 17924:2007 *Soil Quality - Assessment of human exposure from ingestion of soil and soil material - Guidance on the application of physiologically based extraction methods for the estimation of human bioaccessibility/bioavailability of metals in soil.*

New Starters

CRA are pleased to welcome Michelle Dunbar who joins our EMS team as consultant in Reading and Alison Mitchell who joins the office management team in Nottingham.

Details of current vacancies across our offices are available [here](#).

Next Issue:

Business continuity programmes.

Update on Environmental Liability Directive implementation

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Don't be an April Fool

As highlighted in CRA's [Winter 2007](#) newsletter from 1st April 2008 Site Waste Management Plans will be required in England for construction projects costing more than £300,000 (excl VAT) under the Site Waste Management Plan (SWMP) Regulations 2008.

CRA provide SWMP preparation, implementation and validation services. For further information please contact our [Land and Property Team](#).

Brownfield Development Feature

Development Feasibility Assessments (DFAs)

In response to increasing demand from the development community and insurance industry, CRA have pioneered DFAs as a risk-based assessment of costs that may be incurred during the redevelopment of any particular site. DFAs provide a holistic and pragmatic view of abnormal development costs in the context of the potential development. DFAs provide a range of likely, best and worse case estimates of such costs. Included in the DFA is a review of available historical site information, such as ground investigation data and other supporting records, such that an indication of the abnormal costs, over and above those expected on a "Greenfield" site can be derived. These assessments include:

- Geotechnical/Foundation costs
- Remediation costs
- Demolition (decontamination, asbestos removal etc.) costs
- Waste management issues for the site
- Historical and Ecological considerations
- Utilities provision
- Any other abnormal costs

These assessments have proven extremely valuable in assisting our industrial and development clients to evaluate acquisition or divestiture of portfolios of land and property holdings. Each DFA is specific to the needs of the client ranging from the very generic, providing an overview of the general risks to a finely tuned DFA taking into consideration specific client interests, concerns and development plans.

New Pollution Prevention Guidelines for the Construction Industry

The Environment Agency (EA) are reminding the construction industry of the recently published *PPG 5: Works and maintenance in or near water*. It is a simple check list for all construction works near watercourses which include lakes, reservoirs and canals, all of which can be polluted by silt, oil and chemical spills. EA figures indicate in 2006, the construction industry was responsible for 271 pollution incidents causing environmental damage, of which 123 were to water. Of these, 18 incidents were serious enough to cause significant damage.

In most cases such incidents result in damage to the environment and leave the responsible company liable for clean up costs. In more serious cases where serious pollution has occurred it is common for the Environment Agency to prosecute. This guidance note and many others, including advice on topics such as Sustainable Drainage Systems (SUDS) to control surface water runoff, are available for free download [here](#).



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