

London City Bank – does bullion need registering?

Challenge

Company L is a bank in the City of London. Following attendance at a successful briefing to members of a Banking Trade Association, Company L felt that they needed more specific advice. Many banks trade internationally in gold (and other metals) as bullion and it appeared that REACH registration was needed. However the law is unclear and is capable of differing interpretation. The difficulty facing the Bank was making the right decision based on understanding the implications of REACH registration and identifying if there was the potential for any adverse impact on the business.

Solution

A day's consultancy at the Company L's offices was agreed as the best approach as this would give senior managers the opportunity to become involved in discussions as necessary.

A detailed presentation was given to senior executives, commencing with a discussion on the scope of REACH and then dealing with the specific legal issues applicable to bullion. The ambiguities in the law were explained, a range of options developed and the risks and costs associated with these options were detailed. Scenarios were developed involving partner organisations and the expected behaviour of competitors.

There had already been some contact with the UK Competent Authority and their responses were discussed and clarified.

Results

The event enabled the Bank to fully understand the technical and legal issues and to scope the implications of different courses of action. This provided the management of the Bank with a range of options which they could then use to decide what course of action to take. They could make these decisions with a full understanding of the implications for their business and the resulting consequences for their REACH compliance.

Further information

REACHReady's Consultancy service offers the opportunity to discuss your company's business confidentially and in-depth. Technical experts can review information you have already received and help ensure that you understand the relevance of this to your situation. Following an initial free telephone consultation, the pricing for consultancy is based on a standard day-rate of £1300 plus VAT and any associated expenses. We aim to provide a value-for-money service of the highest quality and the flexibility to fit your budget.

For more information please call +44 (0) 20 7901 1444 or email enquiries@reachready.co.uk