

spgprints®

How a downstream user deals with REACH (and related chemical legislations)

ECHA workshop, 16 April 2015

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Long history

Established 1947

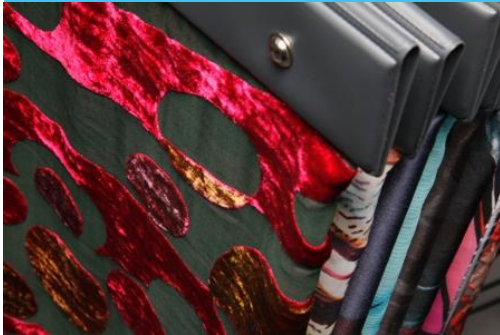
Inventors of the rotary screen 1963

Inventors of digital printing 1986



The business units

TEXTILE PRINTING



We offer high-quality and innovative rotary screen printing and digital printing solutions for printers and converters in the graphics and textile printing industries.

We integrate consumables, pre-press and printing equipment into a total system solution for our customers.

With our local presence we are able to provide global support and unprecedented levels of application and technical know-how and service.

GRAPHICS PRINTING



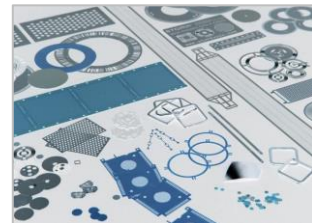
PRECISION METAL



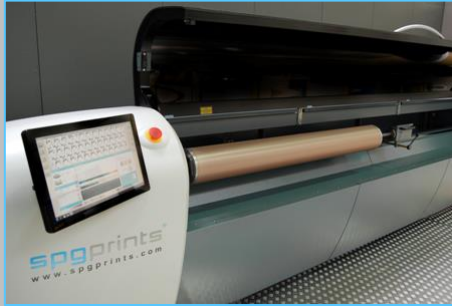
We also offer a wide variety of precision metal parts in the medical instruments, automotive, electronics, food, home appliances, and process industries.

Areas of expertise

- Fashion
- Swim & sportswear
- Home deco
- Technical textiles
- Labels & packaging
- Wallcovering
- Security
- Printed electronics
- Precision metal parts



Main products Textile



Direct laser engraving system



Rotary screens



Rotary screens printing system



Digital inks



Inkjet printing system

Main products Graphics



Digital pre-press



Rotary screens



Rotary screen integration units



UV inkjet printing system

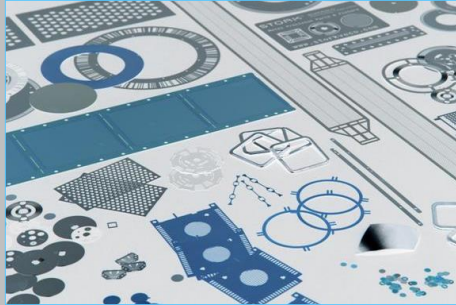


Digital inks

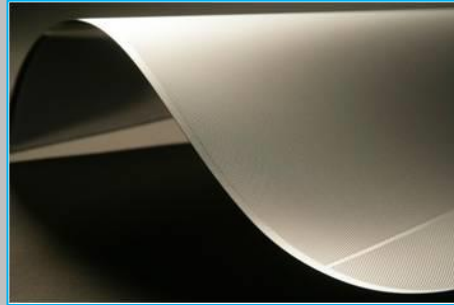


Industrial printing system

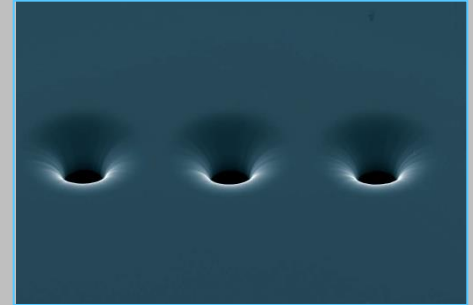
Main products Precision Metal



Metal precision parts



Sugar sieves



Inkjet nozzle plates



Stencils



Encoder discs



Shaver foils

Our downstream user issues

- Supply chain continuation
 - 2008: suppliers queried on registration intentions and informed on use descriptors
- Authorisation chromium(VI)
 - 2010-2011: Dutch Cr(VI) task force and CTAC pre-consortium established
 - 2012: Member of CTAC (preparing authorisation dossiers for chromium trioxide)
 - 2013: Member of CCST (preparing authorisation dossiers for other Cr(VI) compounds)
- CLP & SDS
 - Manage all information from incoming SDS
 - Check compliance with exposure scenarios in eSDS
 - Transition to CLP: SDS and labels of own formulated products (June 2015)

Internal Directive

- REACH & CLP compliance at EU level: Netherlands, Austria, UK
- Internal Directive explains about the obligations under REACH and CLP, what the sites shall do to become compliant, and how to do this:
 1. Chemical substance database: used to derive and track/monitor obligations
IED: list of raw materials used to be included in permit
CAD/CMD: identification of (hazardous or CMR) chemicals
 2. Procedure 'Request new chemicals/test substances': mandatory HS&E procedure, preventing the introduction of e.g. (potential) SVHC's
CAD/CMD: substitute high-risk substances at the gate
 3. Supply chain communication: template letters for communication with suppliers and customers on REACH and CLP compliance.

Internal Directive

- Internal directive (continued):

4. Safety data sheets and CLP: explains how to handle suppliers' SDS, how to check exposure scenarios, when to use CLP symbols on chemicals and on reservoirs/pipelines.
CAD: proper labelling of pipelines and reservoirs containing hazardous chemicals
IED: information from (e)SDS can be used for permit
CAD/CMD: information from (e)SDS can be used for risk assessments
5. SVHCs and applications for authorisation: recognize (potential) SVHC asap (e.g. when classification is changed). Contact non-EU article suppliers on presence of SVHC.
CAD/CMD: substitute high-risk substances
6. Enforcement: annual REACH audit and questionnaire for sites

eSDS compliance check

- Internal procedure mainly based on guidance from ECHA and CEFIC
 - Own use described by an exposure scenarios?
 - Compliant with operational conditions, risk management measures and control of exposure
- Tools:
 - Flow scheme: basic & operational quality check (main SDS), general compliance check (ES), what to do if partly or non-compliant
 - Compliance check form: to be filled in for reference and documentation purposes
 - Logbook: tracking of eSDS checks (may also be part of substance database)
- **Costly exercise:** time consuming (lots of text), multiple expertises needed, scaling can only be done by a risk assessment expert (knowledge on different models; no black box approach!)

eSDS compliance check: our experiences

- Receipt: SDS (or updates) often not sent pro-actively, therefore available SDS may be outdated and/or not conform REACH Annex II
- Number of eSDS received: 25 since April 2011
- ES format: often different formats are used, which is not favourable when performing the compliance check
- CSA tools: many tools are available; knowledge needed on all tools?
- Table of contents: avoid searching many pages for the applicable ES
- DNEL vs OEL: inhalation DNEL can differ from OEL
- Do internal exposure measurement data outweigh non-compliance?

Environmental permits

Will be revised in the coming 12 months.

Sources of information that are used to compile the application dossier, and/or which may trigger preventive measures to be taken, include:

- our internal substance database (info from SDS) built for REACH
- exposure scenarios in eSDS
- ECHA databases: registration dossiers, C&L Inventory
- process descriptions used in authorisation dossiers
- and naturally also BREF documents describing the Best Available Techniques (BATs)



Thank you for your attention

QUESTIONS ???