

REACH & CLP *Case story*

Europe with REACH

How will the chemical industry in the EU really change because of REACH? What benefits will all the studies and joint decisions currently being made in SIEFs bring to the industry, to a single company and to the citizens of the European Union and to the environment?

This is one of the issues that companies contemplate at the moment as they are working hard in SIEFs to obtain information on the effects and the actual risks of the substances they use, import or manufacture in order to submit their joint REACH registrations by **30 November 2010**.

Care products. He is working with a team of toxicologists, ecotoxicologists, buyers, chemists, and regulatory affairs specialists to manage 15 registrations of substances related to detergents. P&G's Fabric & Home Care is a member in more than 200 SIEFs and acts in all the roles specified by REACH; as a manu- ▶

COMPLYING WITH REACH – A PREREQUISITE TO BUSINESS CONTINUITY

One of the fundamental objectives of REACH (Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals) is to improve the protection of human health and the environment from the risks that can be posed by chemicals, and to enhance the competitiveness of the European chemical industry. Chemical companies agree that this is a long-term goal but that now is the time for them to do their best to fulfil the REACH requirements if they wish to continue their business operations.

Procter & Gamble is one of the world's leading consumer goods companies with more than 300 branded products and serving customers in more than 180 countries, including all the EU member states. Dr. Ali Temara, who is based in Brussels, Belgium, is responsible for REACH compliance of P&G's Fabric & Home



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► **f**actorer, importer and industry user. “We have been building our internal capability within P&G to ensure that we have all the right people in the right positions to contribute to the level required to be REACH compliant”, says Temara. “But not all companies have the resources we have to understand the chemicals as profoundly as REACH requires. Therefore, REACH puts, especially now when the deadline is approaching, huge pressure on the companies in this industry. If you don’t have the necessary human resources, you cannot carry out the registration properly and this might, in the worst case, signify that you need to close down your business”, Temara states.

Ms. Annetta Crastan is a Quality Management Responsible and Coordinator of REACH at Laviosa Chimica Mineraria, a medium-sized Italian chemical company based in Livorno and employing 120 people. According to Crastan, especially for smaller enterprises, REACH is all about prioritising. “I think the main mission of REACH is very good, but we don’t have the resources to do the registration work as thoroughly as we would like to. Out of 52 substances that we pre-registered, we chose the most important ones for us, for example bentonites, and we contribute actively in those SIEFs which are crucial for our business, but the others we cannot follow due to the lack of resources.”

MORE COMMUNICATION ALONG THE SUPPLY CHAIN

Dr. Ali Temara lists some of the things P&G has done in order to be REACH compliant.

“We have actually built our own internal system to comply with REACH. There are several duties we perform, for example monitoring the development of the regulation as well as following up with the changing guidelines”, says Temara. The level of involvement of P&G’s Fabric & Home Care in the 15 registrations varies, depending on how important the sub- ►



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- ▶ stance is to P&G. “In some SIEFs I observe the progress and get reassured that all the suppliers are doing their job well. In some SIEFs where the substance is very important to us, I try to bring in as much resources and knowledge as I can in order to facilitate the dossier preparation”, he continues.

Being involved full-time in SIEF processes, knowing the requirements inside out, and understanding all the effort REACH requires, what does Ali Temara think REACH will change? “I think there will definitely be more communication along the supply chain as well as better understanding of chemical safety and companies’ responsibilities.”, he says. “As all companies will be exposed to safety of the chemical in one way or another, they will have to give the information to users as well”, Temara continues. “So REACH will definitely increase knowledge of the chemicals and what is behind the actual substances.”

Temara also hopes that, at the end, all companies will be more responsible in the safe handling of their substances, but he emphasizes that REACH still is a huge challenge for the industry. “The safety of a chemical is a very complex topic. Summarizing the safety facts for downstream users with only a few words in a few pages is very difficult. The safety data sheets soon become safety data booklets. So in order to increase the understanding of safety aspects of chemicals among producers and consumers, we need a lot of effort in making sure that the right

information goes to the right people”, Temara explains.

WORKING IN SIEFS BRINGS INVALUABLE EXPERIENCE

Ms. María José Rodríguez, Regulatory Affairs and Communication Manager at FMC Foret, a subsidiary of FMC Corporation based in Europe, says that active participation in SIEFs or in consortia (separate entities from the



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The information and experience gained is very beneficial for the whole industry and the things learnt in the process can be utilized in the business.

► actual SIEFs) gives invaluable knowledge of companies' substances, no matter what your background is. "I learnt a lot from the dossier preparation", says Rodriguez, who has been actively working in consortia such as sodium tripolyphosphate. "If you just have the resources to do so, I highly encourage active participation in SIEFs or consortia. I know so much more after participating in the registration process. For example, we have gained experience of developing exposure scenarios and this kind of a skill is crucial for a company", Rodriguez clarifies. FMC Foret, one of the main producers of chemical products in Spain pre-registered around 40 substances during the first phase of REACH. Due to its REACH knowledge, FMC Foret also acts as the Only Representative for some FMC Corporation businesses that are based in the US.

Ms. Annetta Crastan from Laviosa Chimica Mineraria has similar experiences. "I think the fundamental idea of SIEFs is extremely good and exchanging information was very useful for me personally and for my company as well. I really appreciated the ability to exchange ideas and the opportunity to agree jointly on our plan of action. Even though the first impression of REACH was that it is an exhausting project for all of us, the informa-

tion and experience gained is very beneficial for the whole industry and the things learnt in the process can be utilized in the business", Crastan summarizes.

Fast facts

REACH:

Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals. Manufacturers and importers must have registered if volumes are:

- Phase-in substances over 1,000 tonnes/year in the ECHA system
- CMR / toxic substances (R50/53) of over 1 tonne/year.

Deadline: **1 December 2010.**

CLP:

European Regulation on Classification, Labelling and Packaging of chemical substances and mixtures.

Companies must provide labels that comply with the CLP Regulation.

Deadline: **1 December 2010 and by 1 June 2015, respectively.**

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