

REACH & CLP *Case story*

Industry consortia are key for the success of REACH

According to many companies, consortia are of key importance as far as the SIEF registration process under the REACH legislation is concerned.

The consortia are separate entities from the actual SIEFs, a subgroup formed by leading companies of a particular SIEF in order to exchange information and jointly develop the required dossiers.

DIVERSE COMPANIES WITH SIMILAR MINDSET

Marko Grčar is the Product Safety and Regulatory Affairs Manager of Belinka Perkemija, d.o.o, a medium-sized Slovenian company and one of the largest producers of peroxide compounds in Central Europe. The company is currently involved in three SIEFs. “The hydrogen peroxide SIEF is the biggest one for us with approximately 1,000 pre-registrants,” tells Marko Grčar. He states that every SIEF is unique and it depends on the companies themselves, how actively they want to be involved in the registration process. “We work in consortia and that is really beneficial for us,” says Grčar.

Harrie Camps, Manager of Regulatory Affairs / Product Stewardship of Saudi Basic Industries Corporation (SABIC) in the Netherlands, is also pleased with the cooperation within consortia. “SABIC is one of the top five petrochemicals companies in the world and we were pleased to find out that almost all of the SIEFs we are involved in had an industry consortium”, says

Camps. “We need to register about 150 different substances and the SIEFs that we are involved in vary in size from 100 companies to approximately 3,000–4,000 participants.”

Lorette van de Mast is the REACH Project Leader of AkzoNobel Industrial Chemicals in the Netherlands. The company is Europe’s largest producer of vacuum salt and a leading



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- ▶ supplier of chlorine, caustic lye, hydrochloric acid, ferric chloride, water treatment chemicals, dimethyl ether and MCA. “We are participating in about 20 SIEFs at the moment which range in size from 100 to 4,000 participants”, tells van de Mast.

THE POSSIBILITY TO EXCHANGE INFORMATION AND SHARE THE BURDEN

The consortia provide great benefits for those involved. One of the most significant benefits is the ability to exchange information. “Within consortia we share information about substances and work together”, explains Marko Grčar. “All members of a particular consortium are entitled to receive the documents for registration regardless of your company being the lead, active or passive registrant”, Grčar continues. “Consortia are important because you can meet other companies face-to-face and work together for a certain deadline”, says Harrie Camps.

In addition, companies belonging to a consortium are able to share the workload that results from the complex requirements. “Consortia have the capabilities, such as technical, legal and financial, to meet the deadline and follow the complex requirements of the REACH legislation. It is a shared burden”, states Camps and continues by explaining how several companies are working for the same goal and deadline in SIEFS. “For example, in one consortium there are 51 members belonging to a SIEF with over 1,000 potential registrants. SIEFs, in general, do not work un-

less there are parties willing to form a consortium. These require that someone takes the lead”, assures Camps. “It is a team effort to fill out the registration dossiers for submission”, sums Lorette van de Mast.

TAKE RESPONSIBILITY

The interviewees tended to have the same message to their fellow companies around Europe – remember that the deadline, 30 November 2010, under REACH for registration of the most hazardous chemical substances as well as substances produced in very large quantities, is just around the corner. In addi- ▶



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REACH is a challenging task, but we can show that we can cooperate as an industry.

► tion, 3 January 2011 is the deadline for the CLP notifications. Van de Mast reminds that the clock is ticking. "AkzoNobel Industrial Chemicals is working in active SIEFs but this is not the case with all SIEFs. I am, therefore, encouraging companies to get active", says Lorette van de Mast.

Harrie Camps shares the thought and advises companies to take responsibility. "Make sure that a consortium is formed. REACH is a complex legislation with lots of data requirements", tells Camps. "ECHA, the Commission and CEFIC (European Chemical Industry Council) should facilitate the formation of consortia within those SIEFs where leadership is lacking and external support is needed to meet the REACH deadlines", continues Camps. For these kinds of issues the European Commission, ECHA and the industry associations have formed the so called Directors' Contact Group. The main objective of the Contact Group is to ensure that the objectives of REACH – the safe use of chemicals and functioning of the EU market – are achieved.

In addition, both van de Mast and Camps feel that this process is important for the industry as a whole. "This is a challenging task, but we can show that we can cooperate as an industry", states van de Mast. "Make sure you

do your utmost to ascertain that the chemicals you handle are safe and that they are transferred into dossiers not only for the authorities' but also for your customers' sake", advises Camps. "Make your contribution to the industry", concludes Camps.

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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