

REACH & CLP *Case story*

Pragmatism – and other expert advice in meeting the REACH deadlines

Many chemical companies operating in the European Union are working hard in SIEFs (Substance Information Exchange Forum) in order to submit their joint registration for REACH by 30 November 2010.

According to several company representatives – some of them involved in as many as 1000 SIEFs – being pragmatic in everything you do is the key to successful SIEF work. The message of these forerunners is to focus on the main issues and, no matter what, submit your registration well in advance of the deadline.

BE CONSTRUCTIVE AND KEEP FOCUS ON THE BIG PICTURE

Ms. Genevieve Hilgers, REACH Team Leader in Procter & Gamble, a large consumer goods company with more than 300 branded products, emphasizes the importance of pragmatism when working in SIEFs. “SIEFs should progress fast on dossier preparation, ensure that they comply with both the business and the technical completeness check rules and that dossiers should be submitted in advance of the deadline as you may not be successful with the first submission attempt. Less time should be spent on discussing all the little details of SIEFs or consortium agreements. In addition, the Lead Registrant should not neglect to keep SIEF members regularly informed of the dossier preparation progress”, says Hilgers. She also advises everyone to be supportive in their co-operation. “There is no need now for unnecessary criticism. We are all in the same boat so let’s work in a constructive way toward our joint goal”, she continues.

Ms. Anouk Carlier-Schwegler is a REACH coordinator at DSM, a large chemical company headquartered in the Netherlands which employs some 22,700 people worldwide. DSM’s product portfolio includes nutrition, pharma- ▶



REACH & CLP *Case story*

Lead Registrant should not neglect to keep SIEF members regularly informed of the dossier preparation progress.

► ceuticals as well as base chemicals and materials. In terms of REACH, DMS is involved in all of its roles: as a manufacturer, importer and industry user. Being DSM's REACH coordinator, Carlier-Schwegler has practical experience of working both in very small SIEFs with only two representatives as well as large ones with more than 1000 companies. She emphasizes the importance of drawing conclusions in the SIEFs. "Focusing on the process as a whole and managing the risks is very important. But what really matters now is the companies' ability to make decisions together – and, at this point, making them fast", says Carlier. "We cannot get stuck in detailed discussions as our first priority is to meet the deadlines", she continues.

The manager of REACH Competence Centre at Kemira's Environment and Safety unit is Ms. Liisa Rapeli-Likitalo. Kemira, a Finnish company focused on the water-intensive chemicals industry, is involved in more than 500 SIEFs. "The fact is that REACH is a challenge for all of us in this business. Implementing the legislation requires lots of resources and we need to get through the registration process if we want to keep doing business. However, nobody is left alone; you can rely on the SIEFs. But the companies in SIEFs must work in a systematic way," says Rapeli-Likitalo. She urges everyone in SIEFs to work as flexibly and constructively as possible in order to reach results on time.

TAKE THE LEAD WHEN YOU CAN

Hilgers, Carlier-Schwegler and Rapeli-Likitalo all represent companies with thousands of

employees. Being large or among the market leaders usually brings along the responsibility of being elected the Lead Registrant in a SIEF. The Lead Registrant is a mandatory role in every SIEF, but REACH does not specify the rules for their election.

Carlier-Schwegler says that based on DSM's experience, in order for a SIEF to function well, it is very important that it is clear from the beginning who the Lead Registrant in a SIEF is. "We have taken the Lead role where ever we can. During this phase of the registration process we are involved in 81 SIEFs, of which we are the Lead Registrant in 25. We have felt ►



REACH & CLP *Case story*

We need to get through the registration process if we want to keep doing business.

- ▶ that if the substance is very important for our business, we have the skills and relevant input to provide, and therefore, we can take lead.”

Out of over 100 substances to be registered in 2010 that Kemira is involved with, the company is a Lead Registrant in 28. According to Rapeli-Likitalo, in order to make the SIEF function and to be able to submit the joint registration on time, it is necessary to have a clear leader in the SIEF. “In substances that are extremely essential for our business, it has been natural for us to be the Lead Registrant in that SIEF. However, in some SIEFs we have been forced to take the role as no one else has stepped forward and we have been able to allocate additional resources for these substances.”

The European Chemicals Agency (ECHA) has issued a list of substances to be registered by December 2010 and a list of Lead Registrants. These lists have been deemed to be very useful especially among the downstream users. Genevieve Hilgers of Procter & Gamble, a large downstream user, invites all the Lead Registrants to let ECHA know about them. “I would highly encourage all the Lead Registrants to inform ECHA once they have been nominated. The two ECHA lists are extremely useful for the downstream users to prioritize their work by contacting only suppliers for which there is a concern with supply continuity. We also call on all manufacturers and importers to communicate their registration intent to their downstream users or to reassure them on the future supply delivery. This does

not necessarily mean that the supplier should contact each and every downstream user as this can be achieved by other means, e.g. via the company website. From an updated list we can easily see whom to contact in case of information requests.”

LEARN FROM OTHERS

The purpose of the SIEFs is to exchange information on the substance at hand. Therefore, many smaller companies with limited resources can learn a great deal just by being in a SIEF. “I know that it is easy for me as a representative of a large company to speak about being active and taking the lead, but ▶



REACH & CLP *Case story*

We can only reach the goal of REACH by helping each other. Be pragmatic, support each other and find a solution together.

- ▶ SMEs are in a completely different place. So my advice is that if you don't have the knowledge or the resources, rely on others in the SIEFs", Anouk Carlier-Schwegler says. "As other companies in your SIEF need to register the same substance and therefore have to fulfil the requirements, you can get the information and pay a fair share of the costs for it. Being passive when you don't have any input is okay", Carlier-Schwegler continues.

Liisa Rapeli-Likitalo has a similar message. "One of the positive sides in the SIEFs is that they enforce companies operating in the chemical industry to improve their working methods and also to share information with each other. Exchanging information saves a great deal of your own resources."

In addition to other companies, there are always the national helpdesks as well as industry and trade associations that offer their support to the companies in their REACH-related queries. Genevieve Hilgers recommends visiting ECHA's website where useful guidelines and lists can be found that can be utilised in the registration process. And as Carlier-Schwegler puts it, "We can only reach the goal of REACH by helping each other. There is so much to know and so little time left, so

please be pragmatic, support each other and find a solution together. Only by doing so, can we all submit our joint registration in time."

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.**

Produced for ECHA

Contact:

European Chemicals Agency
Annankatu 18, P.O. Box 400, FI-00121 Helsinki, Finland

Tel.: +358 9 6861 80
Fax +358 9 6861 8210
<http://echa.europa.eu>
press@echa.europa.eu