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The European Chemicals Agency (ECHA) in Helsinki hosts its formal inauguration today. This coincides with the start of the key processes of pre-registration and registration under REACH. ECHA and the European Commission therefore remind companies to pre-register their chemicals before 1 December 2008. Research and development related notifications (PPORD), inquiries on substances and mandatory registration of non phase-in substances started also on 1 June 2008.

Implementing REACH in practice

This document summarises five industry case stories and provides an insight on how companies handle REACH in practice. The industry case stories include:

- A large multinational chemical company Dow Europe
- A small family-owned textile company Evolon Freudenberg
- A business organisation The Finnish Cosmetics, Toiletry and Detergent Association
- One of the world's leading consumer goods companies P&G
- A distributor of industrial chemical specialities Bang & Bonsomer

In addition, two case stories explain how REACH helpdesks work.

- Member State REACH helpdesk: Belgium
- ECHA helpdesk

Summaries are provided here, however full versions of the case stories are available at: http://echa.europa.eu/news/press_en.asp

COMPANY CASES

1. Large chemical company will have to pre-register 800 substances in about 10000 REACH relevant products

This is a major multinational company with a strong European base. One-third of its manufacturing takes place on the continent and 37% of its annual sales of \$54 billion are generated in Europe. It will have to pre-register substances in about 10,000 REACH relevant products.

- In late 2006, the company set up the REACH Programme Management Office.
- Major IT challenge: over 20 new work processes were introduced -covering preregistration, customer communication and tracking volumes of substances by legal entity. This work began in June 2007.
- The company organised training sessions and workshops on REACH. The training included employees outside the EU.
- The company is contacting its suppliers to determine whether they will pre-register their product.
- The company has introduced a two-stage process for communicating with its thousands of customers. The first phase informed them of its intention to pre-register and register and

established a unique data base providing information on Dow products. The second phase will provide data on the use of, and exposure to, chemical substances.

To prepare for REACH the company undertook a target to meet the REACH requirements in advance of its 2018 final deadline.

2. The example of a SME

Headquartered in Colmar in the East of France, this company produces microfilament technical textiles and has 50 employees.

- Implementing measures linked to REACH were initiated in January 2007.
- In April and May 2007, **suppliers** were contacted about REACH.
- A particular challenge was to get more **safety and environmental information** about the hazardous substances used in the factory.
- A **timetable** was created, starting with the opening of the pre-registration period of 1 June 2008.
- In addition to **external help** from the Strasbourg Chamber of Commerce, Evolon received support from the parent company which had appointed someone with specific responsibility to coordinate operations for REACH.

The company has found establishing a **comprehensive inventory** of all the substances that come into and go out of the premises very useful and recommends this to other companies that will be affected by REACH.

3. An industry association battles for its Members

The Finnish Cosmetics, Toiletry and Detergent Association (TY) has 55 members in Finland. Almost all are **small businesses**, some are **larger companies**. The majority are **importers**, while a few are **manufacturers**. The secretariat has a staff of three.

- TY began discussing REACH in **internal meetings** and the minutes of these sessions were circulated to members.
- The Association worked closely with the Finnish chemical industry and other organisations tailoring the information it received to suit the specific needs of its members.
- Last summer, TY prepared **two sets of guidelines for members** one on cosmetics, the other on detergents describing how REACH would impact each sector.
- TY has a **regular newsletter** for members and aims to operate an **intranet**. Companies are also encouraged to contact the TY secretariat if they have queries.
- The Association has organised **seminars on the future legislation** and emphasises the importance of understanding how the new measures will be implemented in Finland.

4. Downstream user of chemicals sees REACH as an opportunity to further build consumer confidence

With more than 30 manufacturing sites in the EU producing more than 200 **consumer branded products**, this company will play a key role under REACH as a **downstream user**.

• More than 15 scientists have actively contributed to the **preparation of guidelines** to support the practical implementation of REACH.

- Since 2005, a solid multifunctional REACH "Compliance Team" has been set-up. The company has created an inventory of its substances and is developing REACH compliance strategies.
- Their REACH requirement is a moving target as it changes its composition of products, chemical use, tonnage, plants etc., on a regular basis. However several **IT-tools** have been developed to update its inventory of substances.
- They are also working in close **collaboration with their suppliers** to ensure that they will pre-register and register the substances they supply to them.
- It has pro-actively prepared **exposure scenarios** with industry associations like AISE* and Colipa**. Also, scientists in the company continue to be actively working with ECETOC*** to develop key technical guidance.

5. Distributor of industrial chemical specialities, plastics, and basic chemicals

This company is a leading Finnish distributor of industrial **chemical specialities**, **plastics**, and **basic chemicals**. Founded in 1927 Bang & Bonsomer today operates in 9 countries and employs some 270 people.

- The Technical Trade Association has from the very start been **organising training** on REACH.
- A REACH **Task Force** has been active in the company for two years.
- Training has been arranged.
- **Suppliers** both in and outside the European Union have been contacted.
- The data system has been upgraded to meet the requirements of REACH.
- The **website** contains a REACH section and customers have received a letter with information about REACH requirements.
- The Commercial Chamber of China and Russia have been informed about the impacts of REACH.
- The **Navigator tool**, the **brochure for third countries** prepared by the European Chemical Agency (ECHA), the web site of the Ministry of Social Affairs and Health and the access to the national REACH **help desk** have been helpful.
- Mastering the guidance on REACH is also a challenge and other companies are advised to start getting prepared as soon as possible.

Suppliers have been unable to inform the company whether they will provide all the needed products in the future. Therefore the company is not yet able to inform its customers about the availability of products.

REACH HELPDESK CASES

6. Member States helpdesks

Member States have established helpdesks to assist companies with their obligations under REACH. The Belgian helpdesk has been interviewed as an example. A summary is provided here. The full version of this case story is available at:

http://echa.europa.eu/news/press_en.asp

The Belgian REACH helpdesk has been established in 2005. It is hosted by the Ministry of Economy, SMEs, Self-employed, and Energy. It is run by a small team who can get support from their colleagues, within the ministry or from other departments if needed. The helpdesk's role is factual and explanatory. It provides information on the obligations involved, but cannot give advice on how these should be met, as this responsibility lies with the companies themselves.

The helpdesk has established partnership with the Belgian Federation of Enterprises and the chemical industry. It also provides practical implementing tools and brochures. The workload of the helpdesk really began to pick up in early 2007. It currently receives about 60 - 70 requests per month, some containing several questions. It aims to answer within a week. The response time is between 2 days and 2 weeks, depending on the nature of the question.

7.ECHA helpdesk

The European Chemicals Agency (ECHA) has a regulatory obligation to provide advice and assistance to manufacturers and importers registering substances. Its helpdesk has been operational since 1 June 2007 when ECHA was founded in Helsinki.

Currently a team of twelve works at the ECHA Helpdesk. It is responsible for providing advice on REACH, REACH-IT, and IUCLID 5 (International Uniform Chemical Information Database), software for companies to store data on chemicals and to prepare their registration for ECHA. The Team can also call on the specialist knowledge of other ECHA employees and the European Commission.

The helpdesk service is provided free of charge and may be used by manufacturers, importers, or downstream users from within the EU or by other stakeholders worldwide. The helpdesk provides advice and guides enquirers through the various sources of information so that they can understand their own obligations under REACH."

Just over half of all enquiries come from the EU. The non-EU enquiries come mainly from China, Japan, North America and Russia.

The Helpdesk aims to respond to all enquiries within two weeks. Currently most of the questions concern with the import of chemical goods into the EU, registration, and the role of importers and only representatives. There is also an increasing focus on pre-registration and the identification of substances.

ECHA keeps an up-to-date Frequently Asked Questions (FAQs) document on its website. The FAQs covers almost 70 questions in 12 topic areas. The document has been updated three times in the past year. The FAQ also provides links to guidance packages dealing with specific aspects of the legislation.

Currently, the number of questions arriving to the ECHA helpdesk is running at double the rate compared to the start of 2008. Since June last year, the Helpdesk has responded to some 4,400 enquiries (1,900 REACH and 2,500 IUCLID 5).

The ECHA Helpdesk supports also its national counterparts via a network and an IT platform.

Further Information

European Chemicals Agency web site at: http://echa.europa.eu

<u>Press Memo 1:</u> **European Chemicals Agency (ECHA)** on the Press Office page of the ECHA website.

<u>Press Memo 2:</u> **REACH Implementation in Practice** on the Press Office page of the ECHA website.

Seven REACH Case Stories on the Press Office page of the ECHA website.

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