



AUTHORISATION UNDER REACH

UPSTREAM SUPPLY CHAIN APPLICATIONS

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RAMBOLL WORLDWIDE

Our markets

Buildings



Transport & Infrastructure



Planning & Urban Design



Environment & Health



Water



Energy



Oil & Gas



Management Consulting



13,000 employees
300 offices
35 countries

ENVIRONMENT & HEALTH

Merger of ENVIRON
and Ramboll in 2015



BiPRO enhances Ramboll Environ
in June 2016



Part of Ramboll Environ



Service Lines

- Air quality management
- Compliance, strategy and transaction services (EHS audits, EDD)
- Ecological services
- Health sciences
- Impact assessment (EIA/ESIA)
- Resource and waste management
- Site solutions
- Water

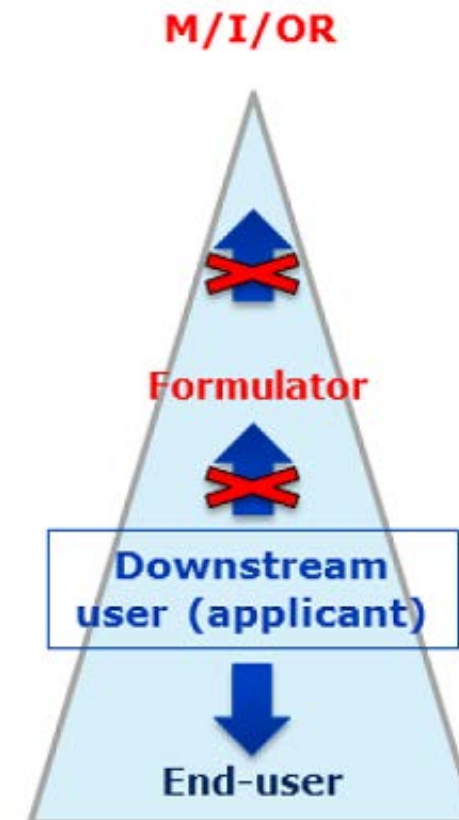
EXPERIENCE IN AUTHORISATION UNDER REACH

NUMBER OF APPLICATIONS (USES)	
Authorisation application (uses) partially for consortia (CTAC, CCST, GCCA)	48 completed (phthalates, TCE, diglyme, CrO3, chromates) 4 in process (CrO3, chromates)
Submitted to ECHA	48
PSIS held	51
Undergo/complete public consultation (PC)	48
Dialogue	8 dialogues with RAC/SEAC, partially for several applications together (not necessary for cases which are 100% clear or rather if there are no comments in the PC)
ECHA opinions	42 final opinions received
EU Commission decision	6 (phthalate/TCE)

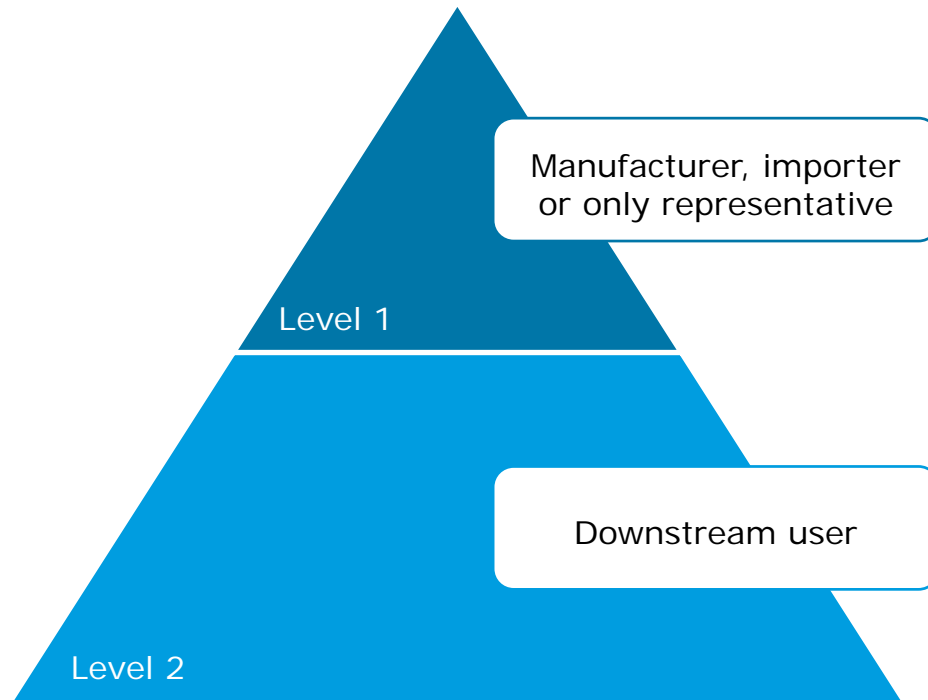
WHY ARE UPSTREAM SUPPLY CHAIN APPLICATIONS NECESSARY?

- Companies **cannot** cover their upstream suppliers (OEMs cannot cover their suppliers)
- Reduce workload at the DU level of the supply chain (especially for SMEs)
- Reduce costs (authorisation fee) at DU level
- Reduce workload for ECHA, RAC/SEAC and the EC

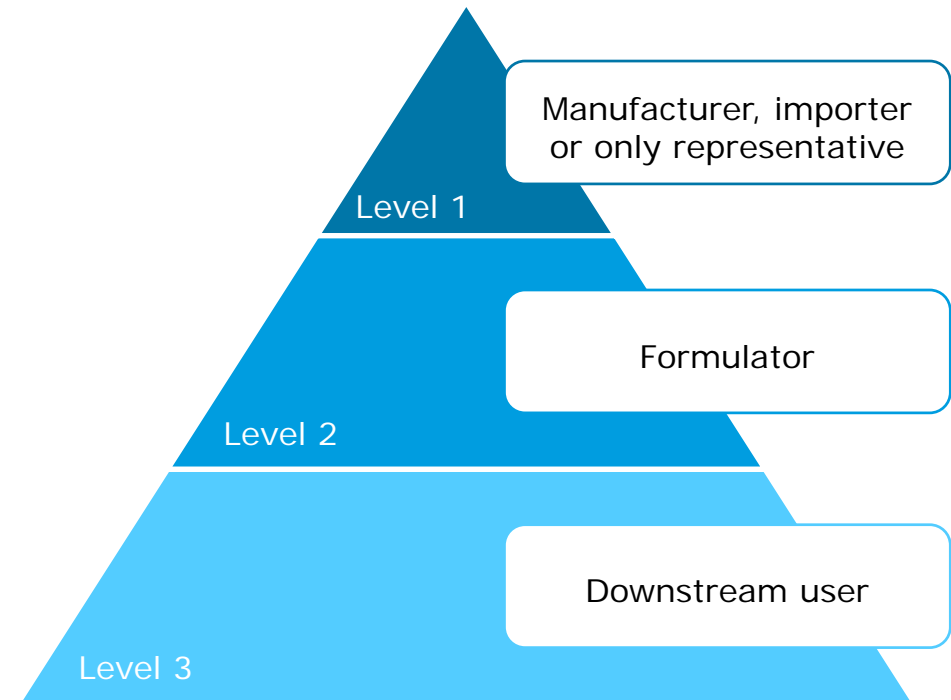
Otherwise ECHA would have faced thousands of DU applications for CrO₃ and hundreds of DU applications for TCE



TWO TYPES OF UPSTREAM SUPPLY CHAIN APPLICATIONS



Type A
Contractual link between applicant and DU (DOW/SAFECEM)



Type B
No contractual link between applicant and DU (CTAC, CCST)

ORGANISATIONAL SET-UP

Contractual link

- No consortium needed
third party to manage CBI sufficient
- Awareness raising directly at DU with limited effort

A

No contractual link

- Build a consortium and have a third party manage CBI
- Motivate by using industry associations as communication channel
provide presentations at this level

B

DATA GATHERING AND DEFINITION OF SCOPE

Contractual link

- Less discussions on scope required (own decision)
- Use established DU contacts for collection of additional information
[questionnaires and interviews](#)
- Representative case studies available to provide insight into supply chain

A

No contractual link

- Easy first questionnaire
[increase detail in the second round](#)
- Motivate DUs by using OEMs as distributors of questionnaires to their suppliers
- Early draft report defining the scope and required functionality
[‘Critical parameter’ = boundaries](#)

B

LETTER OF ACCESS (LOA) TO DOCUMENTS

Contractual link

- No LoA needed, DU automatically covered by application
- Conditions can be implemented via supply contracts

A

No contractual link

- LoA only needed for late comers (DUs) that are not within the scope/boundaries - in case they want to elaborate their own AfA based on the consortium documents
- LoA should be available to all companies outside the consortium and pricing should be transparent & fair

B

TIMELINES

Contractual link

- Interested parties known
- No consortium/cooperation agreement required
- Process starts directly with data gathering and elaboration of documents

 One year

A

No contractual link

- Identify interested parties
- Form a consortium
contract elaboration
- Build awareness of the consortium
make companies join

 Two years

B

CONDITIONS

Contractual link

- Conditions can become part of supply contracts
- Control of OC / RMMs by applicant
- Choice to supply customer or not
[control by applicant](#)

A

No contractual link

- Difficult to implement conditions via several supply chain levels
- Conditions can only be part of the eSDS
- How should measurements / monitoring data be reported to the applicant (review report)?
- No control by applicants

B

THANK YOU!

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