



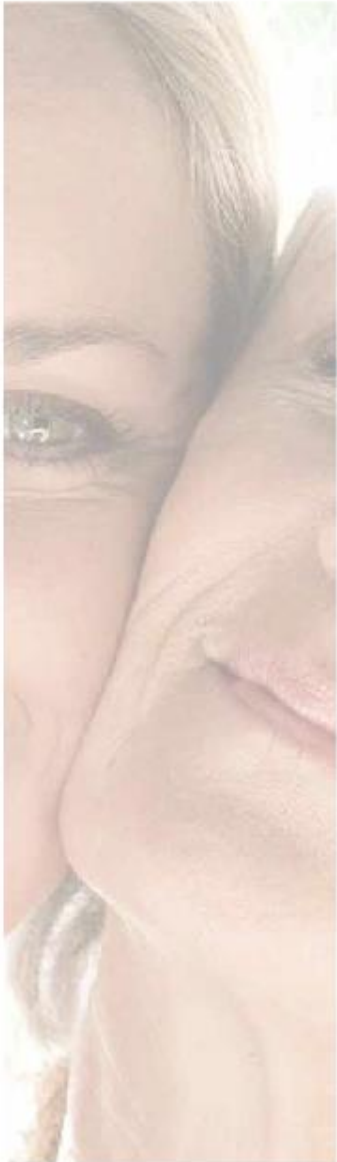
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## PREPARATION FOR REGISTRATION – WHAT IS RELEVANT FOR AN SME?

ECHA Stakeholder meeting 2016



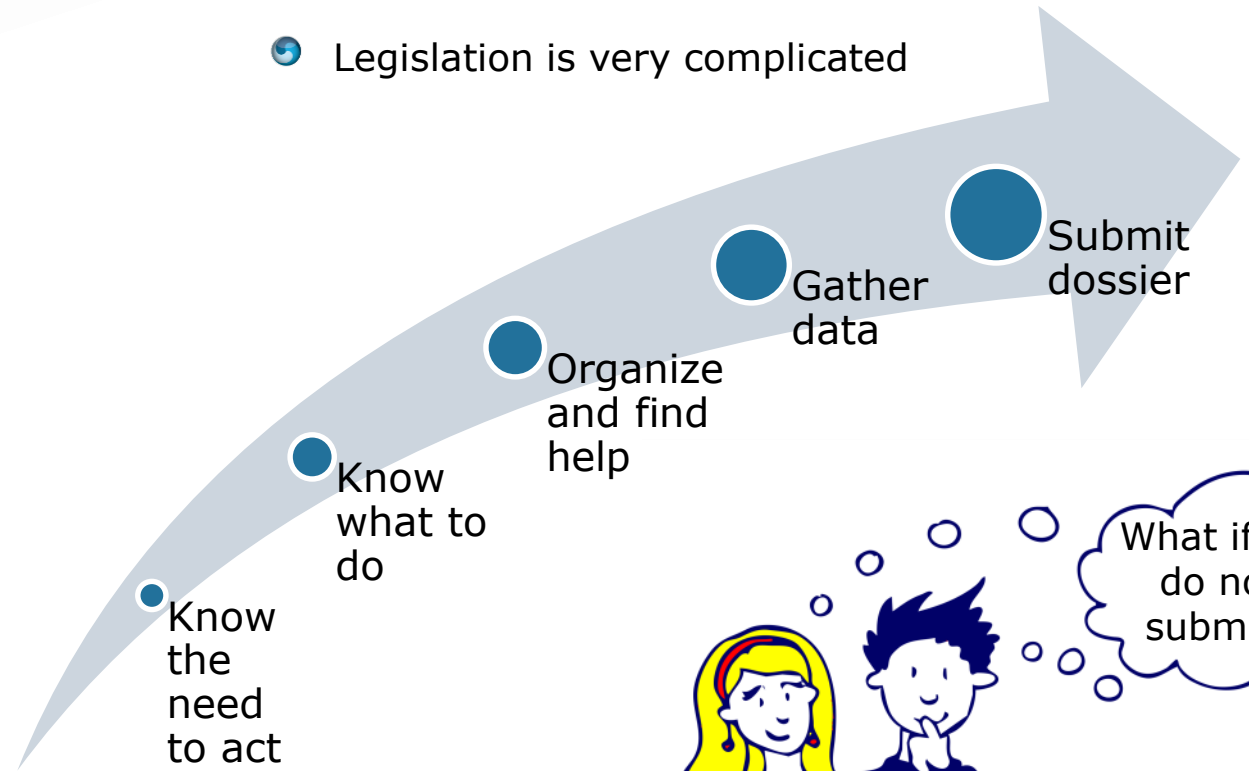
# Agenda

- 'REACH', the new forklift?
- Can you do it for € 500?
- Hello, I am Karinaldehyde!
- Karinaldehyde is natural, so...
- Karinaldehyde? From China!
- I count to three (more precisely: Annex III)
- Can you do the test? When?
- Karinaldehyde looks like:
- Summary

# REACH, the new forklift?

**What does REACH stand for?**  
Your abbreviation search returned 41 meanings

- 'REACH' is not known in many SMEs
- Legislation is very complicated



# Can you do it for €500?



Many SMEs are not rich



Small volume substances, small profits



Need outside help - lack knowledge

- Legislation
- Science
- Tools



Can costs be transferred to clients?

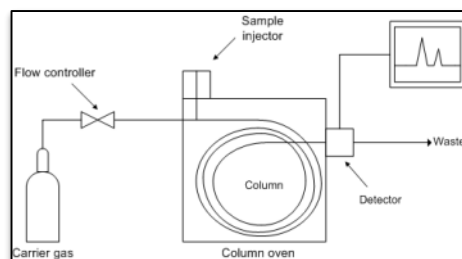


Work together, e.g. via sector

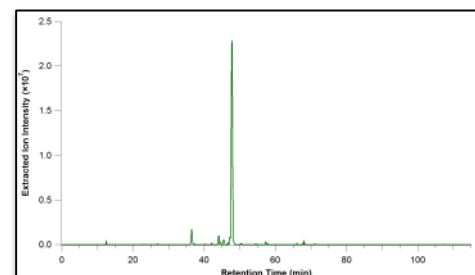
- One consultant for multiple companies/substances might be efficient

# Hello, I am Karinaldehyde!

- Meet 'Karinaldehyde', my substance
- CAS number 1977-04-1
- Karinaldehyde is very good in what it does
- I know the melting-point, the viscosity, the relative density and all other things my client wants to know
- Of course, it is an  $\begin{array}{c} \text{R} \\ \diagdown \\ \text{C} \\ \diagup \\ \text{H} \end{array} \begin{array}{c} \text{O} \\ \parallel \end{array}$ , everybody knows that!



and





To know your substance!

But you really need e.g.

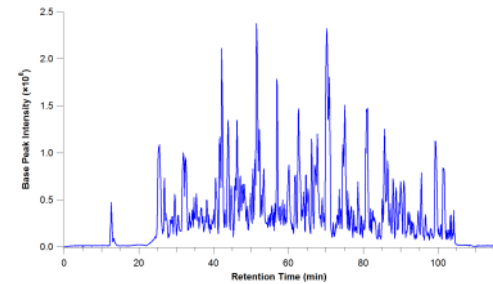
# Karinaldehyde is natural, so...



• How can I know what all components are?

• Karinaldehyde is made from  or 

• I fear it looks like:



• Quite an effort to determine all this!

*Help!*



# Can you do the test? When?



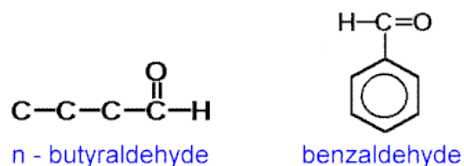
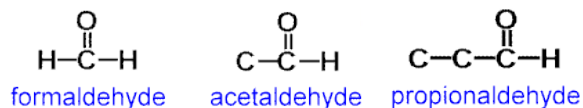
- Karinaldehyde > 10 tpa
- "I need a 28 day study"
- "Can you do it in January 2018?"
  - *We need to ensure the budget first!"*



- Submit before 1 June 2018 → Test in January? Far too late!
- If you still have to do a test now, you are probably too late!
  - Contract labs are very busy
- Start early and prioritise!



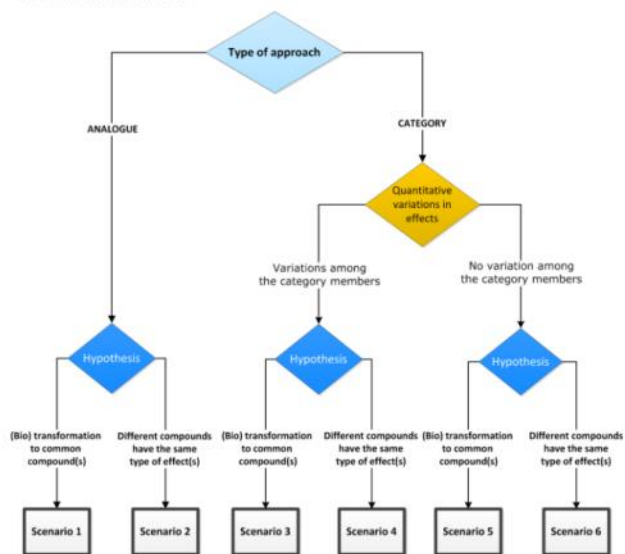
# Karinaldehyde looks like:



- Several other aldehydes
- Quite some data already available for those
- "Can we use that data?"



- Read-across and grouping: use Read-Across Assessment Framework (RAAF)
- Scientific underpinning needed!
- Maybe much more easy (and cheap) to do tests!
- For some parameters: QSARs
  - E.g. for environmental parameters





# Summary

- Many SMEs not really aware of what is needed
  - Keep informing them!
- Not a lot of money to spend
  - Work together, use sector groups
- Limited data on chemical composition
  - Proper analysis is really necessary
  - Quite some substances from natural origin: UVCBs!
  - If importer does not provide it: analyse it!
- Start now if tests are needed
  - *Should have started earlier!*
- QSARs can be useful, but read-across might be less efficient than doing the tests!



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**THE END**