



Stock-taking Conference on the Implementation of REACH Authorisation 13-14 November 2017 at ECHA, Helsinki



RAC commentary on Application for Authorisation by: *emp BIOTECH GmbH*

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RAC observations

- <u>The application was quite short, concise and clear</u>
- The tasks presented as WCS were well described and workers exposures evaluation was based on:
 - measurements and modelling
- The RMMs and OCs described were judged to be
 - appropriate and effective in limiting the risk to workers.
- RAC noted lack of RMMs to prevent releases of EDC to air from tasks not performed under closed systems and captured by LEVs:
 - improvement already planned by the applicant
- RAC considered only few additional monitoring arrangements for the authorisation and for review reports.





We learn through stories and we get inspired from others stories...

- *Emp Biotech* being a downstream user prepared an application themselves and did a good job...
- They were not "inventing the wheel" and did not try to "evade or dodge the requirements",
 - they just followed "the rules of the game" and succeeded.

Think You Can Start Finsh

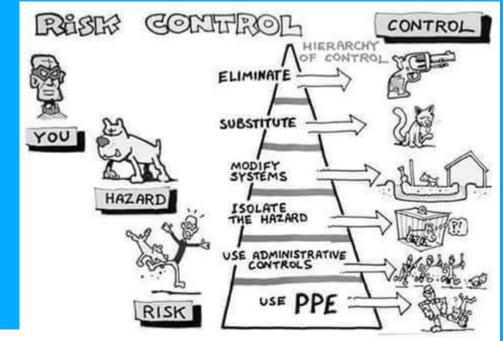
<u>A message to take home:</u>

 If someone else has done it, then so can you!





Thank you for your attention!





IF YOU REALLY WANT TO DO SOMETHING, YOU'LL FIND A WAY. IF YOU DON'T, YOU'LL FIND AN EXCUSE.

~Jim Rohn

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Environmental Protection Agency

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