How communication in the supply chain can change when regulatory risk management emerges

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The Lead REACH Consortium

- Established in 2008 to provide REACH Registration support to companies involved in the manufacture and/or import of lead metal and a range of lead-based substances
- Represents >90 legal entities situated across Europe and North America
- Maintains the REACH Registration dossiers for lead metal and 26 lead-based substances
- Secretariat held by the International Lead Association (ILA)
- Proactive work programmes including scientific projects (human health and environment), regulatory defence (REACH Authorisation and Restriction, Harmonised Classification and Labelling), and related advocacy and communications activities
- Member of Eurometaux and active contributor to key Taskforces on relevant issues

ILA promotes the responsible, sustainable manufacture and use of lead and lead substances
We advocate proportionate regulation based on sound science
Candidate Listing of Lead Metal

➢ 97% of REACH Registered tonnage for lead and lead compounds comes from five substances:
   ➢ Lead metal, Lead monoxide, Orange lead, Tetralead trioxide sulphate, Pentalead tetraoxide sulphate
   ➢ Main user sector: lead battery industry, where strong communications channels already existed

➢ Lead metal included in the Candidate List of SVHCs on 27 June 2018
   ➢ Suppliers of articles: Art. 33 supply chain communication obligations
   ➢ Producers and importers of articles: Art. 7(2) notification obligation (>0.1% / >1 tpy)
     ➢ 6-month deadline from date of Candidate Listing
     ➢ Exemption if already registered for the use, or exposure can be excluded during use and disposal

➢ Companies contacting the Consortium and its members to better understand:
   ➢ How their specific uses and products were addressed in the registration dossier
   ➢ How to have a new use recognised in the dossier
   ➢ How REACH Authorisation would be handled if lead metal were included in Annex XIV
   ➢ What ILA and the Lead REACH Consortium would do to defend the continued use of lead metal

Establishing a Taskforce

➢ Wide range of sectors and industries contacting the Consortium Secretariat in a short period of time
➢ Diversity of uses, user sectors, and needs and expectations
   ➢ EU / national association questions and invitations
   ➢ Enquiries from individual companies, from small companies to large multi-nationals
   ➢ Contacted both by EU users and other sectors reliant on lead, and from suppliers of articles in the EU and beyond

➢ Consortium had to react rapidly, under pressure, in a short time period, on a scale not originally foreseen
➢ Convened a Taskforce to bring together users / industries that were:
   ➢ Requesting support in relation to their uses / sectors
   ➢ Concerned about lead metal under REACH Authorisation
   ➢ Keen to have an advocacy strategy that would help defend their essential use
➢ Resource-intensive: reacting to enquiries received as well as proactively trying to improve outreach to sectors where no direct contact previously existed – trying to build a strong network with our downstream sectors!
Having appropriate supply chain communication

- Via our Taskforce we could:
  - **Clarify the implications** of Candidate Listing and REACH Authorisation
  - **Highlight key milestones** and anticipated timelines in the regulatory process
  - Provide a **central focus / contact point** for the wide range of sectors reliant on lead
  - Make an **inventory** with a view to mapping uses / products to our life cycle description
  - Prepare **foundational messaging** and tools to support sectors responding to consultations
  - Energise users to develop **sector-level advocacy** that would complement ILA’s own campaign activities

- Some **new uses** were created: **information on use** and **exposure data – ideally measured** – needed!
  - Especially in complex supply chains sometimes it can prove challenging to have (enough) clear information
  - For some applications, measured data were limited or none were provided by the users

Looking ahead, and learning from before

- **ECHA’s (draft) 10th recommendation** is in the pipeline
- **Essential to keep user sectors informed** as regulatory risk management emerges
- **With the Taskforce in place**, we can be proactive in our support for downstream sectors
  - Ensuring they understand **when – and how – they might engage in the regulatory process**
  - Guiding them on the **type of information useful for public consultations** and potential AfA
  - Ensuring our **advocacy work recognises the diversity of uses**
  - **Energising and empowering** them for their own outreach activities

Before anything else, preparation is the key to success.

-Alexander Graham Bell

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