



REACH: A Main Stake for the Mn Industry

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REACH: The Framework - 1

- For more than 20 years, the European Union has been developing a comprehensive set of environmental regulations
- Initially focused on the impact of the industrial sites, EU regulations have increasingly expanded to cover products safe management
- In this framework, REACH stands out as the most comprehensive and advanced project of the European Union

REACH: The Framework - 2

- An assessment and management system of “chemicals” is already in force in the EU
 - But the Authorities now consider it to be insufficient because:
 - Does not cover all chemicals
 - Under the responsibility of authorities: i.e. administratively too heavy for them
 - Too slow: only a limited number of substances were actually assessed over the past 20 years
 - February 2001: White Paper on the project of New Chemicals policy called **REACH**
 - October 2003: official proposal released by the European Commission

REACH: The Content - 1

- Registration, Evaluation and Authorisation of Chemicals
 - To be able to put a product on the EU market, each producer or importer of a “substance” has to register it
 - The registration file must give detailed information about status, potential hazards and risk management measures of the substance, along its life cycle (up to down-stream uses)
 - All metals, metal compounds and alloys are considered by the EU system as being “substances” or “preparations”, i.e falling under the scope of REACH
 - “No data, no market”

REACH: The Content - 2

- Substances of very high concern, meaning carcinogenic, mutagenic or reprotoxic, will be submitted to authorization
 - The authorization process will be the responsibility of the EU authorities
 - It will include the necessity to assess a potential substitution of the substance
 - It may also cover substances of “equivalent concern”
- REACH project allows producers and importers to form “consortia”, and so join forces to meet REACH requirements

REACH: Industry's Position

- Industry has not been opposed to the aims and principles of REACH
- Initially designed for the organic chemical industry, the REACH proposal was not adapted to the specificities of the metals industry
- Consequently and from the outset, the primary objective of the metals industry has been to limit the scope of REACH and make it “workable”
 - Exclusion of ores, minerals and recycling waste from the scope of the project
 - To have a prioritization system not only based on volumes but including risks
 - To obtain appropriate approaches for both metals in massive forms and alloys

REACH: The Political Agenda

- To be adopted, REACH has to follow the EU co-decision procedure
 - Both the EU Member States and the European Parliament must agree on the same text
 - The detailed procedure is very complex
 - All advocacy activities have to be developed in parallel to different audiences: MEPs, governments, European Commission
- According to the most probable schedule:

REACH will enter into force in April 2007

REACH: IMnI's Action Plan - 1

- The Mn industry, through IMnI, is deeply involved on all aspects of REACH
 - A. Is a member of the European network advocating at the political level
 - A huge stake for 2006
 - B. Is initiating scientific work and studies in order to identify data gaps and to conduct appropriate additional studies & tests
 - Compare to main other metals, Mn is a “data poor” metal
 - In order to anticipate REACH requirements, IMnI is developing scientific knowledge for both Mn ecotoxicity and human health aspects

REACH: IMnI's Action Plan - 2

- C. Is developing information to its members to help them to prepare and anticipate REACH
 - A very active OHES Committee focused on global issues such as REACH
 - Information sessions such as this present seminar
 - Regular update at the Annual Conferences (Cape Town – June 2006)
- D. Is actively participating in the technical European network in order to propose to its members the most appropriate and cost-efficient way to comply with REACH

REACH: IMnI's Action Plan – 3

- E. Is strengthening its own capacity to be pro-active
 - With the support of a dedicated senior consultant whose mission is
 - To determine the REACH registration requirements of IMnI members
 - To integrate these into the most cost-effective packages taking into account possible partnerships
 - By integrating a full time OHES junior manager from September 2006

IMnI aims to provide full-scale REACH support for all members producing or importing into the EU