



REACH and the Future of the Metals 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 the safe management of products
- In this regard, 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, all along its life cycle (including 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 potential substitutes for 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 supports 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 necessary additional studies & tests
 - Compared to other metals, Mn is a “data poor” metal
 - In order to anticipate REACH requirements, IMnI is performing scientific analysis for both Mn ecotoxicity and human health aspects

REACH: IMnI's Action Plan - 2

- C. Developing information for its members to help them prepare and anticipate REACH
 - A very active OHES Committee focused on global issues such as REACH
 - Information sessions – Ex : Changsha (China) – March 2006
 - Regular update at the Annual Conferences (Cape Town – June 2006)
- D. 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. Strengthening its own capacity to be proactive
 - With the support of a dedicated senior consultant whose mission is
 - To determine REACH registration requirements for IMnI members
 - To integrate these into the most cost-effective packages taking into account possible partnerships
 - To help recruit and train a full time OHES junior manager by year-end

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