

REACH – PURPOSE AND IMPLEMENTATION

Bob Warner

CHEMWISE ASSOCIATES

REACH IS....

- **A MAJOR NEW EU LAW TO REGULATE CHEMICALS**
- Radically different from previous schemes
- The largest and most significant EU law for 20 years
- Alters the landscape and culture of the EU chemical industry

WHY REACH?

- Huge increase in EU stakeholder concerns about chemicals
- Agreement that previous schemes have failed
- Users unable to properly assess and manage risks
- Belief that problem creators not facing their responsibilities

REACH AIMS...

- To provide better protection for people and the environment – information led
- To improved business competitiveness

MAIN ELEMENTS OF REACH...

- Formal Registration of chemicals by mfgrs / importers to EU Agency
- Submission of dossier - including details of hazards, risks and controls for all uses
- Scheme for authorisation and restriction for problem substances

REGISTRATION...

- BY EU IMPORTERS AND MANUFACTURERS
- NON EU FIRMS **CANNOT** REGISTER

(BUT CAN ESTABLISH REGISTRATION BASE IN EU - ONLY REPRESENTATIVE)

REGISTRATION REQUIRES...

- Data gathering and sharing
- Working with Agency, users and competitors
- Expertise
- Investments and fees

REGISTRATION DETAILS...

- Pre registration from June – Nov 2008
- Pre registration leads to formation of information exchange fora
- Full registration progressively introduced by 2018

NO REGISTRATION NO MARKET

FULL REGISTRATION...

- **Technical dossier** including:
 - Description of uses / quantities etc
 - Assessment of risks and identification of precautions for uses
 - Identification of data gaps and plans for providing missing data
- **Agency fee**

REGISTRATION impact...

- Huge practical task -resources
- Disincentive to import from outside EU
- Cost throughout supply chain
- Changes to the market

PRACTICAL ISSUES...

- **THE AGENCY** – funding, resources, operation
- **DUTY HOLDERS** – importers, large and small firms, only representatives
- **NEW WAYS OF COMMUNICATING** – inside firms, with customers and competitors

REACH MYTHS...

- Law and duties are clear
- Alloys need to be registered *
- Cost neutral

* Truth: separate substances in the alloy need to be registered (ex. Fe + Mn)

OPTIMISTIC SIGNS...

- Business is planning for REACH
- Guidance looks good
- Support networks are developing

BUT...

- Detailed planning is difficult
- Enforcement may not be consistent
- Users showing signs of overreaction

STRATEGIC IMPACT OF REACH..

- Extends beyond EU
- Major costs to business
- Structural changes to the EU market
- Changes in the way chemical business is done and who does it

THE ESSENTIAL STEPS – FOR ALL....

- Identify business risks
- Recognise the magnitude and complexity of the impact
- Work cooperatively – within sector and with customers
- Establish good practice

SUMMARISING...

- REACH A MAJOR THREAT TO PROFITS
- REACH IS A GLOBAL BUSINESS ISSUE
- REACH BRINGS PERMANENT CHANGE
- CLEAR AND DECISIVE MANAGEMENT NEEDED

THANKS FOR LISTENING AND,

BE READY FOR REACH

bob.warner@chemwise.co.uk