

What do SMEs have to do to be successful in REACH?

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24 February 2015

ECRN workshop

What is the challenge?

- ❑ REACH: Registration, Evaluation, Authorisation of CHemicals
- ❑ 2018 deadline
 - 1-100 tonnes
 - Who will register in the supply chain?
 - Many more SMEs involved (traders / importers)
 - High number of substances to be registered (per company)
 - High cost of REACH dossiers
 - No (or limited) REACH knowledge in-house
 - Cooperation multinationals with SMEs
 - Languages
 - Substances nobody looked at / that have no data: 'orphans'

Solutions?

- ❑ Make REACH 2018 inventory NOW
- ❑ No data - no market: get legitimate access to the data you need (or stop putting the substance on the market)
- ❑ Decide in 2015 which substances to register when
- ❑ Spread costs over 2015-2018
- ❑ Join (at least 1) REACH consortium
- ❑ If you have 'orphan' substances: start acting now!!!
 - 1 option = join 'orphan' REACH consortium

Make REACH 2018 inventory

- ❑ Check within your supply chain
- ❑ Which substances do you WANT/NEED to register by 2018?
- ❑ Make 3 groups of substances:
 - Registered by someone else
 - Find out cost to get legitimate access to REACH data
 - Include in your budgets when you buy access (2015-2018)
 - Being worked on by a company or industry group
 - Find out cost to get legitimate access to REACH data
 - Include in your budgets when you buy access (2015-2018)
 - 'Orphans': act now!! Get organized!!
 - No cost estimate yet
 - Who will do the work?

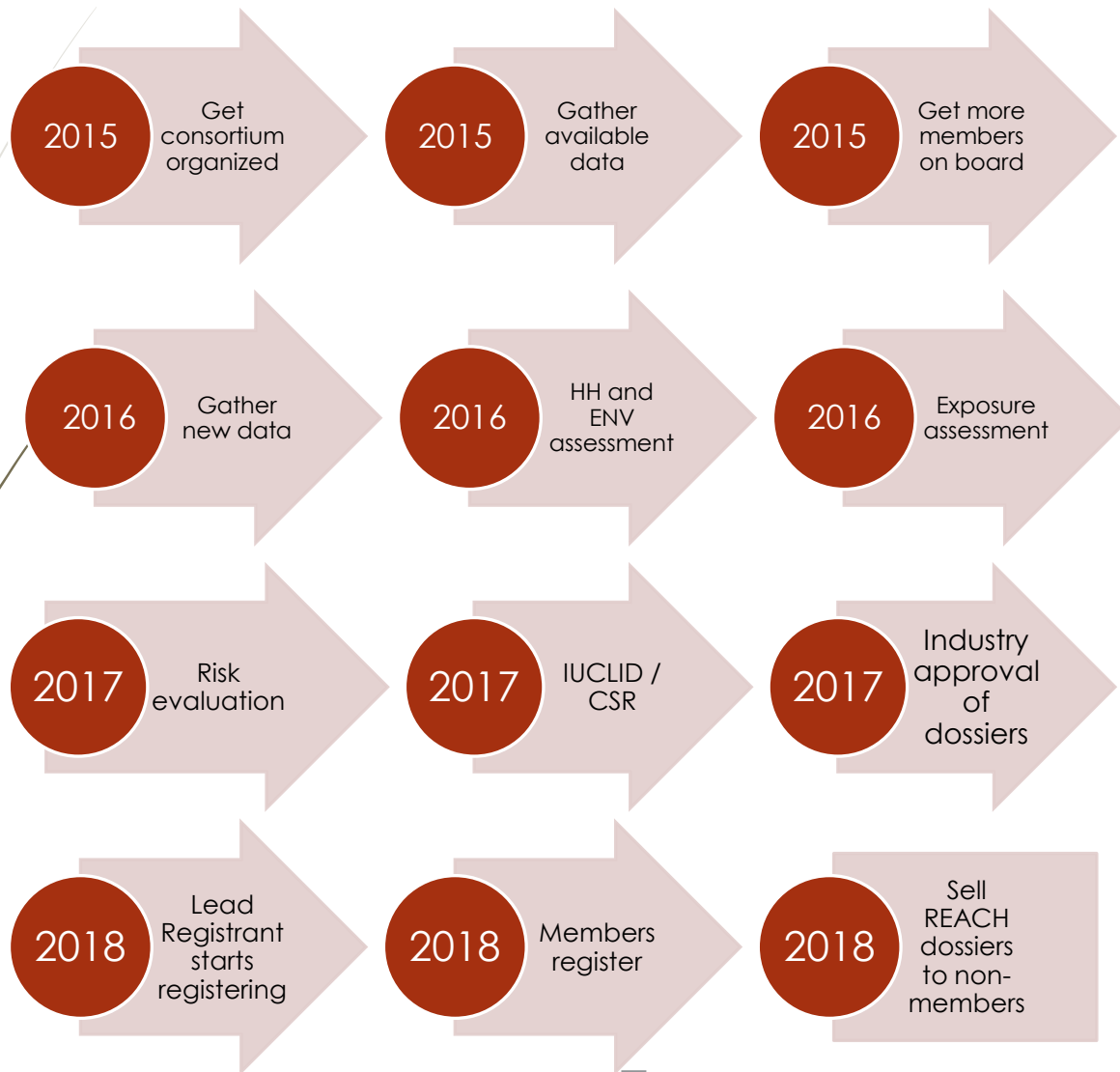
Decide on way forward

- ❑ Depending on costs, decide which substances to register when
 - Buy REACH access (spread costs 2015-2018!!!)
 - Define 'orphan' substances and get organized!
- ❑ Who/what can help you with this?
 - Industry organisations like Agoria / Essenscia / Eurometaux
 - Membership to a REACH consortium
 - Information on the ECHA website
 - Your national REACH helpdesk
 - Consultants

Why act now?

- ❑ Working together saves costs!!!
 - Share study cost
 - Share secretariat cost
- ❑ Takes time to get organized with other involved parties
- ❑ Gives time to find most cost efficient solutions
- ❑ Use the possibility to spread costs over 3 years
 - More feasible for companies
 - Enables companies to keep more substances on the market as of May 2018
 - Very useful for small SME's struggling with costs + human resources

Time needed to develop new data via REACH consortium



Successful REACH SMEs

- ❑ Join (at least 1) REACH consortium
 - Share costs
 - Secretariat helps with REACH questions (= REACH expertise)

⇒ Save resources!!!
- ❑ Example: antimony association
 - <http://www.antimony.com/en/members.aspx>
 - Regulatory affairs consortium (including REACH)
 - 45 members of which ~50% are traders
 - 8 antimony substances REACH registered
 - Small secretariat (2 people)
 - Anti-trust lawyer present at meetings

What can government do to help?

- ❑ Motivate companies to do REACH 2018 inventory
- ❑ Urge them to get prepared now
- ❑ Organize brainstorming with industry/chemical associations / consultants on how to reach SMEs?

Government REACH actions

⇒ ECHA's REACH 2018 roadmap

⇒ Flanders:

⇒ ESSENSCIA - VLARIP

⇒ AGORIA REACH compliance tool

http://echa.europa.eu/documents/10162/13552/reach_roadmap_2018_web_final_en.pdf

<http://www.essencia.be/nl/vlarip>

<http://www.agoria.be/nl/REACH-Compliance-Tool-geactualiseerd>

Conclusion

Core message =
Urge companies
to perform their own
REACH 2018
inventory
asap

Want to discuss this more in detail?

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