

REACH – a challenge for all concerned

“No chemicals sales without data.” This is how the significance of REACH, the European law on chemicals, which has been in force since 1st June this year, could be summarized.

“REACH is the acronym for the Registration, Evaluation and Authorization of Chemicals”, explained *Lorette van de Mast*, projectleader REACH team at Akzo Nobel Base Chemicals. “The REACH law is comprehensive and will affect the entire industrial supply chain for all products in which a chemical substance is present. The regulation covers all substances, whether manufactured, imported, used as intermediates or placed on the market, either on their own, in preparations or in articles, unless they are explicitly exempted from its scope. In practice this means that around 30,000 substances, as well as new substances produced and marketed as of June 1st, 2007, will all have to go through one or more stages of the REACH process at the European Chemicals Agency (ECHA) at Helsinki: registration, evaluation and authorisation. This naturally also concerns our products.” Manufacturers and importers have to submit a registration to the ECHA for each substance manufactured or imported in quantities of 1 tonne or above per year. Registration deadlines, for substances that were already produced or marketed prior to the entry into force of REACH (so-called “phase-in” substances), is 3.5, 6 or 11 years depending on whether the substance is of “high concern” as well as on the tonnages concerned. To benefit from this transitional regime for “phase-in” substances, the substance has to be pre-registered between June 1st and November 30, 2008.

Communications with customers and suppliers

Lorette van de Mast already began to seek a dialogue with suppliers and customers concerning this topic. “After all, REACH concerns us all,” she said. “A lot of (new) information concerning the employed substances will be exchanged among manufacturers, importers, customers and suppliers. We have to be careful in the industry not to overload each other with different questions every time, but strive for standardization That’s why we will send out the CEFIC (European Chemical Industry Council) standard survey to our customers to collate the corresponding data .

Comprehensive data survey

Even within Base Chemicals, a certain amount of work was required to find out about the different substances in use. “We first prepared a list of all substances used in our plants,” van de Mast explained. “This list covered several hundred items. Here, priorities were set by first determining whether a substance was essential or not in our production process and then establishing whether these substances are covered by REACH. Now we have to check with our suppliers whether all substances that appear in our raw materials and auxiliaries will still be available after 1st December 2008. At the same time we will inform our customers on our commitment to pre-register our products. .

Most data has been compiled

Lorette van de Mast doesn’t see any problems in getting the products registered for Ecosystems. “In general we know that almost all of the required toxicological and ecotoxicological data are already available for our products. From that respect we do not foresee major problems as to the registration in itself.” Difficulties will probably arise with substances that are produced or imported by several manufacturers or

importers. In principle, for those substances a joint registration should be submitted. "Taking into account the cooperation with various manufacturers and importers, the registration deadlines will be quite ambitious.." she said.

REACH

The new REACH legislation came into effect on 1st June 2007. REACH is an integrated system for the registration, evaluation and authorization of all chemicals, manufactured, used and imported in the European Union. The aim is to improve the protection of human health and the environment through better and earlier identification of the properties of chemical substances.

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