

As from 1 December 2008, in Europe, all chemical substances must be registered or at least pre-registered to be imported, manufactured or used in any preparation. This is the first step in the REACH regulations. How have Cray Valley and Sartomer tackled the issue?



REACH LESSONS

The REACH regulation entered force on 1 June 2008. It aims to assess the health and environmental impact of chemical substances used in Europe. Prior to REACH, only a very small proportion of these chemical substances were subject to risk assessment and complete testing for toxicity and environmental impact. Given this lack of visibility, REACH has laid down the rules and obligations for the registration, assessment and authorisation for chemical substances. The most toxic, the so-called “very worrying” substances, will have to be replaced with an alternative or a temporary authorisation obtained limiting their use to certain applications. Under REACH, manufacturers had until midnight on 1 December 2008, to pre-register all existing substances manufactured or imported in a quantity of one tonne or more in a European Union country. ECHA (European Chemicals Agency) had estimated there were 30,000 hazardous substances to be declared, and

that 150,000 pre-registrations would be made. In fact, almost three million pre-registrations have been filed by 65,000 companies covering 150,000 substances, of which 45,000 had never been inventoried before.

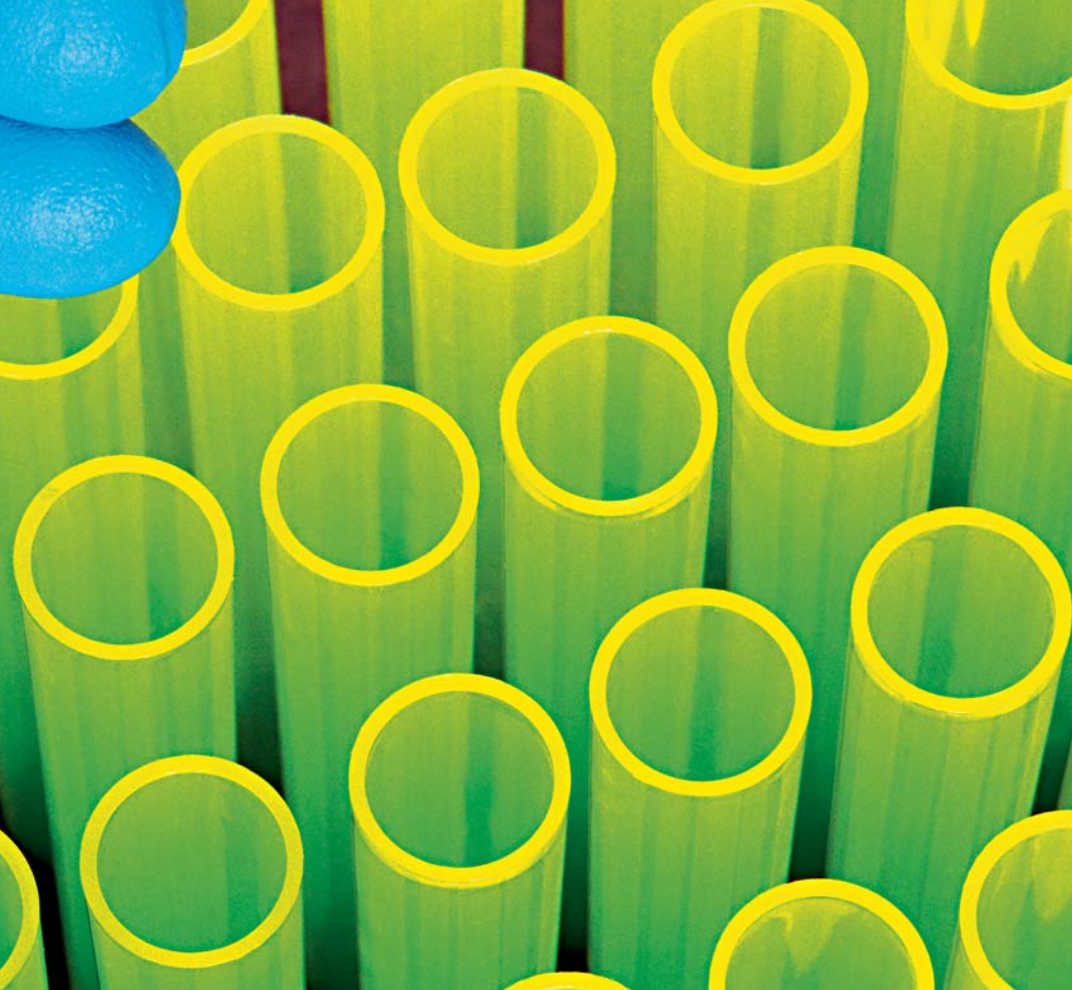
SOLVING THE HEADACHE

“For us, this first pre-registration period started two years ago with a painstaking preparation involving everyone: business, production sites, chemists, site buyers, research laboratories, and so on. It was a long and complex process”, explains Béatrice Marchal, Manager Product HSE for the Resins Division, and responsible for implementing the REACH regulations. *“Before rolling out our approach, we had to study the new regulations and their implementation. The training by REACH Centrum and discussions with other European manufacturers were fundamental to our coming to grips with the process”,* adds Béatrice Marchal. The Resins division use and manufacture products that contain

substances covered by REACH. As a user, we have to make sure of REACH compliance for all the products bought and/or used in Europe. The Product HSE team had to check almost 4,000

Béatrice Marchal, Manager Product HSE for the Resins Division, and responsible for implementing the REACH regulations.





DEFINITION AND STEPS

REACH stands for “Registration Evaluation and Authorization of Chemicals”.

The REACH regulations require that any chemical substance manufactured or imported into Europe in quantities of 1 tonne or more be inventoried, its properties defined and its uses controlled. The impact on health and the environment must be identified for each use whenever a substance is manufactured and/or imported in quantities of 10 tonnes or more a year.

Pre-registration and registration are not the same: all substances must be registered to comply. Pre-registration merely gives the manufacturer or importer time to put together the registration submission. Failure to pre-register a product means it cannot be manufactured or released on the market.

Registration will continue through to 2018, with a shorter timeframe (2010) for the most dangerous products, or those involving the largest quantities (>1000 tonnes/year)

The physical, chemical, toxicological and ecotoxicological data for registered substances will be published on the website of the European Chemicals Agency (ECHA).

raw material/supplier pairs, while also developing with the IT Department a database coupled to an extranet for suppliers to log onto and answer a special REACH questionnaire. Through the joint efforts of the Purchasing Department, site buyers and chemical engineers, more than 99% of the answers had been obtained by the time the inventory had been completed, with just a small number of suppliers being ruled out.

No country, site or supplier escaped this diagnosis right across Europe.

COMPILING THE LIST

As a manufacturer, the Resins division must ensure compliance for their own products and those that they import directly.

“The Resins division product portfolio has around 5,000 products. We all put our shoulder to the wheel to compile the list of all the substances created during production (or contained in the imported products) in order to identify the “REACH status” of each and every one of them. The team worked closely with the BUs to define the pre-registration and registration strategies.”

By adding the monomers in polymers, not originally included in the REACH

regulations, more than 700 pre-registrations were filed by Cray Valley and Sartomer’s subsidiaries in Europe. *“Up until summer 2008, polymer manufacturers — that’s us — believed we were exempted under the REACH regulations for this type of product, providing the raw materials suppliers were European.”* While just some 30-odd substances were declared for Cray Valley and 90 for Sartomer, *“we also had to protect our right to manufacture polymers by pre-registering almost 600 other products”*, explains Béatrice Marchal.

It is pleasing to note that after completing this huge inventory, Cray Valley and Sartomer did not have to withdraw any essential product from their ranges.

TURNING COMPLIANCE INTO OPPORTUNITY

The free circulation of the substances manufactured, exported or imported by Cray Valley and Sartomer has a cost... REACH requires heavy involvement from Business and Research. *“Registration may required by law, but we are going to capitalise on REACH to generate value and set ourselves apart from the competitors. REACH provides a very real opportunity for the chemicals industry to*

focus more squarely on sustainable development, and to be more transparent for consumers and all downstream stakeholders handling our products. Moreover, non-European manufacturers exporting to Europe are equally concerned by the REACH regulations.” This is why Cray Valley S.A. has become the exclusive representative in Europe for Sartomer US and China, as well as for CCP and Cray Valley South Korea. The company has also explained to its non-European suppliers their new obligations under the REACH regulations.

Next steps: After the 5 January 2009 start-up of the Substance Information Exchange Forums, establish new classification proposals for the Divisions’ 120 substances and register by the end of 2010 substances for which the quantity exceeds 1,000 tonnes along with their downstream uses.

C.P.