

Cefic achievements 2012 and current/future challenges  
REACH Implementation Workshop XII  
7 December 2012



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# Industry achievements 2012

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- **Submission of updates (ECHA receives regular submissions of updated registration dossiers)**
- **Continued working in cooperation with authorities on how to improve Exposure Scenarios, Expert Network on Exposure Scenarios (ENES).**
- **Publication of guidance and support documents available for the entire industry (many downloads from Cefic website show continuous interest in REACH!)**
- **Directors Contact Group is ‘waking up’ in view of upcoming 2013 registration deadline. Cefic participating to ensure ECHA is ready and industry does not face unnecessary obstacles.**
- **Inspections have taken place across Europe in the context of the 2<sup>nd</sup> coordinated enforcement project called REACH-EN-FORCE2.**

# Industry achievements 2012

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- **Building our understanding of the Authorisation process and the expectations of industry to start preparing for Applications for Authorisation**
- **First discussions with authorities in Substance Evaluation process Community Rolling Action plan (CoRAP); initial results to be reported by February 2013**
- **Cefic has actively participated in ECHA Committees and different bodies to ensure chemical industry's interests are represented and issues addressed in an appropriate and timely way**

# Key challenges and activities 2013



- REACH Review (Q1 2013)
- 2013 Registration deadline (Q2 2013)
- Outcome of first Substance Evaluations (Q1)
- First applications for authorisation and subsequent RAC/SEAC discussions (Q1 and ongoing)
- Continue enhancing quality of data: a database to be proud of (and useful for general public, scientific community, etc.)
- Starting of new coordinated inspections under the 3<sup>rd</sup> project REACH-EN-FORCE3 project focused on imports.
- ECHA will start implementation of Biocides Product Regulation
- Integration of nanomaterials provisions in REACH (starting with a Q1 workshop)
- Fully understand and discuss how to address emerging issues such as Endocrine disruptors and exposure to a combination of chemicals from different sources (focus on Q1 for ED criteria)
- Substances of very High Concern – Evolution of the Candidate List and Roadmap to 2020 (Q1/2 for roadmap definition)

# REACH beyond 2013: what can be improved?

## Introduction

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- **Crucial to take all lessons learned into account for REACH Review**
- **Not revision, but we should look at possibilities for simplification!**
- **Achieve and communicate common understanding of quality of submitted data in the dossiers**
- **Help SMEs (or smaller companies); 2018 is not far away!**

## REACH beyond 2013

### *CONTINUE: What is working and should continue?*

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- The update of baseline study showed we are on the right track (reducing risks, improving quality): we should continue working together to make REACH Work! Instead of starting with ‘patching’ regulations
- Meeting the deadlines set by REACH and CLP
- Working in Substance Information Exchange Forum (SIEFs) using standard processes and submitting jointly
- Learning from ECHA’s recommendations (ECHA Evaluation report, webinars, etc.)



- **Bureaucratic and complicated submission processes e.g. IUCLID for some submissions that could be done via easy online forms**
- **ECHA stop asking for updates due to different reasons in an uncoordinated way e.g. ECHA's activities that request updates: new fields to be disseminated, information to be displayed in co-registrants platform, targeted compliance checks, dossier evaluation, intermediates communication, ...**
- **Assuming certain REACH processes are impossible before giving them a fair trial (e.g. DU CSR)**
- **Working in silos: industry/authorities/ECHA**

## REACH beyond 2013

### *START: What are we not doing that we should start to do?*



- **Reviewing Chemical Safety Reports and harmonising formats for Exposure Scenarios**
- **Developing and communicating ES information for mixtures**
- **Submitting applications for authorisation if appropriate**
- **Using all possibilities to use information collected under REACH rather than creating additional requirements at MS or European level**
- **Discussions on how to simplify REACH processes**
- **Monitoring EU competitiveness vs other regions of the world: where are we?**

