

## Organisations and Companies

# Reach is Putting Cooperation to the Test

■ European industry organisations are playing an important role in the implementation of the EU's new Reach regulatory framework. They have been kept busy in alerting companies to the challenges involved and helping them address them. Time is beginning to run out quickly, however.

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Europe's new chemical regulatory framework affects a multitude of industries and has brought a massive amount of work for European industry organisations. The latter have taken an active role in supporting companies as they come to terms with its challenges and extending their Reach awareness—something that has kept them very busy over the last few years and months.

"Reach will be a particularly big burden this year. I would say that it is one of the five most important issues on the agenda at the moment. Our role is to ensure that everything goes well and thereby minimise companies' costs," says Science Director **Véronique Garny** of EuroChlor.

Although a lot of work has already been done, the autumn will be particularly challenging. Will all companies be truly ready for the new situation is a question on the minds of those at many organisation offices in Brussels.

A recent study indicates that they will not be, unfortunately. The study, by PricewaterhouseCoopers, indicates that 8% of European companies are not yet even aware of Reach, and one in five companies have very little knowledge of what will be required. Outside Europe, the situation is even worse.

"We've been trying to bring manufacturers together Europe-wide, and do the preparation for establishing different consortia and joining existing ones," according to **Danny Croon**, who is Environment and Process Manager at the Confederation of European Paper Industries (CEPI).

## Small companies are a particular challenge

Croon says that CEPI has succeeded in getting around 80% of companies in the industry involved in joint projects. The remainder

appear to have decided to try and go it alone. This could be considered a good result, as the joint action efforts of many other industries in preparing for Reach have progressed much less effectively.

"We contacted companies twice about participating in joint efforts through national associations, and managed to get 130 mills together. Some mills are still not involved, but as legal entities they have to take the responsibility for themselves, as we cannot oblige anyone to participate," says Croon.

Other industry organisations are also concerned about how to reach small and medium-sized companies in particular and get them involved in Reach-related cooperation.

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"There might be some very small companies which don't belong to any associations, and we can't reach them at all," says **Sylvie Lemoine**, Technical and Regulatory Affairs Manager at A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products.

Industry organisations have prioritised finding the best solutions for the supply chain-based communication required for chemicals under Reach. Efficient communication is seen by many as the largest single challenge involved with Reach.

"We believe that communication in the supply chain could be more efficient and quicker if all our members talked with one voice with our suppliers. If we had a common set of operational conditions for developing exposure scenario, for example, instead of each of our members providing their own data to suppliers for registration," says A.I.S.E.'s Sylvie Lemoine.

"We've been drafting CEPI guidance for Reach implementation, and this includes a questionnaire to suppliers to get an idea of whether they intend taking downstream use into account for registration purposes," adds Danny Croon.

Questionnaires like this that have been sent to chemical manufacturers and other suppliers have not always generated responses, however, which is a problem in itself, according to Croon. He hopes that a solution to this will be found soon.

## Looking to consortia

As preregistration approaches, industry organisations' attention is increasingly becoming focused on consortia-based work. Reach-related preparations at CEPI, for example, is now moving ahead in four separate working groups that are concentrating on the chemicals used and manufactured at different stages of the industry's production processes.

"Legal entities can count on CEPI to give them further guidance and advice, but it will be legal entities themselves that will have to take the lead from now on in the upcoming substance registration process", stresses Danny Croon.

Although CEPI is not a member of the European Chemical Industry Council (Cefic), cooperation between the two organisations has worked well, according to Croon, and has enabled CEPI to concentrate on the special challenges the pulp and paper industry faces, in areas such as specialty chemicals.

"Communication between Cefic and CEPI has always worked well," according to Croon, who says that Reach activities have not been any different.

Work done by Cefic has been an important factor in Reach preparations at a number of other industry organisations as well. Cefic offers a range of consultancy and consortium services through its ReachCentrum service unit.

Many industries have decided to rely on outside service providers to help them set up and manage consortia as a way of overcoming problems such as the fact that not all companies belong to industry organisations.

"Communication in the supply chain could be more efficient and quicker if all our members talked with one voice to chemical suppliers," says A.I.S.E.'s Sylvie Lemoine.



In pulp and paper industry, 80% of companies participate in joint Reach-related projects. "Legal entities must assume the responsibility for Reach themselves," says Danny Croon from CEPI.



The position of industry organisations in Reach consortium management is not easy. "In our consortia, there are companies that aren't members of either EuroChlor or Cefic," says Véronique Garny of EuroChlor.

"We work under the Cefic umbrella, but in our consortia we also have companies that are not EuroChlor or Cefic members," explains EuroChlor's Véronique Garny.

EuroChlor has decided to manage its own consortium work, although it is headed by one of the companies involved. This sets it off from many other Cefic sector groups. According to Garny, the main reason for this is that EuroChlor's 15-person secretariat gives it more resources than many other organisations.

## Dialogue and flexible collaboration

Reach-related work will have reached full momentum in a couple of month's time. The six-month preregistration period that begins in June is expected to be a good indicator of how things will go. Companies, organisations, and the authorities will have to prioritise their activities, as it is already clear that it will be impossible to get everything done exactly according to the original time-tables.

Many industry organisations with minimal resources of their own have looked to cooperation with other organisations as one way of preparing for Reach. A.I.S.E., for example, has set up the Downstream Users of Chemicals Co-ordination Group with six other organisations, aimed not only at sharing experiences but also working together on concrete projects.

"We exchange information at meetings and we're also starting to work together on things like generic exposure scenarios," says Sylvie Lemoine.

Industry organisations are also playing an important role in dialogue between industry and the authorities. The importance of flexible cooperation between all those involved is something that is being stressed in particular.

"We will have to be pragmatic to make everything work, at least in the first few years, and find the best way of learning and improving the way we do things," believes Lemoine.

Véronique Garny's advice on how best to prepare for Reach is short and sweet, and many companies and organisations would be more than ready to agree with her.

"Try to minimise costs, use the information that's already available, and don't reinvent the wheel," she says.

The author is Communications Manager at Reachway Oy, which has developed an Internet-based IT application for managing communication on the chemical supply chain and collecting the data required by Reach.  
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