

Gateway to the European Chemicals Market

The Helsinki Model

■ The Helsinki Model makes Reach workable for non-EU manufacturers, especially small and medium-sized enterprises that export their products to the European market.

Riku Rinta-Jouppi

The Helsinki Model is the *modus operandi* of the Helsinki Reach Centre (HRC), a programme run by the cities of Finland's capital region that brings together organisations which can benefit from co-operation to meet the Reach requirements.

Located in proximity to the Helsinki-based European Chemicals Agency (ECHA), the HRC is well-positioned to bridge the gap between the EU body responsible for management of the Reach process and non-EU industry associations.

While European industry federations help EU manufacturers to comply with Reach requirements, the HRC steps in to help non-EU manufacturers, providing a vital complementary service that will allow non-EU businesses to operate on the European market.

Only Representative brings economies of scale

An importer of chemicals within the European Union can fulfill its Reach obligations and submit a registration dossier to ECHA.

Helsinki International Congress on Chemical Safety

20-22 May, 2008

Organised by the Helsinki Reach Centre, the first annual HICCS congress is an opportunity for all actors influenced by Reach to come together to exchange views just before pre-registration starts. The delegates will receive first-hand information directly from ECHA in its hometown, hear the non-EU point of view, and find out about available services and best practices.
www.hiccs2008.eu

However, in such a case the required information can only be provided by the non-EU manufacturer, giving control of the data to the importer.

In order to bring their access to the EU market under their own control and also to safeguard the confidentiality of their company information, the Reach text allows

non-EU manufacturers to appoint an entity established in the EU as their Only Representative (OR).

The OR implements the non-EU manufacturer's registration as well as other Reach obligations. Because ORs can represent multiple manufacturers, their use can produce economies of scale and reduce the number of registrations needed for the same substance.

Subsidiaries in Helsinki vitally important

In order to monitor and ensure the progress of the registration process, the HRC recommends that non-EU industry associations set up subsidiaries in Helsinki.

It is essential for members of non-EU associations to have a trusted, non-commercial, first-hand source of information that can provide advice on how to deal with Reach requirements as the process unfolds.

The services provided by the subsidiary will complement the role of the OR. The OR focuses on the interests of its clients of vari-

Pre-registration about to start

All companies wanting to introduce chemicals into the EU market must act now: pre-registration of chemicals under Reach takes place during the period between 1st June 2008 and 1st December 2008. If chemicals under the scope of Reach are not pre-registered during this period, they will not have access to the European market.

The main steps, processes, and obligations of Reach are explained on the website of the European Chemicals Agency at <http://echa.europa.eu/>.

ous nationalities, whereas an industry association's subsidiary can focus on the overall interest of members from its home country.

Moreover, while the registration of chemical substances can be done electronically by the OR, the subsequent steps of Reach are likely to require more extensive contacts with ECHA. Due to the complexities of

Helsinki Reach Centre Network

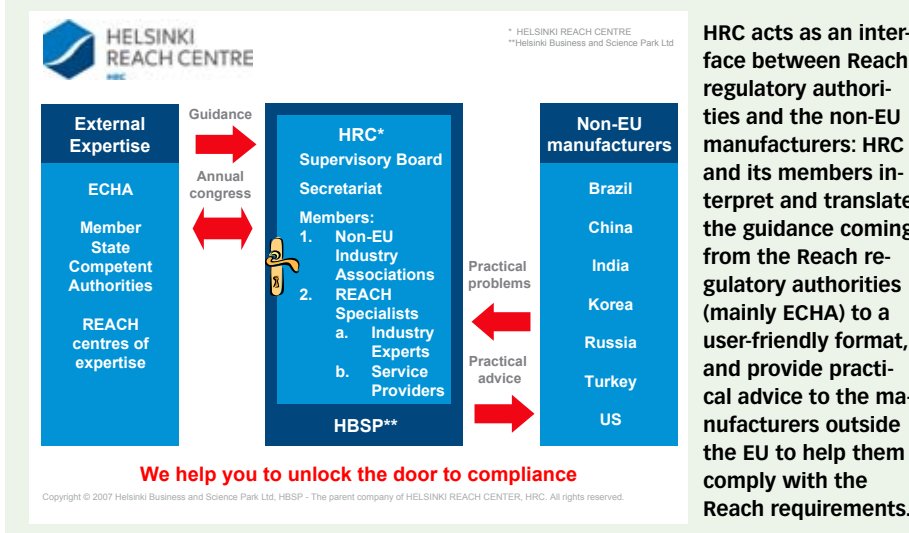
The HRC network consists of two types of members: non-EU associations on the one hand, and a Reach specialist group on the other. The Reach Specialist Group includes Reach experts from within the industry who have gained extensive Reach knowledge, and who have an interest to contribute to the activities of HRC, as well as service providers in various fields (Only Representative, other legal, IT, laboratory, training and consulting services).

Besides its own Reach specialist members, the HRC has an external pool of expertise; it has close contacts e.g. with ECHA and Competent Authorities of the Member States, as well as various Reach centres of expertise. Thus, the HRC ultimately acts as an interface between Reach regulatory authorities and manufacturers outside the EU: HRC and its members

interpret and translate the guidance coming from the authorities to a user-friendly format, and transfer the knowledge to the manufacturers.

As HRC members, non-EU associations benefit from its networking events to get to know Reach specialists who can provide them support, as well as other non-EU association members and their strategies of dealing with Reach. The HRC keeps its members up-to-date individually, via its website (member only areas) and newsletters about Reach, the HRC network, and ECHA.

By doing this, the HRC takes on the challenge of becoming the hub for the otherwise neglected non-EU manufacturers with regard to Reach, thus ensuring a smooth continuation of their operations on the European market.



Reach, systemic country and industry specific problems are very likely. These problems can only be dealt with by direct contact with ECHA, not by the OR, and these direct contacts can be handled by the industry subsidiary.

HRC serves as an incubator

Since ECHA opened its doors on 1 June 2007, Helsinki has been experiencing a rapid build-up of chemical industry expertise associated with Reach, and the city is striving to become the European Chemicals Capital. Non-EU associations with subsidiaries in Helsinki can take advantage of having this infrastructure right on their doorstep.

By putting the Helsinki Model into practice, the Helsinki Reach Centre serves as an incubator for subsidiaries. HRC's start-up services for non-EU associations include explanations and discussions of the different alternatives for establishing representation

in Helsinki (i.e. a subsidiary or overseas co-operation with the HRC), concrete instructions on how to set up a subsidiary and the provision of sample OR agreements.

Furthermore, the parent company of the HRC, the business incubator Helsinki Business and Science Park Ltd (HBSP), is able to offer both office space and housing for personnel and their families.



Riku Rinta-Jouppi is Programme Manager of the Helsinki Reach Centre.
riku.rinta-jouppi@helsinkireachcentre.eu