ECHA 7th Stakeholders' day, May 23rd, Helsinki

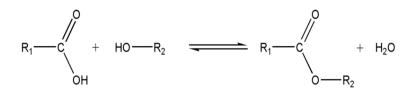


Benjamin NOEL – REACH Coordinator

Stéarinerie Dubois

- Family company created in 1820 : candles
- First production of esters in 1980s
- Sectors of use :
 - -Cosmetic ingredients
 - -Drugs, pharmaceuticals
 - -Food
 - -Functional specialties
- -Business :
 - -France, EU (80% of turnover)
 - -Rest of the world











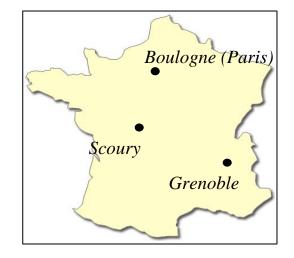
Stéarinerie Dubois

- 120 persons (Medium sized company) :

- $\rightarrow 3$ Accounting Grenoble
- \rightarrow 94 Production site Scoury
- $\rightarrow 23$ Sales Unit Paris
 - 3 Regulatory Affairs

~1% of workforce for REACH

- Software : SAP (no REACH extension), Excel, internal database







Stéarinerie Dubois : REACH

One production site, one legal entity

Main status :

- Producer of substances (also DU for raw materials)
- ~20% of the portfolio to register in 2013
- Lead Registrant for several substances

Limited ressources :

- no (eco)tox experts
- no lawyer
- no computer maintenance / IUCLID unit
- no testing capacity (except some basic phys-chem)

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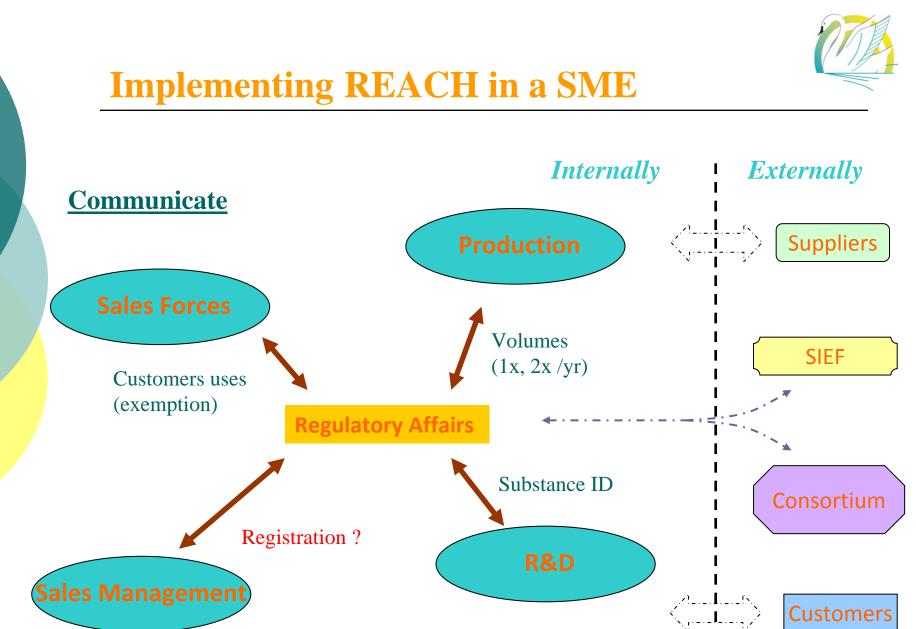


To answer REACH requirements :

Communicate

Externalise

Be prepared for the unprepared



2018 will approach fast !



Externalise

Stéarinerie Dubois joined a consortium of ester producers

INVOLVMENT

As much as possible

100%

Seat and wait for the IUCLID file

0%

- member since the beginning, > 50 members at present
- at the same level as international groups
- different nationalities, all having to talk in english
- different knowledge/interpretation of the text
- consortium agreement, other aspects technically complex : not always clear

- LR decisions needed to fill data gaps (knowledge needed in (eco)tox) => LR responsibility at the end



Be prepared for the unprepared

Nothing new for 2010 registrants, but new for us !

- Substance ID may change
- Joining a joint submission not straighforward : analytics, uses, GSU+CSR
- For a final dossier, administrative costs \approx study compensation
- Registering a non phase-in substance...
- -... update of the dossier after submission to ECHA
- Some delays are short
- Data sharing guidances do not apply for read-accross
- Reg. 1049/2001 'Access to documents' : for all doc owned by ECHA



Last tips

Be aware, stay aware : ECHA website, newsletters, ... English is the language TICK THE BOX in REACH-IT ! Don't forget REACH-IT is closed sometimes Lack of knowledge in (eco)tox : set up helpdesk ?

Any help welcome !