



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

STÉARINERIE **DUBOIS**

Implementing REACH in a SME

Benjamin NOEL – REACH Coordinator



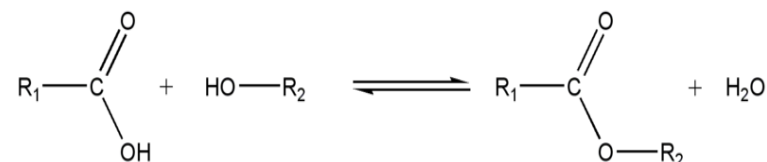
Implementing REACH in a SME

Stéarinerie Dubois

- Family company created in 1820 : candles



- First production of esters in 1980s

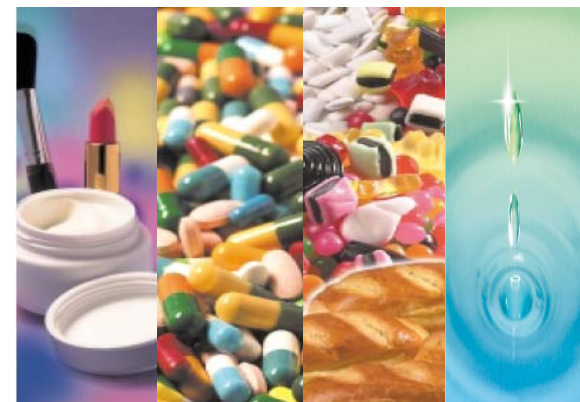


- Sectors of use :

- Cosmetic ingredients
- Drugs, pharmaceuticals
- Food
- Functional specialties

-Business :

- France, EU (80% of turnover)
- Rest of the world





Implementing REACH in a SME

Stéarinerie Dubois

- 120 persons (Medium sized company) :

→ 3 Accounting Grenoble

→ 94 Production site Scoury

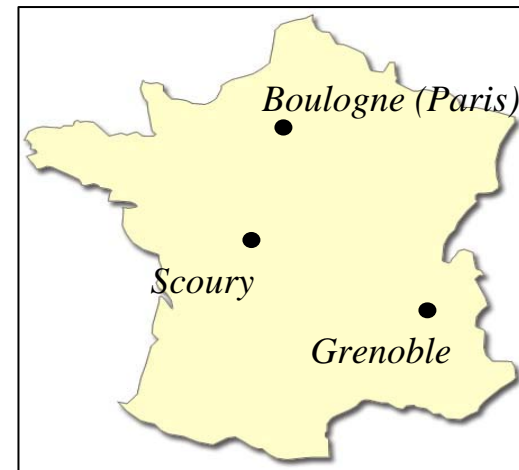
→ 23 Sales Unit Paris



3 Regulatory Affairs

~1% of workforce for REACH

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





Implementing REACH in a SME

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 resources :

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





Implementing REACH in a SME

To answer REACH requirements :

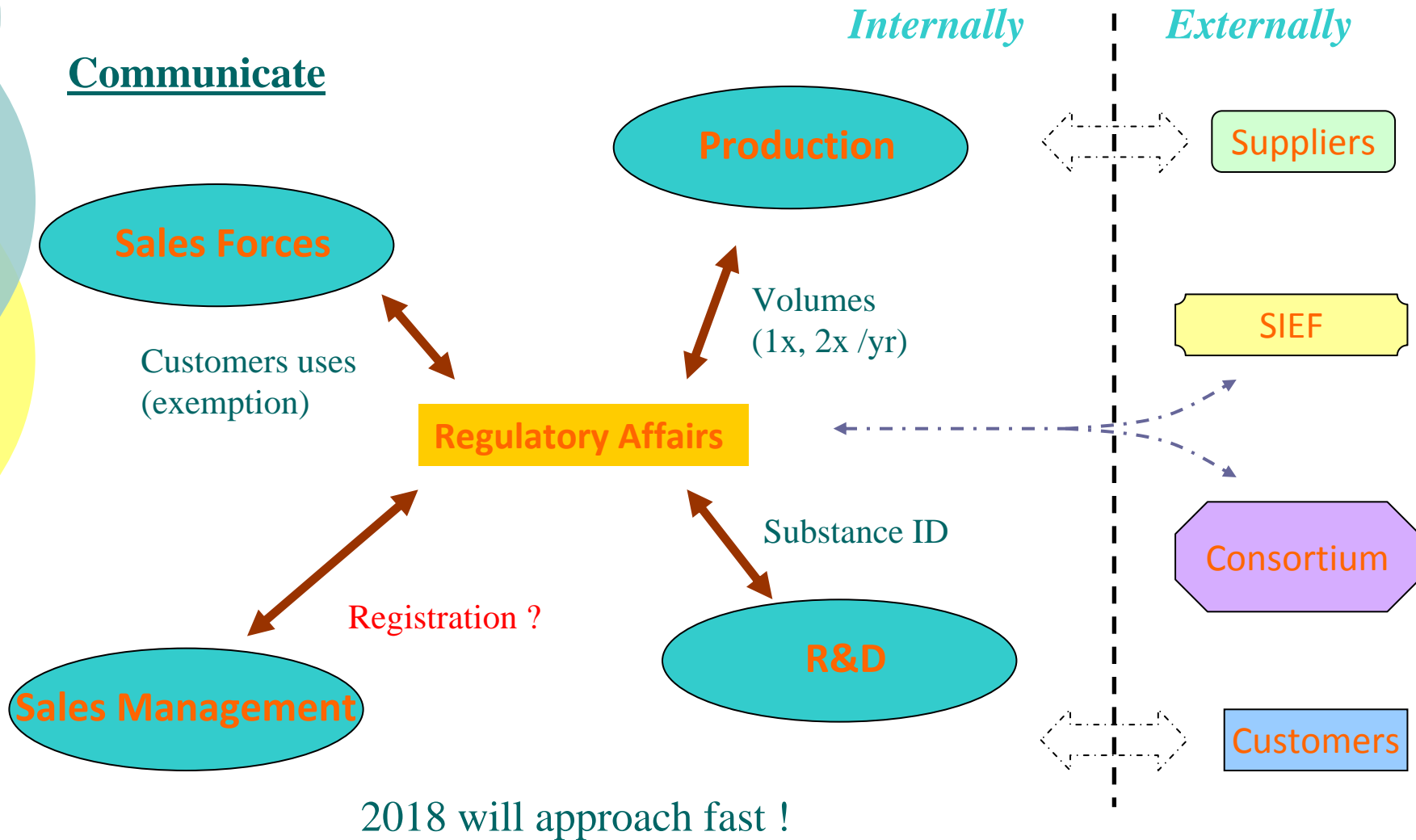
Communicate

Externalise

Be prepared for the unprepared



Implementing REACH in a SME





Implementing REACH in a SME

Externalise

Stéarinerie Dubois joined a consortium of ester producers



As much as possible

Seat and wait for the IUCLID file

- 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



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Be prepared for the unprepared

Nothing new for 2010 registrants, but new for us !

- Substance ID may change
- Joining a joint submission not straightforward : 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-across
- Reg. 1049/2001 'Access to documents' : for all doc owned by ECHA



Implementing REACH in a SME

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 !