Ninth Stakeholders' Day Conference 2014

Case study: Downstream users and REACH

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BUSINESS MODEL

Chemical distributor in the supply chain (member of Fecc)

Chemical Manu-facturer | Purchase | Transport | Storage | **Filling Packaging Labelling** | **Mixing Blending Formulating** | Extensive Technical Support | Vendor-Managed Inventory | Bundling Transport | **Chemical Down stream user**

- Linking chemical manufacturers with chemical users
- Various REACH roles depending on the specific activity. In scope for this presentation :
  - Repackaging from large into smaller quantities (**Downstream user**)
  - Filling, packaging & labeling (**Downstream user**)
  - Formulating according to customer specific requirements (**Downstream user**)

Introducing some of our main recommendations/ learnings

- To make a commitment and to build the needed REACH knowledge via training
- To put things into a practical perspective
- To allow time for the learning
- To have/to get systems in place which can help to do the job
- To require good quality of received SDS and attached ES

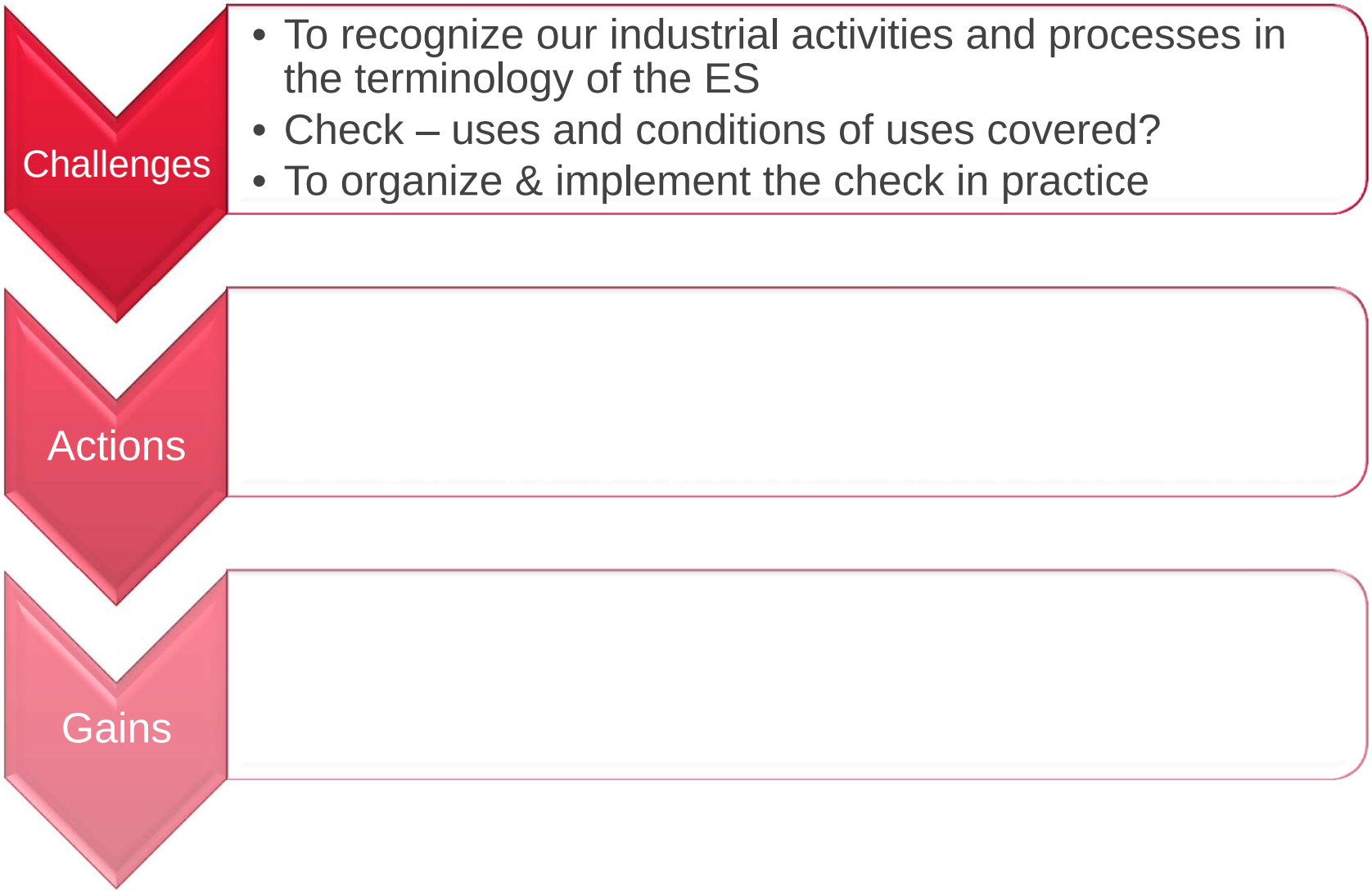
DOWNSTREAM USER

Three situations which typically can be challenging

- **To check if our own uses are covered by suppliers ES, and if the conditions of use are within the boundaries of the ES**
- **To align and consolidate information in ES, when it differs for the same substance, sourced from more than one supplier**
- **Various supply chain communication challenges**

DOWNSTREAM USER

Situation 1 Check own uses



DOWNSTREAM USER

Situation 1 Check own uses

Challenges

- To recognize our industrial activities and processes in the terminology of the ES
- Check – uses and conditions of uses covered?
- To organize & implement the check in practice

Actions

- Involve logistics in close cooperation with central E&Q
- Map our own uses
- Training sessions at a very practical level
- Define & implement procedure. Check. Document check

Gains

DOWNSTREAM USER

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Gains

- Learning by doing works!
- Increased involvement in this new way contributes to the awarenes about safety

DOWNSTREAM USER

Situation 2 Alignment & consolidation of ES

Challenges

- A substance is sourced from more than 1 supplier and the ES from the suppliers are not all identical
- Which information to pass on in the supply chain?

Actions

Gains

DOWNSTREAM USER

Situation 2 Alignment & consolidation of ES

Challenges

- A substance is sourced from more than 1 supplier and the ES from the suppliers are not all identical
- Which information to pass on in the supply chain?

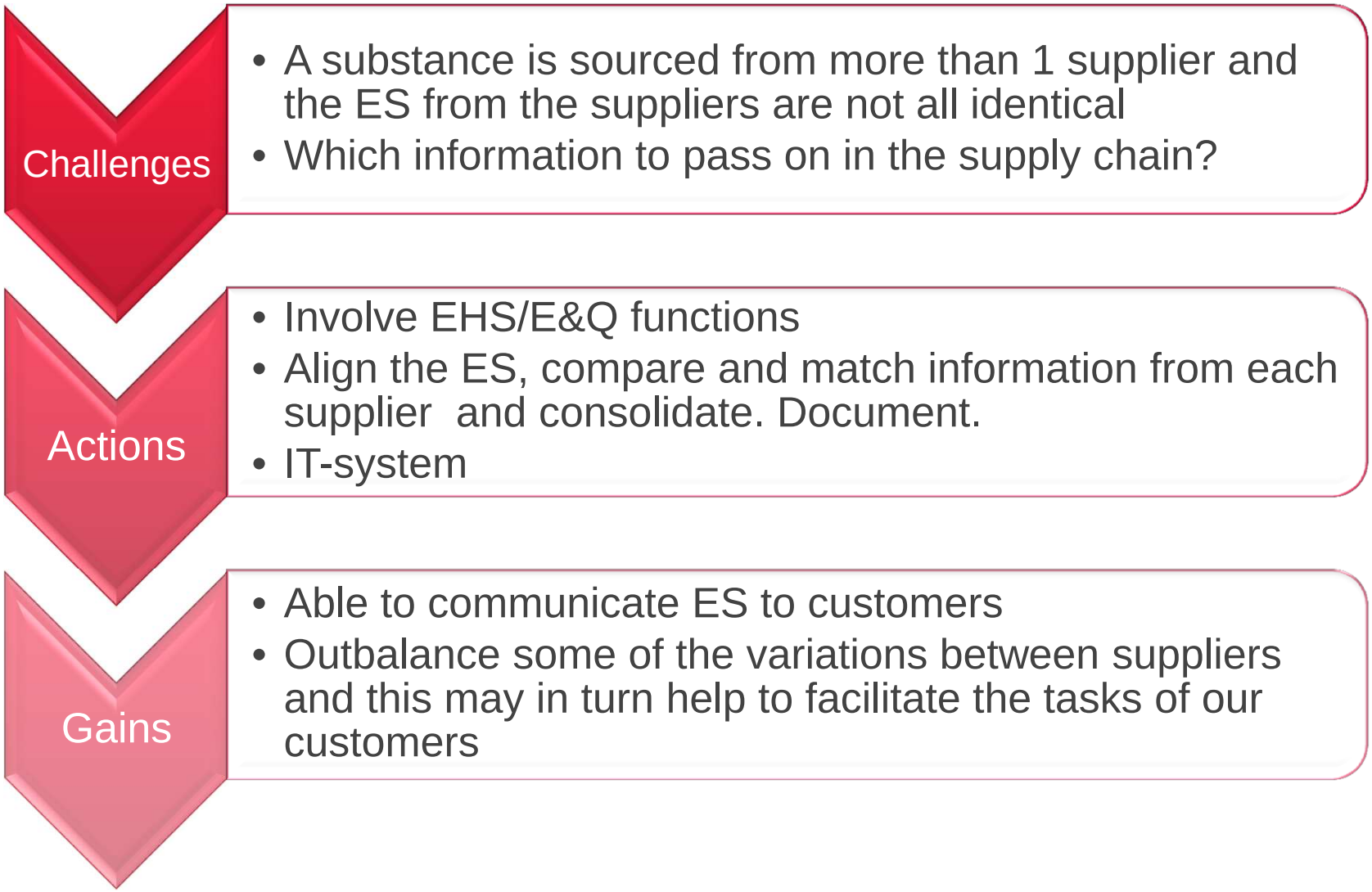
Actions

- Involve EHS/E&Q functions
- Align the ES, compare and match information from each supplier and consolidate. Document.
- IT-system

Gains

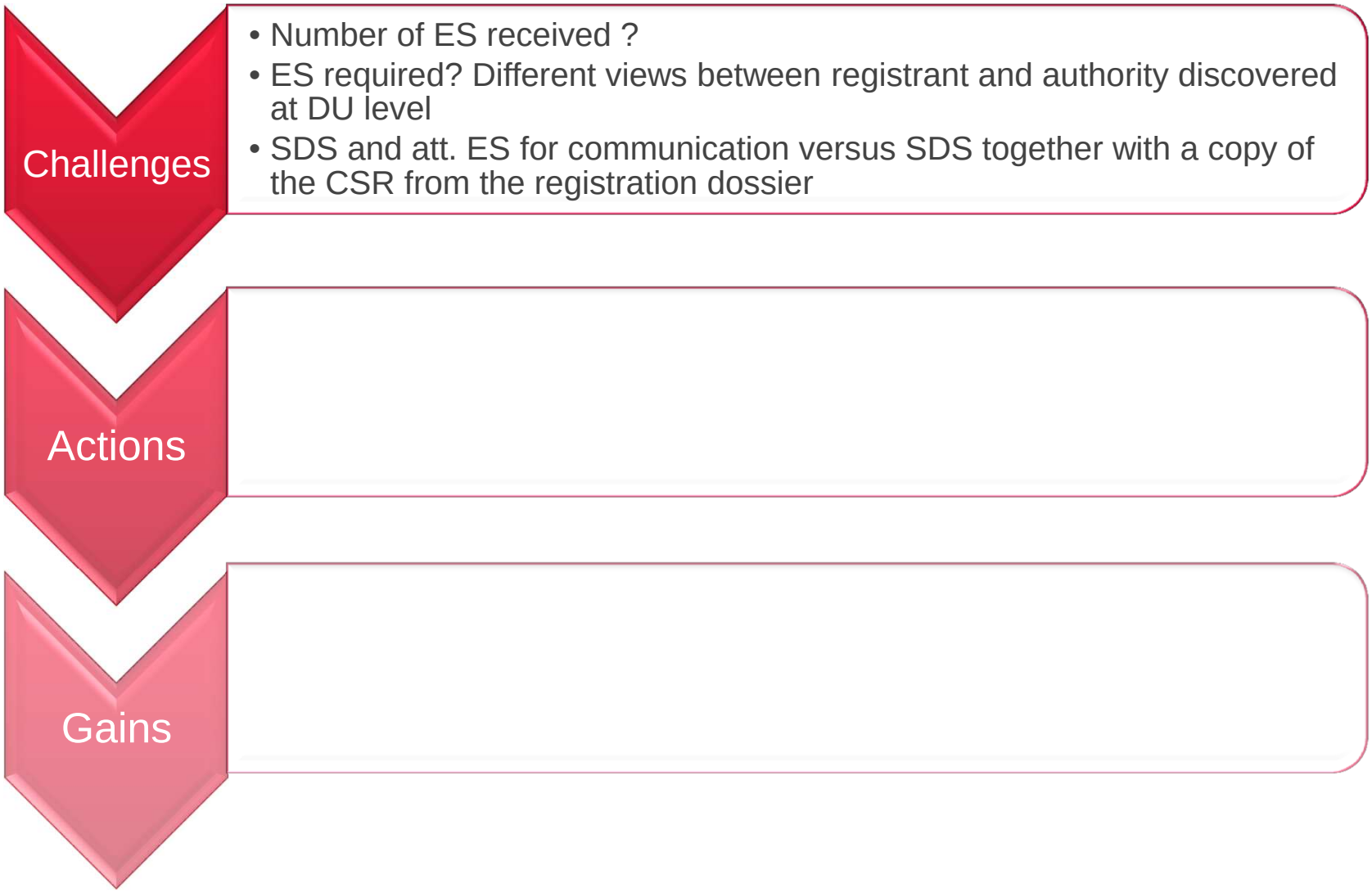
DOWNSTREAM USER

Situation 2 Alignment & consolidation of ES



DOWNSTREAM USER

Situation 3 Various communication topics



DOWNSTREAM USER

Situation 3 Various communication topics

Challenges

- Number of ES received ?
- ES required? Different views between registrant and authority discovered at DU level
- SDS and att. ES for communication versus SDS together with a copy of the CSR from the registration dossier

Actions

- Dialog in the supply chain
- Potential room for increased clarification
- May involve National competent Authority – Industry - ECHA

Gains

DOWNSTREAM USER

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Gains

- Comming soon we hope: More clarification. Topics with input from upstream supply chain solved

DOWNSTREAM USER

Catch-up on pre-conditions for the actions and our recommendations

- Resources
- Good supplier dialog and internal coordination of the dialog
- Good quality of received SDS and the attached ES
- Need for a flexibility in man power/ -hours
- A positive attitude to learning by doing
- Systems for document management
- IT-system for management of SDS and attached ES
- Be ready for incoming questions from customers. Sales /purchase functions involved as well and may thus need a basic REACH knowledge

Thank you