

How an SME can make it

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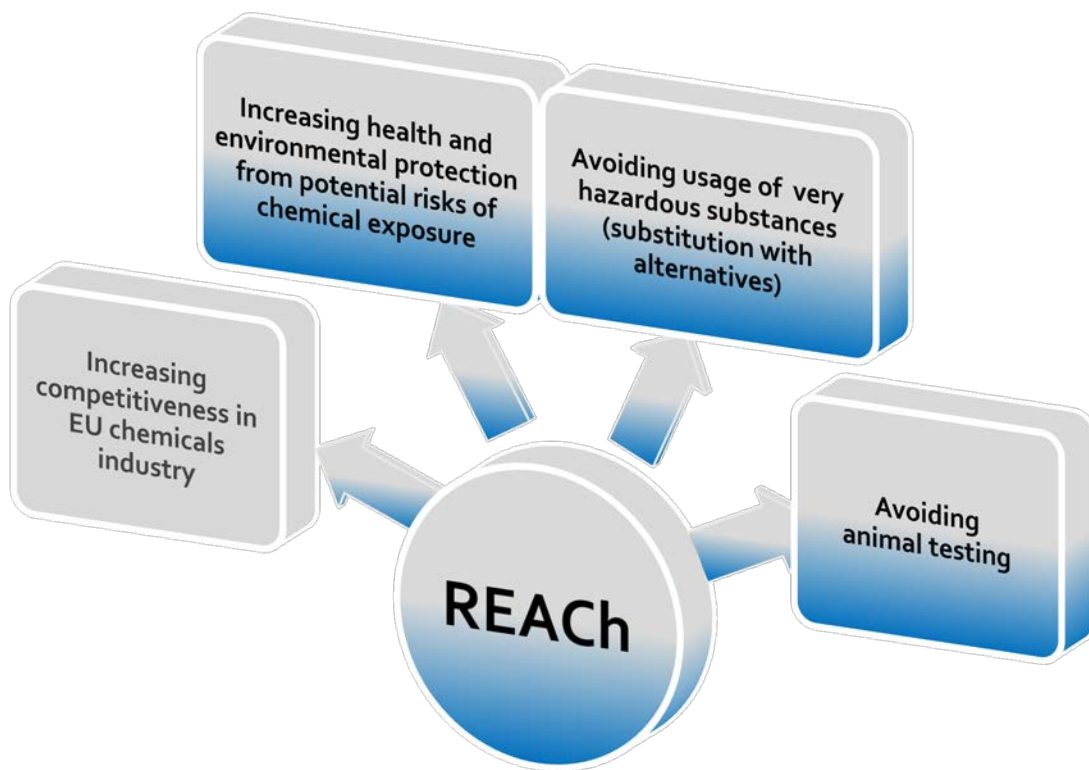
Member of  FEDERCHIMICA

Distribution/import company of raw material for
chemical industry



REACH FOR MY GRANDMA

For my grandma who is watching a social advertising on TV, REACH means this...





REACH FOR US

But for us, as already explained in other occasions, REACH means this...

Keeping in touch with co-registrants

Non-REACH personnel working on REACH issues

Issuing REACH related documentation

Monitoring new sources

Monitoring internal computer systems

Discovering final uses

Hiring of REACH-skilled personnel

Developing internal computer tracking systems

Find trustworthy consultant(s)

Mutual helping in REACH matters

Understanding use descriptions

Contacting registrants to have information about substances to be registered

Being updated on new guidelines

Keeping in touch with trade associations

Knowledge of customs practices

Helping or consulting downstream users

Bureaucracy

Training of personnel that is not fully dedicated to REACH

Participating to courses and events

Communication with the entire supply chain

Frequent meetings with board of directors

Internal communication skills

Proper disclosure between REACH manager and employer about costs to be incurred

Disclosure with financial department about expenses to be paid



2018 REGISTRATION ANXIETY

Starting in 2015, to be ready in 2018

In 2015, thinking we were already late due to the possible huge number of substances to register, we have organized a lot of meetings with our sales and purchasing people and board of directors to understand:

- How many substances do we have to register ?
- 2018 = many substances all together = huge economical effort: do we have other businesses to compensate?
- Will we have to cut our portfolio?
- Will we have to invest in some leading products only?
- ...

SUPPLY CHAIN – UPSTREAM SUPPLIERS

Is the producer / supplier trustworthy?
...and even if it is keep a safety net ready!

Is the producer / supplier replaceable (at the very last minute)?
If YES... all clear!
if NO... call sales and purchasing people!

SUPPLY CHAIN – DOWNSTREAM USERS

Do not underestimate specific uses!
Medicine or shampoo for dogs?

Which registration should be performed for that raw material and for that
use?
Full or simplified?

SIEF - CONSORTIA

<https://echa.europa.eu/regulations/reach/registration/data-sharing/inquiry>

Inquiry

Companies planning to register a non-phase-in (new) substance or phase-in (existing) substance that has not been pre-registered, have a duty to inquire with ECHA whether a registration has already been submitted for that substance.

Similarly, ECHA should be informed through inquiry of additional information required to update a registration due to a tonnage band increase. However, if no additional information is required for an update of a registration, an inquiry should not be submitted.

Finding the SIEF / consortium: if I did not pre-register the substance, what can I do?

Inquiry dossier

To submit an inquiry, potential registrants need to prepare an electronic inquiry dossier. When preparing the dossier, specific attention should be paid to the substance identity information. This information should clearly describe the manufactured or imported substance.

Potential registrants need to **wait for the result of the inquiry** before submitting the registration or starting any tests on vertebrate animals. ECHA checks the substance identity to identify companies who have previously registered or inquired about the same substance and brings them in contact with each other to share data and to submit a joint registration. ECHA also provides the inquiring company with a list of (robust) study summaries available to ECHA.

The information submitted for the purposes of inquiry will not be published.

SIEF - CONSORTIA

<https://echa.europa.eu/regulations/reach/registration/data-sharing/data-sharing-disputes>

Data-sharing disputes

Co-registrants must make every effort to make sure that the cost of sharing information is determined in a fair, transparent and non-discriminatory way.

As a last resort, if no agreement has been reached, the potential registrant can file a data-sharing dispute with ECHA. The data-sharing dispute procedure is free of charge and can be managed without legal support.

Found the consortium, how do I know if the LoA price is fair?

To ensure equal treatment and the right to be heard, ECHA will also request the other party to provide documentary evidence.

ECHA will assess the parties' **efforts** to reach an agreement on the sharing of the data and its costs. This assessment is solely based on the negotiations, meaning all documented communication between the parties.

After the assessment, ECHA issues a decision allowing the potential registrant to refer to the requested data or requesting both parties to continue their negotiations. Non-confidential versions of ECHA's decisions on disputes are published online.

Data-sharing dispute decisions are appealable at the Board of Appeal within three months.

...but what about last minute urgencies?

ECHA IUCLID Cloud for SMEs

Can other companies custom clear some kilos of my raw material to help me?

Are my downstream users willing to share the registration's costs?

Go for stock within 31/05/2018 to save time if you are in late with the registration, but pay attention to the date of the custom clearing!

Read-across

Treasure all the direct and indirect experiences and knowledge to make sure to register within May.

Dialogue along the supply chain is vital to clarify doubts and try to simplify the potential registration.

While embracing the final scope of REACH, an SME should try to keep steady in order to start new and better business in the future.