

# How Zebra works with REACH registration requirements

Zebra A/S – Flying Tiger Copenhagen

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# PRESENTATION



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### Zebra A/S is a Danish retailer:

- Flying Tiger Copenhagen stores
- 861 Stores
- 28 countries
- Mostly non-EU suppliers

### Product range:

- Toys
- Electronics
- Cosmetics
- Office/stationary
- Hobby/DIY
- Home decoration
- Food contact products/kitchen

**We assess and test  
5500 items per year**



UNTIL NOW.....

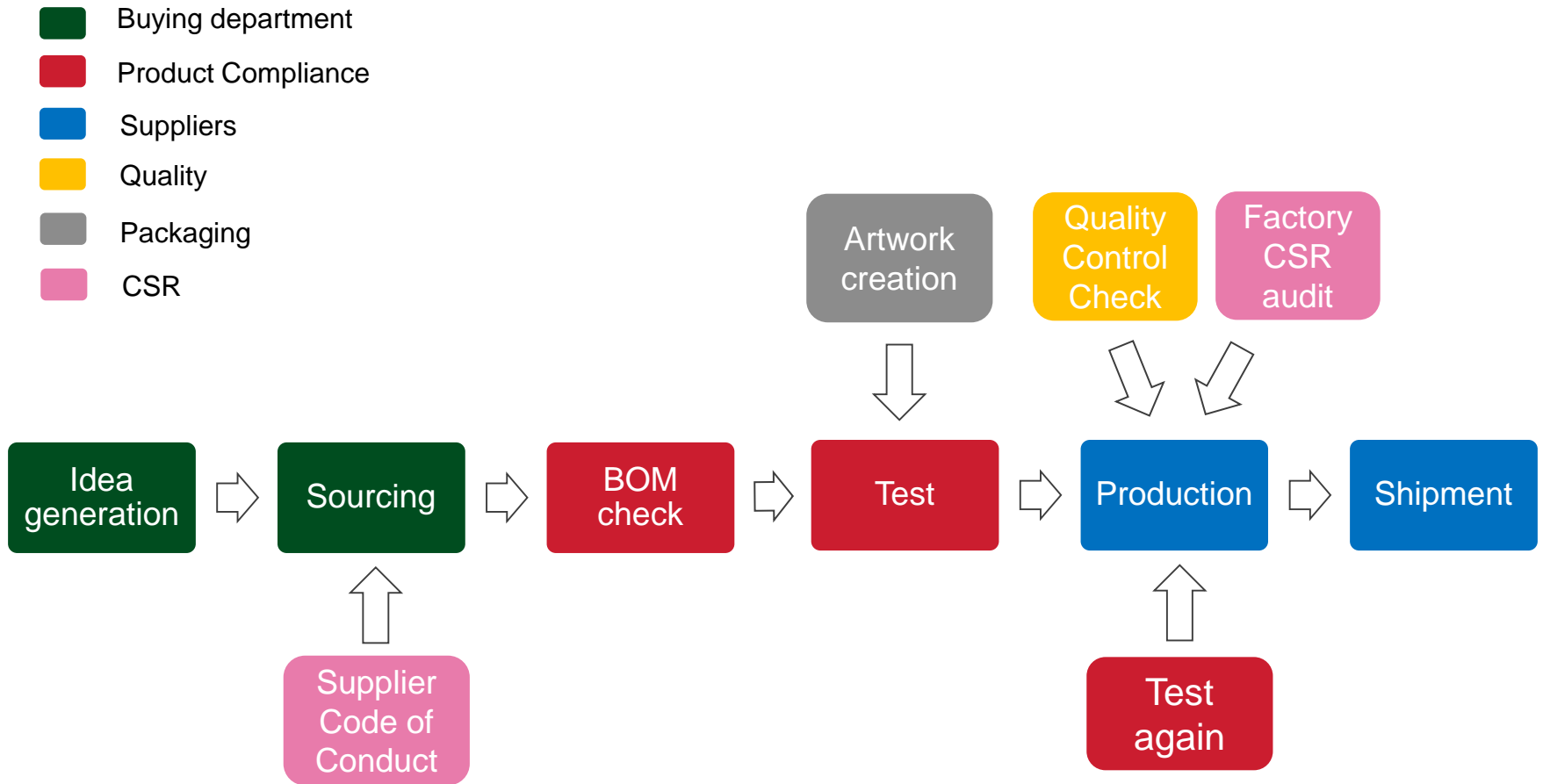


6 registrations

61 pre-  
registrations



# PROCES FOR BUYING



# FIRST PHASE: NEEDED



- An employee with a chemical background
- A database giving the overview of products, substances, amount imported to EU, supplier info etc.
- A consultant with the in-depth knowledge on the registration process
- A laboratory to perform the needed chemical analyses



## SECOND PHASE: DATA DIGGING



- We looked at all chemicals with an import above 500 kg/year:
  - Which products did they come from?
  - Do we still buy these products?
  - Is the buyer going to change the supplier?

This gave us an overview and a deeper knowledge of the chemicals potentially ready for a registration

We looked into 80 new registrations....

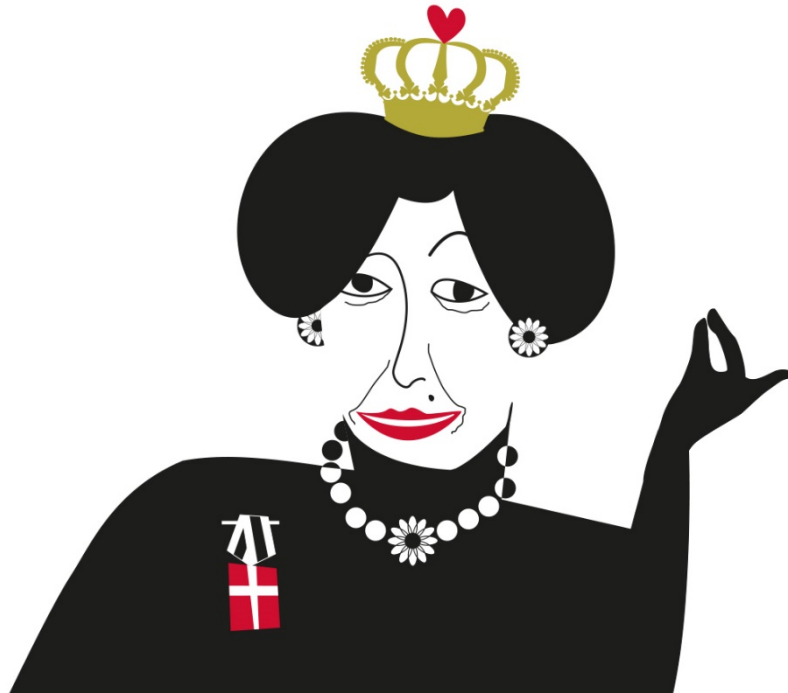


# THIRD PHASE: POSSIBILITIES



## 1. Change to EU suppliers

- Easy solution for Compliance
- Not easy to find the right suppliers
- Own production site: relatively easy to get information
- Sourced outside EU: hard to get the necessary information

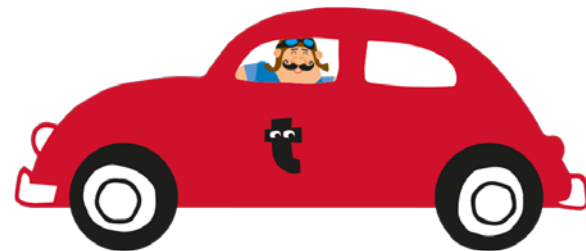


# THIRD PHASE: POSSIBILITIES



## 2. Change to suppliers with their own REACH registrations

- Hard to find suppliers with sufficient knowledge on REACH
- Difficult to get the right information
- Some suppliers have pre-registered
- Would they move on to the registration?
- If they did, could we trust that the registration was big enough to include our products?
- Result: only one supplier had the registrations in place (cosmetics)





# THIRD PHASE: POSSIBILITIES



## 3. Look at all BOM/BOS's relevant for REACH registration:

- Could we use the same formulation for more products?
- Could we use natural materials?
- Could we use more simple formulations?
- Could we use the same chemicals in more products?



REQUIRES A HUGE COOPERATION WITH BUYING



## FOURTH PHASE: DECISIONS, EXAMPLES



Paint came in two sizes from two suppliers in two formulations  
Settle for one formulation, one supplier, multiple of sizes

All pens came with different ink = a lot of different substances  
All ink for pens comes from a EU supplier

Most pencils had synthetic graphite  
All pencils now have natural graphite

Most cosmetics came from China  
Most cosmetics are now from EU

## FOURTH PHASE: DECISIONS, EXAMPLES



Many pigments are used for e.g. slime and modeling clay  
We get the manufacturers to use the same pigments

New products are assessed, also according to current and planned/future registrations

A special candle was produced of a chemical which could not be changed.  
We had to skip the product as we would be the only registrant



# CONCLUSIONS - RESULTS



- We ended up with 20 new registrations (former 80)
- We found the right laboratory and got the final quotation (analyses will be performed in EU)
- We have bought – and are buying – our way into the SIEF groups
- We have some chemicals in analysis and some are on their way



# UNEXPECTED CHALLENGES



- We did not think that getting the samples from the suppliers would be a problem.....
- In China, it is close to impossible to get some samples (e.g. flammable chemicals) transported out of the country due to Chinese legislation
- One of the chemicals to be registred, is owned by a Korean Authority. We could only buy our way into the group by having our Korean partner to do the payment. It could only be done in Korea or through a Korean legal entity.....



# KEY LEARNINGS



- A consultant you can trust and work closely with is essential
- Don't trust that your non-EU suppliers will register. They might have done a pre-registration but their general knowledge about REACH and the cost of a registration is too low
- Of all our suppliers only one actually did register (cosmetic company)
- A close relationship with the buyers is essential
- The buyers do have fewer opportunities/stricter internal rules
- The size of Zebra makes it easier to set strict requirements for suppliers
- It takes time, much more than you think.....

