REACH Implementation - Telene's plan

Registration, Evaluation, Authorization and restriction of CHemicals

Presentation

Objective: new European Regulation concerning registration of existing and new chemicals.
Date of entry in force: June 1, 2007.
Scope of the regulation

Manufacturing Import Placing on the market Use	of	Single substances Substances in preparation Substances in articles	**in quantity > 1 ton per year**

REACH implementation at Telene SAS

- Registration program in place
- Dedicated HSE engineer in Technical group
- Joint team work with Rimtec/Zeon HSE team
- We will keep you updated on pre-registration / registration process
- We are available to answer any questions

Status versus REACH registration

TELENE SAS → Importer
MOLDERS → Articles manufacturer
→ Downstream users

Registration deadlines

For existing substances (put on the market before June 1, 2008), phase-in period with pre-registration before registration,
For new substances (put on the market after June 1, 2008), no pre-registration, registration begins immediately after the entry in operation of the ECHA (European CHemicals Agency).

849 pages of complex regulation and many questions in prospect!

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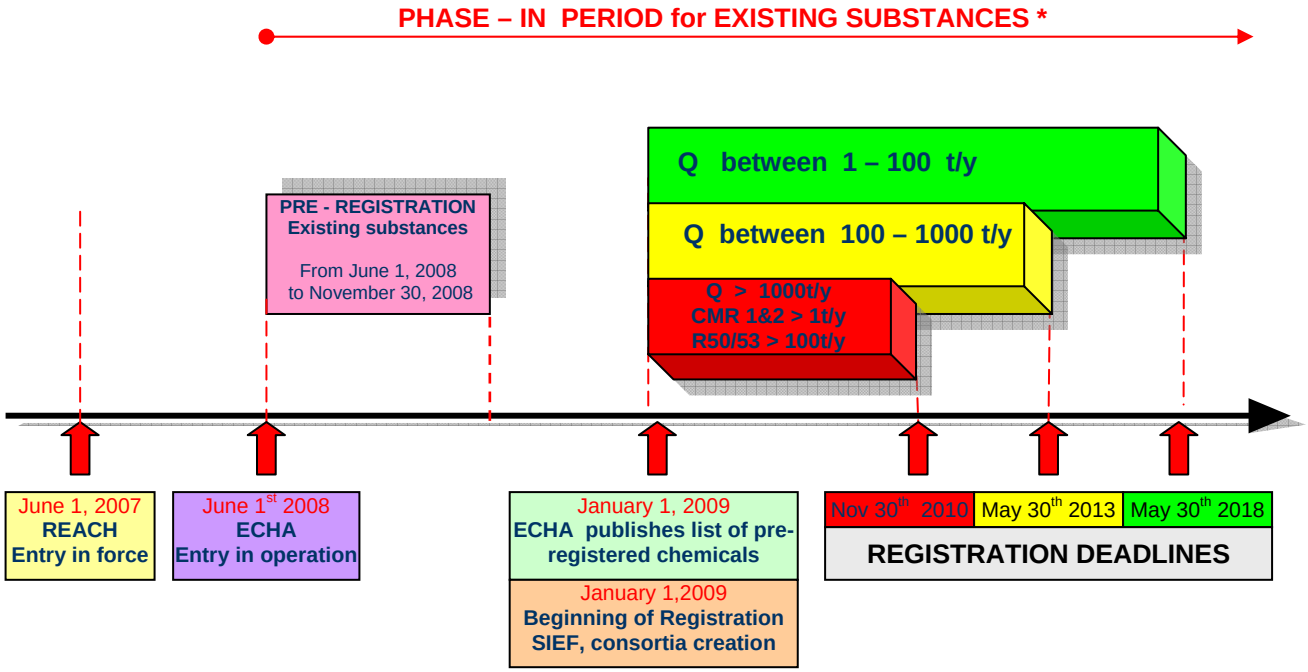
Timelines



** Registration of news substances begins on June 1, 2008 => no phase-in period.*

Telene SAS position: Importer

- Pre-registration of existing chemicals.

- Participation to Substance Information Exchange Forum (SIEF), and creation of consortia with other potential registrants
=> Sharing of data & costs.

- Registration with staggered deadlines, according to substances type and quantity.
=> Priority to high volumes & substances with highest risks.

- In absence of available information concerning toxicological, ecotoxicological, and physicochemical properties, tests may have to be conducted.

- Transmission of information through the supply chain via the MSDS (including exposure scenarios according to use)
=> Downstream users.

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Molders position: Articles manufacturer

Registration

(Art 7, §1) for any substance contained in those articles, if both the following conditions are met:

- Substance is present in those articles in **quantities > 1 ton per producer/importer per year;**
- Substance is intended to be released from those articles, under normal or reasonably foreseeable conditions of use.

NOT CONCERNED => substances are not released from articles, during normal conditions of use.

Notification

(Art 7, §2) for articles which contain CMR 1&2 (Carcinogenic, Mutagen, or Reprotoxic category 1&2), PBT (Persistent, Bioaccumulative, Toxic), vPvB (very Persistent very Bioaccumulative), or other hazardous substances (identified case by case), if both the following conditions are met:

- Substance is present in those articles in **quantities > 1 ton per producer/importer per year;**
- Substance concentration in those articles > 0.1 % (weight/weight).

Current status Mo formulation: no CMR 1&2, ongoing investigations concerning PBT / VPvB properties.

BUT these 2 points are not applicable if substances included in those articles have already been registered for that use. (Art 7, §6)

=> NO REGISTRATION / NOTIFICATION
=> DONE BY TELENE SAS

Molders position: Downstream user

Two possibilities

You register yourself, to the ECHA, your identified use of substances, and meet the REACH requirements.

OR

For each used substance, you make your identified use known in writing (on paper or electronically) to your supplier, in order to be registered by manufacturer or importer, during REACH registration process.
Deadline (Art 37, §3): at least 12 months before importer's registration deadlines (cf Timelines).

After manufacturer / importer registration, you:

- Apply the relevant risk management measures, applicable to your registered use, established by yourself, or by the supplier via MSDS.
- Make these risk management measures, available to your staff (your own rules or MSDS).
- Communicate up the supply chain possible new information on hazardous properties, regardless of your identified use.

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