



REACH update....you thought it was all over?

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- ▶ A reminder of REACH activities in CONCAWE
- ▶ Overview of current issues
- ▶ Overview of on-going issues
- ▶ A reminder of company responsibilities

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- ▶ Historical test data plus development of novel methodology to deal with petroleum substances
- ▶ Registration dossier and Chemical Safety Report development
- ▶ Support to registration
- ▶ SIEF facilitation – interface with licensees
- ▶ Dossier updating
 - ▶ Intermediate registrations
 - ▶ Response on testing proposals
 - ▶ Dossier screening
- ▶ 2013 (and 2018 registrations)



- ▶ Dossier updates
 - ▶ Two rounds of scheduled updates in 2012, plus an update for the revised Testing Proposal for Oxidised Asphalt and to make changes for intermediate registrations
 - ▶ Update already in 2013 for the SRGO Testing Proposal (and the associated Category Justification Document), with more to come for two other gas oil categories plus for residual aromatic extracts and bitumens
- ▶ Scheduled dossier update to include new data in several categories

Sometimes only Lead Registrants need to re-submit dossiers, sometimes all registrants. These updates are essential to keep your registrations current (and in compliance).



- ▶ IT system upgrades by ECHA - require updating of all of the category dossiers to enable them to be used by new registrants (and to submit dossier updates)
- ▶ Evolution ('clarification') of ECHA guidance (e.g. , intermediates and Strictly Controlled Conditions; read-across and waiving; category building)
- ▶ Automated screening of dossiers (to 'improve quality')
- ▶ Analytical characterisation of petroleum UVCB substances – still an open issue with ECHA
- ▶ CoRAP list – substance evaluation
- ▶ SHVC list – first stage towards potential Authorisation
- ▶ Harmonisation of hazard classifications (the CLP inventory) – registrants have an obligation to 'make every effort' to reach agreement on harmonised entries.....



- ▶ Keep your registrations up to date with your activities e.g. process changes, new imports, new uses for chemicals, etc.
- ▶ Report import quantities to the Only Representatives of non-EU manufacturers
- ▶ Keep your own Safety Data Sheets up to date (aligned with registration dossiers)
- ▶ Review incoming Safety Data Sheets to ensure your uses for the chemical are covered and that you are complying with the recommended measures for safe storage and handling on your site (time for remedial action is limited)
- ▶ Monitor your inboxes for messages from ECHA about your registrations (time to respond may be very limited) – make CONCAWE aware as soon as possible
- ▶ If you are a Lead Registrant, help CONCAWE by being (rapidly) responsive; you have specific obligations to co-registrants within the SIEF (you signed an Lead Registrant Agreement!)
- ▶ Keep your CLP notifications up to date (new manufacture, new imports, new R&D activities)
- ▶ Maintain and develop your REACH expertise
- ▶ Maintain adequate REACH records – you may be audited at any time

Remember – No data, No Market (REACH Article 5)



- ▶ REACH was not a 'project' – registration in 2010 was just the R of REACH
 - Evaluation – of Testing Proposals, dossiers and substances
 - Authorisation of highly hazardous Chemicals
- ▶ Maintaining compliance will be a significant drain on company specialist HSE resources for the foreseeable future
- ▶ REACH is chemical control in Europe and companies have to recognise and manage the on-going impact for them as manufacturers, as importers and as Downstream Users of chemicals
- ▶ Updating and maintaining registration dossiers and Chemical Safety Reports for the petroleum substances will continue to be a major work item for CONCAWE. CONCAWE needs the support of the Member Companies on the expert groups and Task Forces that work to ensure your on-going REACH compliance

