Implications of REACH for the industry: An independent expert point of view

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Sustainable management of chemicals

Intrinsic properties of substances

Used amount of chemical t/a

Finishing preparation

Fabric

Process

Degree of fixation %

Elimination in waste water treatment plant (WWTP)
Sustainable production and use of chemicals require sufficient information on hazardous properties and uses of chemicals.

For the majority of chemicals: These data are not public available.

REACH: Defining a necessary new quality standard.
REACH and „industry“

* „Industry“: different actors, different tasks

* REACH: safe communication down- and upstream

A great amount of information is distributed along the supply chain!
Overall conclusions from several pilot trials on REACH

- Many companies in the supply chain would be significantly overstretched without simplifications in the legal text and without substantial support.
- Develop simple EU guidance documents (in addition to other aids and implementation tools) before the system starts.
- Use already existing data for the tasks of REACH
Overall conclusions from several pilot trials on REACH

- in particular: development of standard exposure scenarios and exposure “categories” for various supply chains, in collaboration with substance producers, manufacturers of preparations and users of chemicals
- Share as much data as possible, keeping confidential information confidential
- Discover and use the flexibility of the REACH proposal October 2003.
I. Make use of already existing data.  
Standard emission data are already public available for many branches e.g. OECD Emission Scenario documents

Example:

The Matrix Project  
"Branch- and product-related emission estimation tool for manufacturers, importers and downstream users within the REACH-system. Technical guidance for emission estimations: manuals and software tools“  
contact: UBA Berlin, Burkhard Wagner, Silke Müller
II. One standard exposure scenario can cover hundreds of similar exposure situations

Example:

Environmental Standard-Exposure-Scenario for substances in dye stuffs and textile finishing chemicals for registration under the REACH system developed together with the actors of the textile chain
R+D project sponsored by the German Federal Environmental Agency (UBA);
contact: UBA Berlin, Birgit Müller, Ulrike Frank
III. It should be possible to keep confidential business information confidential under REACH

Exact formulas of preparations are kept confidential under REACH.

What’s the starting point of confidentiality? Which degree of detail is necessary?

Example:
Lacasse, Baumann: Textile Chemicals, Springer 2004
- Sustainable use of chemicals needs the REACH quality standard.
- Reach Implementation Projects, strategic partnerships on REACH and additional projects should be used to develop the appropriate instruments to make REACH successful.
- We need safe information flows within the supply chains.
- By using the flexibility of REACH, registration should become effective, fast, less expensive.
- Chemicals of very high concern should have no future.
- Better data base for chemicals < 10 t/a (exposure, ecotoxicity)