

# How communication in the supply chain can change when regulatory risk management emerges

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## The Lead REACH Consortium

- Established in 2008 to provide **REACH Registration support** to companies involved in the manufacture and/or import of lead metal and a range of lead-based substances
- Represents **>90 legal entities** situated across Europe and North America
- Maintains the REACH Registration dossiers for **lead metal and 26 lead-based substances**
- Secretariat held by the **International Lead Association (ILA)**
- **Proactive work programmes** including **scientific projects** (human health and environment), **regulatory defence** (REACH Authorisation and Restriction, Harmonised Classification and Labelling), and related **advocacy and communications activities**
- **Member of Eurometaux** and active contributor to key Taskforces on relevant issues

*ILA promotes the **responsible, sustainable manufacture and use** of lead and lead substances  
We advocate **proportionate regulation based on sound science***

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## Candidate Listing of Lead Metal

- **97% of REACH Registered tonnage** for lead and lead compounds comes from **five substances**:
  - Lead metal, Lead monoxide, Orange lead, Tetralead trioxide sulphate, Pentalead tetraoxide sulphate
  - **Main user sector: lead battery industry**, where strong communications channels already existed
  
- Lead metal included in the **Candidate List** of SVHCs on 27 June 2018
  - Suppliers of articles: **Art. 33 supply chain communication** obligations
  - Producers and importers of articles: **Art. 7(2) notification** obligation (>0.1% / >1 tpy)
    - **6-month deadline** from date of Candidate Listing
    - Exemption if already registered for the use, or exposure can be excluded during use and disposal
  
- Companies contacting the Consortium and its members to better understand:
  - How their **specific uses and products** were **addressed in the registration dossier**
  - How to have a **new use recognised** in the dossier
  - **How REACH Authorisation would be handled** if lead metal were included in Annex XIV
  - What ILA and the Lead REACH Consortium would do to **defend the continued use** of lead metal



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## Establishing a Taskforce

- **Wide range of sectors and industries** contacting the Consortium Secretariat in a short period of time
- **Diversity of uses, user sectors, and needs and expectations**
  - EU / national association questions and invitations
  - Enquiries from individual companies, from small companies to large multi-nationals
  - Contacted both by EU users and other sectors reliant on lead, and from suppliers of articles in the EU and beyond
  
- Consortium had to **react rapidly, under pressure**, in a short time period, on a scale not originally foreseen
- **Convened a Taskforce** to bring together users / industries that were:
  - Requesting support in relation to their uses / sectors
  - Concerned about lead metal under REACH Authorisation
  - Keen to have an advocacy strategy that would help defend their essential use
- **Resource-intensive: reacting** to enquiries received as well as proactively **trying to improve outreach** to sectors where no direct contact previously existed – trying to build a strong network with our downstream sectors!



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## Having appropriate supply chain communication

- Via our Taskforce we could:
  - **Clarify the implications** of Candidate Listing and REACH Authorisation
  - **Highlight key milestones** and anticipated timelines in the regulatory process
  - Provide a **central focus / contact point** for the wide range of sectors reliant on lead
  - Make an **inventory** with a view to mapping uses / products to our life cycle description
  - Prepare **foundational messaging** and tools to support sectors responding to consultations
  - Energise users to develop **sector-level advocacy** that would complement ILA's own campaign activities
- Some **new uses** were created: **information on use** and **exposure data – ideally measured – needed!**
  - Especially in complex supply chains sometimes it can prove challenging to have (enough) clear information
- For some applications, measured data were limited or none were provided by the users

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## Looking ahead, and learning from before

- ECHA's (draft) **10<sup>th</sup> recommendation** is in the pipeline
- Essential to **keep user sectors informed** as regulatory risk management emerges
- With the Taskforce in place, we can be proactive in our support for downstream sectors
  - Ensuring they understand **when – and how – they might engage in the regulatory process**
  - Guiding them on the **type of information useful for public consultations** and potential AfA
  - Ensuring our **advocacy work recognises the diversity of uses**
  - **Energising and empowering** them for their own outreach activities

***Before anything else, preparation is the key to success.***

-Alexander Graham Bell

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