LEARNING FROM THE
REGISTRATION EXPERIENCE OF A SME

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GIUSTO FARAVELLI S.p.A.

FARAVELLI GROUP

FEDERCHIMICA

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Giusto Faravelli Spa – Milan, Italy

Hamburg   Prague   Barcelona   Beijing   New York
new entry 2014

DISTRIBUTION/IMPORT COMPANY

WHAT YOU CAN LEARN FROM OUR REGISTRATION EXPERIENCE IS WHAT THE REGISTRATION EXPERIENCE ITSELF HAS TAUGHT US

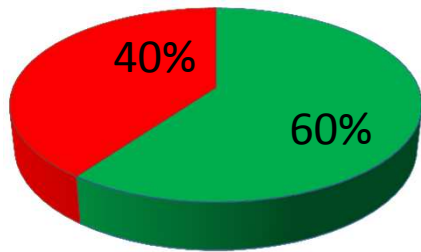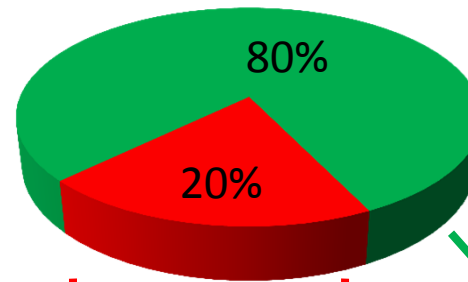# OUR CURRENT STATISTICS IN REACH

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1800 product codes

Purchases

- ■ from EU suppliers
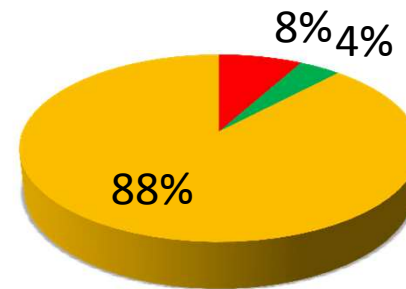- ■ from EXTRA-EU suppliers

40%
60%

Sales

- ■ REACH relevant fields
- ■ EXEMPT fields

80%
20%

Sales covered by

- ■ Our pre-registrations
- ■ Our registrations
- ■ Supplier's pre-registrations/registrations

8% 4%
88%
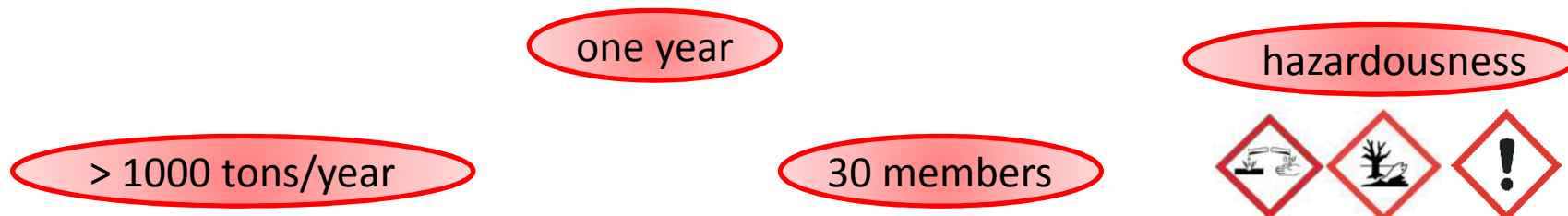
Other fields of application = further regulatory compliance = further customers' requests = [...]
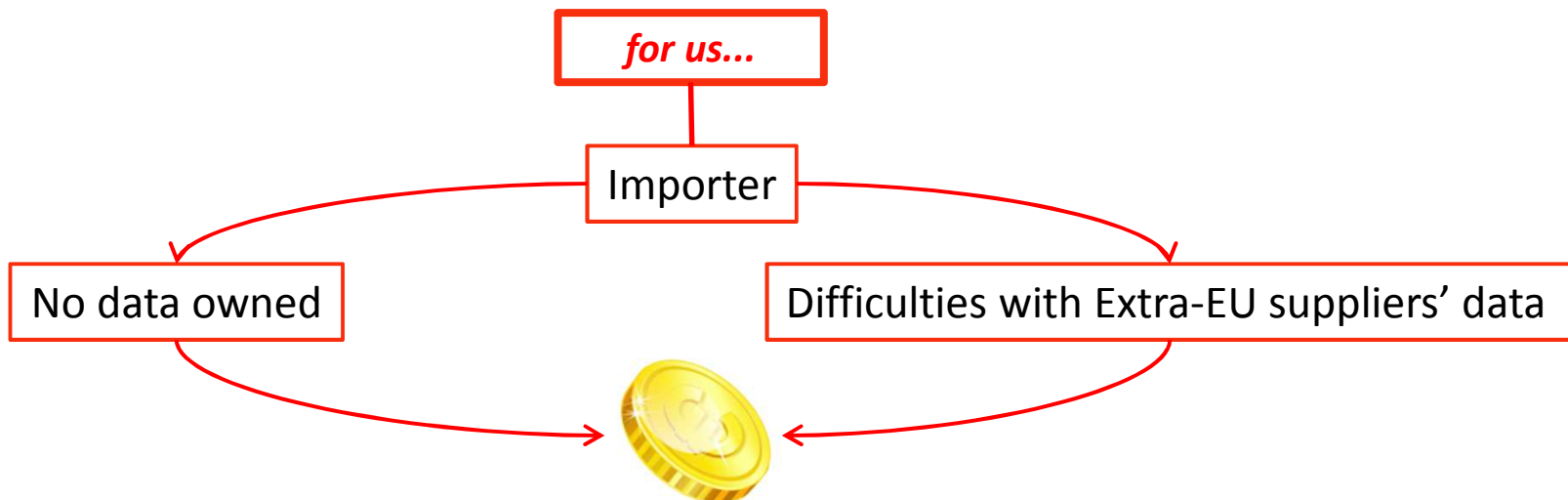
FIRST CONSORTIUM EXPERIENCE

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Copper Compound Consortium (CCC)

Secretariat hold by: Regulatory Compliance Limited (Head Office in Edinburgh).

one year

hazardousness

> 1000 tons/year

30 members

VERY POSITIVE EXPERIENCE

for us...

Importer

No data owned

Difficulties with Extra-EU suppliers' data

FURTHER REGISTRATIONS:

Synthesis intermediate
4 months

Full registration of a hazardous substance (CCC)
3 months

Full registration of a non-hazardous substance
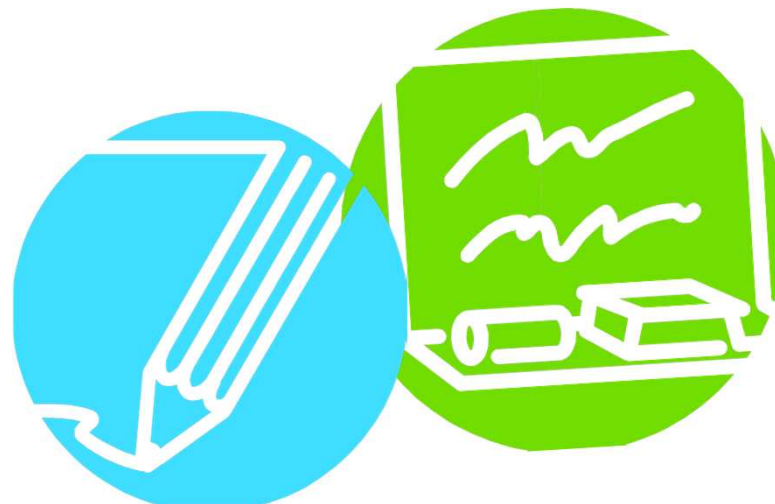*4 months*

Called-off project → Consortium in progress

↓

Several gaps with extra-UE suppliers
(see forward)

↓
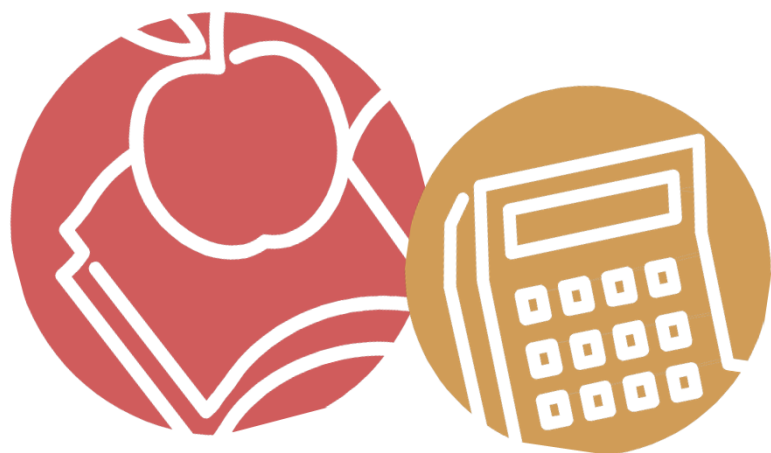
BUSINESS LOST

➡ *Missed registrations can still be a learning opportunity!!*

WHAT WE'VE LEARNT FROM REACH REGISTRATION

LESSON N°1: Registration Time

Most demanding registration (>1000 tons/year)

1 year

Less demanding registration (non-hazardous substance)

4 months

Average time

4 -6 months

Bearable if you have to register <u>one substance/year</u>...

➡ **"Efficient time management" is the first factor to consider..**

... especially with 2018 drawing closer ...

huge number of substances to be registered

LESSON N°2: Costs

LoA price could be very high

How can we check that costs are "fair"?

Is REACh manager able to evaluate the financial side of registration?

⟷

Is accounting / finance dept. expert in REACH regulation?

? HOW TO SAVE MONEY ?

Secretariat as a key player

Using QSARs or Read-across

Meeting as an investment?

…what in 2018 when there will be n-registrations = n-meetings?

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No knowledge = compliance problems

Leaning on non-reliable ORs

Satisfactory and useful data for registration ?

An importer always has to pay for data

There are lots of pre-registrations but how many of those will end in a registration?

WHAT CAN WE DO??

?

Start registering all substances?
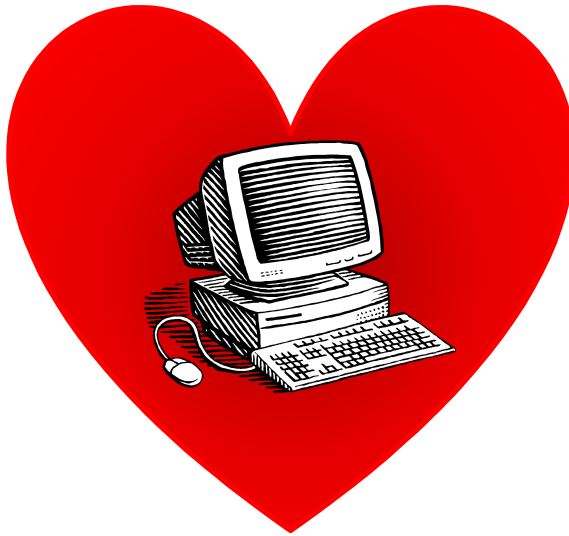**BUT** if they register it too you will have wasted money

Wait and see?
BUT then it could be too late..

A good decision can only be made by knowing well your supplier and building firm relationships with your own communication skills (see after)

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IUCLID is seen as a great hurdle for smaller companies and is even perceived as a barrier for registration.

The use of a computer-powered internal tracking system to keep REACH under control is advisable, more so if you have to manage lots of different products

Even if it costs...

LESSON N°5: Communication

CONSORTIUM

ECHA

One-to-one meetings

TRADE ASSOCIATIONS

Expert advices

INTERNALLY

OK
- Revisions and counterproposals
- Requests of explanations
- Active partecipation
- Meetings

- "My questions are stupid"
- Relying on "Urban legends"
- "The less I ask, the less I'll expose myself" !!

LIMITING FACTORS

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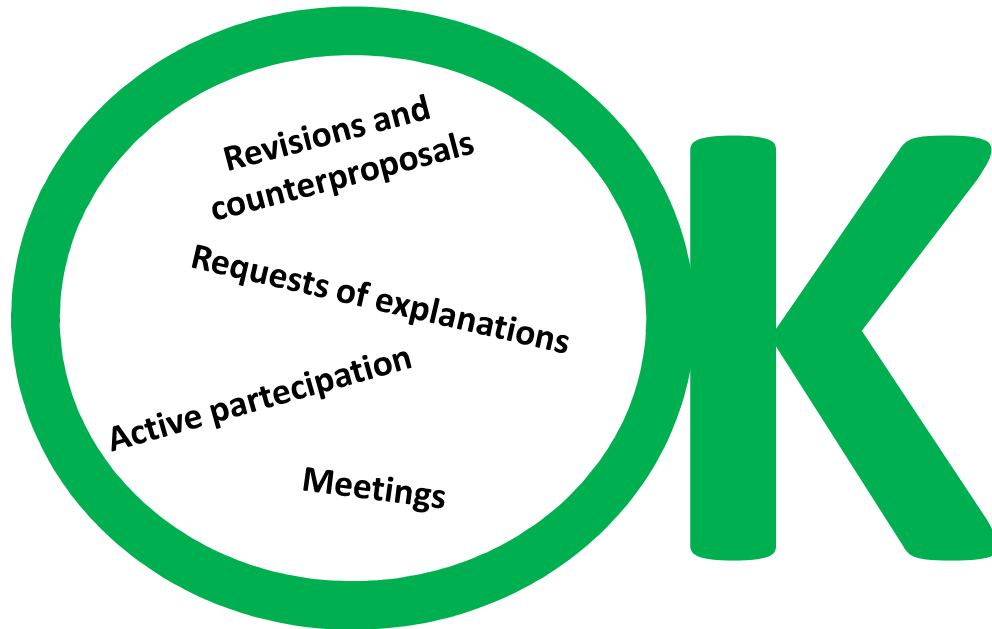
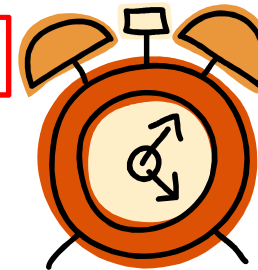lots of substances to be registered

dedicated staff

development of IT systems

trainings

"urban legends"

end use inquiries and e-SDS
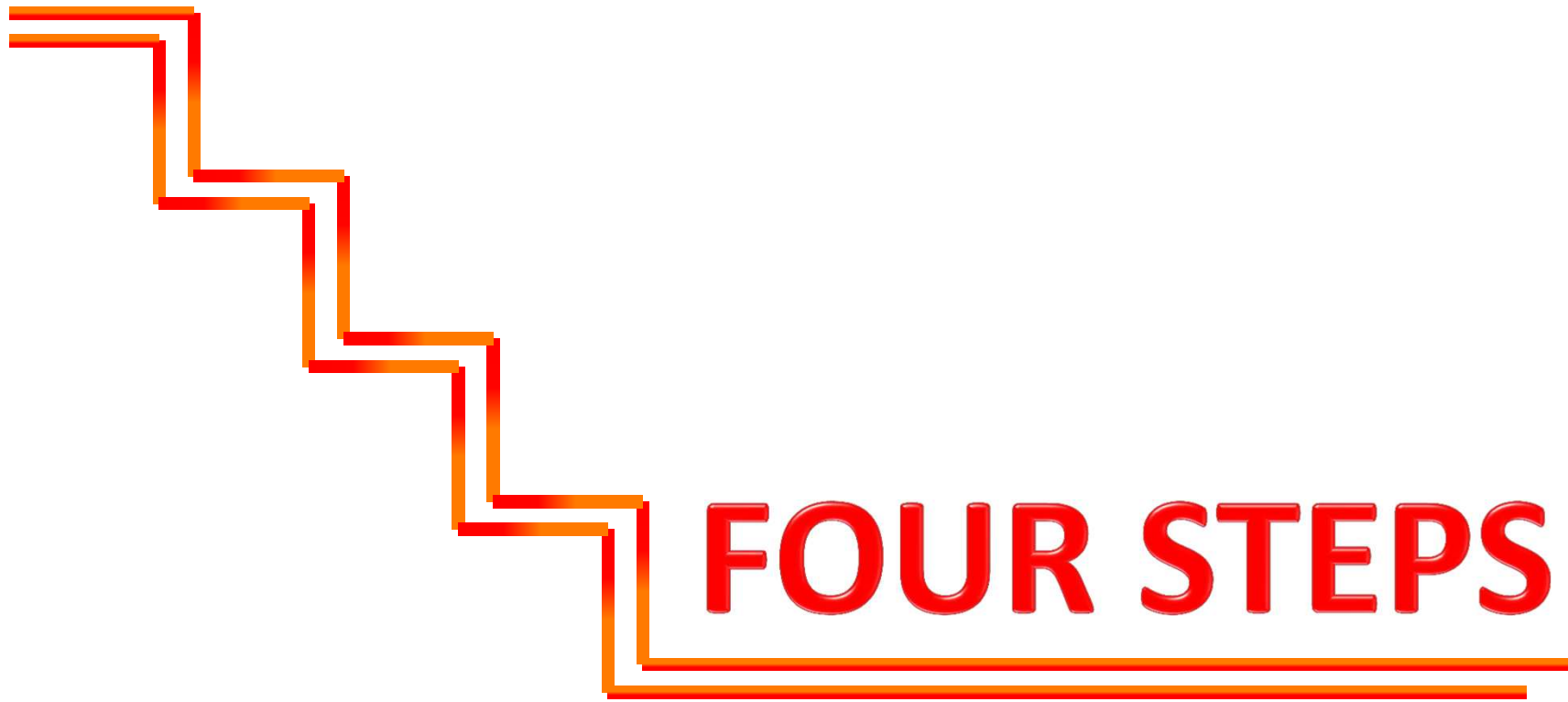
reminders

registration intent inquiries to suppliers

lack of REACH knowledge

At least one, fully dedicated person is required to manage and keep REACH system under control

FOUR STEPS

FOR 2018

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BE READY IN 2018

?

?

?

PREVENTIVE TRAINING OF PERSONNEL THAT IS NOT FULLY DEDICATED TO REACH

HIRING OF REACH-SKILLED PERSONNEL

CONSULTANTS

?

?

?

STEP 2: KNOW HOW, COMMUNICATION AND FORMATION

keeping in touch with suppliers

mutual helping in REACH matters

keeping in touch with trade associations

monitoring new sources

working with computer systems

participating to courses and events

proper disclosure between REACH manager and employer about costs to be incurred

involving and training colleagues who are not directly involved in REACH matters

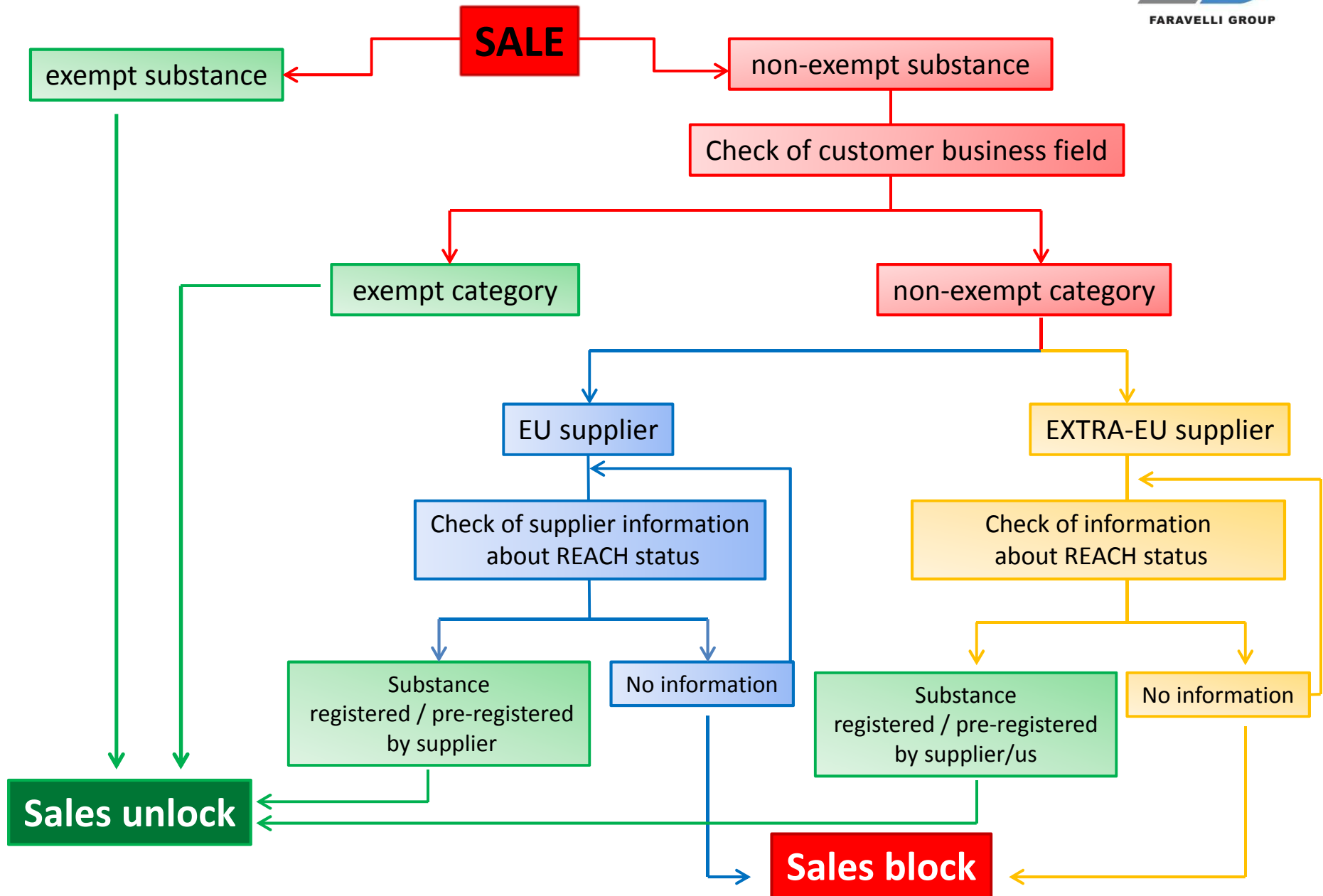disclosure with financial dept. about invoices to be paid

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STEP 3: CREATION OF AN INFORMATIC SYSTEM

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SALE

exempt substance

non-exempt substance

Check of customer business field

exempt category

non-exempt category

EU supplier

EXTRA-EU supplier

Check of supplier information about REACH status

Check of information about REACH status

Substance registered / pre-registered by supplier

No information

Substance registered / pre-registered by supplier/us

No information

Sales unlock

Sales block

STEP 4: DIALOGUE WITH ECHA FOR SIMPLIFICATION

Need for strict rules about costs sharing

e.g. a regulation for standardized LoA costs

Support for extensive use of QSAR e Read-Across reports

A new, non-mandatory **simplified** interface to be developed by ECHA for data entry, aimed at registration of substances between 1 and 10 t/y

via REACH IT?

Avoiding sudden "rule"-changing (e.g. Annex IV/V; GL on Intermediates…)

Trade associations are the perfect "collectors" of proposals and questions

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REGISTRATION EXPERIENCE

a fieldwork to learn how to characterize the main obstacles...

... and identify the most suitable strategies to overcome them

MANAGING KEYS

Efficient future-oriented organisation

Collaboration

Communication

Skills

Time

Financial resources