



# REACH COMPLIANCE

COMPLIANCE OF REACH RELATED ACTIVITIES FOR MANUFACTURER-EXPORTERS OF CHEMICALS TO EU WITH CHEMEXCIL AS A NODAL AGENCY FOR REACH PRE-REGISTRATION AND LATER ON FOR REGISTRATION WITH EUROPEAN CHEMICAL AGENCY (ECHA), HELSINKI (Registration Authority for import into EU).

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# I. SERVICES IN INDIA

## CHEMEXCIL:

1. CHEMEXCIL Team to liaison between Industry and ECHA in Helsinki through Only Representative (OR ) – Sustainability Support Services (SSS) and Helsinki Reach Centre, Finland.
2. Fill in the Pre-registration forms and submit them through OR / Third Party Representative.
3. Follow-up with O R and Reach Centrum (CEFIC) for formation of consortia/its exact position before pre-registration i.e. 1st December 2008 & after pre-registration when ECHA will announce SIEF i.e. 1.1.2009.

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4. Follow-up with OR / CEFIC (SIEF FORMATION) and Jai Research Foundation for identifying the data gaps and give the following conclusions:

- Advise the members on steps to be carried out based on SIEF Reports
- Cost thereof and cost of final Registration
- Assist Jai Research in upgradation if any in carrying out tests
- Finally help manufacturers to formulate his export strategy based on the profitability vis-à-vis cost of registration and advise him on the registration.
- Re-imbursement of 50% of the registration charges under MAI with the value cap of Rs.5 lacs per product and 5 products per year.



# INDIAN SERVICE PROVIDERS

## 1. REACH Support

- Studies and Research related to REACH
- Maintenance of Portal in co-ordination with Helsinki Research Centre, Finland.
- Advise to Chemexcil Team on IUCLID5 / Tech. matters
- Techno/Commercial guidance on re-validation of all data to be sent for Pre-registration/Registration.

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**2. IT Expert – Shri Shreyas Shah  
– who will look after day to day  
IT Functions.**

**3. OECD Compliant Lab viz. Jai  
Research Foundation for data  
generation,**

- Analysis,
- Toxicology testing,
- Eco-toxicology testing.
- Advise to manufacturers of data gaps based on SIEF results and as advised by OR / Reach Centrum recommendations

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## II. SERVICES ABROAD :

**Compliance with REACH of Indian companies require an European Legal Entity as**

(a) Only Representative

(b) Third Party Representative, where identity is camouflaged and C B I (Confidential Business Information) is flagged out.

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# FOREIGN SERVICE PROVIDERS

## 1. OR or Third Party Representative

- Sustainability Support Services (Europe) AB (SSS) which is the EU based legal entity (based in Sweden), has been appointed for the purpose of 'Only Representative services and / or Third Party Representative', where identity is camouflaged and C B I (Commercial Business Information) is flagged out. They will be responsible for coordinating with REACH Centrum (CEFIC) along with Tec. Expert from India for advising on data gaps and SIEF formation.
- After formation of SIEF, OR/Tec. Expert he will inform to Jai Research Foundation for carrying out requisite tests.
- Jai Research Foundation will follow all norms and procedures as prescribed with REACH for respective data generation and analytical activity.

# PRESENCE IN EUROPE (HELSINKI) AND CHANNELS OF COMMUNICATION



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## 2. Helsinki Reach Center

HRC aims to support the non-EU industry associations representing their members (especially the SMEs) to fulfill the REACH requirements, by bringing them together with HRC pool of REACH specialists. Furthermore, HRC aims to enhance creation of REACH services in the Helsinki capital region.

## 4. Membership of the Helsinki Reach Center

Will provide an excellent access to ECHA, and will be a platform where other non-EU bodies can get organized and could raise various concerns and issues with ECHA or any such agency





# THEIR MEMBERS

**HRC has two types of members:**

1. Non-EU industry associations
2. REACH Specialist Group
  - a) Industry Experts
  - b) Service Providers

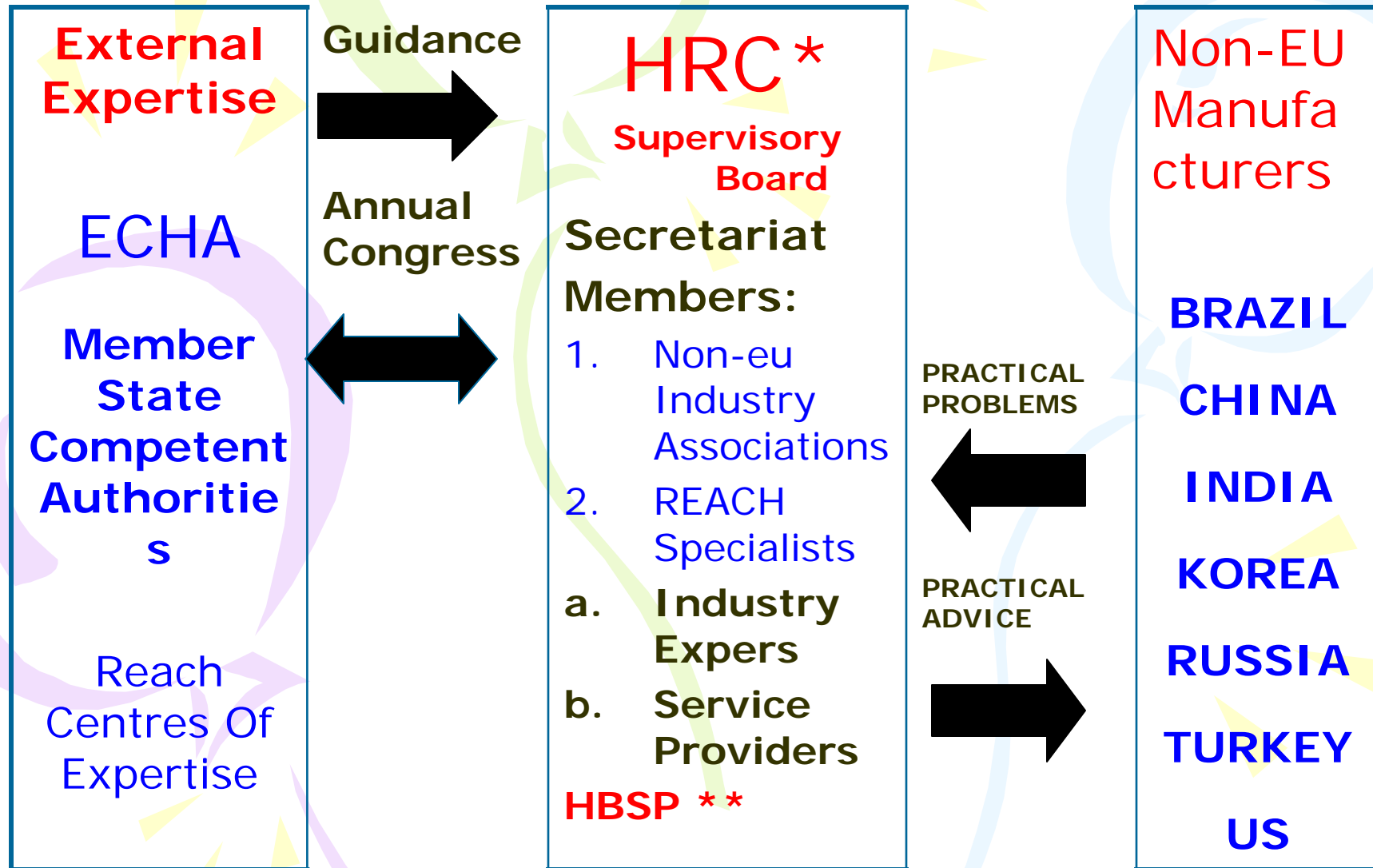
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# 1) Non-EU industry associations

- Non-EU industry associations act on behalf of their member companies
- Private companies are not accepted for practical reasons
- Non-EU industry associations can either
  - set up a subsidiary in Helsinki
  - benefit from the HRC services as an overseas member

# THEY HELP YOU TO UNLOCK THE DOOR TO COMPLIANCE



\* HELSINKI REACH CENTRE

\*\* Helsinki Business and Science Park Ltd.



## 5. Membership with REACH Centrum

- (CEFIC formation of REACH Consortia – Participation and Management before pre-registration & after pre-registration and advise on data gaps. This Membership will provide all the services related to formation of consortia before 31-12-2008 and after 1-1-2009 (when ECHA will actually announce SIEF Membership (after formation of SIEF) i.e. 1.1.2009

## 6. Membership with Reachway and IT software developed for communication between Indian manufacturer-exporter – European Importer – OR Third Party Representative with down stream Supply Chain Management for Communication and Risk Management –

- This would enable us to communicate with actual end users and thereby helping us in the registration process.

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# Introduction Reach Centrum

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- Cefic, the European Chemical Industry Council, has setup ReachCentrum to support Industry (EU & non-EU; Cefic Members & non Members) to make REACH work

- As such, the focus of their Services is on:

- **Transfer of practical REACH Implementation information, via:**

- General & In-depth Training and Workshops
- Consultancy and Workshops

- **Consortium Management Services to prepare, form and manage Consortia up to successful Registrations under REACH**

- [www.reachcentrum.eu](http://www.reachcentrum.eu)



# "Take away message"

- REACH is a fact and has a business impact on chemical industry (EU & nonEU) and its supply chain(s)!
- Individual Companies are recommended prepare & submit a good and business driven pre-registration file and take the internal decision on the follow-up strategy per Substance, to be:
  - A 'Passive' SIEF Member, reactively anticipating to SIEF communications, securing that access to the relevant data can be bought at the correct time;
  - An 'Active' SIEF Member, identifying & joining the relevant REACH Consortium to actively contributing to the SIEF and Joint Submission
- Industry is recommended to support smart allocation of the Joint Registration work to Lead Registrants / Lead Consortia and to interact efficiently
  - Post your all queries on CHEMEXCIL'S interactive web portal.
  - [www.chemexcil-reachhelp.com](http://www.chemexcil-reachhelp.com)
- Let's co-operate to make REACH work!

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## COMPANIES THAT HAVE SUCCESSFULLY PRE – REGISTERED

- PARAMOUNT MINERALS AND CHEMICALS LTD.
- WESTMAN CHEMICALS LTD.
- SAPPHIRE PIGMENTS LTD.
  
- CYANIDES AND CHEMICALS COMPANY
- DUJODWALA PRODUCTS LTD.
- INDIAN OXALATE LTD.
- KARNAVATI RASAYAN LTD.
  
- MULTI ORGANICS LTD.
- RONSON PIGMENTS LTD.
- BHABANI PIGMENTS.

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