

Cooperate to Succeed

Saudi Arabia's SABIC has a big job on its hands to ready itself for this important legislation. It says cooperation across the industry will help everyone

Guest columnist

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WHEN IT comes to Europe's Registration, Evaluation and Authorisation of Chemicals (Reach) directive, it is important for people in the industry to look beyond the initial challenges it presents, and focus on the broader opportunities created by this pan-European legislation.

This is what we at SABIC have been doing. In recent years our business has grown, coinciding with the birth of one of the most audacious and far-reaching pieces of legislation to affect the industry.

We believe that the EU chemical industry only stands to benefit from a single regulatory system for new and existing chemicals, and have openly embraced the changes outlined by the EU. Reach will not only impact existing chemicals, but will also encourage our industry to innovate, either by replacing potentially harmful substances with suitable alternatives, or by dramatically reducing the risk posed by the use of these chemicals.

Because Reach mandates that all chemical substances in the EU be comprehensively documented, knowledge and expertise regarding these substances will increase, benefiting the industry as a whole. And since



the legislation also covers chemicals that are imported into the EU, Reach will also have a positive global impact.

SHARING VITAL TO REACH THE TOP

To help lessen the burden of animal testing, the Reach regulation mandates that all producers and importers of a chemical substance should work together by sharing toxicology data and jointly submitting dossiers. Beyond its humane spirit, this requirement also offers a clear financial benefit to producers.

SABIC has already joined preconsortia groups of producers established by the European Chemical Industry Council (Cefic) through its sector groups and will be openly sharing Reach-related knowledge and best practices with others in the industry. But the sharing does not need to stop there.

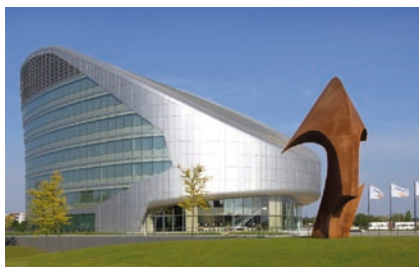
Reach-related preparations have provided those in the industry with the perfect opportunity to strengthen contacts along the value chain (from suppliers to customers). SABIC has also been working closely with trade associations, nongovernmental organizations, policy makers and regulatory bodies, sharing Reach-related information where possible.

However, our commitment to sharing goes beyond the minimum requirements set by the Reach legislation. Reach has ushered in a new era of cooperation and it is important that the whole industry comes together to share best practices and relevant knowledge going forward, if Reach is to succeed.

At SABIC, we are using conferences and industry networks to discuss and compare relevant work processes with our coproducers and will be sharing information on the progress of the registration process of SABIC substances with customers and other stakeholders alike. In response to the increasing number of Reach questionnaires from customers, we have already created Reach declarations for all our products, available for download from the European products and services pages on our website.

LISTENING TO CUSTOMERS AND PARTNERS

It is not only the producers that have a role to play in making Reach a success. It is important that suppliers are fully on board with how the changes will affect them. We have made a concerted effort to connect with suppliers by identifying those who provide us with critical materials, without which we could not continue to do what we do.



SABIC Europe HQ, where Reach policy develops

When the time is right, we will engage with customers about how they use our products, in order to prepare for the eventual chemical safety assessments required by Reach. Before this can happen on a large scale, however, the relevant technical guidance – Reach Implementation Product (RIP) 3.2 – must be formally agreed to, but rather than passively waiting for this to happen, we are taking the proactive step of launching a pilot exercise based on the likely outcome.

The scope of Reach is so complex – and its impact so large – that cooperation is the surest way to produce the best results. By

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working together, industry and authorities will increase their knowledge and expertise regarding chemical substances, and contribute to a healthier future for our children and the planet.

PRAGMATIC APPROACH

We fully endorse the objectives of Reach. As a responsible manufacturer and importer of chemicals, we care for the safety and health of people and the environment, and compliance with Reach is merely a logical step forward. Yet we also see Reach as a serious business topic, and this has been reflected in our pragmatic approach to the new changes.

We have assembled a dedicated team overseen by a board-level steering committee to centrally guide the timely delivery of high-quality dossiers for all our products. Although independent from business and Safety, Health, and Environment functions, the Reach project team aims to cover both needs and is built around regulatory, communications and toxicology experts, who are in regular contact with a wider program team.

A product stewardship expert provides a bird's eye view on the Reach implementation process and makes sure that the learning generated by Reach is captured and permanently embedded within the company's culture.

GETTING READY FOR REGISTRATION

With the preregistration window fast approaching, we are in the process of assembling the necessary data in our IUCLID 5 database (the European Commission's software aid) to ensure that all products are preregistered ahead of the June 1 deadline.

As for all companies implementing Reach, this is an important phase in our preparation and it is essential that no products are overlooked in the process. At SABIC, we have also been looking to the future, taking into account those substances that are in development and that are likely to appear in products in the near future. These will also be included in the preregistration phase.

To help our team achieve registration on time, we recently signed a four-year strategic partnership with The Netherlands

Organization for Applied Scientific Research (TNO), a highly respected scientific research institute. TNO offers us additional resources in the crucial areas of risk assessment, chemical safety, and registration. With the people and processes thus in place, we are well on our way to meeting our Reach goals.

As with any new legislation, it is important that companies take the right approach to ensure that they are in the best position to implement the changes, minimize the impact on the business and to keep ahead of the competition. By working with a third party such as TNO, which has the expertise and knowledge to help shape the approach, companies can put themselves into the best possible position to react to the changes. ■



» Harrie Camps has been program manager for Reach at SABIC Europe since 2005. In 1988, he joined Dutch chemicals major DSM in the Netherlands, where he has held a variety of engineering and managerial jobs related to polymers.