

# REACH SERVICES



## The Registration, Evaluation and Authorisation of Chemicals regulation, REACH (1907/2006/EC), came into force on 1st June 2007 and assigns the responsibility for the safe use of chemicals to industry.

Under REACH, substances of both new and existing compounds which are produced or imported in quantities >1 tonne per year must be registered at the European Chemicals Agency (ECHA). Registration requires the submission of a Registration Dossier and the specific data requirements for these registrations will depend on tonnage volumes (1-10t, 10-100t, 100-1000t, >1000t).

For substances produced or imported in quantities >10t per year, a Chemical Safety Assessment (CSA) must be performed, which will be documented in a Chemical Safety Report (CSR) this will address possible risks to humans and the environment. Manufacturers, importers and, where applicable, downstream users must demonstrate that the intended use of their substances poses no risk to humans and the environment.

REACH also affects manufacturers and importers of articles. Once a substance is added to the Candidate List, REACH imposes immediate obligations on manufacturers and importers of articles to notify their customers if the substance is present above 0.1% by weight. If certain conditions are fulfilled importers and manufacturers of articles may also have to notify ECHA.

The deadline for registration of substances exceeding 100 t/annum is 1st June 2013 and for those exceeding 1 t/annum, 1st June 2018. We anticipate that many companies responsible for substance registration at these tonnage thresholds will not have the in-house registration capability and there will be many data poor substances whose characteristics will need to be read across to other substances. These aspects, combined with an industry wide pressure on resources, suggest that early preparation and registration will be key to compliance.

Our European REACH team has a wealth of experience of working with international chemical companies and national chemical industry associations. The interdisciplinary team includes toxicologists, eco-toxicologists, industrial hygienists and experts in human health

and environmental risk assessment. We have registration specialists who have had experience in the successful submission of 2010 dossiers, notification of new substances regulations (NONS), handling complex projects and managing Substance Information Exchange Forum (SIEFs) and Consortia.

### Where can we help?

REACH consultancy:

- We advise companies on their REACH obligations and ensure they are REACH compliant. We offer confidential industrial advocacy support, evaluation and management of product liability issues, and technical due diligence.

REACH registration:

We provide confidential REACH registration and related services, including:

- Provision of testing and registration strategies including data gap analysis, read across, exposure based waiving, testing proposals (Annex IX and X) and Klimisch evaluation.
- Preparation of IUCLID 5 dossiers including Robust Study Summaries (RSS) and submission to ECHA.
- Providing a comprehensive consortium and SIEF management service by using REACH specific software.
- Preparation of Chemical Safety Report including DNEL/PNEC calculations, PBT vPvB assessments, human and environmental risk assessments.
- Supply chain communication including checking and updating of safety data sheets and preparation of the extended safety data sheet (eSDs).
- Classification and labelling of chemicals (DSD/DPD).
- Consulting, compliance and assessment services for Substances of Very High Concern (SVHC).

Only Representative Services:

We act as Only Representative (OR) and Third Party Representatives for non EU based suppliers. Through our confidential service we assure compliance and remove the administrative burden of REACH. In doing so we may also help to reduce supply chain management costs.



## Our track record

We have an excellent track record of working with companies of all sizes on REACH projects and have specific expertise in managing projects with issues resulting from complex supply chains. Profile below are just some of the projects our team has delivered;

- For an international industrial machinery manufacturer, WSP is providing support to ensure compliance with the REACH regulation for articles produced. Our work has included developing strategies and action plans, participating in the internal REACH group, preparing and leading workshops as well as contributing to the formation of routines and supplier agreements. WSP is also providing guidance and advice during the inventory of substances in articles as well as evaluating existing technical systems and providing suggestions for potential improvements.
- WSP assisted a Swedish pigments manufacturer to pre-register a substance used in the manufacture of a particular paint. Subsequently WSP developed and submitted full registration dossier for the substance. Work included classification of the pigment according to DSD and CLP, interactions with SIEF groups for read-across data, use of IUCLID-5 in dossier preparation and preparation of chemical safety reports and safety data sheets.
- In addition, we are currently acting as Only Representative for 18 clients who supply chemical substances into Europe - this covers more than 100 substances. We have successfully updated NONS dossiers to full REACH registration dossiers; and we are currently providing in-house REACH support to a film manufacturer and to a multinational engineering firm.
- We also successfully compiled a full REACH dossier for a company to safely 'productify' a >1000 tonnes/year waste component, saving them several hundred-thousand euros in waste disposal costs. The "productifying process" of waste components such as STP Sludge and bio ashes etc. is a strong trend within European companies in the energy sector and waste disposal industry, which can rapidly transform waste costs into financial assets.

## About us

WSP Group PLC (WSP) is a leading international design, engineering and environmental consultancy with more than 9000 specialists working across 100 countries. Over the last ten years, WSP's environmental service has established itself as one of the most innovative environmental consultancies delivering health, safety, environmental and regulatory support services.

### Call us

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