



How Austrian Industry is reaching out for REACH



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How (far) Industry is reaching out for REACH ?

- Production or trade
- Producers or downstream users
- Chemical industry or other producers
- Chemicals or articles
- Company size

What happened so far?

- Support by authorities
- Support by industry associations
- Companies preparing themselves

What is/was needed when

- Preparations in advance (before EoF)
- Implementation period
- Pre-registration
- Further preparations

- Awareness raising (EC/ECHA, MS, IND)
- Information (public, help desk)
- Training (private sector)
- Main issues:
 - Scope
 - Substance ID
 - Articles (borderline cases)

Austria: Administration and Industry

Ministry for Environment:

Competent Authority

Umweltbundesamt (Federal Environment Agency): Acts on behalf of CA as a technical advisory body



Chemicals Inspectorates in 9 Federal States: Enforcement

Austrian chemical industry consists mainly on SMEs, most of them DUs; all are represented by

Austrian Federal Economic Chamber (obligatory), some (mainly producers) are also organised in **Federation of Chemical Industry Austria**

Industry Activities in Austria

- Awareness raising
 - 2 series of “Roadshows” through all Austrian provinces, information leaflets, seminars)
- Guidance documents and information folders
- Translation of RIPs and ECHA guidelines
 - substance ID
 - downstream user
 - substances in articles
 - pre-registration

Industry Activities (ctd.)

- Seminars
- Training courses
- Education program “REACH Multipliers”
 - Mid-term course
 - Together with German industry associations
 - Aim: Providing of REACH-knowledge for company REACH officers and consultants

- Awareness raising
 - Information to general public
 - Direct mailing to companies
- **HELPDESK**
- Seminars and workshops
 - Administration organised and participation of experts in industry activities
- Advice by enforcement authorities (inspectors)

View from outside!!!

- Substance inventory
- Role clarification
 - esp. in case of complicate import chains
- Clarification of further availability
- Prepare to register ???

How to proceed from now?

Pre-registration finished =>

- Join / establish SIEFs
- Data inventory
- Registration strategy
- Collect data and prepare dossier
 - needed expertise
 - external capacities

Industry: Next steps

- Which information is already available on substance properties (Annexes VI – XI) ?
- Which information is already available on use and exposure?
- Where are the gaps?
- How to close the gaps (cost, efforts)?

But:

- **Do not start comprehensive testing!**

Sharing of Costs

Owner of studies to provide proof of cost(s)

Share of cost for shared studies

- fair, transparent, non discriminatory
- in case of no agreement: equal sharing

Equal share for studies to be performed



Actors in the value chain

EU chemical manufacturing companies

- Awareness is depending on branches, preparedness is varying depending on the level of being organized in industry associations which provide either more general advice and/or tailor-made services to individual member companies or a group of companies

Downstream chemical using companies

- Became aware of REACH quite late, lots of questions about being concerned, not clear if many will take the option to register their use directly themselves

Non-EU chemical manufacturers

- With respect to their customers (who must comply with EU legislation) companies need detailed advice and guidance on what they need to cooperate with EU consortia

Implementation in Austria

Implementation of REACH in Austria:

- Adaptation of national provisions:
 - Chemicals act (“Chemikaliengesetz”)
 - Further national regulations
- Defining competences under REACH
 - Communication with Agency
 - Allocation of tasks
- How to enforce REACH?
 - Inspectorates

Austrian REACH Panel (Österreichische REACH-Plattform)

- Ministries
- Umweltbundesamt
- Enforcement authorities
- Trade Association
- Social partners (Unions) and other stakeholders
- NGOs



Preparation / Training (IND+ADMIN)

- **Knowledge-based training:**
 - Knowledge of REACH & of current chemical legislation
 - Knowledge of the guidance for REACH
 - Basic knowledge of REACH-related legislation
 - Knowledge of the GHS
 - National Helpdesk processes and systems (e.g. IT systems)
 - Use of the official FAQ document and the GDs
 - Knowledge of national enforcement procedures on REACH

Preparation / Training (IND+ADMIN)

- **Knowledge-based training (ctd.):**
 - A general knowledge of the various stakeholders involved + their respective tasks and responsibilities
 - Structure and responsibilities of the national helpdesk and stakeholder structures
 - Knowledge on how to best reach, inform and advise SMEs and awareness on the possible misinterpretations caused by different jargon
 - Knowledge on risk assessment of chemicals in general
 - Knowledge on the use of IUCLID 5

Preparation / Training (IND+ADMIN)

- **skill-based competencies:**
 - Customer responsive attitude: comfortable under customer pressure
 - Listening skills
 - Ability to analyse and reframe enquiries to clarify questions
 - Good organisational skills for the administration of enquiries
 - Oral and written communication skills to aid clear responses

2009 - 2010

registration hot phase