

## REACH – Looking back into the future

The goals of the REACH regulation (EC) No 1907/2006 are to improve the protection of people and the environment, to increase transparency with regard to data and risks within the supply chain and to optimize test methods using fewer laboratory animals. The path to fulfilling these goals leads to a general obligation to register all substances produced or introduced in the EU with the European Chemical Agency (ECHA). The registered substances are subsequently evaluated and the use of certain hazardous substances is further regulated. This is done

- › based on the CLP Regulation (EC) No 1272/2008 (GHS),
- › according to an authorization procedure outlined in REACH Annex XIV for substances of very high concern (SVHC)
- › and a restriction procedure pursuant to REACH Annex XVII.

### What happened up to now

The REACH pre-registration process was implemented at Printcolor in 2008 through our office in Bochum, in compliance with the law, and documented in line with the so-called "Submission Reports". We entered all of this information into an Excel workbook. It contains the approx. 2,000 raw materials that we use for the production of our products. The pre-registration process was the first and only step where we could or had to directly play an active role.

A total of 37,768 substances were pre-registered at the ECHA. In the meantime, the permanent registration by the producers of these substances had begun. This is done according to the degree of danger presented by a substance and/or the quantity used, staggered according to three deadlines:

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|---|------------------|
| › 1000 tonnes per annum plus CMR <sup>1</sup> and R50/53 substances | until 30/11/2010 |
| › 100 - 1000 tonnes per annum                                       | until 31/05/2013 |
| › 1 - 100 tonnes per annum  | until 31/05/2018 |

According to a report from the specialist magazine *Chemie-Plus* in October 2013, 9030 substances had been submitted for registration until this point in time. Considering the 37,768 pre-registrations that is a rather modest number. REACH stipulates that manufacturers of the same substances combine for the purpose of a joint registration. It is hoped that many more registration documents will be submitted in the third registration phase (until 31 May 2018). It can however be concluded that numerous substances will no longer be available after expiration of the deadlines, since new, additional data must be provided for many products which involves enormous costs. Thus the saying goes: **No data – no market!**

### What could happen

The REACH objectives have already shown effect on a number of occasions: One current example is the modified classification of N-Vinylcaprolactam (NVC). Pursuant to the most recent findings, and depending on the composition proportion, this raw material must be labelled with the "skull symbol" after a short transition period. Today, many printing works deliberately decide against the use of such printing ink. For us that means: Less harmful alternatives must be found in the laboratory with equivalent properties.

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<sup>1</sup> Substances that are carcinogenic, mutagenic or toxic to reproduction.

SVHC substances (Substances of Very High Concern) are another criteria: To date, 151 substances are listed as SVHC and are consequently classified by the authorities to be of very high concern. Over the next few years, however, it is expected that up to 450 additional substances will be added to this list. With the appropriate approval, these "substances of very high concern" could still be used in the future, which will be out of the question for Printcolor.

## What we are doing

As a manufacturer of printing inks we are users and processors of these substances. We are - just like our customers - so-called *Downstream Users*. In this role we are able to exert our influence indirectly on registration. Through pre-registration and contact with our suppliers, we have expressed our interest in certain products. By means of a permanent follow-up procedure, our REACH team monitors current registrations and CLP notifications as well as the SVHC list.

The team is made up of Dagmar Helsby, Buyer; Thomas Ellinger, Development Chemist; Martin Otto, Material Safety Data Sheet Specialist; and Richard Gähwiler, HSE Officer. It monitors the activities at the ECHA, is in regular contact with suppliers and manufacturers and stays informed about the EU legislation. Taking all of these specifications into account, Printcolor can react early to raw material changes or cancellations of raw materials to ensure continuity of their own product range.

The classification of our products in accordance with GHS (CLP Regulation (EC) No 1272/2008) and consequently the adaptation of labels and safety data sheets (in accordance with REACH Article 31) are also processed by the REACH team. It is based upon Regulation (EU) No 453/2010 which specifies the information requirements on the MSDS. Until 1 June 2015, all products will be labelled according to the new regulation and customers will be provided with detailed information on these improvements. We are convinced that our product range will continue to be available in its well-known form and quality.

