



## Flash Feedback

Innovation and REACH  
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Dr. Peter Freunscht – Unilever Regulatory Affairs



## SIEFS and consortia – our experience

### Unilever's obligations

- manufacturer of substances (>1000 tpa)
- importer of substances (as substance and in mixtures)
- downstream user (formulator >1000 raw materials)

### Unilever's role in the 2010 registrations

- member of ca. 10 consortia
- has interacted with ca. 25 SIEFs as registrant
- downstream user:
  - individual supply chain communication
  - involved in industry activities (AISE, DUCC, cefic)



## Product development and REACh



- REACh awareness is required in different functions:  
Buying, Logistics, R&D
- all plans involving new materials, new uses or new supply chain set-ups must be analysed for REACh
- financial impact is difficult to predict: from € 2,000 for an LoA to € 1 million for a stand-alone registration
- all regular safety assessment to be aligned with REACh data requirements – both hazard and exposure