

Impact of REACH on innovation

6 December 2011, Brussels

Ulla Telcs

The European Engineering Industries Association



34 Member associations, 22 countries
 130,000 companies, €1,510 billion of annual output, 9.7 million people employed

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Orgalime industries?

- European Engineering Industries
- Largest manufacturing sector in Europe
 - 130,000 companies
 - €1,510 billion of annual output
 - 9.7 million people employed
- Major EU downstream user
- Major producers and importers of final articles
- Supplier of equipment to all other sectors of the economy and to consumers

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In the supply chain...

What do our clients expect from us?

- Innovative products with high degree of reliability, safety & fit for purpose
- Compliance of components with EU legislation

What do we expect from our suppliers?

- Availability of broad substance portfolio for innovation
- Predictability, reliability & certainty on substance availability (registration)

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Objectives & Tools

- Objectives:
 - Better information on substances
 - Substitution of hazardous substances

- Tools:
 - Registration & evaluation
 - Candidate list, Authorisation & Restriction
 - Communication & information

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Effectiveness & efficiency

Parameters	Impacts
Effectiveness	<p>Registration: Only the first phase took place but uncertainties for DUs: risk of substances withdrawn, concentration of distributors.</p> <p>Communication: few information on the state of play of substances registration & uses; SDS: not yet fully in place</p> <p>Authorisation: not yet fully running. However, there is a risk of delocalisation due to costs and lack of substitute for specific uses</p>
Efficiency	<p>Communication: information gathering from suppliers is time consuming and complex</p> <p>Candidate list: updated too often update without sufficient warning,</p>

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Utility & consistency

Parameters	Impacts
Utility	Candidate list: risks of blacklisting, uncertainties due to the lack of long term planning, immediate application of Art 33. requirements
Consistency	Authorisation: risk of overlaps with sectoral legislation and inconsistency Information & communication: non harmonised enforcement of key requirements

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Does REACH promote innovation?

- Positive impacts on innovation are unclear
- Limited substances portfolio & legislative overlaps do not support innovation
- Implementation needs to be further improved
 - a harmonised implementation & enforcement of REACH
 - Strengthening both upstream and downstream information flow
 - Consistency of EU chemical management legislation

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Thank you
for your attention!

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