

REACH- A Distributor's Perspective

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Agenda

- Introduction
- Who are Cornelius
- Cornelius's compliance strategy
- Issues
- Conclusion

Introduction

- This presentation aims to outline who Cornelius are
- It will go further and attempt to outline what Cornelius are doing to ensure REACH compliance
- Finally it will indicate some of the major issues that have become apparent during this process

Who are Cornelius?

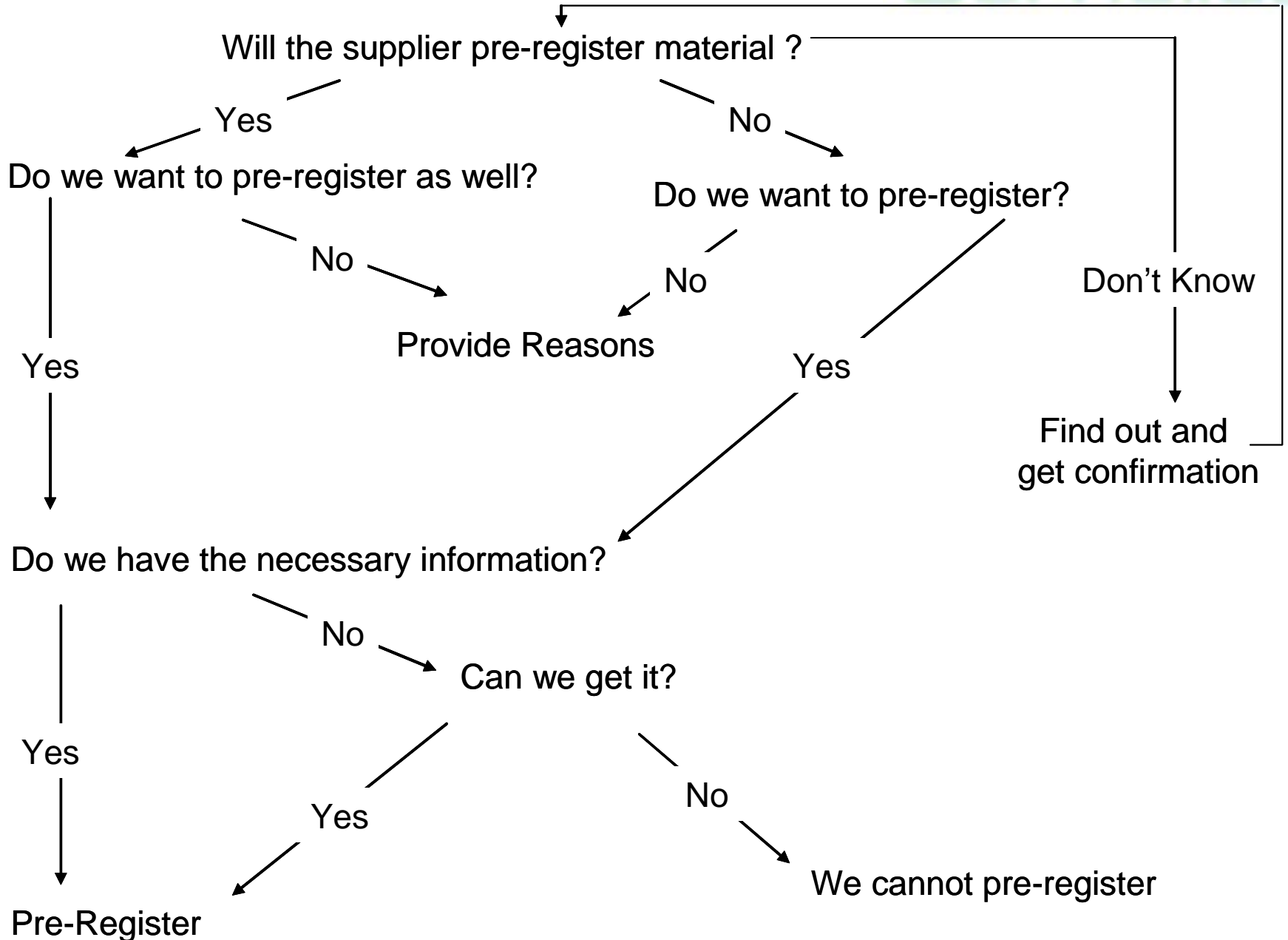
- Cornelius are a Chemical Distributor
- We represent over 50 Principals in the UK and mainland Europe
- Our Principals are mainly European, Chinese or from the USA
- Cornelius sell into the Cosmetics, Health & Food, Surface Coatings and Advanced Materials industries

Cornelius's Compliance Strategy

- Set up REACH task force-me!
- Spread the word! (Internal and External)- explain impact on sales
- Ask Principals/ Suppliers
- Talk to Principals/ Suppliers
- Visit Principals/ Suppliers (USA/ China)
- Explain the issues in plain English!

Cornelius's Compliance Strategy

- Assign commercial “champions” within the business to each Principal/ supplier
- Set up “masterfiles” for all Principals/ Suppliers and their products
- Decide if any materials require pre-registration/ registration by Cornelius- using “Flow Diagram”
- Prepare IT/ Web system to indicate REACH status and provide Policy Statement
- Invest in Refac (Reach Facilitation Service)



Issues

- Non- EU companies thinking this is nothing to do with them
- Lack of clarity (plain English) in legislation- (e.g. refined/unrefined oils)
- Possible changes to Annex IV and V criteria- need to keep updated by HSE
- Other countries may have a more relaxed/inflexible approach to REACH making UK less/more competitive

Issues

- Even experts don't really know how the SIEF (Substance Information Exchange Forums) will run- too many unknowns
- Costs are extremely high
- Opportunities for anticompetitive practices- will the ECA have teeth?

Conclusion

- REACH is here to stay
- The next 6 months will have a major impact on how you operate over the next 11+ yrs
- You can use REACH in a positive way
- The best prepared businesses are the ones that will survive REACH!

This is not the answer!



Thank you for you attention