

REACH *Case story*

Downstream user of chemicals sees REACH as an opportunity to further build consumer confidence



Genevieve Hilgers, P&G REACH Team Leader

P&G, one of the world's leading consumer goods companies considers a solid multi-disciplinary team, new IT-Tools and very close collaboration with suppliers, key plans for REACH compliance. The company will use REACH as an opportunity to further build consumer confidence in chemicals.

With more than 30 manufacturing sites in the EU producing more than 200 consumer branded products, P&G will play a key role under REACH as a downstream user. As an importer, P&G will also have to register substances brought into the EU.

“We have been deeply involved in the development of REACH since its early days, and more than 15 P&G scientists have actively contributed to the preparation of guidelines to support the practical implementation of REACH.” says Genevieve Hilgers, the P&G REACH Team leader.

Since 2005, a solid multifunctional REACH “Compliance Team” has been set-up within P&G, involving many

departments across business units. These include Regulatory, Safety, Occupational Hygiene, Purchasing, Legal, IT, QA and R&D departments.

P&G has created an inventory of its substances and is currently developing REACH compliance strategies to protect its business. On substances to be pre-registered and registered, P&G is already preparing dossiers and working with industry consortia.

Ms Hilgers said “A considerable amount of work has already been done in the company on most of these substances. Indeed, globally, more than 400 toxicologists work full-time in P&G to ensure safety compliance for our products and operations. The challenge for us now is to put all the data in the “REACH format”.

Another challenge faced by an innovative company like P&G is that its REACH requirement is a moving target as it changes its composition of products, chemical use, tonnage, plants etc., on a regular basis. However several IT-tools have been developed within the company to update its inventory of substances impacted by REACH on an ongoing basis, and also to automate the process of data gathering and dossier preparation as much as possible.

In parallel, P&G is also working in close collaboration with its suppliers to raise REACH awareness and to ensure that they will pre-register and register substances supplied to P&G. This is vital to guarantee supply continuity. P&G has carried out mass mailings to all its suppliers and will set-up face-to-face meetings with key partners.

Communication with suppliers is essential to share P&G’s uses of chemicals. P&G has pro-actively prepared exposure scenarios with industry associations like AISE* and Colipa**. Promoting a standardized approach is critical to help suppliers benefit from a harmonized set of conditions and to lessen workload of downstream users like P&G. Also, scientists in P&G continue to be actively working with ECETOC*** to develop key technical guidance and tools for risk assessment of chemicals that will be required for REACH implementation.

“We believe that REACH can be a significant opportunity to build consumer confidence in chemicals and drive their safe and effective use, if implemented well and in a workable manner” said Genevieve Hilgers. Since 2002, P&G has had in place a website, http://www.pg.com/company/our_commitment/product_safety.jhtml which provides the science and safety behind its products. In future P&G is ready to work with AISE and ECHA and industry associations to prepare guidelines on effective communication of the risks and safe use of products to consumers.

* AISE: The European Soap, Detergents and Maintenance Products Industry Association

** Colipa: The European Cosmetic Toiletry and Perfumery Association

***ECETOC: European Centre for Ecotoxicology and Toxicology of Chemicals