

REACH *Case story*

Large chemical company will pre-register about 800 substances



Hans-Norbert Adams, Dow REACH Programme Manager

Dow Europe is a major multinational company with a strong European base that has been involved in REACH from a very early stage. One-third of its manufacturing takes place on the continent and 37% of its annual sales of \$54 billion are generated in Europe. It will have to pre-register up to 800

substances in about 10,000 REACH relevant products.

Dow participated in the European Commission's consultation process in 2004 and was on the CEFIC steering committee. As a result, the company was aware from the very start of what the legislation might look like and the need for proper implementation. It also took part in the simulated registration of glycol ethers.

In late 2006, Dow set up an internal implementation team for the whole group – the REACH Programme Management Office – currently under the leadership of Hans-Norbert Adams. Its role is to coordinate the many different projects established to ensure compliance.

In this context, the company faced a major IT challenge. It had to integrate the future REACH requirements into its existing systems of data, internal and financial flows. This meant establishing and adjusting work processes. In all, over 20 new work processes will need to be introduced, covering such issues as pre-registration, customer communication and tracking volumes of substances by legal entity. Work began on these in June 2007.

Internally, the company organised training sessions and workshops to ensure staff understand the new work processes and their additional responsibilities under the REACH legislation. The training included employees outside the EU who will need to be aware of the rules which will apply to items sourced by suppliers in third countries. Dow has also created a REACH website for internal company use.

The company is contacting its many suppliers to determine whether they will pre-register their products and then ensuring this is confirmed. Within the EU this is relatively straightforward, but is far more complicated for purchased products entering Europe from non-EU Dow subsidiaries. Establishing the substances and volumes involved throughout the whole supply chain can be complicated by a range of barriers, including trade secrets.

Dow has introduced a two-stage process for communicating with its thousands of customers:

- In the first, which has now been completed, it informed them of its intention to pre-register and register. It has also established a unique data base, which could be a forerunner for others in the industry, providing information on Dow products. This can be accessed on www.reach.dow.com.
- The second phase, which will begin later this year, will provide data on the use of, and exposure to, chemical substances. Dow is waiting for guidance to be set by CEFIC to ensure that there is harmonisation throughout the industry.

“This is difficult since the situation varies from company to company,” explains Mr Adams. “It depends on the structure of the company and the data systems that have been installed. Can they speak to each other and be easily updated? The main factor that enables us to implement REACH is to have an organisation in place and the ability to call instantly within the company on a specialist. It is also important to start the preparations early. “

“Finally, another key ingredient for us is the fact that senior management has been heavily involved and has given strong support to the whole project from the outset. The REACH goals are integrated in our global 2015 sustainability targets. As a result, our target is to meet the REACH requirements before its own 2018 final deadline.”