



Skills and Experience required to deliver REACH

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Overview of presentation



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- Assuming some knowledge of REACH
 - What the UK CA can/cannot provide
 - UK CA view on skills and experience required over the range of activities required under REACH
 - Not necessarily comprehensive but provides a broad overview

Key Points



1. The type of skilled and experienced resource required will depend on your duties under REACH **and** what you choose to do.
2. How much you will need is dependent upon the answer to 1 above
3. There are a number of ways to resource – only you can determine the best option for your business
4. The UK CA cannot endorse any particular option

What the UK CA **can** do:



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- Provide advice on interpretation of text of REACH
 - Facilitation role – help duty holders understand that they have responsibilities and how to meet them
 - Work with stakeholders on communicating key messages
 - Part of the EU network of national helpdesks
 - Network with other UK ‘helpdesk’ providers

What the UK CA **cannot** do



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- Provide input to any assessments being conducted by industry
 - Give views/opinions on draft assessments
 - Respond to complaints about the operation of REACH at the European level (ECHA/European Commission)
 - Provide support on policy issues (Defra)

Key REACH activities



- Pre-registration
- Registration
- Evaluation
- Authorisation
- Restriction
- Classification and Labelling

Pre-registration



- Need to catalogue what substances you manufacture, import and/or use (and how you use them) including in articles
- Need to understand the identity of these (chemistry)
- Need to determine what's in scope and to what extent (knowledge of REACH)
- Need to understand implications (regulatory knowledge and business decisions)
- Need to prepare pre-registration documentation (simple but need e.g. CAS or EINECS numbers)

Registration



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- If you pre-registered then working in Substance Information Exchange Fora may require legal support, an independent third party, specialist scientific skills
 - Preparation of technical dossier – physico-chemical, toxicology, ecotoxicology, exposure & control (environment and human health) and (depending on tonnage and/or hazardous properties) possibly expertise in environmental and human health risk assessment for Chemical Safety Assessments and Chemical Safety Reports
 - May also require some IT expertise support (though IT systems are supposed to be easy to use)

Evaluation



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- Largely driven by European Chemicals Agency and Member States Competent Authorities
 - If you have a substance on the Community Rolling Action Plan then you may need to draw on expertise in toxicology and exposure and control (environmental and human health)

Authorisation



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- Once ECHA has produced a list (Annex XIV) of substances whose use is subject to authorisation industry will need to submit an application for authorisation to use it.
 - Authorisation may be granted either:
 - Demonstration of adequate control
 - Socio-economic argument to show benefits greater than risks and if no alternatives available

Authorisation



Adequate control

Exposure/control expertise (environment and human health)

Possible risk assessment expertise

Socio-economic route

Exposure/control expertise (env and hh)

Socio-economic expertise

For both

Expertise to consider alternative substances and/or technologies (chemistry, other disciplines?)

Restrictions



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- As for authorisation, largely led by ECHA/MS but if a substance of interest to your business then you may need a range of similar skills and experience required for authorisation in order to contribute to the consultative process

Other issues



Safety Data Sheets

If required then these need to be compiled by a competent person (Annex II)

Classification and labelling

Harmonised C&L and GHS – will require phys-chem and toxicology/ecotoxicology expertise but with knowledge and experience of applying to regulatory frameworks.

Summary



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- A wide range of expertise may be required for someone to meet their obligations under REACH:-
 - Chemistry, toxicology, ecotoxicology, exposure & control (environment and human health), legal, socio-economic
 - Not JUST technical knowledge but also experience of applying this to the regulatory chemical framework