

LIFE13 ENV/IT/000849

inREACH | protecting health and environment by streamlining REACH compliance check at European Economic Area import stage

project funded by Life+ 2007-2013 financial instrument

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FEDERCHIMICA
CONFINDUSTRIA





PROJECT LIFE 13 ENV/IT/00849 inREACH - protecting health and environment by streamlining REACH compliance check at European Economic Area import stage

project funded by Life+ 2007-2013 financial instrument of the European Commission

Duration of the project: 36 months (01/09/2014 to 31/08/2017)

Total budget: € 801.034,00 EC contribution: € 400.517,00

18 Actions **26** Deliverables **12** Milestones



Environmental Problem targeted

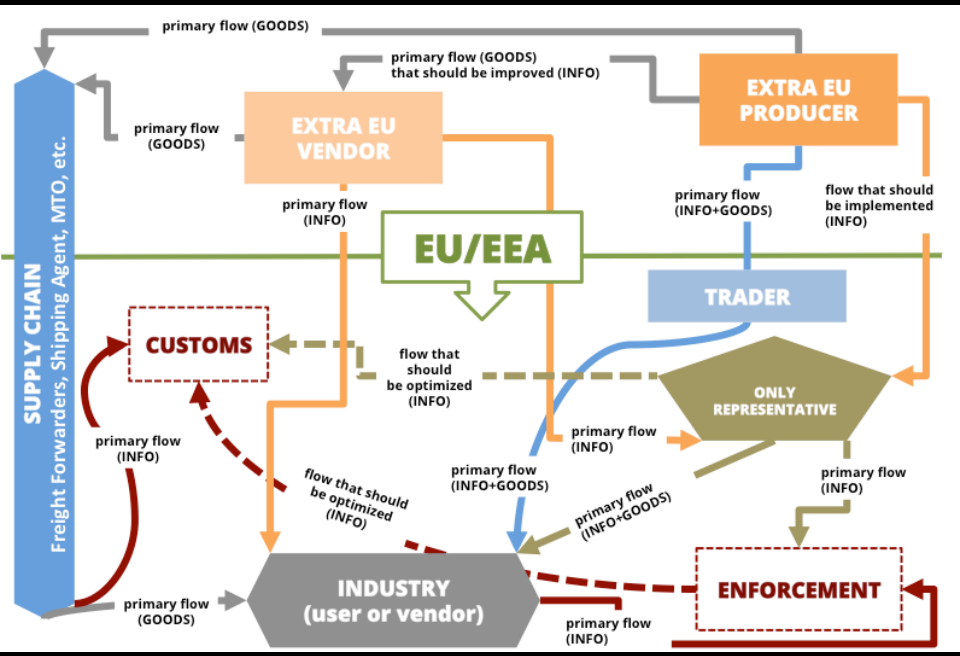
With reference to Article 1 of the Reach Regulation (*protection of human health and environment as well as the free movement of substances, on their own, in mixtures or in articles, while enhancing competitiveness and innovation*) Project Actions have as Global Objective the reduction of the Critical Issues related to access to European Economic Area (EEA) of Chemicals with incomplete or not compliant to REACH Regulation information in import operations.

Coordinating Beneficiary Tecnologie Innovative per il Controllo Ambientale e lo Sviluppo Sostenibile (Ticass) srl

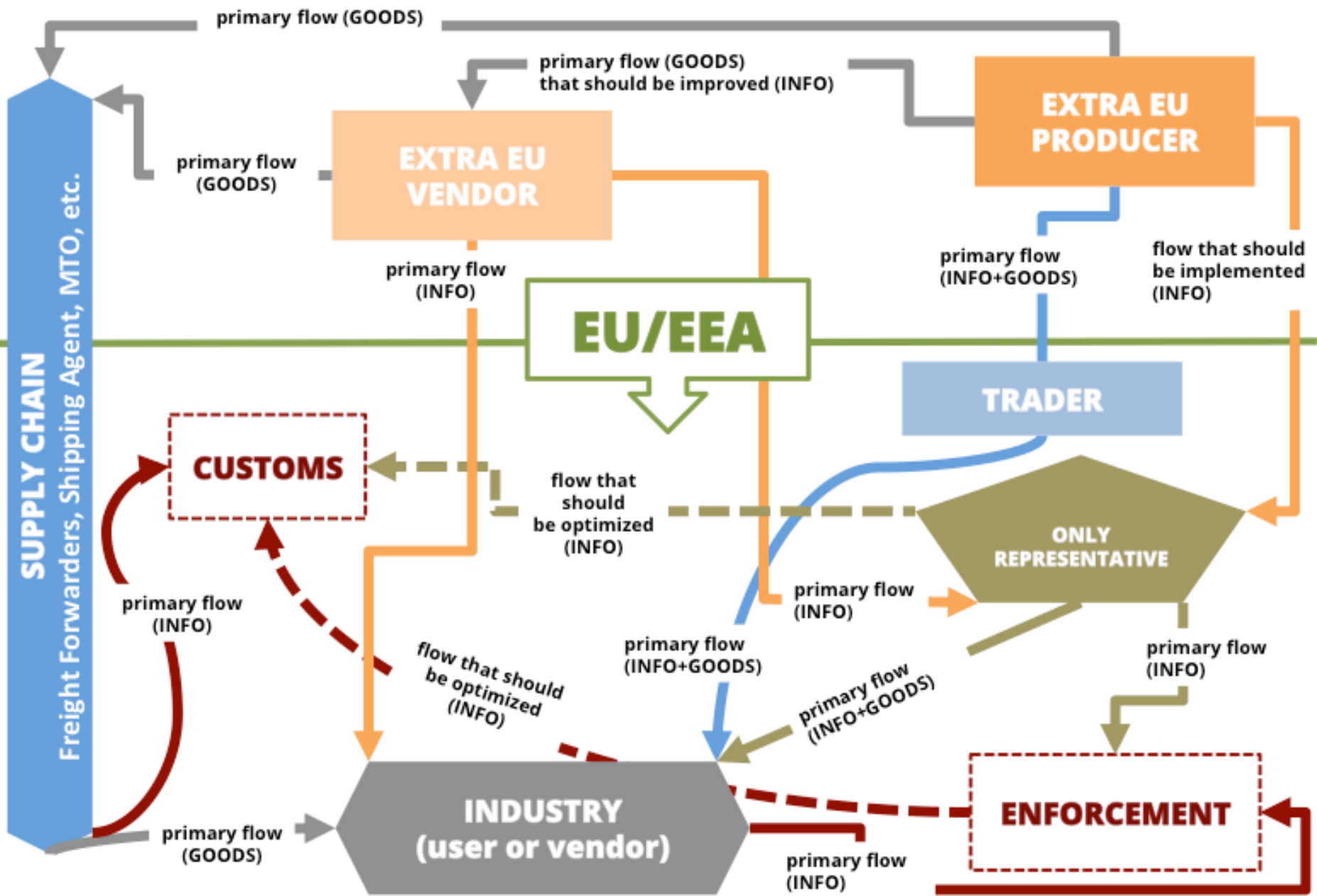
Associated Beneficiaries Federchimica, Centro Reach srl, Istituto di Ricerche Farmacologiche Mario Negri

“Reach” the Project web site at www.inreachproject.eu - Inputs from Stakeholders needed!

the inREACH Project why



more than **20** different ICT Tools reported into the Project Specific Report 2



the inREACH Project why

EU Regulations (Reach/CLP) require Producers and Importers to pass down the Supply Chain information on chemicals and how to use them safely.

Anyway, there is evidence of Importers facing difficulties in evaluating and managing quality and compliance of information transferred to them by extra EU Suppliers.

e.g. information on permitted uses and exposure are generally difficult to obtain. **Importers** of chemicals need to identify and manage risks linked to substances they market.



the inREACH Project why

REACH status verification

Who (legal entity) Why (exempted, pre-registered, registered...), and When (deadline for registration, or registration number).

“REACH Legal entities” may be different from “Customs clearing Legal Entities” >>> there must be precise and transparent information for **Enforcement Authorities**.

the inREACH Project why

Focus on the Importer

At Customs level information is focused on the subject actually carrying on clearing procedures. But it might not be the importer itself, which may delegate procedures to a Freight Forwarder.

Furthermore, Traders are not always exporters themselves, but it may be a Trading Company buying items from extra-UE Producer(s) - more than one - and forwarding goods throughout the Supply Chain to Europe.

the inREACH Project why

fostering **allocation of responsibility** throughout the Supply Chain with special focus on “hot topics” (Traders, Only Representatives).

e.g. establishment of clear liabilities in relation to marketing and use of dangerous substances; ensure that importers assume responsibility for their products.



the inREACH Project why

CLP compliance check

Classification and labelling of hazardous chemicals shall be assessed to ensure adequate risk management throughout the European Union.

A clear confrontation between mandatory classification (harmonized endpoints) and proposed ones (nonharmonized endpoints) has to be done **by the** Importer well before starting import operations.

the inREACH Project why

issues related to information on substances imported to an EU Country detailed in a language different from the official one of that Country and Safety Data Sheet (SDS) incomplete/poor level of information.

e.g. UK importers feeling comfortable with SDS of substances from Australia because written in plain English

e.g. Cleaners containing 95% of a highly dangerous component released on the EU market with conformity to USA market only

the inREACH Project

Environmental problem targeted:
protection of human health and environment as well as the **free movement of substances**, on their own, in mixtures or in articles, while enhancing **competitiveness** and **innovation** (Art. 1 of the Reach Regulation)

“there is a relevant need for ensuring that goods imported into EU will undergo the same checks foreseen for the equivalent goods produced here in EU territory because potential environmental impacts or adverse effects are strictly related to (and focused on) the fact that their final use (e.g. toys, paints, etc.) take place in the EU territory, not where production was made (outside EU)”

the inREACH Project

focus on the topic "Risk"

Improvements of the protection of environment and health from risks posed by chemicals will be pursued by actions fostering safer handling of chemicals including chemicals in products, **promoting chemically safer products in the industry supply chain**, and raising awareness of and contributing to synergies between chemicals and other environment and health policies.

the inREACH Project how

Preparatory Actions | Extended Stakeholders Forum

established for helping fulfilling the general purposes of the project (e.g. seminars, report and deliverables discussion and contribution)

Target Audience

Manufacturers, Companies established outside EU, Only Representative of the non-EU manufacturer established in the EU, Downstream users, Formulators, End-Users, Producers of Articles, Re-fillers, Re-importers, Importers with a “Only-representative”, Enforcement Authorities, Customs Agencies, ECHA

the inREACH Project how

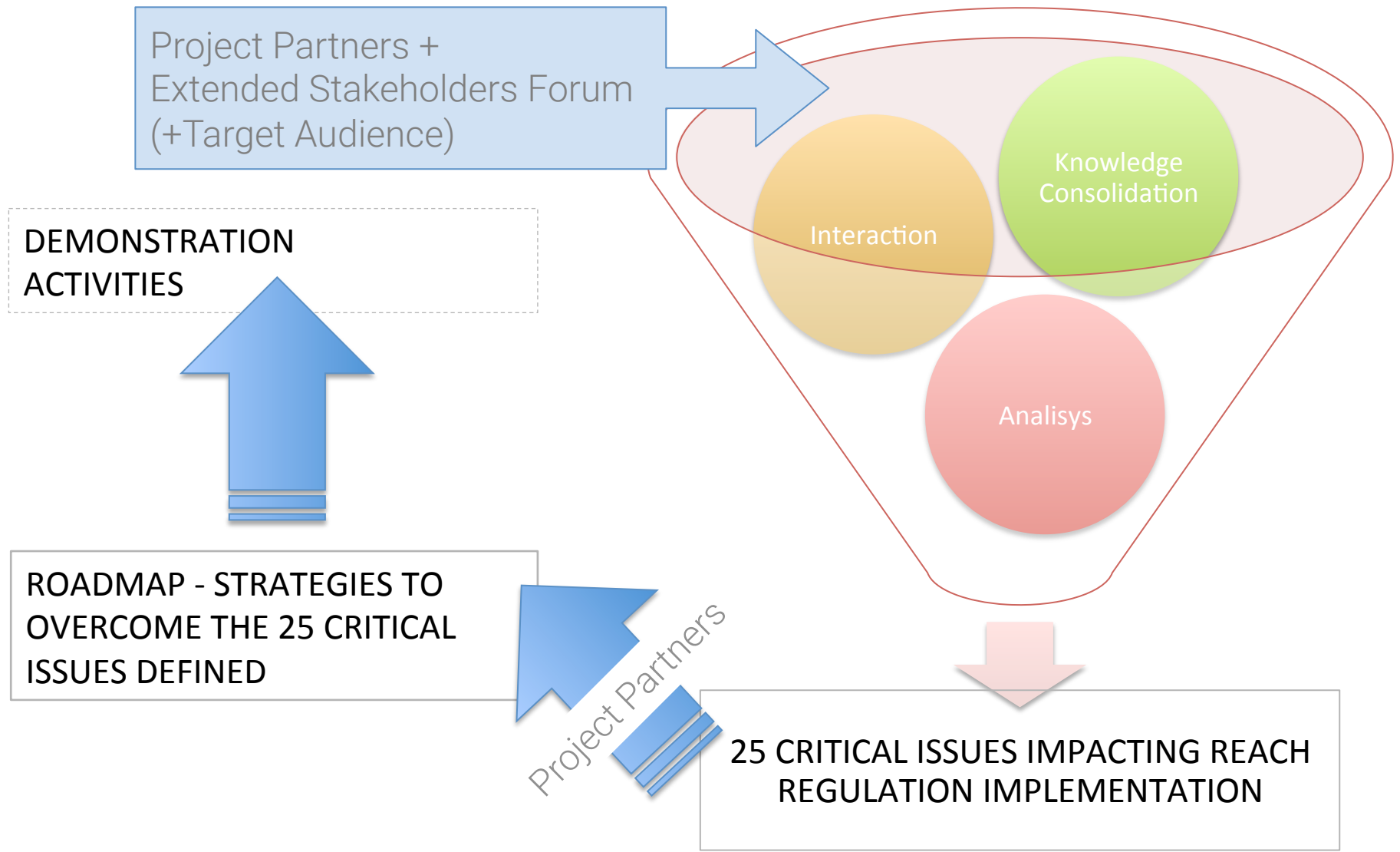
Preparatory Actions | inREACH Framework: 25 Critical Issues impacting REACH Regulation Implementation 5 major impacts of REACH -> 5 Specific Reports, 5 issues each

1. Regulation (Regional, National, EU, World);
2. Procedures and Technologies (Workflows, ICT, Web Services, Databases, Saas, legacy systems, etc.);
3. Science (Definition of standard Sampling Protocols for REACH analyses);
4. Transports and Logistics (Impacts of the REACH Regulation on the Supply Chain);
5. Science-Politics integration (Capacity Building and Education/ Training).

Report 4 - REACH Regulation and its impacts throughout the Supply Chain

1. REACH Regulation does not foresee explicitly the definition of a proper role for Customs with impacts on procedures, operations and responsibilities allocation over the Supply Chain
2. Classification based on Harmonized Systems (HS), Combined Nomenclature (CN), TARIC Goods Code, is not fully compliant with the definition of substance/mixture/article in REACH Regulation
3. Traders: import of substances exploiting a unique registration number used to access different Member States market
4. Pre-registration number and Customs: from a theoretical point of view they may not be allowed to ask for specific information about it
5. Customs Clearance: avoiding problems and delays given by REACH non-conformity at EU border control level

the inREACH Project how



the inREACH Project how

Implementation Actions | inREACH Framework: design, implementation, deployment

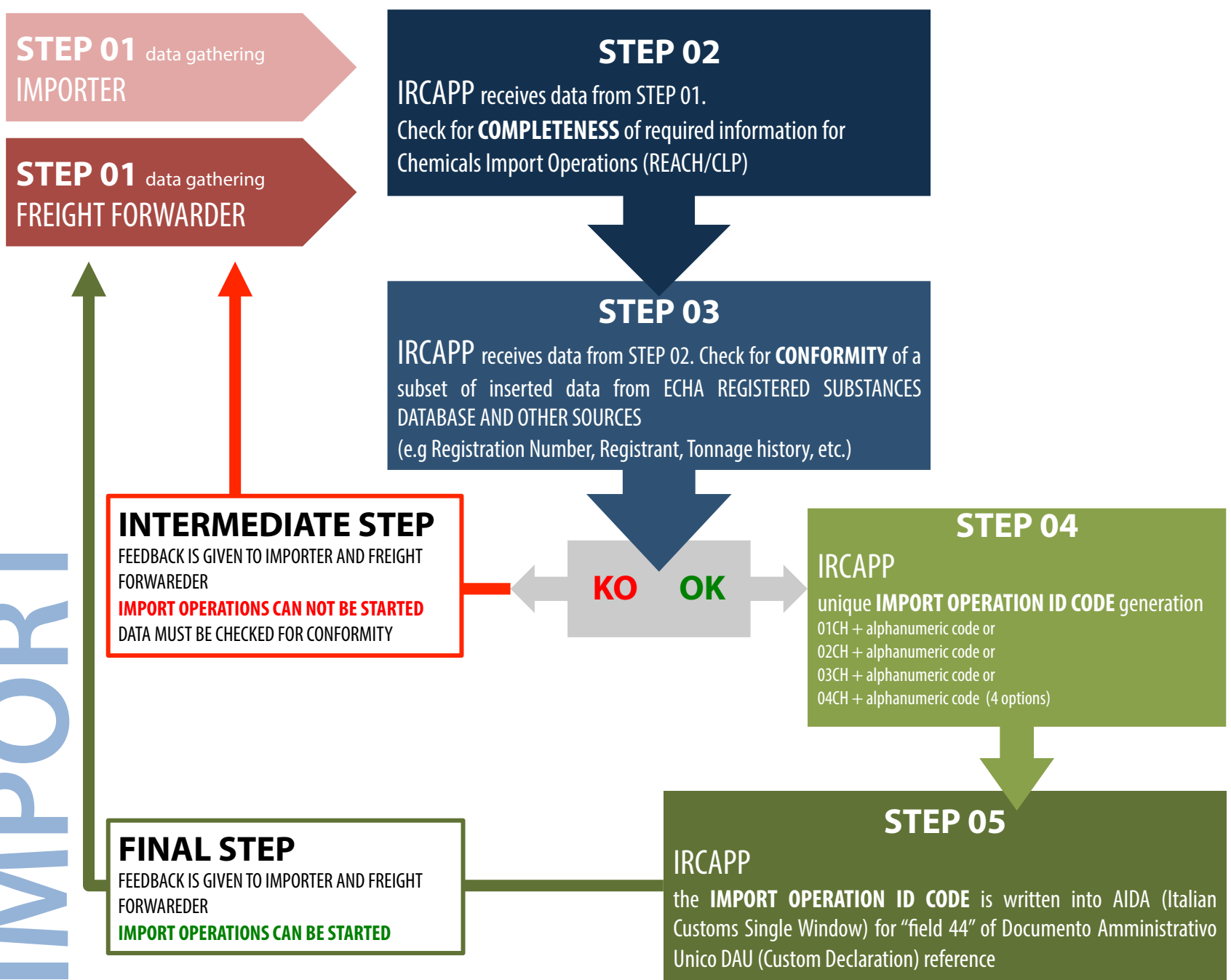
inREACH is a **DEMONSTRATION PROJECT**

it will be implemented with focus on technical and economical viability of a Framework (ICT + processes and procedures) impacting the environmental problem targeted

The project will deploy **DEMO** activities at national level with reference to EU/EC scenario (+ exploitation)

IMPORT

ENFORCEMENT



the inREACH Project how

Implementation Actions | inREACH Framework: design, implementation, deployment

3 steps

- I selection of subset of strategies and actions listed in the RoadMap
- II definition of a coherent WorkFlow gathering organization and process models for the Target Audience
- III Technical Specification of an ICT Platform (iRCApp)

improved **science-policy integration** and transfer of results to provide a solid technical background for Public Bodies, Authorities and the Business Community affected by REACH and CLP Regulations

focus on Import to European Economic Area (EEA) Operations, SMEs, Enforcement, Customs and the Supply Chain

technical specifications for an operations and process model, supported by Cloud Services, to check compliance of chemicals (REACH, CLP Regulations) at EU import stage (**inREACH Framework - procedures + ICT**) and Demonstration Activities

overall evaluated reduction by 5-10% of chemicals with limited or not compliant information entering into EU



Stakeholder's Platform

A national thematic Stakeholders Platform established with links to relevant regional, national and EU Authorities and Agencies to support project actions (Extended Stakeholder Forum (Ext.SF))



Identification of the 25 Most Critical Issues

Identification of the 25 most Critical Issues affecting REACH and CLP Regulations implementation (Public Bodies and Companies)



Roadmap for the Definition of Strategies

A Roadmap for the definition of strategies and activities to overcome the 25 most Critical Issues affecting REACH and CLP Regulations implementation



Operations and Process Model

Consolidation of the inREACH Framework (procedures + ICT) and technical specifications for an operations and process model, supported by an ICT platform, to check compliance of chemicals with REACH and CLP



Demostration

Demonstration of the exploitability, viability and sustainability of the developed inREACH Framework at national level and its potential replicability at EU level