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REACH and CLP

– an industrial perspective on
registrations and notifications

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On behalf of EASTMAN REACH Team

Agenda

- Introduction of Eastman Chemical
- Our “REACH footprint”
- REACH: what is new?
- Challenges
- SIEF Management & Communication
- Role of Industry Associations
- CLP
- Summary



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Introduction of EASTMAN CHEMICAL



Introduction to
Eastman Chemical



Eastman Chemical REACH Foot print

- 53 Registrations for 2010 over 44 substances
- 17 Lead Registrant substances in 2010
- 7 active Consortia
- 17 active SIEFs
- 1,2 M € ECHA Registration fees
- ~10 FTE Eastman REACH employees
- ~10 outside service providers
- 2013 – 2018: another “164” Substances to go

What's new in REACH?

- Burden of proof/responsibility
- No difference new/existing substances
- **Obligation to work together and share data**
- **New obligations on up and downstream players**
- From hazard to risk
- Authorization/substitution
- Europe wide
- **IT enabled**
- **Extended SDS**
 - From 5 → 100+ pages!





What is new in REACH?

Old

- One man show
- National
- Paper driven
- Hazard
- Exposure driven testing
- Single Company

New

- Team
- EU wide
- IT enabled
- Risk
- Full battery testing
- Multi Company (SIEF's / Consortia)

What is new in REACH?

- The Eastman REACH team consists of:
 - Regulatory managers
 - Toxicologists
 - Eco-Toxicologists
 - Phys-Chem specialist
 - Project / Program managers (6sigma Black Belt)
 - Analytical chemists
 - CLP specialist
 - IT personnel
 - Legal department
 - Corporate communication
 - Financial management
 - Business management
 - Several external REACH Service Providers





REACH SIEF's and Consortia

- Cooperation between competitors is legally obligatory according to REACH
- Competition law restricts competition to work together
- Industry is in the twilight zone of both regulations
- SIEF / Consortium External Management or Leadership Team
- Outside Consultants, Testing Labs, REACH Service Providers
- Meeting place of company cultures
- Complex, costly financials and contracts between parties

Challenges for a Consortium in SIEFs

Challenge	Solution
➤ Consortium ≠ SIEF	➤ Communicate early and regularly in SIEF
➤ Often many SIEF members	➤ Top down communication
➤ Re-Inventing the wheel	➤ Use Industry standards ➤ Benefit from learnings in Consortia
➤ Too much time spent on tox studies	➤ Start early on in process on exposure assessments
➤ Time squeeze towards the end	➤ Tight time control
➤ Financial uncertainty in number of LoA's	➤ Early LoA sales
➤ Varying level of competence in service providers	➤ Go for the most experienced providers



Challenges for a Lead Registrant in SIEFs

Challenge	Solution
➤ Large number of SIEF members	➤ Coding system: leader-follower-non-active
➤ No SIEF communication systems	➤ From e-mail to specific tools
➤ LR liabilities	➤ SIEF agreement
➤ Need Answers from SIEF members on	➤ SIEF Management tools
➤ Registration intention	
➤ Sameness of substance	➤ Clear, transparent and regular communication
➤ Data availability	➤ Use industry standards
➤ Lead Registrant vote	
➤ C & L	





The REACH project management timeline

	SIEF Formation	Building Technical Dossier	Hazard Assessment	Chemical Safety Assessment	End Game
Time	3	6	3	6	3
Team	Communication	Regulatory	Reg	Tox	IT
	Legal	(Eco)Tox	(Eco)Tox	(Eco)Tox	Legal
		Phys Chem	Phys Chem	Phys Chem	Finance
		Analytical	CLP spec.	Service Provider	Communication
			Communication	IT	
	Project Management Specialist				

21 months minimum for 23 months between Jan 2009 and November 2010



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			Communication	IT	
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C&L communication to SIEF
Communication End Use Descriptor through Supply Chain



SIEF Management

Communication with SIEF is Key!

- Dossier preparation progress
- Dossier cost structure
- Transparent, fair and non-discriminatory
- Document preparation:
 - SIEF agreement
 - Letter of Access
 - Invoice
- Lead Registrant communication
 - Directly
 - IT-Tools (e.g. using REACHSuite)
 - Service providers



REACH communication on www.eastman.com

 Product End Uses  Lead Registrant *Click on a reference below for more information*

Chemical name	Trade Name	CAS#	EINECS	Product End Uses	Lead Registrant	Registration Number
1,4-cyclohexanedimethanol	Eastman™ CHDM	105-08-8	203-268-9			01-2119448337-34-0000
2,2,4-trimethyl-1,3-pentanediol diisobutyrate	Eastman TXIB™	6846-50-0	229-934-9			01-2119451093-47-0000
2,2,4-trimethyl-1,3-pentanediol monoisobutyrate	Eastman Texanol™	25265-77-4	246-771-9			01-2119441305-48-0000
acetic acid		64-19-7	200-580-7			01-2119475328-30-0004
acetic anhydride		108-24-7	203-564-8			01-2119486470-36-0003
1,4-Benzenedicarboxylic acid, 1,4-bis (2-ethylhexyl) ester	Eastman 168™	6422-86-2	229-176-9			01-2119446265-39-0000



2,2,4-Trimethyl-1,3-pentanediol Monoisobutyrate

Eastman will be the Lead Registrant for this substance as outlined in the REACH requirements.

Chemical Name: 2,2,4-trimethyl-1,3-pentanediol monoisobutyrate
Abbreviation: Texanol
CAS#: 25265-77-4
EC Number: 246-771-9
Contact: sub.25265-77-4@eastman.com

Additional Documents

-  [Substance Identification Profile](#)
-  [Product End-Uses](#)
-  [Pre-SIEF Communication](#)
-  [Classification and Labeling](#)

Dossier Preparation Status     **Completed**

Key Steps in preparing the Registration	Status	Remarks
SIEF leadership team available	Yes	Eastman, Dow, Perstorp
SIEF agreement available	Yes	
End-uses defined	Yes	
Classification & Labeling proposal available	Yes	View Document
CSA/CSR to be prepared and submitted	See Comment**	Hazard assessment only
Exposure Scenarios available	n/a*	Not classified
Dossier type	Full dossier	Registration completed by LR
Registration Token available	Yes	Mid - July 2010

*n/a = not applicable

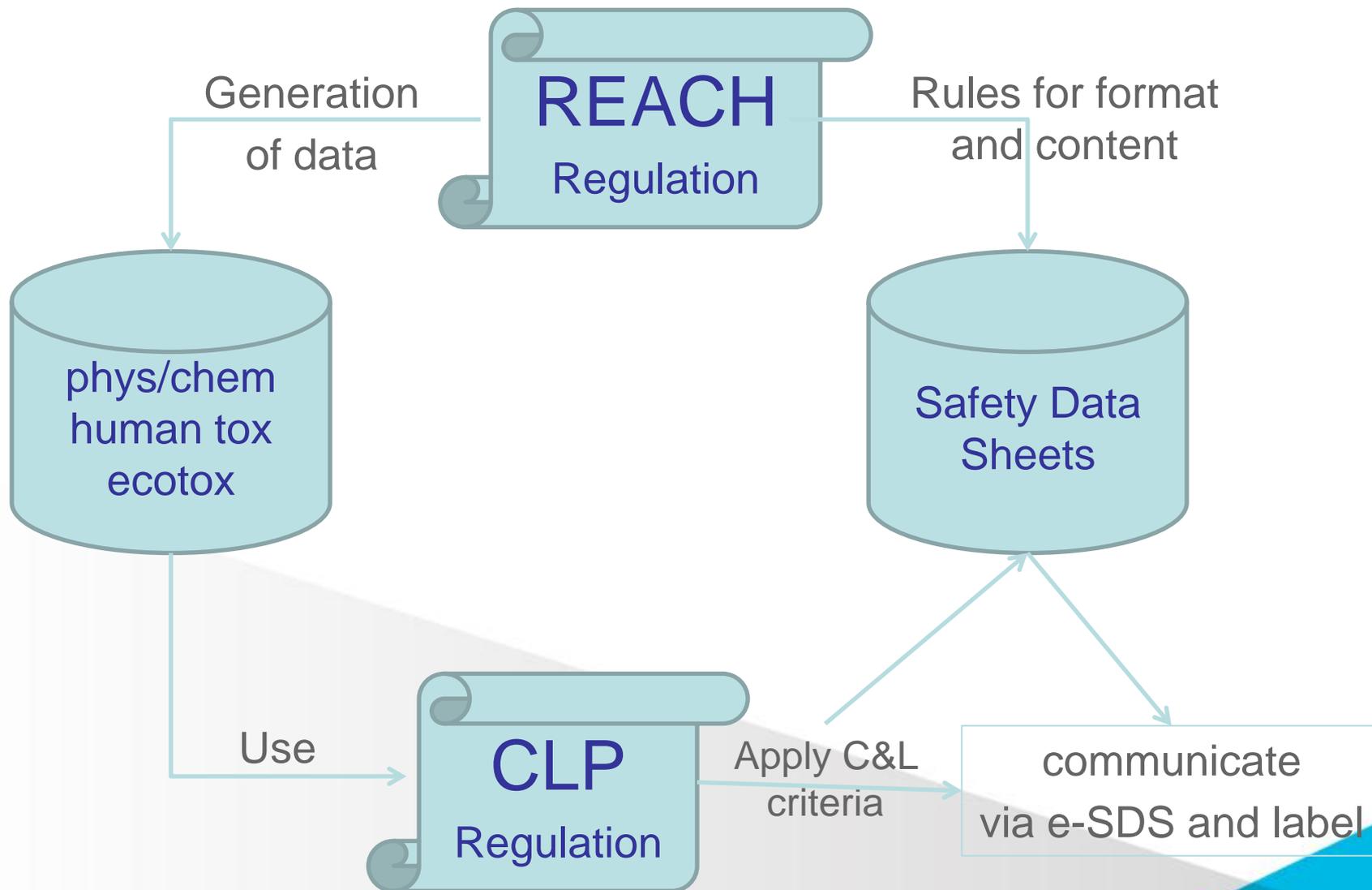


Role of Industry Associations

- **National Associations – VNCI (NL)**
 - Industry voice to National Competent Authority
 - Platform for national based companies
 - Think-tank for improvement work
 - Implementation training resource / Helpdesk for SMEs
 - Supporting in trading role of Dutch chemical industry
 - Gate to CEFIC
- **European wide – CEFIC**
 - European voice to ECHA and Commission
 - Platform for multi-nationals
 - Common interpretation of Regulations
 - Preparing standards and tools for industry
- **Down Stream User Industry Associations**
 - CEPE, FEICA, AISE, etc
 - End-use and exposure assessment

REACH – CLP

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Classification and Labelling

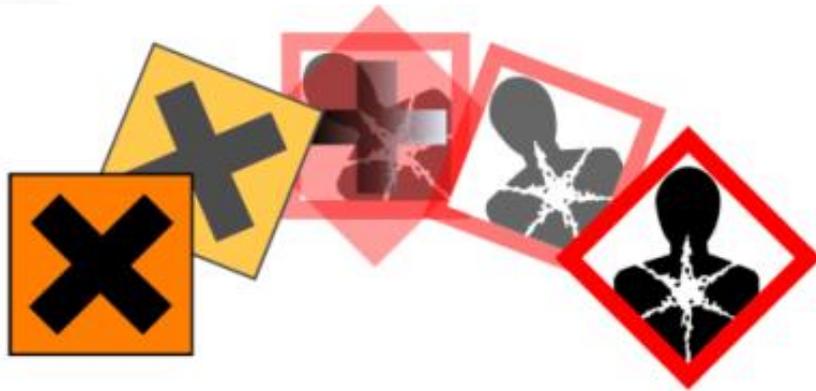
- Harmonized C&L
 - Annex VI of CLP Regulation
 - Agreed by Member State Competent Authorities
- Industry C&L
 - Listed in Inventory
 - Notified per 1 January 2011
 - Not necessarily harmonized



CLP Notification

- Notification interconnected with REACH, but different!
- What has to be notified:
 - Substances subject to registration under REACH
 - Hazardous substances and placed on the market
- Volumes
 - REACH: > 1T/Y
 - CLP: ≥ 1 molecule/Y (incl. lab chemicals)
- Not a one-time exercise:
 - New product: notification within 1 month after placing on the market
 - New data available may lead to changing classification: update of the notification

Pictograms have changed





Summary

- REACH is the most complex regulation that affected Eastman
- REACH has a considerable impact on
 - Business permanence
 - Money
 - Resources
 - Up and downstream value chain relationships
 - Interaction with competitors
 - Business threats and opportunities
- REACH has not stopped after November 30th 2010
- Key role of National and International Industry Associations



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Thank You!