



REACH – Implementation and Effects within BASF

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BASF SE – Department of Product Safety

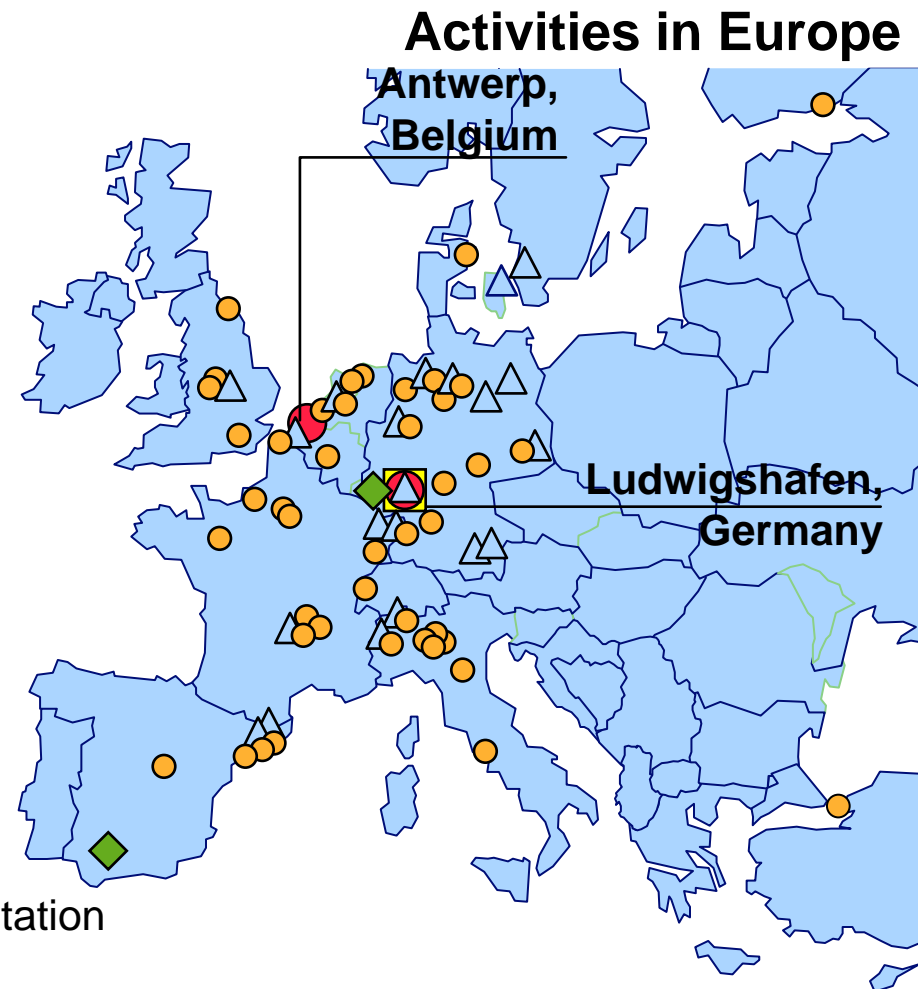
REACH-ing Industry - The New European Chemical Legislation

Malta, November 28th 2008

BASF – The Chemical Company

- Global sales 2007:
€57.951 million
- Employees worldwide
at year-end 2007: 95.175
- More than 100 legal entities
are dealing with REACH

- Headquarters
- Verbund site
- ▲ Research center
- ◆ Agricultural research station
- Major chemical production site



BASF SE Ludwigshafen - worldwide largest integrated industrial complex



BASF Product Safety - Global Competence in Ludwigshafen



Toxicology

Ecology

~ 300 employees on more than 12.000 m²

Status REACH-Implementation within BASF

- BASF started REACH implementation in 2004
- Facts and figures of REACH at BASF
 - Several thousands substances to be registered
 - ~ 40.000 pre-registrations (dataset = substance + legal entity)
 - ~ 100 legal entities involved globally
 - Estimated costs: 500 to 550 M€ till 2018
- Increase of pre-registrations due to re-import re-interpretation
- All processes with ECHA have been tested successfully (pre-registrations, registrations, R&D exemptions)

Some examples for current challenges of industry

Read from substances

[Reaction mass of 2-(2-((2,4-dimethoxyphenyl)amino)vinyl)-1,3,3-trimethyl-3H-indolium chloride and C.I. Basic Blue 3 and ethane-1,2-diol and formaldehyde and glycerol and methyl 4-hydroxybenzoate and b10 and water] [Reaction mass of formaldehyde and formic acid] [Reaction mass of formaldehyde and urea] [Reaction mass of Formaldehyde, oligomeric reaction products with phenol and formaldehyde and o-cresol and phenol] [Reaction mass of formaldehyde and guanidinium chloride] (46 total)

Pre-SIEF partnership

Previous 10 31-40 of 487 Next 10

Select Contact organisation	Status	Info	Participant type	Reference No.	Contact person
<input type="radio"/> B-Lands Consulting	PAI		Relevant Participant	05-0114071000-04-0000	Max Weiss
<input type="radio"/> B-Plast2000					Contact



Reach-IT

You are connected as on behalf of BASF SE - [Preferences](#) - [Logout](#)

[Home](#) > [View Pre-SIEF Memberships](#) > [View Pre-SIEF Member Contact Info](#)

[Pre-SIEF](#) [Read across details](#) [Substance details](#)

Contact

Title:
First Name:
Last Name:
Phone: 123456789
Fax:
E-mail: bin.wang@msn.com

Organisation

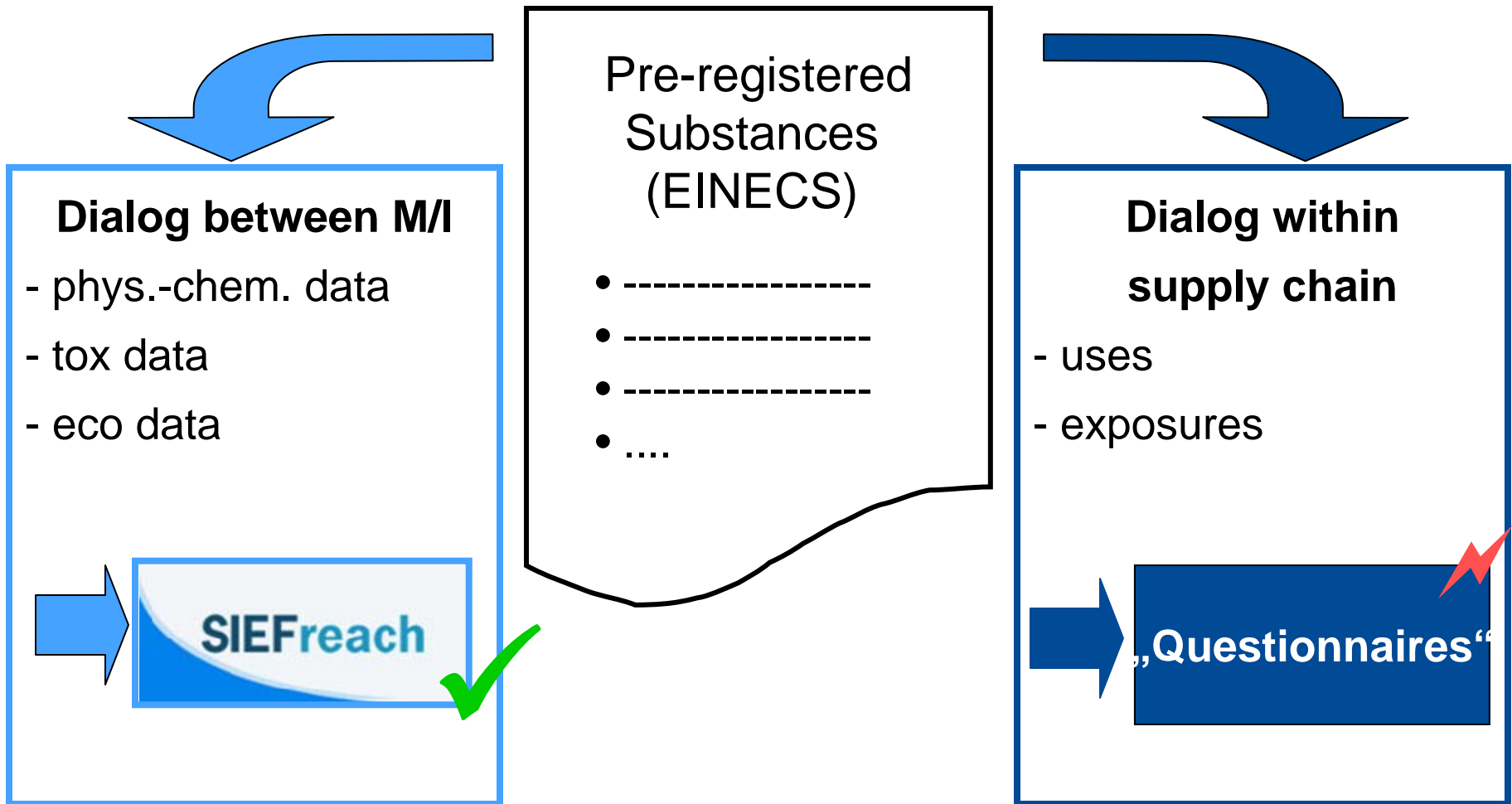
Organisation name: BASF
Department:

Address

Street: Your website address
Street 2:
Postal code: 78965
City / Town: Rome
Region / Country:
Country: Italy
Postal address:

- Ongoing changes of REACH interpretation and technical guideline documents: translation into practical processes and IT- / technical solutions need time
- Constructive dialog within industry and with competent authorities for a pragmatic approach for REACH implementation
- Registration (preparation of CSA / CSR and eSDS)
 - Definition of formats of CSA / CSR / eSDS in practice
 - Practical cooperation within SIEFs / Consortia, data and cost sharing between manufacturers and importers
 - Practice of dialog within the supply chain – role of supplier and DUs
 - Extension of existing registrations of new substances
- Practice of OR
- ...

Communication issues – within M/I and within the supply chain



SIEFreach - online since 21.08.2008



The screenshot shows the SIEFreach website interface. At the top left is the 'SIEFreach' logo, and at the top right is the 'ReachLink' logo. Below the logo is a 'LOGIN' section with fields for 'Benutzer-ID:' and 'Kennwort:', a 'Login' button, and a link for 'Lost or Forgotten Password?'. To the right of the login section is a banner with a blue background and white text that reads '(PRE-)SIEF COMMUNICATION COLLABORATION' next to an image of a hand holding a flask. Below the banner is a 'WELCOME TO SIEFREACH' section with a horizontal line. The main content area contains several paragraphs of text, including a 'Subscription' link, a 'Help' link, and a large image of a flask with 'SIEF' written on it. The text describes the SIEFreach platform, its purpose, and provides information about the implementation plan, scope, and how to get started. It also mentions service desk support.

SIEFreach

LOGIN

Benutzer-ID:

Kennwort:

Login

Lost or Forgotten Password?
Please click [here](#).

[Subscription](#)

[Help](#)

(PRE-)SIEF COMMUNICATION COLLABORATION

WELCOME TO SIEFREACH

SIEFreach is the IT platform for industry to support SIEF participants in their activities to share data for REACH. More information about SIEFreach ownership and how to subscribe for SIEF participation is available at www.reachlink-eu.com.

This page provides you with information about the SIEFreach Implementation plan, as well as 'How to get started with the system'. Please refer to the Quick Reference Guide which will be helpful to go through these steps.

Implementation plan:

After the pilot implementation, first half of August, SIEFreach is launched on 21 August 2008.

SIEFreach scope:

The basis for SIEFreach is the Pre-SIEF data from the ECHA REACH-IT system, which is uploaded into SIEFreach. One of the potential registrants triggers the transfer of data for one Substance for all Legal Entities involved. After activation, Legal Entities start cooperation and communication in the Pre-SIEF / SIEF, ultimately leading to preparing a Joint Submission of the Registration Dossier. SIEFreach offers collaboration tools on various subjects, like Substance Sameness, Available Studies, C&L, Cost Sharing.

How to get started:

SIEFreach offers Legal Entities to be grouped in order for your company to be flexible regarding administrative activities for managing SIEFs. The first step is to create the Legal Entity Group(s) and have the Legal Entity Group Administrator (LEGA) subscribed to the system:

- Self subscription by the LEGA:
The first person for a group of Legal Entities to subscribe to the SIEFreach system is the LEGA, who will complete a form with personal details, as well as the Legal Entity Group details and Invoicing details
- After activation of the LEGA account, the Group Administrator will receive a User ID and a Password (to be modified at first login)

After this initial step, the LEGA has to create User Accounts, create SIEFs from Pre-SIEF ECHA data, affiliate Legal Entities to LE Groups and finally allocate Users to SIEFs, before these users can start working in the SIEF. More information is available in the Quick Reference Guide.

Service Desk support:

A Technical Helpdesk is available to support you in case of technical issues with the SIEFreach system. It is expected that companies will try to resolve issues internally. That's why the Helpdesk is supposed to be accessed by the LEGA only (not by all SIEF Users).

- The SIEFreach team

SIEF
SUBSTANCE
INFORMATION
EXCHANGE FORUM

CSA / CSR / eSDS: Cooperation and pragmatic approaches

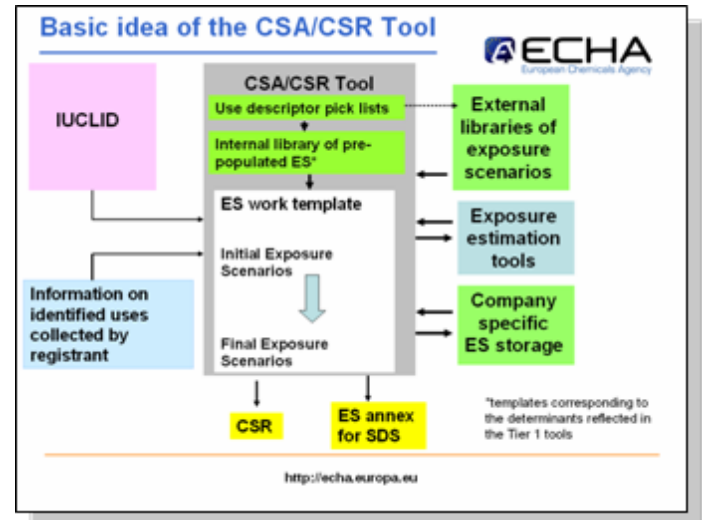
1. Step
Basic exposure assessment
(no / minimal RMM)



2. Step
Generic exposure assessment
(specific OC / RMM)



3. Step
Individual exposure assessment
(individual OC / RMM)



Safety data sheet according to REGULATION (EC) No 1272/2008
Date: Revised: July 2008
Product: H2GA

Annex: Exposure scenarios

1. Generic Exposure Scenarios by ECETOC

2. Sector group: In-house specific Exposure Scenarios

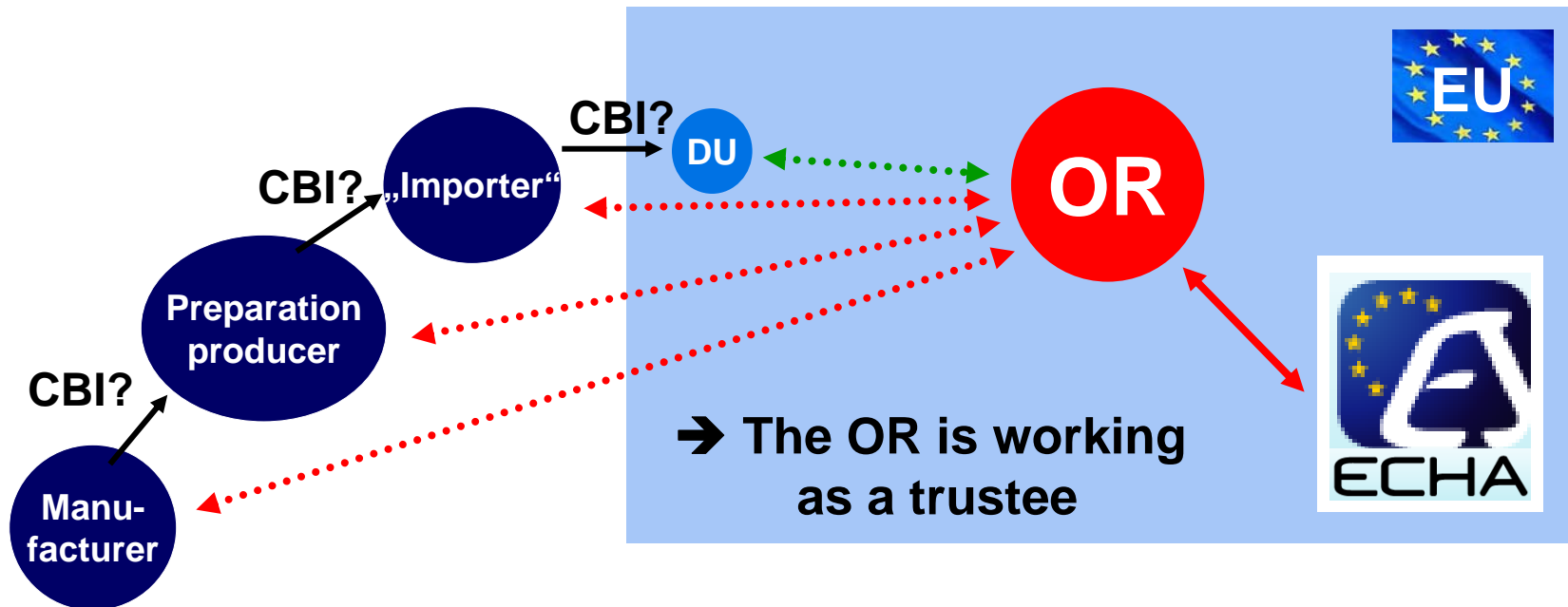
3. Individual Exposure Scenarios / Individual Use Conditions

(a) Waste treatment (Paper Recycling)

1. Disposal of effluents (sewage)
2. Disposal of effluents (sewage)
3. Disposal of effluents (sewage)
- 4.1. After sorting, H2GA has reacted and is part of a solid matrix
- 4.2. Traces of residual H2GA is less than 0.01% and hydrolysis to the non-toxic and non-persistent form is complete
- 4.3. Not applicable
5. Traces of residual H2GA is less than 0.01% and hydrolysis to the non-toxic and non-persistent form is complete
6. Not applicable
- 6.1. Good industrial hygiene to be applied

RMM: Risk Management Measures; OC: Operational Conditions

Problem of CBI-protection in a complex non-EU supply chain



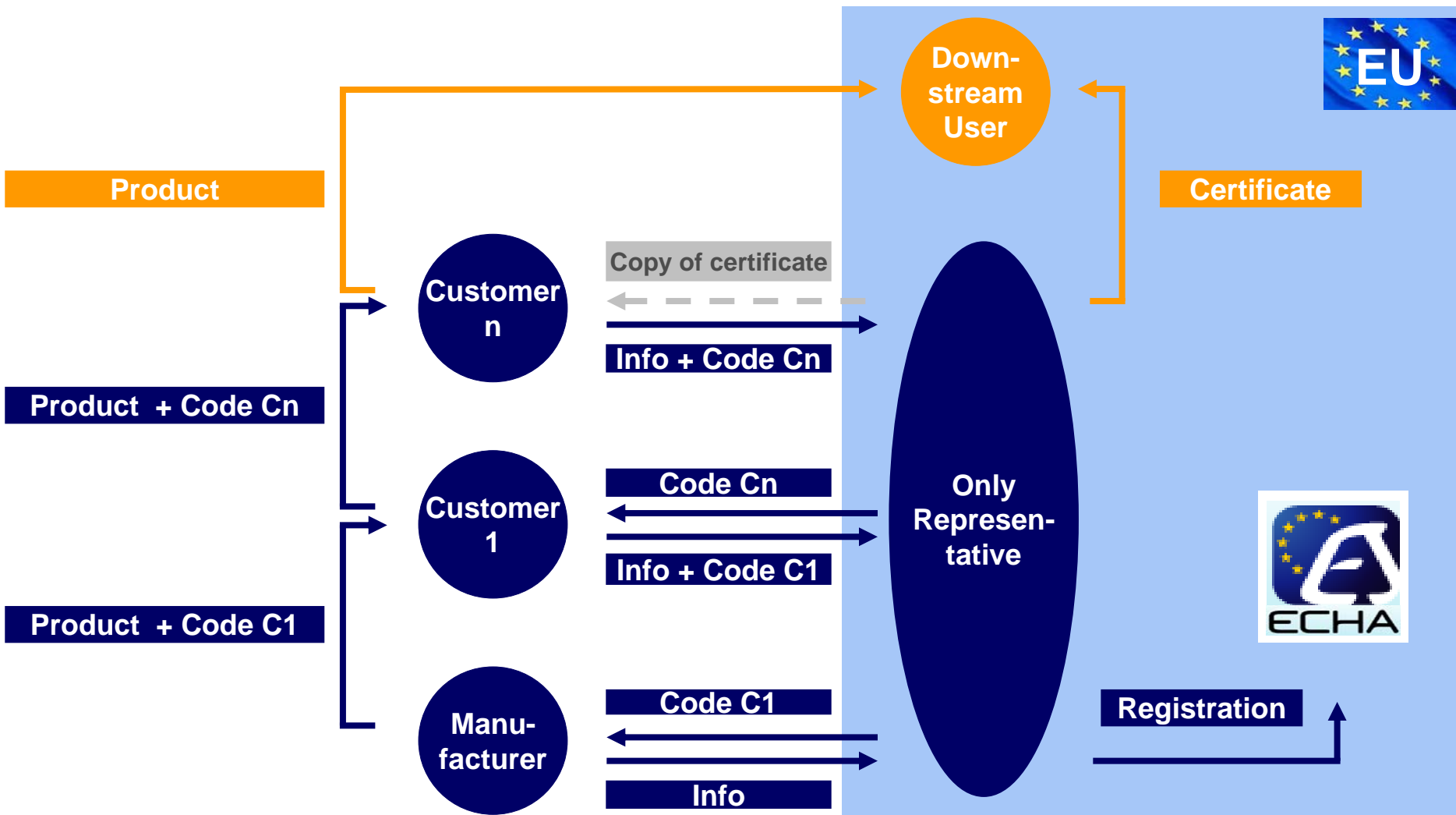
- Fees, Information
- Material, Information
- Certificate
- Information, Cost, Secrecy agreement

OR: Only Representative

DU: Downstream User

CBI: Confidential Business Information

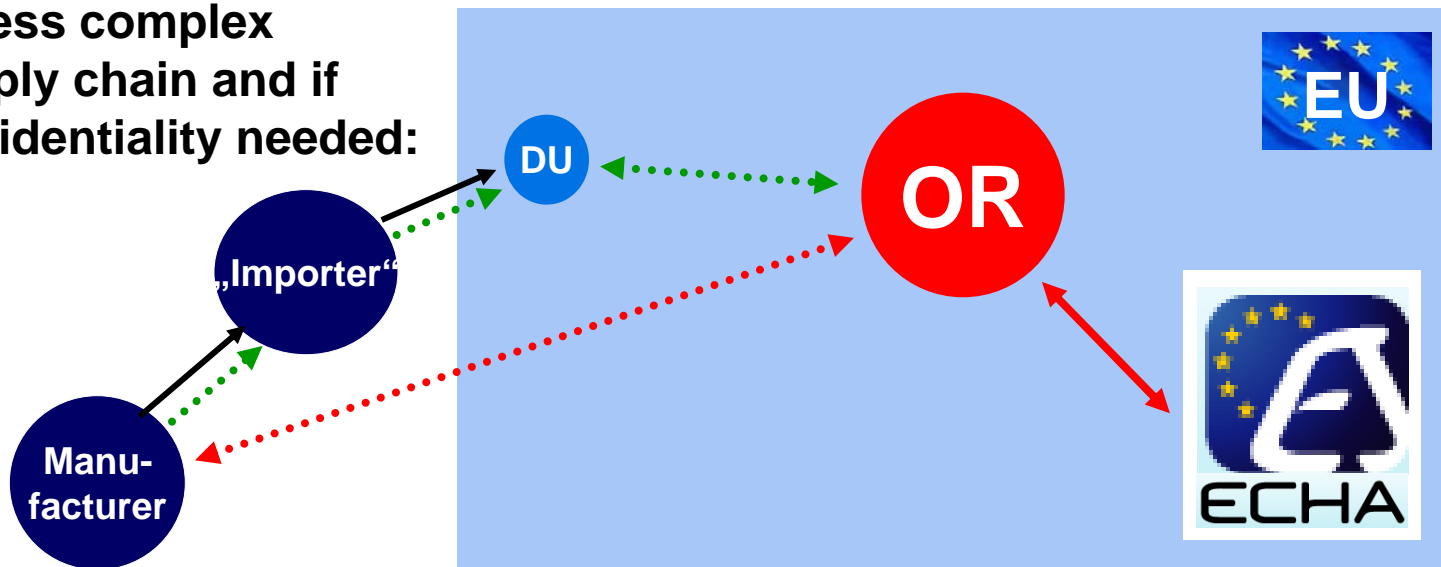
Challenge OR with CBI-protection: The “CODE OR – model”







Back up

Only Representative: CBI in the supply chain

Less complex
supply chain and if
no confidentiality needed:



-  Fees, Information
-  Material, Information
-  Certificate
-  Information, Cost

OR: Only Representative

DU: Downstream User

CBI: Confidential Business Information