

# Perspective of a Manufacturer, Importer and Downstream User

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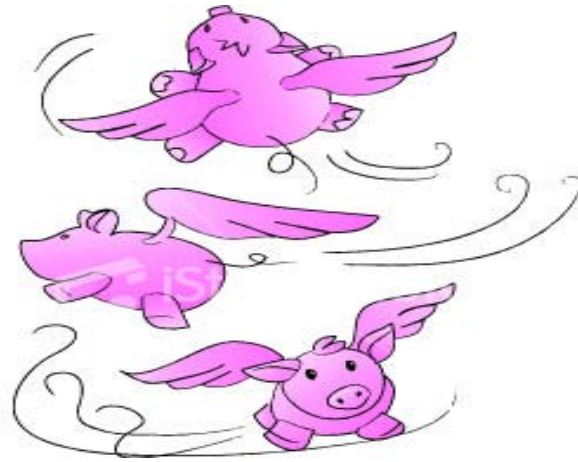


# CCS & REACH

- What CCS have done
- What CCS are doing
- What more needs to be done



# REACH – the benefits!



# CCS Facts

- Founded by Des Savage in 1986
- Situated in Donaghcloney
- Dublin Office opened 2000
- 5 Acre Site
- 3250 m<sup>2</sup> warehousing (35,000 ft<sup>2</sup>)
- 420 m<sup>2</sup> specialist Pharma/Food warehouse (4,000 ft<sup>2</sup>)
- 420 m<sup>2</sup> sq ft Blending Plant (4,000 ft<sup>2</sup>)
- Transport Fleet consisting of 14 Tankers & 5 Flat bed lorries

# CCS Products

- Surfactants
- Concentrated detergents & blends
- Biocides
- Solvents
- Caustic alkalis
- Acids
- Inorganic
- Water treatment



# CCS AT DONAGHCLONEY

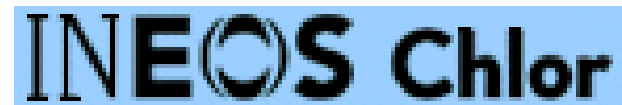


# CCS Laboratory

- Modern R&D and QC laboratory
- ISO 9001:2000 approved
- 2 Full Time Chemists



# CCS Suppliers



**CRODA**

**UNIQEMA**

# DEFINITIONS

- ***Substances*** – chemical elements and their compounds
- ***Preparations*** – mixtures or solutions of two or more substances
- ***Use*** – processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilisation

# DEFINITIONS

- ***Distributors*** – any natural or legal persons established within the community, including retailers who only store and place on the market a substance, on its own or in a preparation, in the course of an industrial process or professional activities
- ***Downstream user*** – any natural or legal persons, other than the manufacturer or importer, who uses a substance, either on its own or in the course of an industrial process or professional activity.

# REACH INVENTORY

- Compilation of Inventory by substances & preparation
- Include SDS and Specifications
- Identify if manufacturer or downstream user
- Annual volumes
- CAS Numbers & EINECS numbers
- Legal entity – substance or preparation
- Use – industrial, professional or consumer

# REACH INVENTORY

Material	Substance/ Preparation (S/P)	Manufacturer /Importer/ Distributor (D)/ Downstream User (DU)	Annual Volume (tonnes)	CAS No/ EINECS	Customers (C) /Supplier (S)	Industrial (I)/ Professional (P) /Consumer (C) use	SDS Ref
Sodium Hydroxide Liq (47%)	S	DU	50	1310-73-2/ 215-185-5	Bloggs & Son (C)	P	IN_12
Sodium Hydroxide Liq (47%)	S	D	2800	1310-73-2/ 215-185-5	Ineos Chlor (S)	I	IN_12



# Communication with Suppliers

## Use of questionnaire

1. Will substances that are contained in Product X and require registration be pre-registered by your Company?
2. Regarding the substances contained in Product X please indicate the relevant REACH registration deadlines for those substances
3. Provide contact details for person in your company responsible for REACH issues.

# Communication with Customers

- Notified customers of CCS awareness of REACH
- Updating SDS to take account of new format
- Questionnaire in early 2008 to ascertain use of products
- Communicate information back to supplier

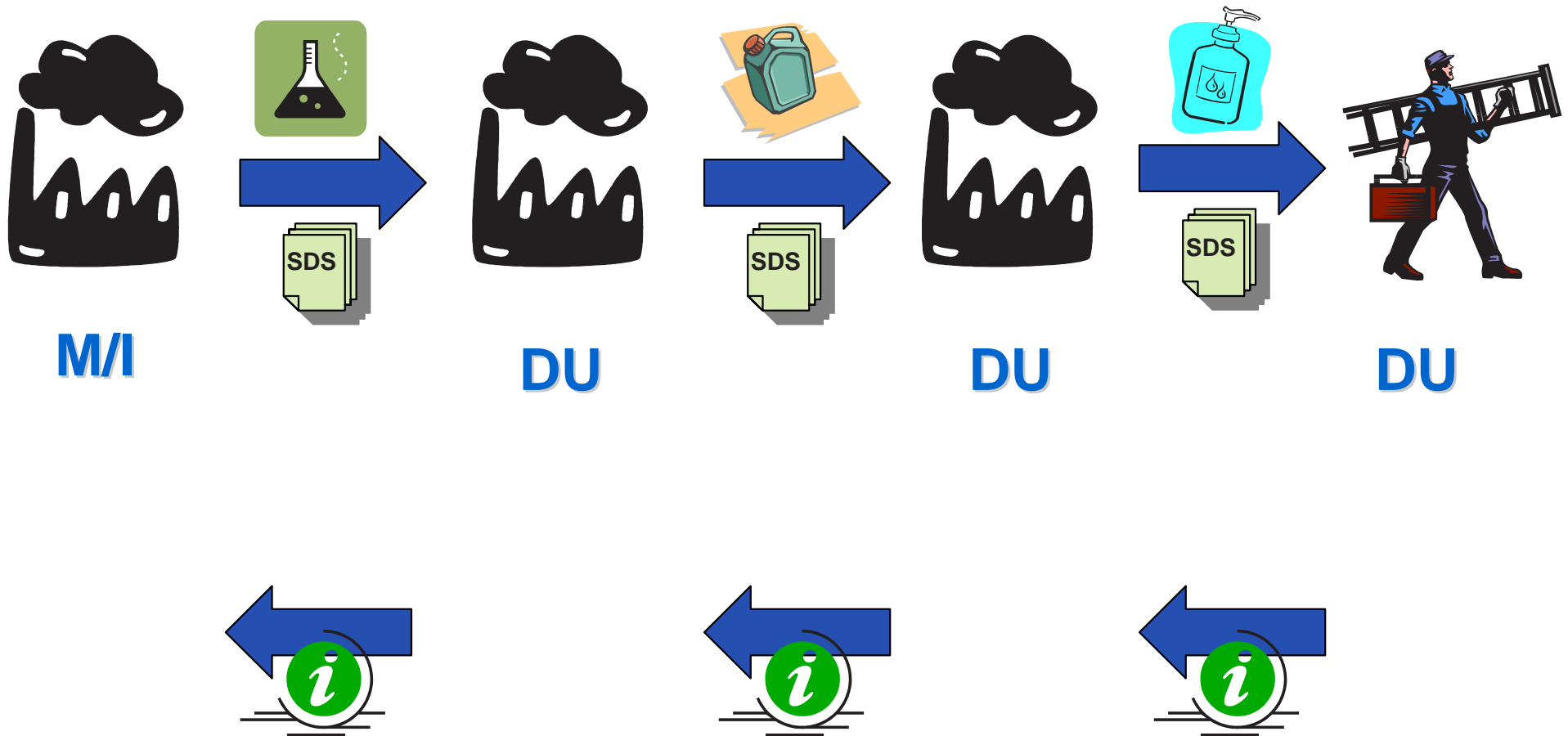
# Role Downstream user

- Check of the SDS of the substances (Inclusive of exposure scenario);
- choose of different options:
  - Work in accordance to substance SDS
  - Request to Manufacturer to notify the different use
  - Own notification of use to European agency and own safety assessment (DU-CSA)
  - Change supplier / manufacturer with positive scenario
  - Change of substance in formulation
- Risk management within own company
- Creation of expanded SDS for the formulation and consolidation of use, exposure scenario, risk management for customer

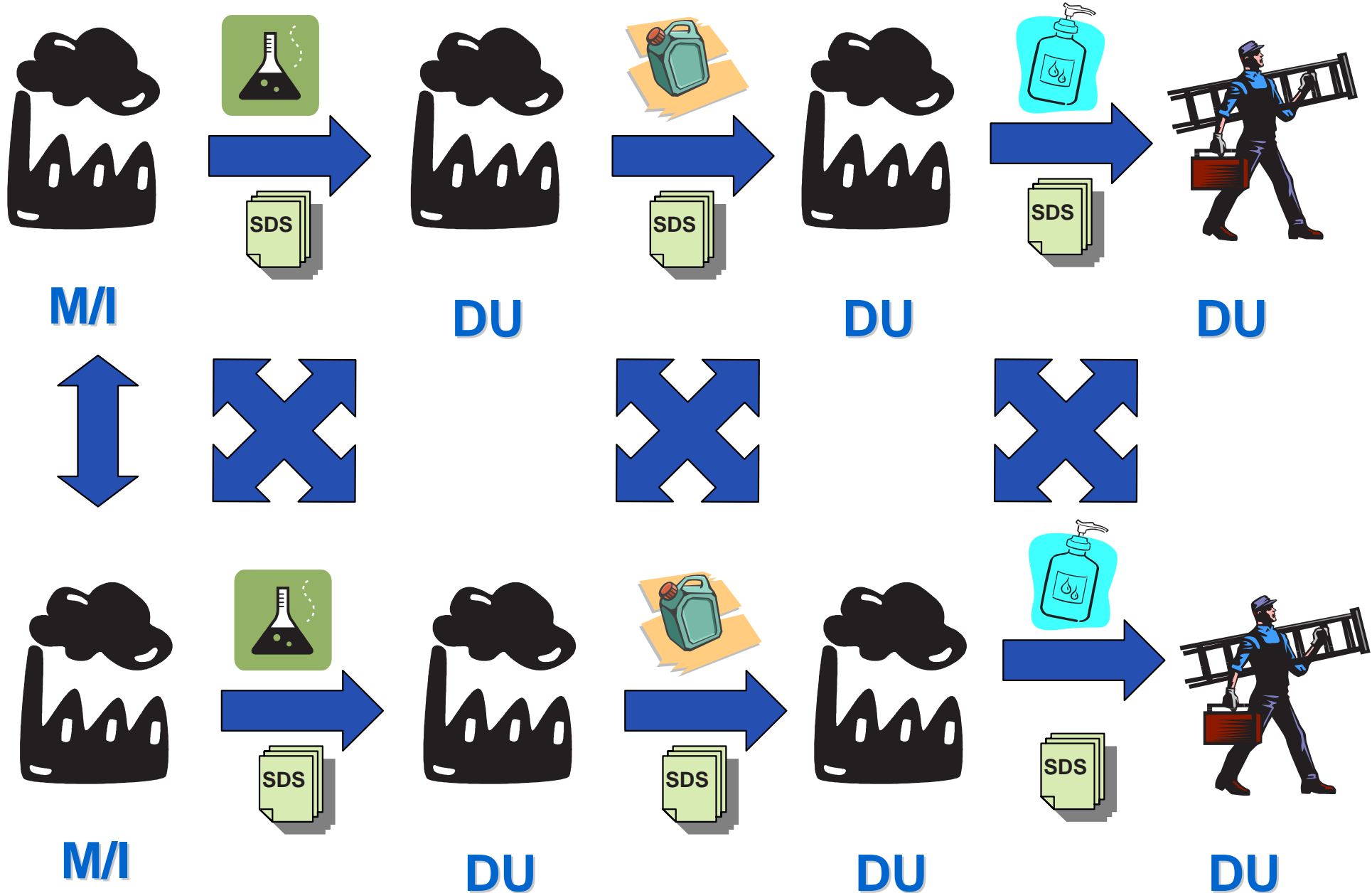
# Downstream Users' Duties

- DU must prepare CSR if:
  - Use is outside the exposure scenario (provided in supplier SDS) or
  - For any use his supplier advises against (Council)
- DU must inform the Agency:
  - If DU has to prepare CSR/ classification is different to that of supplier
  - Before commencing or continuing a particular registered use
  - Max 6 months after receiving Registration # via SDS
  - Except if used as such or in preparation in quantities <1t/y, below concentration limits or Product and Process Oriented R&D incl. controlled risks for protection of workers and environment

# Information flow



# Roles and responsibilities of REACH



# SDS

## 1. PRODUCT AND COMPANY IDENTIFICATION.

Trade Name: **Sodium Hydroxide Liquor 10-50% w/w**  
Product Description: Sodium hydroxide solution  
Synonyms: Caustic Soda Liquor/Lye, Sodium Hydrate.

Manufacturer/Supplier: Central Chemical Supplies Limited  
44 Hall Road Donaghcloney,  
Craigavon,  
Co. Armagh,  
BT66 7LJ.  
Northern Ireland.

Telephone Number: +44 (0) 28 38 881 936.  
Fax Number: +44 (0) 28 38 882 335.  
Email: [info@ccsni.co.uk](mailto:info@ccsni.co.uk)  
Emergency Telephone Number: +44 (0) 28 38 881 936.

## 2. HAZARD IDENTIFICATION.

Corrosive. Causes severe burns to all parts of the body. Will cause deep ulceration with subsequent scarring. For users of rayon grade consult health and safety information on mercury.

## 3. COMPOSITION/INFORMATION ON INGREDIENTS.

This product is to be considered as a preparation in conformance to EC directives.

Information on hazardous ingredients.

Chemical Name	% w/w	EINECS No	CAS No	Symbols	R Phrases
Sodium Hydroxide	10-50	215-185-5	1310-73-2	C	R35

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# Next Steps at CCS –Short Term

- Review of CCS blends e.g. dishwashing concentrate from basics
- Estimated cost of €64,000 for 1 – 10 tonnage band for one Company Application
- Review directly imported products
- Will require pre-registration and eventual registration
- Update of SDS
- Questionnaire to customers
- Information to customers
- Information to suppliers
- Set up a REACH desk  
[reach@ccsni.co.uk](mailto:reach@ccsni.co.uk)

# Next Steps At CCS – Longer Term

- Complete review of SDS to include Chemical Safety Report (CSR) if necessary
- Prepare for Globally Harmonised Systems of Classification and Labelling of Chemicals (GHS)



# REACH – the benefits!



In Ireland everyone knows Pigs can see the wind  
and there is no reason why they can't fly too!

# REACH – the benefits!



# REACH – the benefits!

- One Market – Harmonisation
- Reduce the number and complexity of the legislation
- Change the burden of proof from “Authorities” to “Manufacturer”
- Respond to genuine public concern about “Chemicals” and their use



# REACH – the benefits!

- Motivation of European Commission:
- Difficult to identify risks - difficult to address risks
  - Lack of information about most substances on the market
  - Burden of proof on the public authorities
  - No efficient instrument to deal with problematic substances



# REACH – the benefits!

- Solution provides:
- Protection of human health and the environment
- Increase transparency and customer awareness
- Maintain innovation
- Maintain Internal market
- Promotion of non-animal testing and minimisation of animal testing
- Conformity to WTO obligations
- Establishment of a new European Chemicals Agency

# Summary

- Compile an Inventory
- Communicate with Suppliers
- Communicate with Customers
- Identify products at risk
- Identify alternatives
- Still more information especially on RIP projects to come from ECHA

# REACH HELP

- UK – HSE Help Desk  
[ukreachca@hse.gsi.gov.uk](mailto:ukreachca@hse.gsi.gov.uk)
- IRELAND – HSA Help Desk  
[reachright@hsa.ie](mailto:reachright@hsa.ie)

# THANK YOU

**ECOLAB**<sup>®</sup>



**d5** consulting  
mentoring and consultation

**CCS**

*Central Chemical Supplies LTD.*