

IMPACT OF REACH IN PORTUGAL: AP TOX SURVEY RESULTS

Teresa Borges^{1,2} & Elsa Casimiro^{1,3}

¹ AP Tox – Portuguese Toxicology Association, Portugal

² Environmental Health Division, Health Directorate-General, Portugal

³ INFOTOX – Environment and Health Risk Consultants, Portugal



www.aptox.pt

Introduction

In order to understand the level of preparedness of the Portuguese Industry for the REACH registration process, the Portuguese Toxicology Association (AP Tox) developed a survey which could be completed online during 15th July- 30th September 2009. This survey was essentially directed at individuals responsible for REACH within Portuguese organizations. All industrial associations in Portugal were contacted, inviting them to inform their members about the survey.

The survey consisted of fourteen short questions which could be completed in about 10 minutes. It had two objectives:

- Understand the level of preparedness of the Portuguese Industry for REACH registration
- Identify which technical areas of the REACH registration dossier pose the most concern

Results & Conclusions

The total number of respondents was 40. These were predominantly (50%) from SME companies in Portugal. The survey results indicate that most (64%) organizations will need to do full registration by December 2010, and that about half of the respondents did pre-registration for 1-10 substances. Almost all companies are participating in SIEFs, but most are in passive roles.

Our analysis also showed that respondents are very concerned about being able to meet the deadlines, the costs associated with the process, and not being able to sell to their normal clients in the near future. Although most companies indicated that substance identification was no longer a concern, many indicated that they will need help from third parties when it comes to the more technical parts of the full registration dossier. This was most evident for the environmental and human health assessments as well as the risk characterization sections of the CSR.

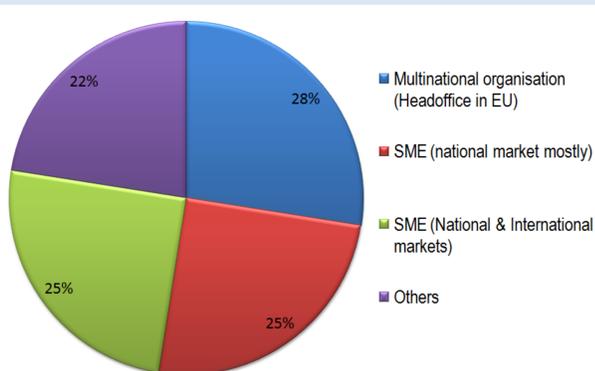


Figure 1 – Replies to the question "How would you describe your organization?"

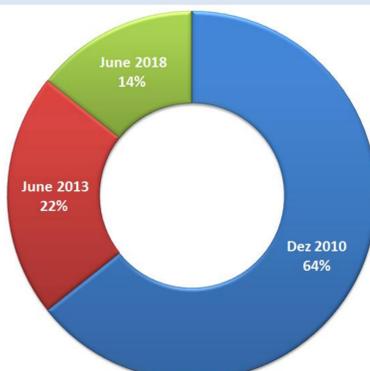


Figure 2 – Results from the question "When will you need to register most of your substances?"

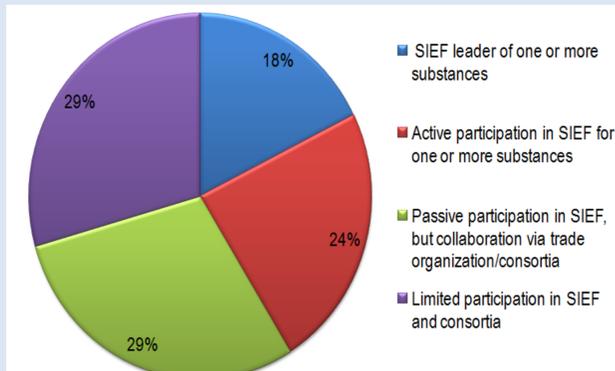


Figure 3 – Replies to the question "What is the level of participation of your organization in SIEFs/consortia?"

	Level of Concern		
	High	Medium	Low
Understanding the legal implications of REACH	60%	27%	13%
Meeting deadlines	73%	20%	7%
Available staff and resources	53%	33%	13%
Available 3rd party experts	47%	53%	0%
SIEF co-operations	33%	47%	20%
Related costs	60%	33%	7%
Unable to see to current clients	60%	27%	13%

Table 1 – Result of question "What are the concerns/challenges you see for REACH compliance in your organization?"

	Do not Know	No problem foreseen	Difficult, but possible	Need 3 rd party assistance	Not applicable
Correct substance identification/sameness	7%	64%	7%	21%	0%
Data sharing, quality & costing in SIEFs	14%	14%	43%	21%	7%
Deciding what additional tests are needed	21%	21%	0%	57%	0%
Creation of new material safety data sheets (SDS)	14%	29%	21%	29%	7%
Organizing, data interpretation & writing the registration dossier	7%	21%	29%	43%	0%
Using REACH specific IT tools (i.e. IUCLID)	15%	38%	15%	31%	0%

Table 2 – Result of question "In order to comply with full registration, what technical challenges do you foresee?"