



REACH registration and SMEs

Statistic

- 639 Hungarian companies → 13740 pre-registrations
 - 212 Hungarian registrations to ECHA

A significant proportion of them are SMEs

Deadlines

- 30. november 2010 < 1000 tonnes

Material Chemical Cooperative

- 01.June 2013 Registration > 100 tonnes

Expected difficulties during preparing the dossiers

- SMEs are not aware of obligations
- Language barriers
- Lack of knowledge of community background rules
- Rules on trade secrets
- Law of competition
- Changing IUCLID and REACH IT program
- Financing

Difficulties when dossier submitted

- Dossier is incomplete
- Compliance audit reveal deficiencies
- Insufficient links
- Material identity problem
- Form and content problems in Safety Data Sheets

Services available

Use of services:

- Translation
- Legal service
- IT service
- Expertise to comply with REACH requirements

Are SMEs able to finance all them?

Financial burden

Rules and cost sharing decided by members of consortia

- → no difference on manufacturing capacity
- → cost of LoA lower for the member of consortia
- → fix price of LoA for SMEs

Expreience of Material Chemical Cooperative

One Compound already registered:

- Failed to inform us about establishment of consortia → Higher cost of LoA. /Big companies had to pay less/
- Material's proposal for fee was rejected by SIEF.

Request: To determine fee-categories depending on yearly production capacity

Result: REACH registration unit cost are more than ten times higher than the cost of big companies!

SME's should focus on

Community level action →

- Cost should depend on company's annual turnover
- SMEs should join to consortia
- Detailed background information instead of fix price of the LoA

Target

REACH regulations should be

- Transparent
- Fair
- Non-discriminative



THANK YOU FOR THE ATTENTION!