



Experiences on upstream chromatates applications

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Implementation of REACh authorisation

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Hapoc has applied for eight authorisations:

0064-01 / 0064-02 / 0064-03 / 0064-04/ 0064-05/ 0091-01/0092-01 /0112-01



Upstream Authorization in the view of a SME downstream-user

Implementation of REACh authorisation

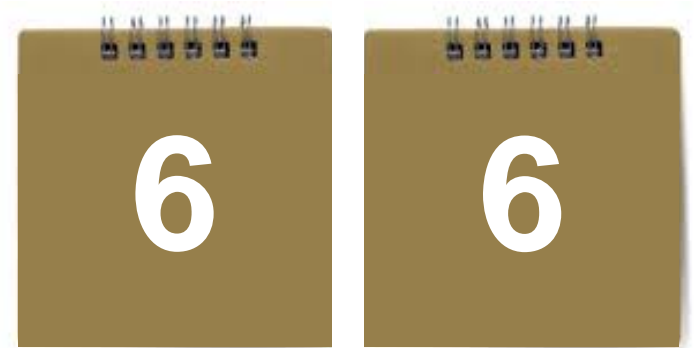
Application for Authorization on Chromium VI compounds

Number of Applications: 66 (107 uses)

Decisions by Commission: 14 (20 uses)

Opinions by RAC and SEAC: 52 (84 uses)

Upstream: 20 applications (42 Uses)



- Opinions on Upstream recommend review period of 4 or 7 years



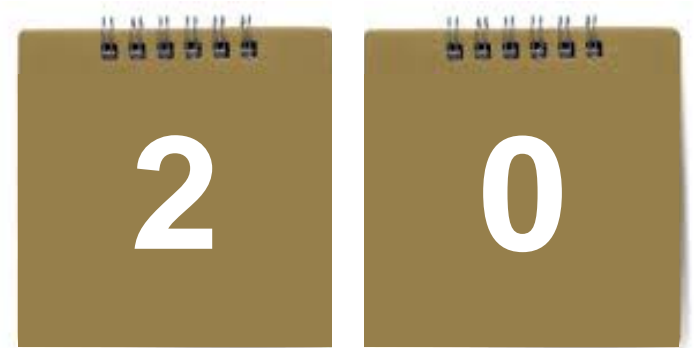
Implementation of REACh authorisation

Upstream is not like upstream

„Pure“ Upstream: e.G. CTAC or CSST

„Hybrid“ Upstream: e.G. hapoc

DU grouped under an upstream applicant



- Afa process and challenges are very much the same
- Obviously differences in practical implementation



Lessons learned

Communication & Comprehension

- DU and/or SME are still not aware of authorization requirements and impacts
- Collection of data is difficult even within a consortium

=> **Language of communication needs to be adjusted to the auditorium**

Format & Content

- Industry is very uneasy about necessary level of detail, quality of evidence, and visualization in the documents
- The more a potential activity lacks behind state of the art the less proof is documented for this fact

=> **Example cases would be better than guidance documents**

Scope

- Of original 7 uses 2 were discontinued, 2 reorganized, 1 additional use identified.

=> **More niche applications with unknown economic importance will appear over the next two years**

8



How to make a large group of SME companies
fit for REACh ?

Hapoc is a different approach of authorisation

- Hapoc is 106 companies grouped under an applicant
- Hapoc delivers chromtrioxid and essential side products
- USP: HAPOC supports with add-on`s SME companies to deal with REACH

- REACH information and REACH Monitoring
- Risk minimization concept
- R&D Projects
- Technical consulting
- Best Practice cases
- Measurement campaigns
- Webbased database: Exposure, Emission, Waste Water
- REACH Audits

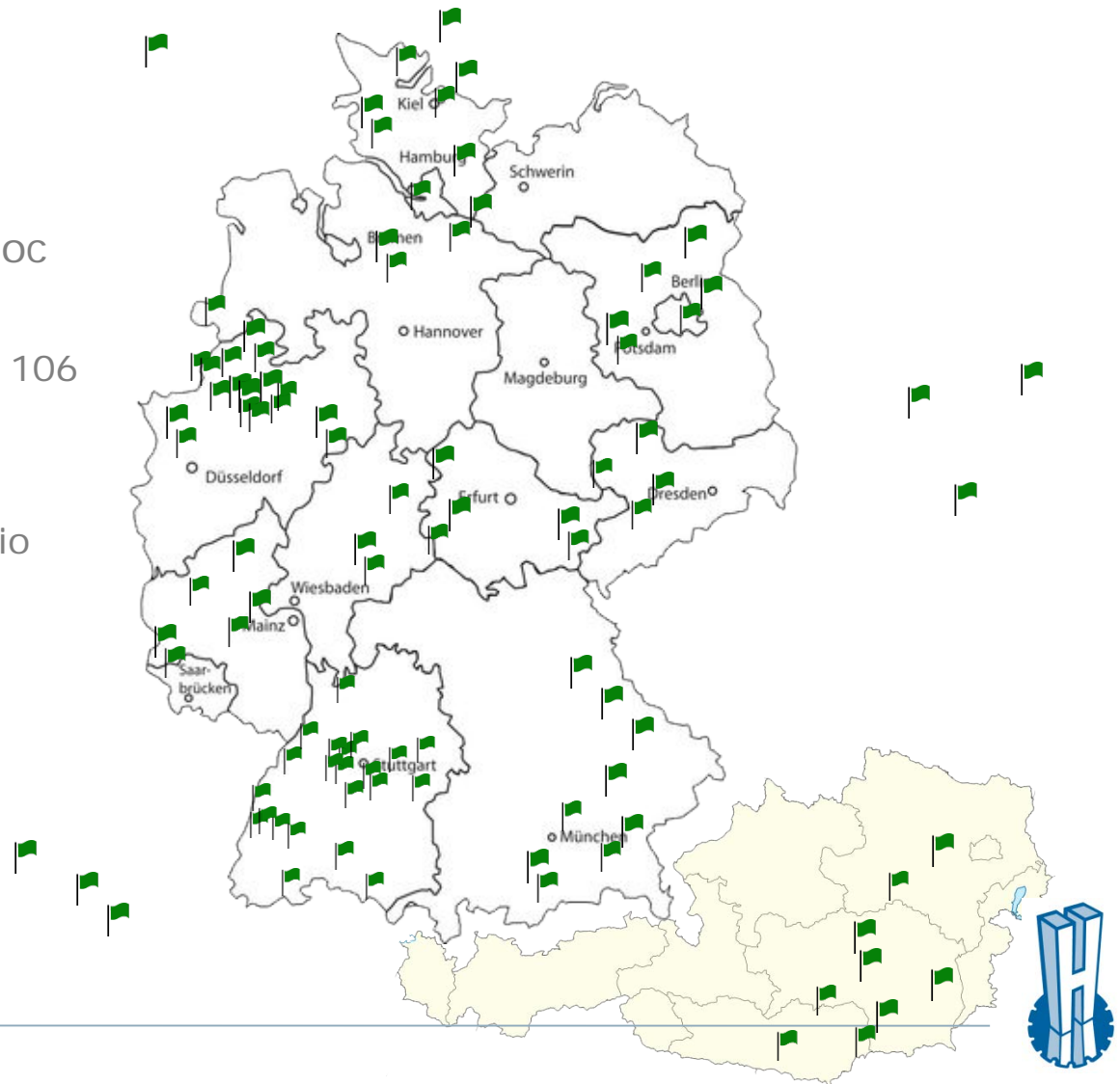
- AfA is designed for electroplating and SME jobplaters
- HAPOC is based on an cooperative approach



Implementation of REACh authorisation

Regional Spread: Hapoc

- Number of companies: 106
- Mostly: SME
- Average Turnover: 5 Mio
- Average workers: 50





Let's show ECHA



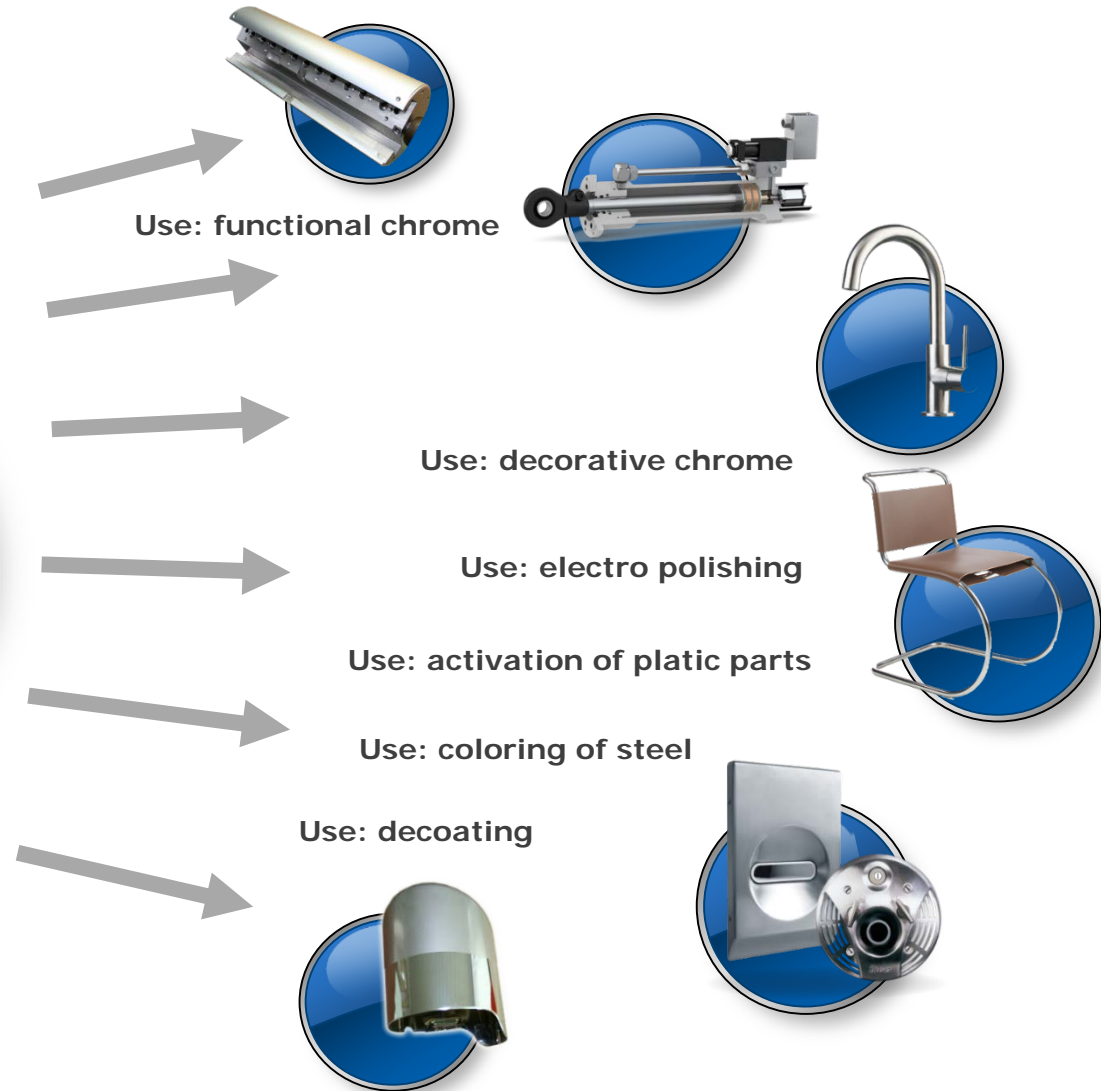


who we are



Implementation of REACH authorisation

Plating is used for:



Lessons learnt



Implementation of REACh authorisation

What makes it complicated ?



- > 100 companies
- Different Supply chains
- Different markets
- How to describe Non-Use ?
- How to describe Socio economic impact?



- > 100 companies
- Data not available for Upstream
- How do we get the data ?



Downstream User Network

- 150 Companies and networker
- Weekly phone-conferences
- Tutorials/ Newsletter / Videos
- Monitoring and Consulting
- Public briefing sessions (local, national, european)
- Processing of surveys (Response-Quote > 75%)
- Measurement Campaign (Response-Quote > 75%)



„50 % of my daily work is dedicated to REACh“

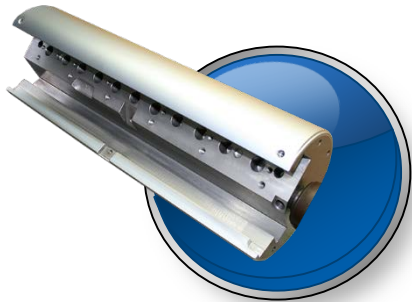
Thomas Kronenberger
General Manager LKS Kronenberger, Land Hessen, Bruxelles, 2015



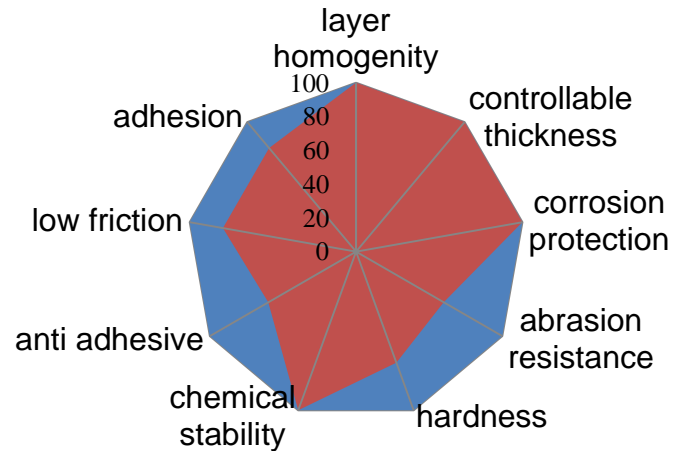
Implementation in
daily business



Analysis of Alternatives



Functional chromium plating Cr(VI) vs. Chem. Ni



- Technology-check
- Technical features of product
- Instrument: spider diagrams

- Technology-checks for all known alternatives available
- Lot`s of work but a good instrument of Customer-Relationship

Exposure

Measurement Campaign

Implementation of REACh authorisation

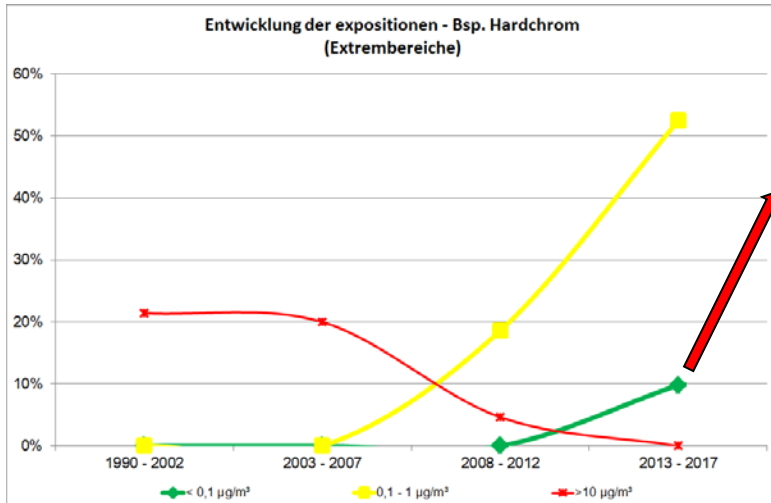
Measurement campaign on exposure scenarios (17 WCS)



Exposure

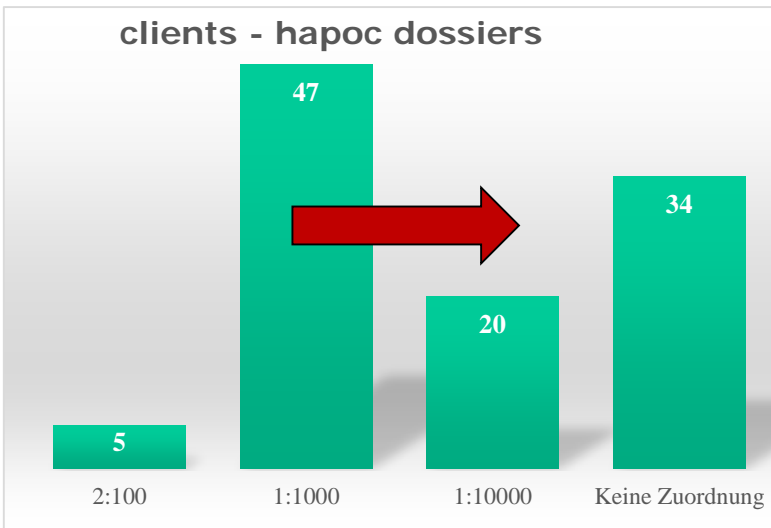
Values

Implementation of REACh authorisation



Development Exposure-values:

- Data for more than 10 years
- >1000 of real measurements
- Risk-level is decreasing
- High levels are insignificant
- Measurements in all WCS
- Risk-level can be improved
- Consulting (Best-Pratice)



Proposal OEL:

EU-Parliament: 0,001 mg/m³

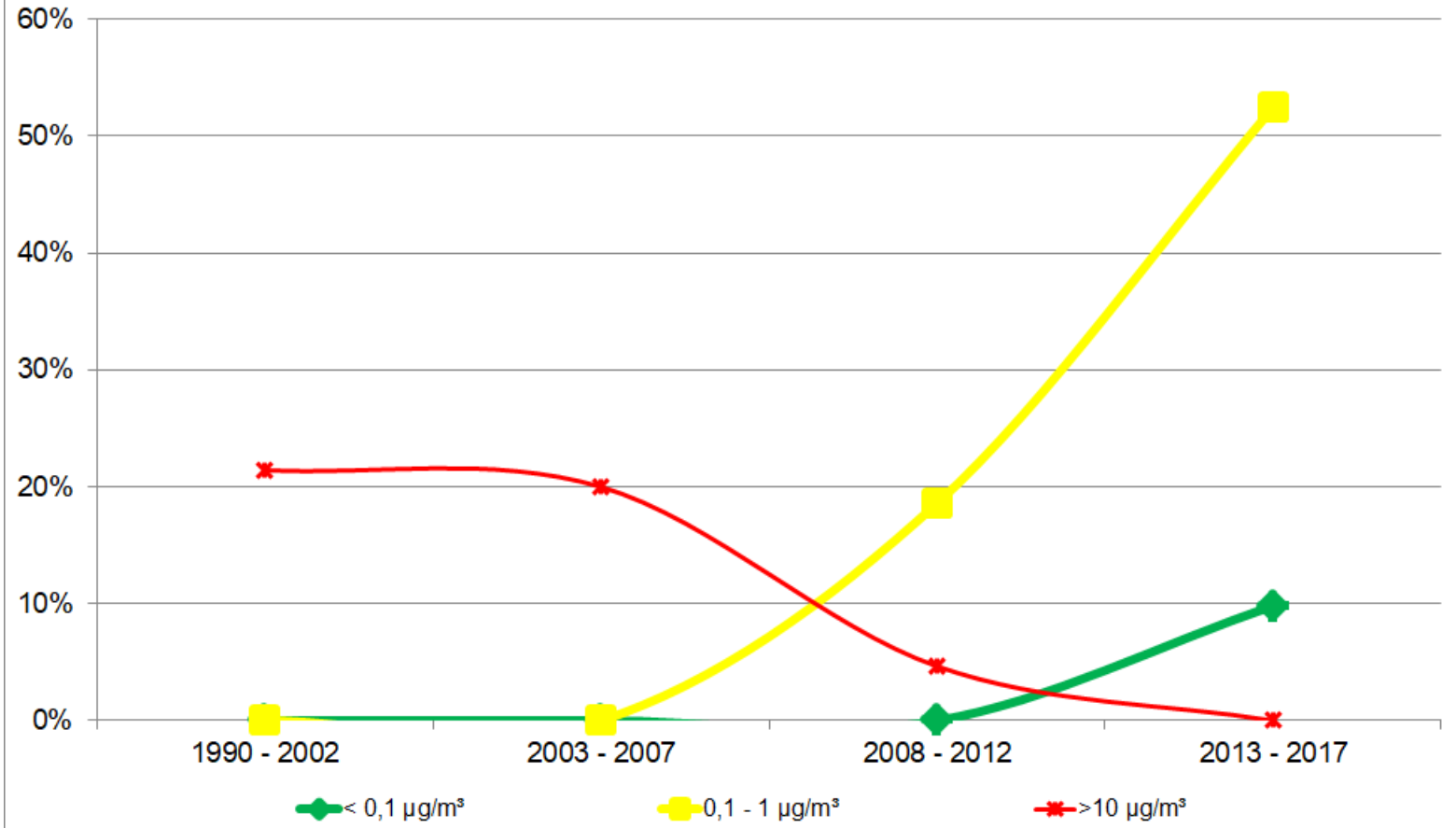
Guideline 2004/37/EG
EU-Parliament, Straßbourg
25. Oktober 2017

National OEL (Fr) 0,001 mg/m³



Implementation of REACh authorisation

Development exposure scenarios 1990-2017



Webshop and date base

myhapoc

Implementation of REACh authorisation

The screenshot displays the 'hapoc' web application interface. At the top, there is a navigation bar with the 'hapoc' logo and a 'my hapoc' user profile button. Below the navigation bar, a sidebar contains buttons for 'start', 'shop', 'my hapoc', 'kontakt', and 'impressum'. The main content area shows the title 'Anlage 112: Automat' and a status bar with indicators for 'Exposition' (yellow), 'Abwasser' (yellow), 'Abluft' (green), and 'Boden' (green). The 'Exposition' section contains a table of data:

Zuordnung Dossier:	hapoc 0064-02	
Abluftwert:	0,9	mg/m ³
Expositionszeit:	0,2	h
Dose-Response:	0,1	mg/m ³
MessDatum:	01.12.2015	
AblaufDatum:	01.12.2017	1 90 Tage verbleibend.
MessProtokoll:	+ neues Zertifikat auswählen!	

To the right of the table, an 'Achtung!' (Warning) box contains the following text:

Exposition:
Gültigkeit des Zertifikats läuft in 90 Tagen ab!
Bitte vereinbaren Sie einen Termin mit einem zertifizierten Messinstitut.

Abwasser:
Messwerte nicht im Toleranzbereich!

At the bottom of the main content area, there are two buttons: 'Angaben bestätigen' and 'Zurück'. The footer contains contact information for Hapoc GmbH & Co. KG and a copyright notice for 2016.



How can
upstream be
optimized ?



Conclusions:

- Upstream is more complicated
- Single-Applications seem to be more promising

Upstream Applications are necessary for authorisation system to work



Conclusions:

- Upstream is more complicated
- Single-Applications seem to be more promising

Upstream Applications are necessary for authorisation system to work

- Upstream has to be streamlined
- Clear and transparent criteria and decision-making
- Review periods to be reconsidered
- Upstream must have a chance for fair Review periods
- Active Downstream-User-Network
- Add-on instruments for more transparency and control
- Cluster Authorisation





No to risk





Yes to upstream





Thank you

