

# Registration, Evaluation and Authorization of Chemicals



Core Application Process



A COURT GLOBAL NETWORK



# Short biography

My name is : René van Rij,

Job title: General manager Hoco-RST,

Role in AfA: Main point of contact  
for the applicants side,

Company role: Lead applicant.

# Introduction Court Holdings Ltd (CHL)

- For more than **98** years, the Court Holdings Group has been providing exceptional product development capabilities, world-class technologies and superior quality products and services to the global Automotive, Steel and Aluminium industries.
- An international operation consisting of **39 independent, entrepreneurial facilities**, in **14** different countries, with over **2,000** customers in North America, Europe, China, Taiwan, Australia, Brazil and India., divided in two branches **MANUFACTURING** and **CORE**.
- Our Values: ETHICAL, RESPONSIBLE, LEADER, RELATIONSHIP, QUALITY, EMPLOYEES, ENTREPRENEURIAL MINDSET, SUSTAINABILITY
- Court Holdings Limited has established a reputation of excellence in several key industries.
  - *Automotive Parts, Rail Industry, Agri-Processing, Work Roll, Real Estate, Renewable Energy*



CORE  
53%



Automotive  
Parts  
35%



Real Estate  
7%



Rail  
Industry  
3%



Renewal  
Energy  
1%



Agri-  
Processing  
1%

# Introduction of CORE (a CHL global network)

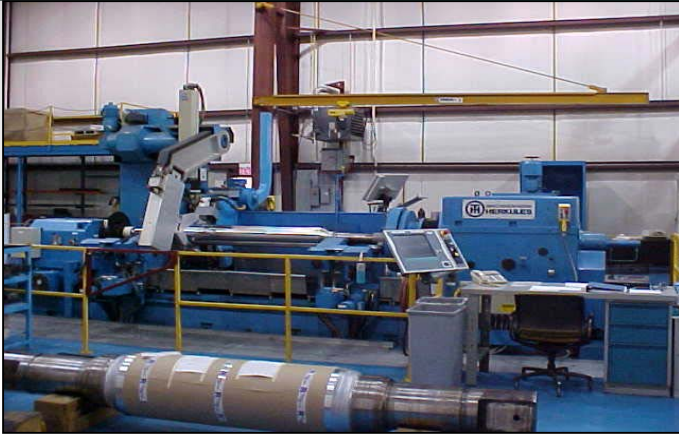


## CORE NETWORK

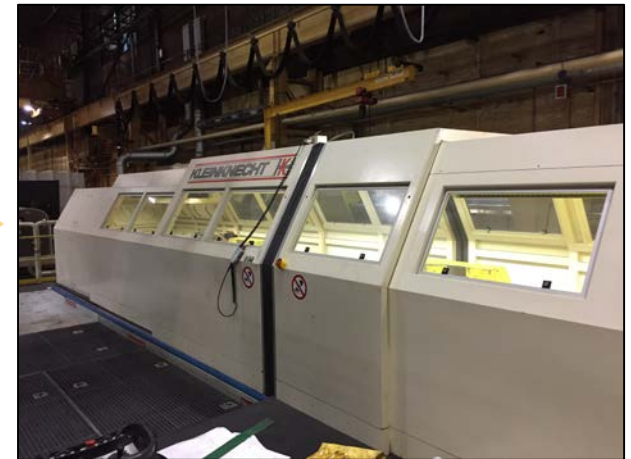
- 34 independent, entrepreneurial facilities operating in 14 different countries/ 15 JV + 3 Strategic Alliances
- CORE
  - We provide a metal rolling mill roll refurbishment & surface engineering service
  - Capabilities: Surface Engineering, Surface Coating – Metal Finishing, Benchmarking, Quality Management, Occupational Health & Safety Management, Environmental Management
- Leader and a Vehicle for Partners to access,
  - Emerging Technology
  - Suppliers to Global Steel & AI Industries



# Roll Group Services = Core

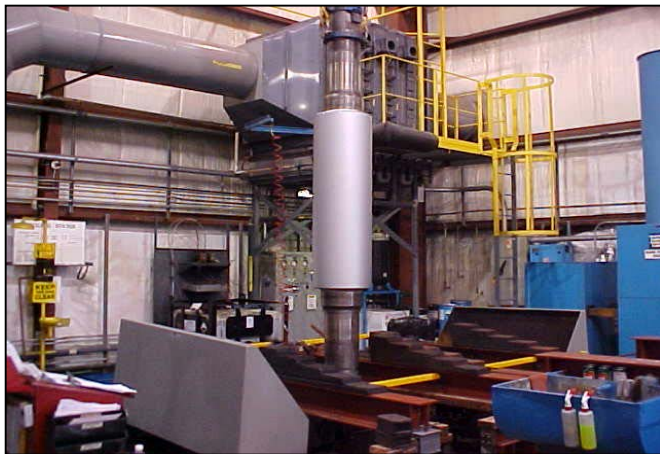


Roll Grinding (BUP, WR, journals)



Chrome Deposit


Texturing





# CORE locations in EUROPE

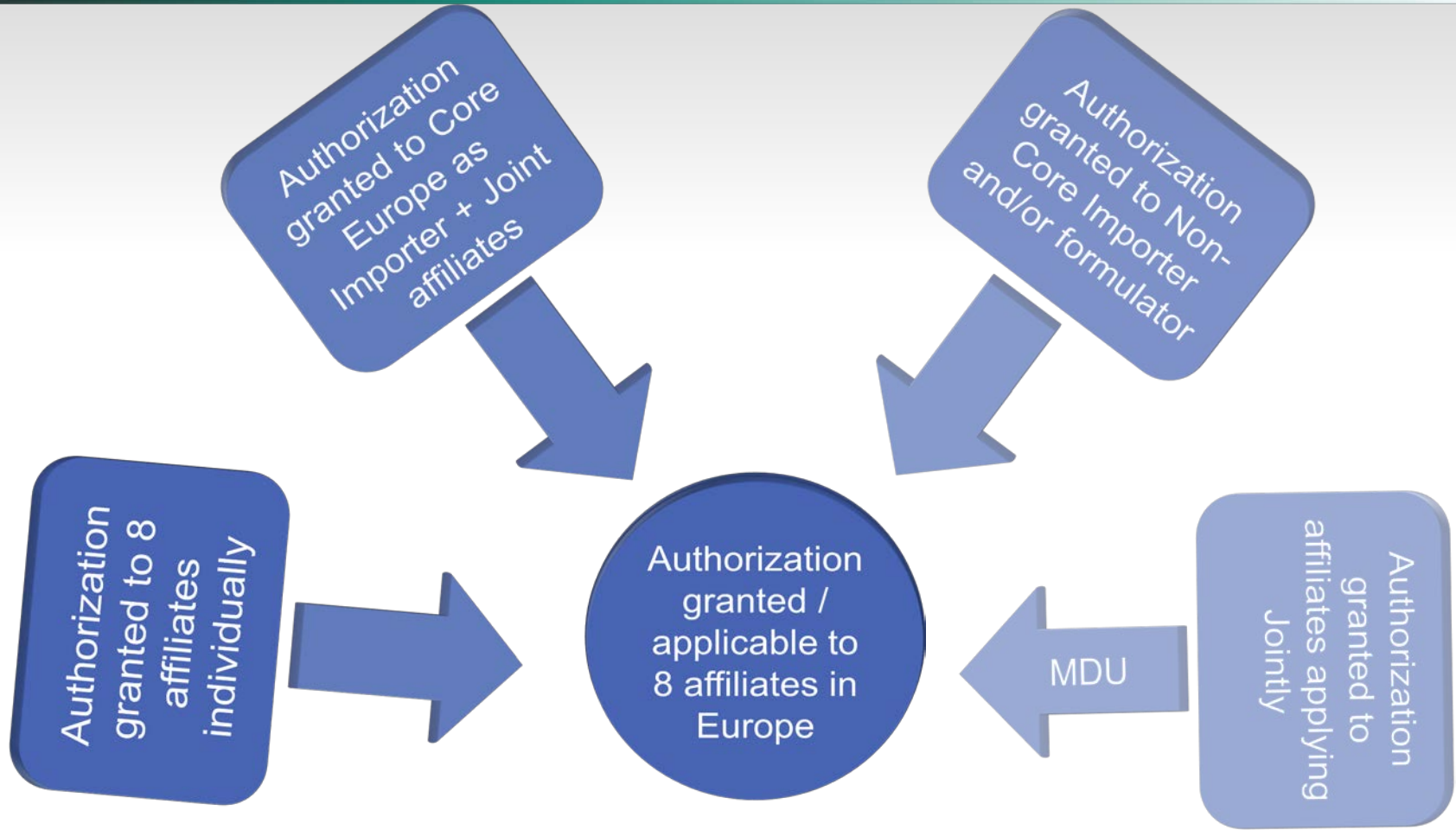


-   ArcelorMittal
-   ThyssenKrupp
-   TATA STEEL
-   Constellium
-   ILVA
-   S.R.S.C

# Core Europe, a Joint Applicant

Legal entity	Location site	Country	Partner
Nord-Chrome	Basse Indre	France	Arcelor Mittal
	Mardyck,	France	Arcelor Mittal
	Florange,	France	Arcelor Mittal
Hoco-RST	IJmuiden	Netherlands	Tata Steel
Walzen-Service-Center GmbH	Oberhausen,	Germany	Thyssen Krupp
	Dortmund	Germany	Thyssen Krupp
WAVEC GmbH	Eisenhüttenstadt	Germany	Arcelor Mittal
RHENAROLL	Neuf-Brisach	France	Constellium
Texturing Technology Limited	Port Talbot	Wales, UK	Tata Steel
T.C.L. Srl	Novi Ligure (AL)	Italy	Ilva
NC POLAND	WARSAWA	Poland	Arcelor Mittal

# Choice to make.





# Multi Downstream Users application

## Pro's MDU application

- **A high similarity in processes**
  - Use existing benchmarking data
  - Relatively easy to gather needed data, speaking the same language, and having a hierarchy in place.
- **Use a single point of contact for the consultants**
  - Quick and uniform reaction
  - Homogenous data
  - Communication through the SPOC reduces the noise in information.
- **One goal, one focus**
  - Dedicated and focused project leader in contact with consultant
  - Back-up of multiple multi-national steel companies
  - Possibility to use the resource of our partners
  - Independent of any supplier, free to buy chrome anywhere.
- **Economical advantage**
  - Easy to expand when more plant arise
  - Share the costs of the consultant
  - Better position in price negotiations with suppliers

## Con's MDU application

- High grade of confidentiality (NDA's) consultant and our Customers because we needed the financials of our customers. Finally they were communicated strictly confidential with our consultant (EU competition council)
- More internal work to keep everyone focussed
- Higher costs then joining CTAC supplier application
  - Lanxess, Atotech, Ethon e.o.
- Availability of a senior officer to be dedicated to this process
  - Invest in relation with the partner
  - Must have a lot of internal network connections
- **Good, knowledgeable consultants is a must!**
  - To provide feed-back
  - Support
  - Procedure knowledge
- Need a high level of endurance

- Remain independent
- Stay in control of the Authorization

# IMPACTS CONSIDERED AT OUR CUSTOMERS (STEEL MILLS)

The non-availability of chrome plated work rolls affects customers business to a different extent, depending on the quality of steel.

**'Product line type 1'** - Steels, that can still be produced in a reasonable quality, but would cause one or more of the following consequences:

- A loss of mill production capacity
- Higher operational and logistical costs
- Increased rejects;
- Lower rolling process stability

**'Product line type 2'** – Steels, that can be produced in the requested quality but only, if additional investments (e.g. cleaning lines) are taken. This might lead to negative economic impacts on the business (in addition to those named under “Production line 1”, like higher roll exchange frequency) :

- investment costs for additional equipment/machinery (e.g. cleaning line...);
- increased operational costs;
- higher chemical use;
- increased rejects and down grading of steel

# IMPACTS CONSIDERED AT OUR CUSTOMERS (STEEL MILLS)

**‘Product line type 3’** - The non-availability of chrome plated work rolls will result in unacceptable quality of steels (for at least a significant portion of the mill’s product mix) such that the customers would not purchase it anymore. This would lead to:

- **Stop of respective business field(s)** with severe impacts on others;
- **Loss of market share** / loss of market segments.

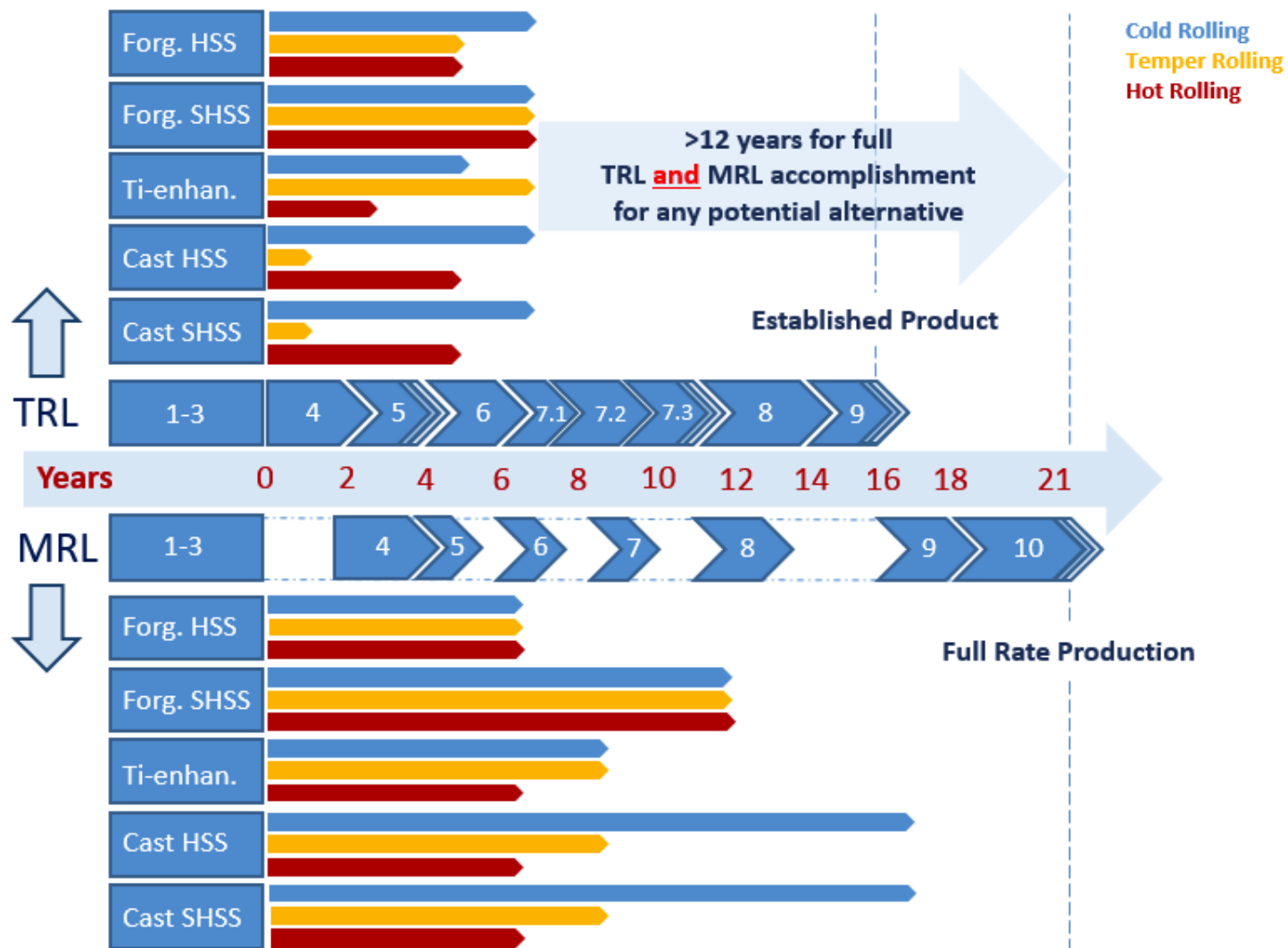
Because of the weight of the rolls, the applicants sites and customers sites need to be geographically close to minimise transportation costs. Besides the extra exhaust of CO<sub>2</sub>, it will be too expensive for your customers to outsource the rolls outside the EU.

The steel industry is a **very competitive business** with capital intensive investments and **long investment cycles**. European steel companies can only continue business economical feasible by providing their clients with a product mix of high quality steels.

A evaluation of impacts at the steel mills, accepted by SEAC, related to this authorisation results in **yearly costs of more then €5.7 billion** for the scenarios stated above. Also, additionally investments of more than € 400 million would be required. Business loss for Core Europe is at least **€95.3 million**.

**Monetised health impacts is lower then €3.25 million**.

# TRL/MRL; Technology/Manufacturing Readiness Level



# Conclusions;

- For us applying for a own authorisation was more or less natural
- By applying jointly we had a connection with the three big steel producers in Europe, and added value to our company for them,
- Controlling the authorisation in our own hands, no dependency on any third party, for complying to EU demands and sustaining the authorisation,
- It is important to have a good consultant who understands, or want to understand the business you're in,
- We came to the final choice of a joint application after consulting a well informed law firm explaining all the legal pro's and con's,
- Back-up of our customer was crucial, the economic impact on their business was much bigger then ours, in a non-use scenario,
- Using the TRL/MRL method made the needed review period very clear,
- To get started, we experienced a lot of uncertainty because of vague outlines by ECHA in the beginning of the process,
- It is a very expensive process, fees, consultant, legal advise, and internal hours
- PSIS was a interesting experience, good discussion, and meaningful clarifications.



# Acknowledgement

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