



# Chemical regulations from the industry perspective – best practices, challenges and shortcomings

Jiří Brejcha, Prague, December 6th 2018

# Different positions x same path?

- Producers
- Traders / partners
- Downstream users
- Suppliers



# Aspects of chemical substance regulations

- Information chain
- Information exchange
- Confirmation possibility
- Saving of position – industry and/or companies
  - Not single approach
  - Fair and clear competition x cooperation
- Enforcement
  - Needs
  - Cooperation
  - Feedbacks
- EU goals x Global goals = positions x Global strategies
- Role of associations
  - Communications
  - National x EU level – different path and approach
  - proactive role of ETRMA





# Chemical legislation



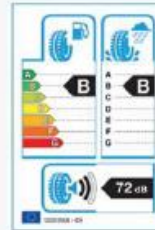
- Different development in different part of the globe
  - EU 27/28 REACH, UK REACH ??????
  - China REACH
  - Korean REACH
  - Turkey REACH
  - Russia ?
  - US – California proposition No 65
- Same tasks – different legal text = need of single framework
  - Clear and easy to understand
  - Stable approach
  - Communication and cooperation
- Conflict minerals – US x EU – differences in development ?



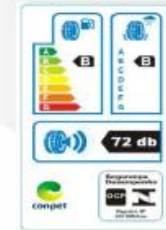
# Labeling of tyres



Voluntary & active since 2010  
<http://www.jatma.or.jp/english/labeling/outline.html>



Mandatory & active since 2012  
<http://www.etma.org/public/activitiesstyreg.asp>



Mandatory as of 2016  
<http://www.inmetro.gov.br/>



Mandatory & active since 2012  
<http://www.kotma.or.kr/>



Proposal since 2010  
<http://www.nhtsa.gov/>



Introduction in discussion for 2016



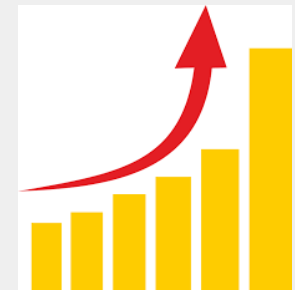
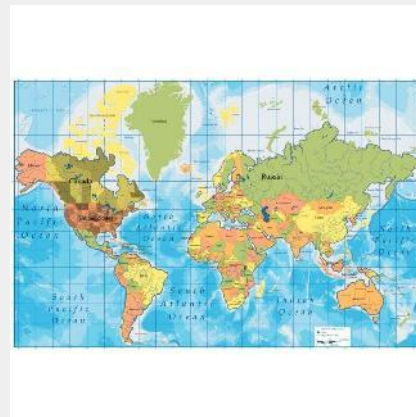
# Supply chain

- Classification – CLP – same or different
- REACH registration
  - number is sufficient info and sources ?
  - how to be proven ?
  - tonnage ?
- Material safety data sheets
  - Language
  - Classification
  - Reliability of information



# Availability of raw materials

- REACH registration deadline
- Cost of registration – cost of chemical substance
- Global market situation = secure of development and business
- Respect positive approach
- Safety first !
- Proactive role of industry
- UK REACH ?



# How to improve and also check own situation ?

- Analytical methods – help to develop, evaluate and prove
- SVHC
  - not available single method x cocktail effects
  - only national standards
  - cost
- Cooperation with Universities
- Lack of understanding and interests
- Need to be improved
  - Capabilities
  - Independency
  - Expertise
  - Helicopter view
  - Non disclosure of information x open access policy
  - Educational aspect = future continues improvement





# Any questions?



Jiří Brejcha

Material development

Trelleborg Wheel Systems

Švehlova 1900, Prague 10

Czech Republic

Email: [jiri.brejcha@trelleborg.com](mailto:jiri.brejcha@trelleborg.com)



Thank you