

# Lower Olefins and Aromatics Reach Consortium A Case History

REACHsuite Customer Focus Day  
5<sup>th</sup> November 2009

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# Who are LOA?

- **Lower Olefins and Aromatics REACH Consortium**
- **Governed by the LOA Temporary Association**
- **40 member companies consisting of the Industry's 'Big Names'**
- **+ Technical Service Providers**
- **+ Hunton & Williams Legal Team**
- **Open for all to join via a membership fee & agreement**
- **Financial resources agreed until end of 2010**
- **Website at [www.loa-reach.com](http://www.loa-reach.com)**



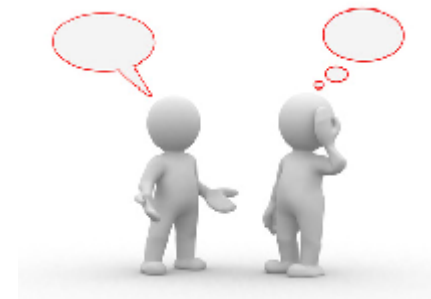
# What is LOA's Scope?

- **Covers 136 substances including:**
  - ethylene
  - propylene
  - butadiene
  - benzene
  - toluene
- **30 Substance Dossiers**
- **106 substances benefit from a category approach in 14 categories**
- **Streams from steam cracking and Aromatic units**
- **2 reaction masses**



# January 2009 – What We Expected

- **150000 pre-registrations in total**
- **Pre-Registration would close on December 1<sup>st</sup> 2008**
- **1 upload of SIEF data into the REACHsuite system per SIEF**
- **Communication with the SIEF via chat rooms & individual email / telephone conversations**
- **LOA would automatically take the SFF role as we were the TPR**
- **Enthusiastic Co-operative collaboration!**



# January 2009 – What We Got

- ECHA received 2.2 million registrations (approx. 15x their original estimate)
- REACH IT had to close while ECHA revised their substance lists
- SFF role had been blocked by a small number of money hungry ‘Unhelpful Organisations’
- Re-think strategy on:
  - Communication with thousands of members
  - Maintenance of thousands of contacts
  - LOA Costs Sharing Paper
  - Assuming the role of SFF



# SIEF Management for LOA

- Full time SIEF Manager
- 136 SIEFs with between 2 and 4500 members per SIEF
- 37500 contacts within the system regularly updated via REACH IT
- SIEF Report Page per substance for 'fair, open and transparent communication of information'
- Some SIEFs split due to member uses
- Managing the SIEF process inclusive of:
  - Data call in
  - Sameness Check information
  - Classification & Labelling
  - Uses & Exposure
  - Registration & Dossier download



## REACHsuite – The Tool for the Job

- **Manages all contacts within each SIEF**
- **Allows email communication with entire SIEF, all SIEFs, specific groups or select individuals within the SIEF**
- **Builds a SIEF Report Page per substance for displaying all SIEF issues**
- **Allows for information to flow directly into the database from online forms**
- **Will handle all contractual needs online and provide contracts for purchase of Dossiers or Letters of Access**



# Learning from LOA - Communication

- **Keep communications as short as possible**
- **Limit the number of attachments you send**
- **Be prepared to 'educate' spam filters**
- **Out of Office replies = No Reply Address**
- **Mid week emails get highest hit rate**
- **Limit the email traffic by posting an up to date set of FAQ's on a website**
- **Use clear and concise English**
- **Limit graphics to an identifying logo or similar**
- **Ensure members maintain contact details**



# Learning From LOA – Data Gathering

- Use a 'constructable' form (Cform) to be completed online by each SIEF member
- Ask the right questions in the right way
- Give a deadline for closing the form and stick to it
- Do not allow members to leave questions unanswered
- Be prepared to answer questions about your questions
- Only ask for useful information
- Minimise unqualifiable data fields – no text boxes!
- Be prepared for a low response rate
- Publish your data in a clear way



# Learning from LOA – Advising Others

- **Know your limits!**
- **The SIEF Manager is not a chemist**
  - But she knows some people who are...
- **The SIEF Manager is not a REACH expert**
  - But she knows a man who is...
- **The SIEF Manager is not a technical computer helpdesk**
  - But she will try and help...



# Learning From LOA - Unhelpful Organisations

- **Offer an open dialogue where interests overlap**
  - Most will fall on deaf ears
  - But not all
- **Lead by example and be organised**
  - Stay ahead of the game
  - Be 'open, fair and transparent' in all aspects of the work
- **Make it clear to all SIEF members that you are not affiliated with or working with other 'Unhelpful Organisations'**



# Conclusions

- **Strong Leadership & consistent approach required by the SIEFs**
- **REACHsuite needed to enable the management of the SIEF process**
- **Full time SIEF Manager to operate the system and drive the SIEF process**
- **Team of experts in REACH regulation and chemistry to help answer technical questions**
- **Effective communication strategy**
- **Desire to remain SIEF Pioneers**

# Thank You For Listening



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