RPA

Risk & Policy Analysts

REACH Services

RISK & POLICY ANALYSTS LTD

Risk & Policy Analysts Ltd.
RPA is an independent consultancy with an established reputation and proven experience in the fields of chemicals policy and chemicals risk management.

We provide multi-disciplinary, innovative expert advice and strategic analysis skills, and have been assisting our clients in both the public and private sectors for more than 25 years. RPA's experience encompasses a diverse range of sectors, with our most active areas of work including chemicals, construction, raw materials, water, marine/coastal, energy, waste, industrial policy, consumer policy and tourism. We also undertake risk assessments of novel technologies and other activities posing physical hazards.

We pride ourselves on delivering high quality, bespoke services, which include:

- Strategic analysis to assist decision makers with the development and implementation of sustainable policies
- Engagement in regulatory compliance, for example, assisting stakeholders in meeting their obligations under the REACH Regulation
- Stakeholder engagement, including supply chain mapping work, where this may include workshops, interviews, questionnaires and drop-in sessions run by trained facilitators
- Qualitative and quantitative impact assessment, including the monetary valuation of human health and environmental impacts
- Cost-benefit analysis covering economic, social and environmental aspects
- Systematic collection and synthesis of technical data, including information on chemical functionality, alternatives assessment and market analyses
- Problem-specific methodology development and production of associated guidance on how to undertake analyses to meet regulatory and other requirements.

RPA's Experts

RPA's team consists of an established, multi-national group of highly experienced and qualified staff. With backgrounds in chemistry, chemical engineering, environmental science, toxicology and economics, RPA's highly accomplished and multi-disciplinary team provides an exceptionally high-quality, tailor-made consultancy service to clients in the private sector (e.g. multinational corporations, SMEs, company consortia and industry associations), as well as the European Commission, national governments and regulatory agencies.

Highly regarded for our superior services by clients, contemporaries and colleagues alike

RPA's consultants are able to communicate fluently in 10 international languages and are supported by a team of experienced communications/administrative staff. With technical directors possessing many years of experience in their chosen field of expertise, and an extensive network of freelance academic and industry experts who we can call upon to supplement our in-house skills, RPA guarantees that it will deliver exceptional outcomes for every project.

"RPA are committed to the job, responsible, punctual, reliable and always ready to assist and help"

- Marek Pabis

Grupa Azoty S.A. REACH Representative

CHEMICAL SERVICES

Chemical Services

RPA has established an unrivalled reputation in the fields of chemicals policy and chemicals risk management.

This started with the development of risk reduction strategies under the Existing Substances Regulation (ESR) on behalf of the UK and other European Governments, and progressed into the analysis of the socio-economic advantages and drawbacks of legislation on the control of risks from chemicals to human health and the environment on behalf of the European Commission.

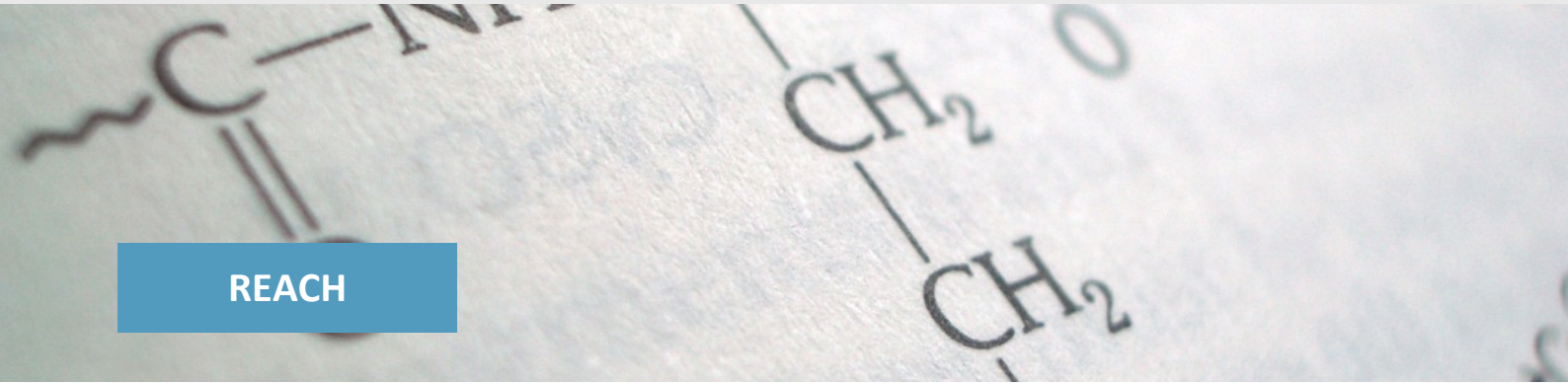
The REACH Regulation has revolutionised the way chemical risk management is undertaken in the EU, whilst creating an environment for similar legislative frameworks to develop in other global regions. RPA has been actively involved in REACH from its inception, undertaking the main Business Impact Assessments for both DG Enterprise and DG Environment on the then draft Regulation and assisting in its progress through the regulatory process by providing assessments of the impacts of proposed amendments. Over the years, we have developed several guidance documents for the implementation of REACH, including a guidance document for DG Environment on assessing health and environmental impacts as part of socio-economic analyses prepared to support REACH Authorisation or Restriction proposals. We have also undertaken studies on the potential impacts of the REACH Regulation for a number of EU trade organisations and companies in the private sector. RPA is currently actively working on several aspects of REACH, mainly Authorisation and Restriction, and the development of guidance and methodologies for a range of clients, within both the private and public sectors.

RPA is also closely involved in ongoing work on the need for (and development of) regulation in relation to the safety of nanomaterials. This includes the preparation of an impact assessment for the European Commission to identify and develop the most adequate means to increase transparency and ensure regulatory oversight for nanomaterials on the market; RPA has also analysed the suitability of the EU Occupational Safety and Health (OSH) Legislation in protecting workers from potential risks and hazards inherent to nanomaterials' exposure and nanotechnology use in the workplace.

RPA's work on chemicals is crucially interlinked with work on enterprise and industrial policy, as we take a holistic view of the potential socio-economic impacts of regulatory intervention on specific industrial sectors and markets in the EU (and often beyond), along with the safety, market availability, quality and cost of consumer products.

In the area of chemicals, RPA's capabilities enable us to:

- Support industry organisations (individual companies, consortia, associations) in understanding their REACH-related obligations and developing strategies for addressing future regulatory challenges
- Prepare analyses of alternatives and socio-economic assessments according to REACH guidelines either for industry or for public authorities, for example as part of a REACH compliance strategy (Authorisation)
- Collect, synthesise and analyse information on market structures, flows of chemicals, and articles containing them, into and out of the EU, and provide strategic advice on competition dynamics and the competitiveness of specific chemical industry sectors
- Organise and execute communication strategies along the supply chains of specific chemical substances, typically as part of a wider study



REACH

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals.

The REACH Regulation (Regulation (EC) No 1907/2006) came into force in June 2007 and has revolutionised the way the marketing and use of chemicals are regulated in the EU. The Regulation lays down specific duties and obligations on manufacturers, importers and downstream users of substances on their own, in mixtures and in articles. It is based on the principle that industry should manufacture, import, use or place substances on the market with such responsibility and care as may be required to ensure that, under reasonably foreseeable conditions, human health and the environment are not adversely affected.

RPA has a wealth of experience and expertise in helping clients manage their regulatory and compliance risks and obligations under REACH and other chemical regulations

Our REACH Services

RPA provides advisory services to a variety of clients in the area of REACH Authorisation and Restriction. We employ a highly experienced and competent chemicals team, consisting of chemists, toxicologists, chemical engineers, economists and environmental scientists to cover all aspects of a chemical's lifecycle. Having now supported ECHA, competent authorities and industrial clients, we have developed a detailed, tried-and-tested methodology for collecting and analysing information and preparing the necessary reports according to ECHA's specifications and to meet the needs of its Risk Assessment (RAC) and Socio-Economic Analysis Committees (SEAC).

Our services are currently more focused towards supporting European industry associations and private companies, both large and medium/small enterprises. This includes working with companies or associations across a wide range of industry sectors including: bulk chemicals, organic and specialty chemicals, ferrous and non-ferrous metals, paper, petrochemicals, pharmaceuticals, polymers, explosives, soaps and detergents, fragrances, cosmetics, etc.

The types of REACH-related services we offer

For industry clients (trade associations, consortia of companies and individual companies): RPA provides analytical, strategic and advisory skills in relation to Authorisation and Restriction, including:

- Project management services
- Strategy development and more detailed study scoping coping services
- Updates to registration Chemical Safety Reports (in association with leading experts in the field of risk assessment)
- Supply chain communication
- Analyses of alternatives
- Socio-economic analyses
- Preparation of substitution plans

For authorities and public bodies: RPA is capable of providing analytical and advisory skills in relation to:

- Market analyses for Annex XV dossiers (SVHC and Restrictions)
- Analyses of alternatives for Annex XV dossiers (SVHC and Restrictions)
- Development of guidance for the implementation of REACH requirements
- Provision of training

AUTHORISATION AND RESTRICTION

Authorisation and Restriction
RPA have been at the forefront of REACH Authorisation since its inception.

With respect to REACH Authorisation, our industry clients range from major global sector groups to individual company applicants, and from manufacturers to downstream users. We have supported consortia with related but varying uses, as well as group applications with identical production processes. We are frequently called upon by consortia managers to help their consortia formulate meaningful arguments that will have an impact on decision-makers, for submission to public consultations under various REACH processes. For REACH Authorisation and Restriction services, some clients elect to work with their existing (generally REACH Registration) toxicology/scientific consultant, with RPA providing the expertise on socio-economics and the analysis of alternatives. In other cases, where clients request the input of risk assessment experts, we collaborate with highly-reputed toxicology service providers that also work closely with industry and regulators.

To date, RPA has been or is involved in the preparation of Applications for Authorisation (AfA) for eight substances and 26 uses on behalf of 34 different applicant companies. This has included preparing the AfA two phthalate plasticisers, DEHP and DBP for a range of clients, including the DEHP Authorisation Task Force (which submitted three individual applications), a group of recyclers of PVC waste containing legacy DEHP (which submitted a single, joint application), an American-German joint venture company which submitted an application for the continued use of DBP, and a European manufacturer of DBP which submitted applications for two downstream uses. Two applications have already been granted by the European Commission for a review period of 12 years, while the remaining applications are pending, having already received favourable opinions from the ECHA Committees. In addition, we have supported a Polish company in gaining Authorisation for the continued use of trichloroethylene, again with a 12 year review period, while we are currently supporting another user of the substance in preparing a review report.

In 2015-2016 we also supported a further 19 companies in submitting Applications for the Authorisation of chromium trioxide, sodium dichromate and ethylene dichloride (EDC). Sixteen applicants have received a recommendation for a 12 year review period, while two more have asked for and received a recommendation for a 10 and a 4-year review period. One application is still pending. In addition, we are undertaking Scoping Studies for two companies using two different substances in the lead up to new Applications for Authorisation and are assisting various parties with a strategic interest in substances listed on the 5th and 6th recommendation lists. Finally, we are acting as technical service providers to Working Group 5 of the International Aerospace Environment Group on REACH Authorisation related matters. This has included the development of core socio-economic and analysis of alternatives arguments for use in future applications.

RPA recognise the need to stay at the forefront of developments. We actively participate in the Network of REACH SEA and Analysis of Alternatives practitioners (NeRSAP) and regularly attend and present at ECHA workshops and meetings. We have also written expert articles on REACH Authorisation in scientific journals and our prior work is included in examples of Authorisation documents chosen by ECHA as well as a Guide to applicants issued by ECHA.

RPA have received much praise for their Authorisation related activities and are in a position to provide a number of positive recommendations from previous clients.

OUR WORK

Our Work

RPA's past and current REACH Authorisation work*

Substance	#Uses	Client	Consultant & Action	Submission	Status
Bis(2-ethylhexyl) phthalate (DEHP)	5	5 companies	AoA & SEA Peer review of Application	2013	**Authorisations granted:** one for 7 years, two for 4 years **Authorisations pending:** three recommended for 4 years
Dibutyl phthalate (DBP)	3	2 companies	AoA & SEA	2013	**Authorisations granted:** three for 12 years
Trichloroethylene (TCE)	1	2 companies	AoA & SEA	2014 - 2018	**Authorisations granted:** one for 12 years **In preparation:** one review report
Chromium trioxide & sodium dichromate	7	14 companies	AoA & SEA	2015 - 2016	**Authorisations pending:** nine recommended for 12 years; one recommended for 10 years (as requested by applicant)
Ethylene dichloride (EDC)	8	9 companies	AoA & SEA	2015 - 2016	**Authorisations granted:** one for 12 years **Authorisations pending:** six recommended for 12 years; one recommended for 4 years (as requested by applicant); one still at draft opinion stage (delayed by ECHA)
PBT substance	1	1 company	AoA & SEA	2018 - 2019	**In preparation:** undertaking a Scoping & Strategy Study
Endocrine disrupting substance	1	1 company	AoA & SEA	2019	**In preparation:** undertaking a Scoping & Strategy Study
8 substances	26	34 companies			

* Up to March 2017

KEY REACH STAFF

Key REACH Staff
The expert team at RPA consist of an established multi-national group of highly experienced and qualified staff.

Meg Postle is a founding Director of RPA, with over 25 years of consultancy experience. Meg is the Director responsible for RPA's REACH Authorisation support work, including work for Working Group 5 of the International Aerospace Environment Group and more chemical specific consortia. With a background in natural resources and environmental economics, she has extensive experience in applying economics techniques within the field of chemical risk management. Meg has been involved in a wide range of impact assessments carried out for the European Commission related to REACH, CLP, the Carcinogens and Mutagens Directive, Reprotoxins and nanomaterials.

Panos Zarogiannis is RPA's Technical Director for Chemicals Policy and is experienced in undertaking extensive analyses of the impacts on industry, consumers and authorities from the implementation of regulation affecting the marketing and use of chemicals and their products. Panos leads the technical component of RPA's work for REACH Authorisation of several Substances of Very High Concern (including for sodium dichromate on behalf of a Consortium of seven Downstream Users) and has been involved in all Authorisation projects so far, including participation in PSIS and Trialogue meetings. Mr Zarogiannis has extensive experience in managing chemical risk management projects on behalf of public and private clients since joining RPA in 2000.

Linda-Jean Cockcroft is a Technical Director for Business, Industry and Growth. With almost 20 years' consulting experience, Linda-Jean has extensive knowledge of and expertise in the REACH Regulation, both from an industry and a consulting perspective. She has worked full time in industry on REACH Authorisation and has considerable experience in consulting on Authorisation and Restriction and related issues. With expertise and experience in business risk management on sustainability and other key chemical industry issues, Linda-Jean has a unique combination of industry-based regulatory strategy experience and knowledge of industry, regulatory and stakeholder-relevant REACH issues.

Tom Persich is a Senior Consultant with RPA with experience of working on a range of projects both for the European Commission and for Industry. Tom specialises in collating and analysing information on the hazard profile and physicochemical properties of numerous chemicals. Tom regularly undertakes work for industry clients on the formulation of AoA and SEA documents under the REACH Authorisation process.

Highly skilled experts able to communicate fluently in several international languages

RPA

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