

REACH
IMPLEMENTATION
BY AN
IMPORT/EXPORT
COMPANY

COMPANY PRESENTATION

- MASSO business is focussed mainly in IMPORT of chemical products for several sectors of use.
- Our Headquarters are located in BARCELONA , but we have 4 additional European offices in FRANCE, POLAND ,CZECH REPUBLIC , HUNGARY, and 3 more in CHINA, INDIA & DUBAI.
- We work with more than 100 different countries , most of them located outside Europe.



PRODUCTION

BARCELONA

39.000 m²
Warehouse
Formulation plant
R+D
Quality Control



Logistics



TARRAGONA

20.000 m²
FOR DISTRIBUTION

Logistics



CASTELLON
(Ceramic Department)

19.700 m²
22.000 Tonnes Bulk
Capacity



WHERE ARE WE?



COSMETICS

Actives
Aesthetic modifiers
Emollients
Emulsifiers
Film Formers
Humectants
Preservatives
Solubilisers
Surfactants
Thickeners



PRODUCTS FOR ENVIRONMENTAL HEALTH.

Biocides for pest control in urban environments: insecticides, rodenticides, disinfectants, traps and application equipment.

FORMULATED PRODUCTS AND ACTIVE INGREDIENTS FOR HOUSEHOLD, INDUSTRIAL & INSTITUTIONAL CLEANING

Cleaners, Antioxidants, Optical brighteners, Rheological modifiers, biocides for Household use, mass market products



AGROCHEMICALS

The Agro Division of Comercial Química Massó, S.A. formulates and distributes to the Spanish & Italian & Portuguese market a wide range of Crop protection products.

Most of these products come from foreign companies, some of them being among the most important International Companies in the Crop Protection sector





Food ingredients and additives for food, dietetics and functional foods.

- Probiotics & Prebiotics
- Peptides
- Lecithin
- Spices
- Functional Ingredients for Meat Products
- Seasonings and Decorative Herbs
- Flavours
- Essential Oils and Fragrance Fine Chemicals
- Gibberellic acid
- Tannins and Oak Extracts
- Enzymes
- Omega-3 and 6 fatty ac.
- Vegetal Extracts
- Stabilisers (Guar and Xanthan gum, Sodium Alginate...)
- Sweeteners (Saccharine)
- Milk proteins

POLYMERS

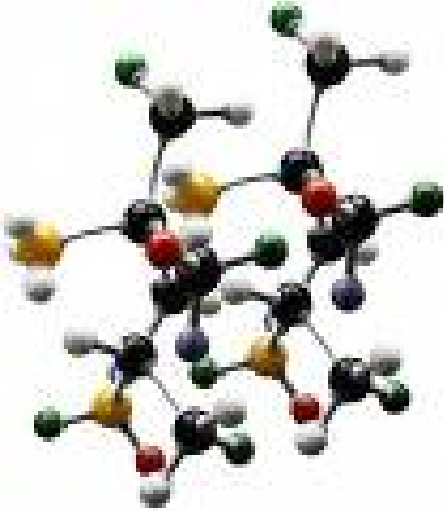
POLYPROPYLENE

- Polypropylene, compounding of modified technical PP blend.
- Cellulose acetate , Polysulfones,...
- Antistatic, masterbatches.
- EVOH
- Adhesives
- PVC additives MBS, acrylics and processing aids)
- Purging compounds (Dyna-purge ®)

ELASTOMERS

- RUBBER Polychloroprene ,
Ephichlorohydrin, Polyacrylic,
Chlorinated Polyethylene,
Fluoroelastomers,...





POLYURETHANE

- TDI Polyester and Polyether
- MDI Polyester and Polyether
- MOCA
- ADDITIVES...

COATINGS

- IRON OXIDES
- RESINS (hydrocarbon, alkyl, polyurethanes, epoxy.)
- INDUSTRIAL BIOCIDES
- COAL TAR COMPOUNDS
- FATTY ACIDS
- ETHYL SILICATE
- STABILIZERS
- TITANIUM OXIDE (Rutile)
- ORGANIC PEROXIDES
- Lactate Esters as solvents

CERAMICS



- Raw materials and specialities for ceramic producers AS:
 - CLAYS "ball clays" type
 - CALCINED ALUMINAS
 - KAOLIN
 - CORONDUM
 - VANADIUM (PENTOXIDE , AMMONIUM METAVANDATE)
 - ZIRCONIUM OXIDES
 - REFRACTORY PRODUCTS
 - CERAMIC ROLLERS
 - The manufacture of additives (deflocculants, fixative agents, glues)
 - WAXES



PAPER

- Coating kaolin's
- Iron oxide
- Talc for antipich, filler & Coating
- Defoamers and Deaerators
- Deinking products
- Ceramic dewatering elements
- Plastic dewatering elements
- Pigments
- Oil & Grease resistant
- Fluorochemical
- TiO₂

TEXTILE

- Dyestuffs
- Auxiliaries for all types of fibres





ELECTRONICS & NDT & PETROLEUM ADDITIVES

ELECTRONICS

Base materials for manufacturing PCB's
FR4, FR2, CEM1 low Dk laminates..
Photploter film, Soldermask, microetches,
solder and film strippers, HAL fluxes, etc...

NDT (Non Destructive Testing)

X-Ray films
Radiografic consumables
Lead Intensifying screens
Liquid Penetrants
Magnetic Particles

PETROLEUM ADDITIVES





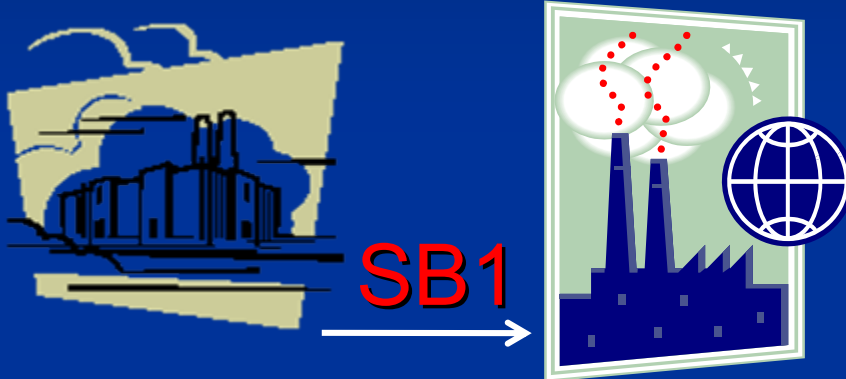
MASSÒ

INTRODUCTION

- First of all I am going to do a little review of main actors within supply chain, before to start talking about REACH implementation.
- After that ,I will focus my presentation on How implements REACH for a new product / substance manufactured or imported for first time after 1st Dec´08. (When first phase of REACH Regulation finished)

DEFINING THE ROLE : MAIN ACTORS

EUROPEAN UNION
B=EU Manufacturer



A=User & importer & exporter

SB2

PC1



DU=Down Stream User

PC1

SC2

SC1

C=Non-EU
Manufacturer



SC2

P3



FIRST STEP :SUBSTANCE IDENTIFICATION

- An important step at this moment is to do the inventory of all substances and preparations, specifying their composition, if they are imported
- AN important field that must be known for each substance are:
 - Chemical Name (IUPAC and others)
 - CAS Number
 - EINECS Number (European inventory of Existing chemical substances)

(Substances listed in EU inventory are known as PHASE-IN SUBSTANCES and can benefit from and extended deadline for registering, depending on the total quantity manufactured or imported per year)

SECOND STEP: SUBSTANCE EVALUATION

- Once we have all information about the substance , we are able to evaluate what we have to do with it.
- Depending on these data we have 3 different options:

SUBSTANCE STATUS

EVALUATION OF SUBSTANCE



EXEMPTED
SUBSTANCE ▶

PHASE-IN
SUBSTANCE

NON PHASE-IN
SUBSTANCE

➤ EINECS
AVAILABLE



➤ NO EINECS





REGISTRATION

LATE PRE-REGISTRATION



EXEMPTIONS

- Medical products for human or veterinary use
- Food additives in foodstuffs
- Flavouring in foodstuffs
- Additives in feeding stuffs
- Substances in plant protection and biocidal products.
- Polymers(*) 
- ANNEX IV & V 

POLYMERS

- POLYMERS HAVE NO EINECS NUMBER ASSIGNED
- POLYMERS ARE EXEMPTED
BUT MONOMERS MUST BE PRE-REGISTERED/REGISTERED
- WHAT HAPPEN WITH IMPORTED POLYMERS?

IMPORTED POLYMERS

- EUROPEAN MANUFACTURERS
- IF Polymerization process is made with monomers pre-registered or registered by other European companies, THEN
- POLYMER EXEMPTED
- NON-EUROPEAN MANUFACTURERS
 - Have Monomers been pre-registered /registered in EU by other previous actors (manufacturer)?
 - If YES
 - POLYMER EXEMPTED
 - If NO
 - MONOMERS (Bounded or not) MUST be pre-registered in EU when they are over 2%



ANNEX IV & V

- Some substances are EXEMPTED Of REACH REGISTRATION.
- We can find them in ANNEX IV where some CAS numbers are listed (Ex: sodium gluconate , some fatty acids) and in ANNEX V where some criteria have been established in order to allow some substances under some conditions to be exempted (Ex. Natural products not dangerous and not chemically modify)



THRID STEP: QUANTITY

- The quantity manufactured and / or imported to the EU is very important in order to decide if we are in time or not for submitting Late Pre-registration.
- If we manufacture and import the same substances we have to considerer the Total amount.
- If we manufacture for some different uses , we have to discount the amount of kilos for exempted applications.

LATE PRE-REGISTRATION

Art.28 6) Potential registrants who manufacture or import for the first time a phase-in substance (>1 Tn/y) or use for the first time a phase-in substance in the context of production of articles or import for the first time an article containing a phase-in substance that would require registration, after 1 December 2008, shall be entitled to submit pre-registration within six months of first manufacturing, importing or using the substance and no later than 12 months before the relevant deadline in Article 23.



31 Nov. 2009



≥1000 TN
CMR cat.1 y 2
R50/53 ≥ 100 TN



31 MAY 2012



100-1000 TN

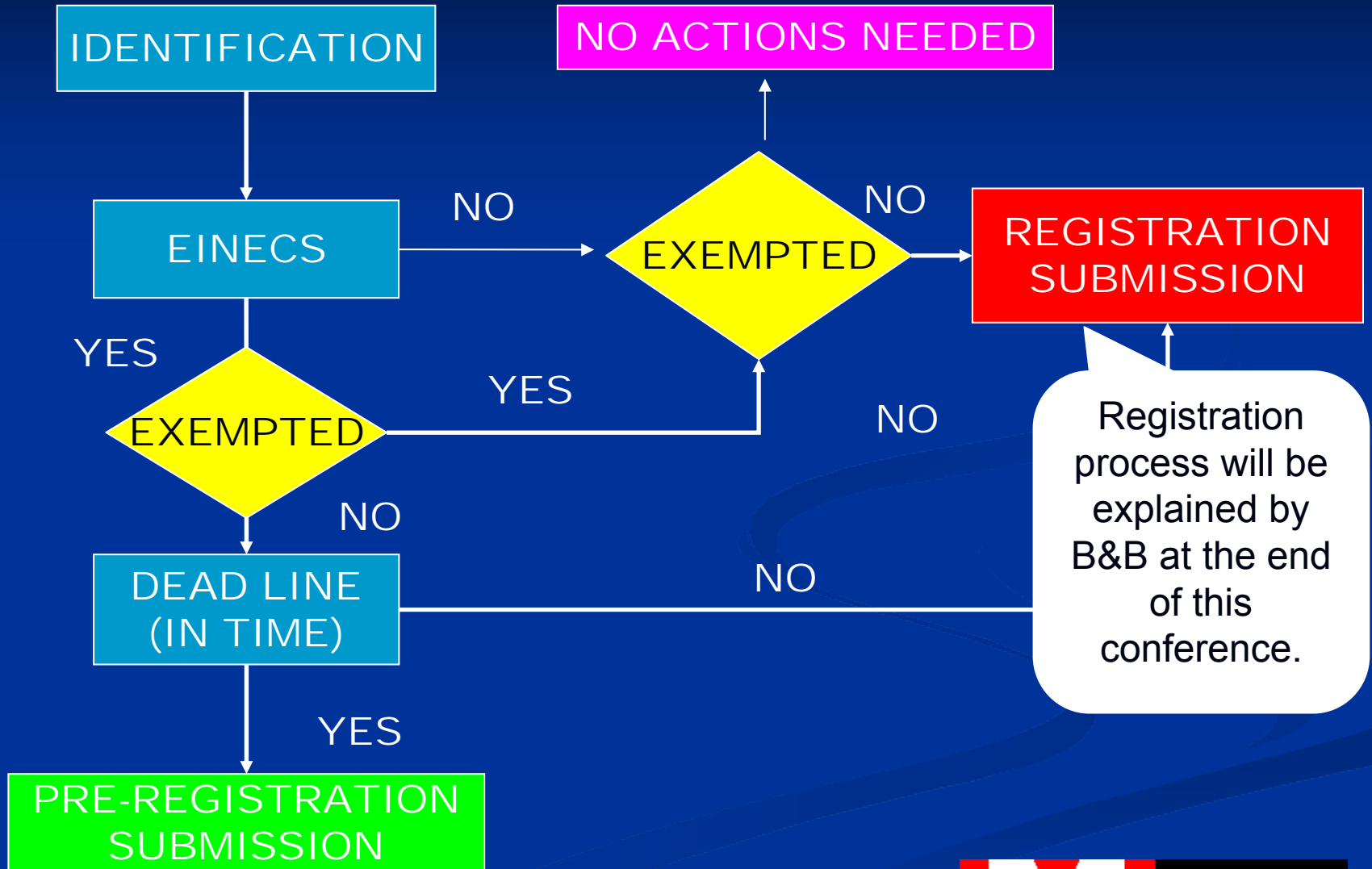


31 MAY 2017



1-100 TN

SUMMARIZING....



AFTER PRE-REGISTRATION

- Once the pre-registration has been done (simple and free of cost), the company will be part of a SIEF (Substance Information Exchange Forum) , a database containing the names of the different manufacturers /importers of the same substance.
- We should identify the Leader , analyze the number of members , and check if our substance fulfill with the sameness of the substance (purity ,impurities...)
- However, it can be developed a preliminary assessment to see if other companies are interested in the same substance, how much of that substance they currently manufacture and commercialize and what data is currently available. Define the substances to be pre-registered and establish contacts with other companies to share data.
- **AT THIS POINT IS TIME TO START REGISTRATION PROCESS!!**

CURRENT SITUATION

- At this moment , we are still working with all products/substances manufactured and/or imported before REACH entered into force (Dead lines 2013 & 2018)
- In most cases our suppliers have implemented REACH themselves through :
 - A consulting company as OR (Only Representative)
 - Their own offices in EU as OR
- In other cases through a single DISTRIBUTOR as their OR. (Masso has developed this role for some Non-EU manufactures)

TO CONCLUDE...

REACH IS A COMPLICATE REGULATION



.....BUT A LOT OF COMPANIES AS B&B,
MASSO AND MANY OTHER ARE
WILLING TO HELP NON- EUROPEAN
MANUFACTURES.

THANK
YOU!

