



SUCCESSFUL REACH REGISTRATION FOR CONSORTIUM

DHI as trusted advisor on REACH registration of mineral wool and formation of a consortium of registrants

Mineral wool is an example of a substance subject to registration under the REACH Regulation. Man-made vitreous fibers (MMVF), the technical term for mineral wool, are made from natural materials, synthetic materials or metal oxides. They are widely used in everyday life of millions of people such as for thermal insulation, filtration and soundproofing. Hence, MMVF are among the thousands of substances falling within the scope of REACH. As advisor, DHI has assisted in preparing a comprehensive registration dossier for MMVF.

MANAGEMENT OF CONSORTIUM FORMATION

Well ahead of the first REACH registration deadline, DHI was engaged in the formation of the consortium among the pre-registrants of the MMVF. The pre-registrants representing small and large companies produce the same substance and supply products to the same market. The registration covering all the companies was faced with the challenge of exchanging sensitive information and the manner by which to share the data. Registration process requires a high degree of coordination and the involvement of an independent entity to handle sensitive information. Assigned the role as coordinator and trustee, DHI has led the companies through the negotiations for the formation of the MMVF consortium and the agreement on data sharing.



Thermal insulation is a key use of mineral wool. The MMVF consortium comprises the most important producers of mineral wool in Europe, which involved the challenge of exchanging sensitive information among competitors. © Shutterstock / BestPhotoPlus

CLIENT

MMVF Consortium and its 20 members

CHALLENGE

- Compliance to REACH registration requirement and the registration deadline
- Consortium Agreement among competitors on the same market
- Meeting registration deadline for lead registrant and co-registrants

SOLUTION

- DHI acted as coordinator in the consortium formation and as trustee for handling of confidential information
- Preparation of the lead registrant dossier including the chemical safety report

VALUE

- Implementation of a Consortium Agreement among competitors
- Creation of a lead registrant dossier
- Preparation of company specific dossiers (CSDs) for 40 legal entities
- Achievement of successful REACH registration

LOCATION / COUNTRY

Countries within the European Union

Part of the negotiations were discussions and agreement of the substance identification to be covered in the registration and how to obtain consensus among the MMVF consortium members.

DATA SHARING

It was important for the companies in the MMVF consortium to agree on how to split the cost connected to the registration. For this purpose, a tonnage-based cost allocation key was set up. In addition, the MMVF consortium introduced a reimbursement model to manage any income gained from the selling of the Letter of Access to companies starting an import or manufacture of MMVF and interested in joining the registration. Saint-Gobain, one of the most important manufacturers, was appointed as the lead registrant with the other founding members of the MMVF consortium as co-registrants in the joint submission.



Mineral wool is used as thermal insulation in buildings. With our knowledge in regulations, DHI has prepared a comprehensive REACH registration dossier for mineral wool. © Shutterstock / Mr Twister

PREPARATION OF LEAD REGISTRATION DOSSIER

Once the consortium was established, collection and evaluation of data for the registration process began. Members provided scientific data from investigations of the substance to DHI for preparation of the registration dossier in IUCLID. When scientific information was not technically possible or data were not available, DHI made the justifications for adaptation from the standard requirements. We have also prepared the chemical safety report including the available data in the hazard and risk assessment of the identified uses of MMVF.

CLIENT TESTIMONIAL

“ The value for us was that DHI helped us to create a dossier which covers all the companies producing mineral wool in Europe, including the import of this substance. The process was complicated as it involved many companies. However, DHI was able to deal with these problems and gained everybody's trust with the high quality work that they produced. Ole Kamstrup — former Vice President — Rockwool International

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At the end of the registration process, DHI delivered successful REACH registrations to its customers. Fulfillment of the REACH registration was the added value for the lead registrant and the co-registrants of the MMVF.

UPDATE OF REGISTRATION DOSSIER

After the REACH registration, companies may expect to update their registration dossier, either with new company details such as tonnage information or in response to a request from the European Chemicals Agency, ECHA. As a result of the dossier evaluation, ECHA required supplemental data from the MMVF consortium. The members of the consortium provided the data, and DHI updated the technical dossier, which was submitted to ECHA.

OUR SERVICES

As coordinator and trustee, DHI was instrumental in accomplishing:

- Formation of the MMVF consortium
- Agreement on data sharing
- Exchange of sensitive information between the 20 consortium members

We are responsible for:

- Evaluation of data
- Preparation of the registration dossier in IUCLID
- Elaboration of the Chemical Safety Report
- Update of technical data after REACH registration