

Résumé

European Resin Manufacturers
Association Newsletter May 2014

**EUROPEAN
RESIN
MANUFACTURERS
ASSOCIATION**

General Assembly Chairman's Message

If you produce resins or are a supplier to the industry, please take a minute to consider this message.

The possibility that polymers will be registered under REACH continues to be a major issue for ERMA and the resins industry as a whole. It is apparent that many resin manufacturers are not aware of this development and are dismissive of any threat to their business. When I have discussed this subject with potential new members the comments I receive are typically as follows:

1. 'REACH legislation does not concern us directly since polymers are exempt.'
 2. 'If legislation were to be implemented we are sure the relevant department within our company will be dealing with this.'
 3. 'We are members of Cefic so I suppose our interests are being dealt with.'
 4. 'It would be impossible for polymers to come under the legislation as there are just too many polymers on the market.'
 5. 'Polymer legislation is not relevant as polymers are by definition reacted forms of the registered chemicals on which they are based.'
- Unfortunately none of these broad statements reflect the reality of the current position.

The original REACH legislation introduced the possibility that polymers would be included in the legislation at a later date; following the successful implementation of chemicals registration ECHA are now considering polymers as a next step. It would appear that an initial high level consideration of polymers was relatively simplistic and considered the major plastics, polythene, PMMA and the like. As we know the resin industry is much more complex and demonstrates how it might be possible for Europe to sleepwalk into industry-threatening legislation.

Concerns have been made within Cefic (the European Chemicals Association), that the interests of the resin industry were not being considered appropriately within the established working groups, therefore Cefic agreed to the formation of a separate working group called the RTP (Resins Technical Platform). This group meets regularly although the committee is obliged to communicate through the Cefic hierarchy to the regulators or Commission.

ERMA are affiliated to Cefic and are members of the RTP. However we maintain our independence – and the right for example to discuss and lobby the European Commission directly. Some of our members are also members of Cefic, including membership of sector groups such as the EPDLA, the sector group



for resin dispersion/emulsions – but this latter group is not an RTP participant.

Other independent groups include EPRA, the phenolic resins group, Plastics Europe and CEPE.

Various Cefic sector groups also sit on the RTP including HARRPA (hydrocarbon and natural resins), SRM (Solvented resins), CES (Silicone resins), UVEB (radiation curing resins), PPRM (polyester powder resins).

Note that there are no individual ERMA members who are also members of the RTP, since individual company membership of the RTP is not permitted, so they rely on ERMA to represent and communicate directly with them on this Platform.

Furthermore most resin companies are not even members of CEFIC; ERMA is the only independent route they have to find out the course of the legislation. We can communicate their concerns directly through the RTP and through the other channels we have available.

When dealing with this subject we need to make our case carefully and in simple terms. Intuitively we might consider that polymers are indeed made from known registered/ preregistered raw materials so there is no case to argue. Such arguments often result in the riposte: 'OK, so where's the evidence?' There is no doubt plenty of evidence for this point of view, however this evidence needs to be collated and presented effectively to legislative bodies and without creating any precedents, which lead to further unnecessary complications.

Above all we need maintain active communication with our members; we would also encourage anyone within the resin industry reading this who is not a member to contact us, we will gladly send further detailed information.

Finally I wish to formally announce that Jim Hemmings our General Secretary has announced his retirement from ERMA. Jim has made an outstanding contribution to ERMA's activities over the past 15 years, both with the executive function and in representing ERMA at other industry and legislative bodies. I would like to thank Jim for the tremendous contribution he has made over the years.

It would have been impossible to replace Jim with one successor so we have split the roles of this position into two: I am delighted to report that the marketing and administrative function will be assigned to ORREST who have taken up this position effective 1st April. Please see a summary of the press release below. We will also be announcing in May the appointment of a Technical Consultant who will assist the Technical Chairman of ERMA in sifting and communicating technical and legislative information as well as advising members on all technical matters.

David Graham, Chairman, ERMA.

Résumé is the newsletter of the European Resin Manufacturers Association (ERMA).

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