

European REACH Grease Thickeners Consortium (ERGTC)

The Consortium has now been in existence for three years and continues to grow with to-date 46 company members. Agreement has been reached on a Constitution which all members have signed up to and which is the basis for the co-operation of all the members.

The pre-registration of substances with the ECHA has now been completed and has focussed our minds on the final registration deadlines of 2010 , 2013 and 2018.

We have in the ERGTC contracted out to a third party the work necessary to group thickeners into families that will be used as the basis of future read-across of chemical, physical and particularly toxic and ecotoxicological properties. This work is ca 80 % complete and is projected to be completed in the third quarter of 2009. At this point we will be moving into the second stage of the work in which data gap analysis for each of the families will be carried to ascertain the necessary future testing programme that will be necessary.

The thickeners included in the work are not restricted to the alkali metal salts of fatty acids but also embrace metal sulphonates, salts of di-carboxylic acids and polyureas. The diverse chemical nature of these thickeners has required the establishment of small "task forces" working under the auspices of the main Consortium who are looking at these groups of substances with the same overall objectives as for the fatty acid metal salts.

The Consortium is working with ATIEL / ATC in the application of the Generic Exposure Scenarios (GES) which they are generating on behalf of the Lubricating Oil Industry. This will involve the defining of Specific Use Descriptors (SUDS) which have been split into five categories. This approach can then be adapted for use in grease applications.

The complexity of the work programme arising from both the technical aspects and the necessity to preserve confidentiality has led to the creation of a Project Management WG (PMWG) made up of members of the Consortium. This WG have provided the Consortium with an action plan detailing milestones and time frames for the carrying out of our work programme. This will ensure that we meet the registration deadlines that have been defined under the REACH regulations.

The formation of pre-SIEFS has led to the awareness that there are question marks over the registration deadlines that have been posted for substances. Additionally there are in some instances considerably more parties who have expressed an interest in grease thickeners than are currently members of the Consortium. The Consortium members are currently involved in assessing who and what interest these parties may have. They are being invited to join the Consortium if there is a mutual interest.

There are other consortia in existence or are in the process of being formed which may well overlap with our own work. We are in the process of establishing who they may be and opening a dialogue with them so that we can work together to ensure duplication of work is avoided.

There are some technical questions that need further clarification by the ECHA e.g. Annex IV & V of the REACH Regulation. This impacts not only on ourselves but also on other Industry sectors. We are seeking to support other organizations in obtaining clarification.

Readers of this synopsis who may be involved in other related Consortia and feel it would be advantageous for them to discuss our work to explore commonality can contact the writer. Mike.Morris@Tesco.net (T)+44 151 3425289

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