



## Innovative training for increasing the knowledge base of the European polymer industry in relation to REACH

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<b>Dissemination Level</b>		
<b>PU</b>	Public	<b>X</b>
<b>PP</b>	Restricted to other programme participants (including the European Commission)	
<b>RE</b>	Restricted to a group specified by the consortium (including the European Commission )	
<b>CO</b>	Confidential, only for members of the consortium (including the European Commission )	

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# Introduction

The overall objective of Polymer REACH (**P-REACH**) is to develop an e-learning platform and training materials for the European polymer industry to learn and understand how to manage their obligations under the European legislation, REACH.

Today, no e-learning solutions exist that encompasses REACH and all aspects of the polymer industry. This unique training course will contribute to scientific and technical know-how about REACH and help users to understand and comply.

The P-REACH project consortium has conducted a survey in order to evaluate the level of awareness of the plastics chain about the REACH Regulation in the partner countries. This survey was also meant to identify specific issues for which companies in this sector would not have found yet appropriate solutions or answers to their questions related to REACH.

# The Survey

The questionnaire was divided into two parts:

The first part with general questions about REACH had to be filled by all participants in order to define the knowledge base within the companies.

## **Part I**

1. What is your position in the company?

- Management
- Board
- Human Resources
- Sales
- Purchase
- Research & Development
- Production
- Other. Please specify:

2. Have you ever heard about REACH in your company?

- Yes.
- No.

3. Do you think that your company should feel concerned about REACH?

- No: we know we do not have obligations under REACH.
- Yes: we have obligations under REACH.
- Maybe: we haven't got enough information on this topic in order to evaluate the need.

4. How did you learn about REACH?

- Customers
- Competitors
- National association
- Company's legal department
- Media
- Other. Please specify:

5. If you have obligations under REACH, who would you contact for advice on compliance?

- Customers
- Competitors
- National association
- Company's legal department
- National helpdesk
- The European Chemicals Agency
- Consultancies
- Other. Please specify:

6. Have any of the sources you have contacted provided enough information for you to prepare an action plan in your company in order to comply with REACH?
- Yes. Please go to question 7.  
 No. Please go to question 8.
7. What kind of information did you find useful?
- Information on how to prepare a safety data sheet under REACH.  
 Information on how to communicate your uses of the substances to your supplier.  
 Information on how to deal with the overlapping of the REACH and the Classification, Labelling and Packaging of Chemical Substances Regulations.  
 Other. Please specify:
8. What kind of information was missing for you to prepare your company for compliance with REACH?
- Basic information on REACH.  
 Information on who should be involved in the company.  
 Information on how to register substances.  
 Information on what to register.  
 Other. Please specify:
9. Would you like to take part in a phone interview in order to answer the second part of this questionnaire?
- Yes. (Please fill in date and time on Part II of this questionnaire)  
 No.
10. Would you like to receive more information about P-REACH?
- Yes. Please add me to your mailing lists.  
 No.

The second part was dedicated to companies interested in using an e-learning tool with training materials about REACH. This part of the questionnaire should be filled within a phone-interview giving the opportunity knowing more about the company. The obtained knowledge will be used to design a tool that meets the expectations of the companies. Furthermore, all companies contributing in the project at this early state will have the possibility to take part in the pilot tests of the developed training materials.

## **Part II**

11. In which format did you receive the information you needed about REACH?
- Conference  
 Training  
 Workshop  
 Manual  
 Website  
 Other. Please specify:

12. Have you found it necessary to train your staff in order to prepare for compliance?

- Yes
- No

13. How has your staff been trained on REACH?

- They received a manual.
- They attended a conference.
- They attended a workshop.
- They followed an in-house training.
- They followed an e-learning programme.

14. Did you need to call external experts for this training?

- Yes.
- No.

15. How many people would you need to train in your company in order to prepare for compliance?

16. Out of this number, how many would have access to a computer?

17. Why would you subscribe for an e-learning programme?

- Because a business relation would recommend it.
- Because the programme would have been prepared by a reputed organisation (close contacts with the EU Institutions, long experience in a particular sector, etc.).
- Because it would be cheaper than any other solution.
- Because its contents would be specific (e.g. dedicated to the polymer industry).
- Because it would be delivered in my language.
- I am not interested in e-learning.
- Other reason. Please specify:

18. If you have already used e-learning, under which format did you receive the information from the e-learning platform?

- Training material (documents, PowerPoint presentations) to download from a website.
- Training material provided on a CD-Rom
- Training material provided in a manual
- Online trainings (webconferences)
- Other. Please specify:

19. If you have already used e-learning, would you continue using it?

- Yes.
- No. Please explain why:

20. Would you like to be included in the P-REACH pilot tests?

- Yes.
- No.

The questionnaire has been translated into Estonian, French, German, Italian, Lithuanian and Portuguese and according to this distributed in the partner countries.

# Evaluation

For a total number of **135 questionnaires**, the first part was completed whereas the turnout was very different in the countries. This makes a country-specific evaluation very difficult and for countries with less than 10 filled questionnaires no statistical evaluation was made.

## Evaluation of PART I

In the following, part I of the 135 questionnaires is evaluated and country specific data are displayed if worthy of mentioning.

1. The persons that completed the questionnaire were up to 30% from the management, 29% from other positions such as environment, safety and quality, 23% from research and development and only a few percentages from board, human resources, sales, purchase and production:

What is your position in the Company?	%
Management	30
Board	7
Human Resources	1
Sales	2
Purchase	7
Research & Development	23
Production	7
Other	29

2. Out of them 96% have ever heard about REACH and only 4% (up to 27% in Lithuania and 8% in Italy) did not.
3. 68% know that they have obligations under REACH whereas 15% state that their companies don't have obligations. 18% of the respondents mention not having enough information on REACH in order to evaluate if their companies should feel concerned or not (27% in Lithuania, 25% in Portugal and 21% in Italy).
4. The information they obtained about REACH came to 46% from the national associations. Up to 39% were informed by their costumers, 35% by media, 23% by their suppliers (among other), 16% by the company's legal department and only 7% by competitors:

<b>How did you learn about REACH?</b>	<b>%</b>
Customers	39
Competitors	7
National Association	46
Company Legal Department	16
Media	35
Other	23

5. For advice on compliance the companies would mainly contact the national association (45%) and the European Chemicals Agency (39%) as well as the national helpdesks (34%). 24% of the companies contact consultancies for advice. Among other, up to 19% would contact their suppliers and their industry associations and 14% expect advice from the company's legal department. Only 4% will contact their customers:

6.

<b>If you have obligations under REACH, who would you contact for advice on compliance?</b>	<b>%</b>
Customers	11
Competitors	4
National Association	45
Company Legal Department	14
National Helpdesk	34
The European Chemicals Agency	39
Consultancies	24
Other	19

6.&7. 70% of the respondents indicate that the sources they have contacted provided enough information to prepare an action plan in their companies in order to comply.

The information they found useful was up to 80% on how to communicate their uses of the substances to the suppliers. How to prepare a safety data sheet and how to deal with the overlapping of REACH and CLP was voted each to 43%.

20% of them declared other needs such as:

- **how to deal with SVHC**
- **information on actual obligations of DU**

- **future information to customers**
- **preparation of the PRE-registration of substances that exist in their products**
- **how to communicate with costumers**
- **general requirements; basics**

<b>What kind of information did you find useful?</b>	<b>%</b>
Information on how to prepare a safety data sheet under REACH	43
Information on how to communicate your uses of the substances to your supplier	80
Information on how to deal with the overlapping of REACH and the Classification, Labelling and Packaging of Chemical Substances Regulations	43
Other	20

6.& 8. 28% state that they did not get information on how to comply (83% of the responses from Lithuania).

86% of them do not know what to register and 78% of them missed the information who should be involved in the company. 75% are asking for basic information on REACH and 28% are looking for information on how to register.

43% missed other information such as:

- **information from suppliers of products**
- **how to identify substances that need to be pre-registered as well as to deal with final products and not at a substance level**
- **a standard approach suitable for plastics converting packaging companies using standard polymers and masterbatches**
- **recyclates introduced into the products**
- **Legal information, how to ensure clients**
- **Updates**

<b>What kind of information was missing for you to prepare your company for compliance with REACH?</b>	<b>%</b>
Basic information on REACH	75
Information on who should be involved	78

in the company	
Information on how to register substances	28
Information on what to register	86
Other	43

10. 88% of the interviewees would like to receive further information on the P-REACH project and asked for being added to the projects mailing list.

## Evaluation of PART II

103 respondents filled in the part II of the questionnaire, but only a few of them have been interrogated via phone interviews.

11. 64% received the information about REACH via the internet and 50 % from conferences. Almost one-third mentioned training (32%) and workshop (32%), and 23% that they got a manual for receiving information about REACH. Other sources (20%) where inhouse-training, ECHA, associations (i.e. EuPC seminars).

In which format did you receive the information you needed about REACH	%
Conference	50
Training	32
Workshop	32
Manual	23
Website	64
Other	13

12. 30% of the respondents did not find it necessary to train their staff in order to prepare for compliance. From the 64% that found it necessary, 40% followed an in-house training, 22% a workshop, 20% a conference and 15% received a manual.

15% followed an e-learning programme:

How has your staff been trained on REACH	%
They receive a manual	15
They attend a conference	20

They attend a workshop	22
They followed an in-house training	40
They followed an elearning programme	15

14. 32% of the interviewees declared that they needed to call external experts for this training and 56% not.

17. 48% of the interviewees state that they would subscribe for an e-learning because of its specific content. 38% see it as a cheaper solution than others and 26% would choose it because of its good reputation. 16% would subscribe for e-learning available in their language and only 6% would subscribe because of a recommendation of a business relation. Other reasons (17%) such as:

- **no travel time**
- **available at any time**
- **specific content for recyclers**
- **dedicated to articles containing polymers**

Only 17% declared not to be interested in e-learning.

<b>Why would you subscribe for an elearning programme?</b>	<b>%</b>
Because a business relation would recommend it	6
Because he programme would have been prepared by a reputed organisation (close contacts with the EU institutions, long experience in a particular sector, etc.)	26
Because it would be cheaper than any other solution	38
Because its contents would be specific (e.g. dedicated to the polymer industry)	48
Because it would be delivered in my language	16
I am not interested in elearning	17
Other reason	9

18. The interviewees that already have used e-learning got their training in the following formats:

<b>If you have already used elearning, under which format did you receive the information from the elearning platform?</b>	<b>%</b>
Training materials (documents, PowerPoint presentations) to download from a website	36
Training material provided on a CD ROM	13
Training material provided in a manual	9
Online trainings (web conferences)	17
Other	4

- 19. 49% that have already used an e-learning tool would continue using it whereas 7% would not continue using e-learning.
  
- 19. 55% would like to participate in the pilot tests of the developed e-learning toll of the P-REACH project.  
44% are not interested in such tests.

# Conclusions

Although the evaluation of all questionnaires from all partner countries results in the fact that 2 of 3 companies are aware about having obligations under REACH, the awareness in the countries such as Italy, Portugal and Lithuania displays another image. There, every 5<sup>th</sup> or even 4<sup>th</sup> company still has concerns about their duties.

Furthermore, the above evaluation of the survey gives the necessary input for creating a specific e-learning tool dedicated to the needs of the polymer industries in order to comply with REACH.

The use of an e-learning training seems to be highly appreciated due to the facts that such training is available at any time without any travel time and in different languages.