

Introduction
to
Only Representative Organisation (ORO)
AISBL
(international non profit association for only representatives)

▶ Agenda

1. ORO Background
2. ORO Formation
3. ORO Statistics
4. In summary

▶ 1. ORO Background

Regulation EU1907/2006 REACH is in force since June 1st. 2007

- REACH is the most significant piece of legislation in the EU history, regulating the management of chemicals.
 - REACH covers all chemical substances manufactured in and imported into the EU market.
- ⇒ Every exporter and exporting nation has to deal with REACH in order to access the EU Market!

▶ 1. ORO Background

- The Regulation EU1907/2006 REACH would mean a massive trade barrier for non EU Manufacturers....

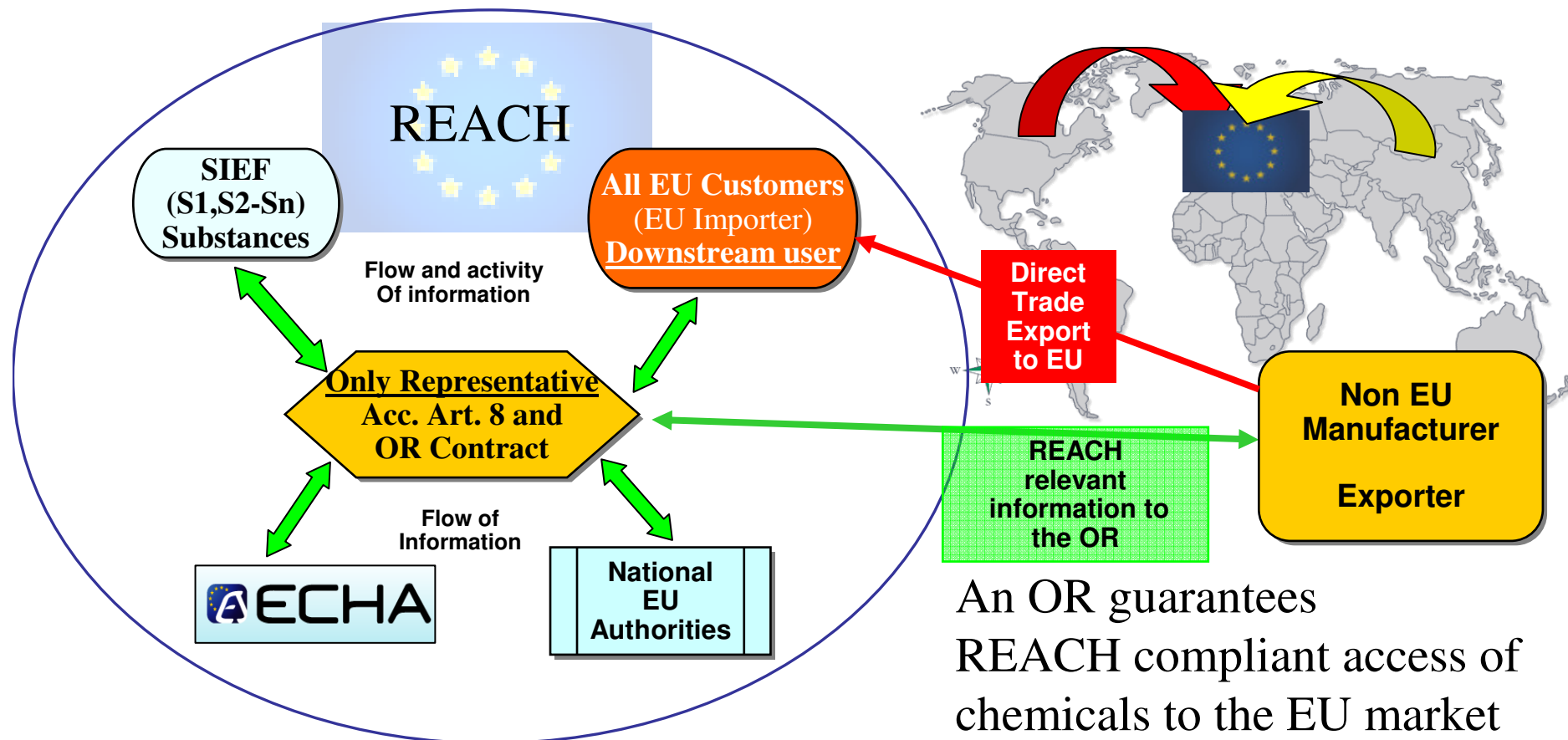
....but for the Only Representative (OR) provisions implemented in the Regulation under Art. 8.

...If effect, the Only Representative is the means by which the EU protects itself against WTO/TBT claims.

What is an Only Representative?

A trustworthy link for REACH information in the supply chain!

He/she is responsible for the REACH compliant registration of substances!



An OR guarantees REACH compliant access of chemicals to the EU market

▶ 1. ORO Background

**The OR role has been newly created
under REACH**

It has resulted in a new professional service:
The Only Representative

Result:

“many consultant companies and others took on
the new role as an Only Representative as a
business opportunity”

▶ 1. ORO Background

Situation on OR's in 2008:

- Art. 8 holds no detailed definitions on duties and obligations of OR's.
- New marketers took on the role as an OR (with more or less qualification).
- No official proof of OR qualification needed – just minimal formal requirements.
- Many misinterpretations & misunderstandings on OR issues
- Official ECHA guidance documents (RIP) were changed four times on OR issues
- High uncertainties among OR Clients, Authorities in non-EU Countries and EU Importers
- High intransparency on OR quality and reliability
- EU Agency did not take the OR into account in REACH-IT
- Still many open and not regulated issues...

The REACH time frame and the potential risk of uncertainties created the need to act for an Only Representatives Association.

Leading OR moved ahead in Oct. 2008 and founded ORO (Only Representatives Organisation)

The founding ORO members



CHEMSERVICE

DR. KNOELL
CONSULT

 **SWIT Deutschland GmbH**



武钢(欧洲)贸易有限公司
WISCO EUROPE GMBH



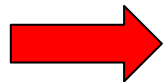
New Members:

ChemAdvice (Germany), DEKRA (Germany),...

▶ 2. ORO Formation

In the General Assembly December 09th, 2008 (Brussels) the ORO Executive Council was elected.

President:	Dieter Drohmann / Chemservice drohmann@onlyrepresentatives.org
Vice-President:	Marc Kiener / Likedeelers m.kiener@onlyrepresentatives.org
Treasurer:	Tom Hargreaves / BMT Cordah hargreaves@onlyrepresentatives.org
Vice-Treasurer:	Carsten Senz / Wisco Europe senz@onlyrepresentatives.org
Secretary:	Kevin Bradley / REACH Representative bradley@onlyrepresentatives.org
Vice-Secretary:	Ben Gandhi / ROR gandhi@onlyrepresentatives.org



26 April 2009: ORO has been granted legal personality as an international non-profit Organization (AISBL).

▶ 2. ORO Formation - Objectives

I: Set up OR quality standards

- Agree on minimum requirements and basic standards an ORO Member needs to meet
- Promote these standards towards stakeholders
- Increase the reputation and importance of our industry segment

II: Common Understanding of REACH

- Develop a common understanding of REACH requirements for ORs and non-EU manufacturers
- Establish working groups and committees to address specific areas of concern to the membership
- Establish a communication network between members on technical and regulatory issues related to REACH Implementation

III: Interests Representation

- Represent the interests of ORs and non-EU manufacturers
- Cooperate with regulators and other stakeholder in the REACH process
- Promote ORO members as superior sources for OR Services

▶ 2. ORO Formation - Membership

ORO Full Membership Criteria

Full members have to meet the following requirements:

1. Be in compliance with REACH Article 8 requirements;
2. Have a clear understanding of REACH and concerned regulatory and administrative processes and provide evidence of experience of EU chemicals policy, legislation and management;
3. Have competence in data and systems management, including handling of confidential information and confirm on request the Downstream User status to EU Importers for the REACH covered substances;
4. Employ competent people with relevant technical qualifications and experience and have physical presence in the EU;
5. Have a Sustainability Plan in place, which limits the risks of the non-EU manufacturers - examples include fair OR contracts and succession planning;
6. Have insurance coverage;
7. Represent the interests of ORs and non-community manufacturers.

▶ 2. ORO Formation - Membership

ORO membership options:

- **Full Member**
- **Associated Member**

A. Full Membership is granted to **Only Representatives** who agree to comply with REACH Art. 8, the quality standards and code of conduct (agreed by the General Assembly) set-out by ORO

B. Associated Membership is open to other companies, or institution, that do not meet the requirements of a Full Member but offer strategically and technical REACH Services and can contribute to ORO's Goals

- All Members shall have the right to attend the General Assembly and to take part in the activities of ORO and its functional sub-groups and working parties, in accordance with the rules established by the General Assembly.
- Only Full Members shall have voting rights.
- Membership fee (2009) is 450,- Euro

▶ 2. ORO Formation - Membership

ORO members can:

- Benefit from technical advice on interpretation of REACH and best practices provided related to OR activities (e.g. through Extranet)
- Benefit from the interest representation and reputation of a professional industry association
- Use the ORO Logo on the company Website
- Have the company Logo displayed at the ORO Website

▶ 3. ORO Facts & Figures

ORO has 15 Full members:

- 10 Founding members
- 5 Applying members

Located in:

Germany (8) / UK (2) / France (2) /
Belgium (1) / Netherlands (1) / Bulgaria (1)



All ORO Members:

- are acting OR and comply to REACH
- serve approx. 500 Non EU Manufacturers
- cover over 5000 chemical substances

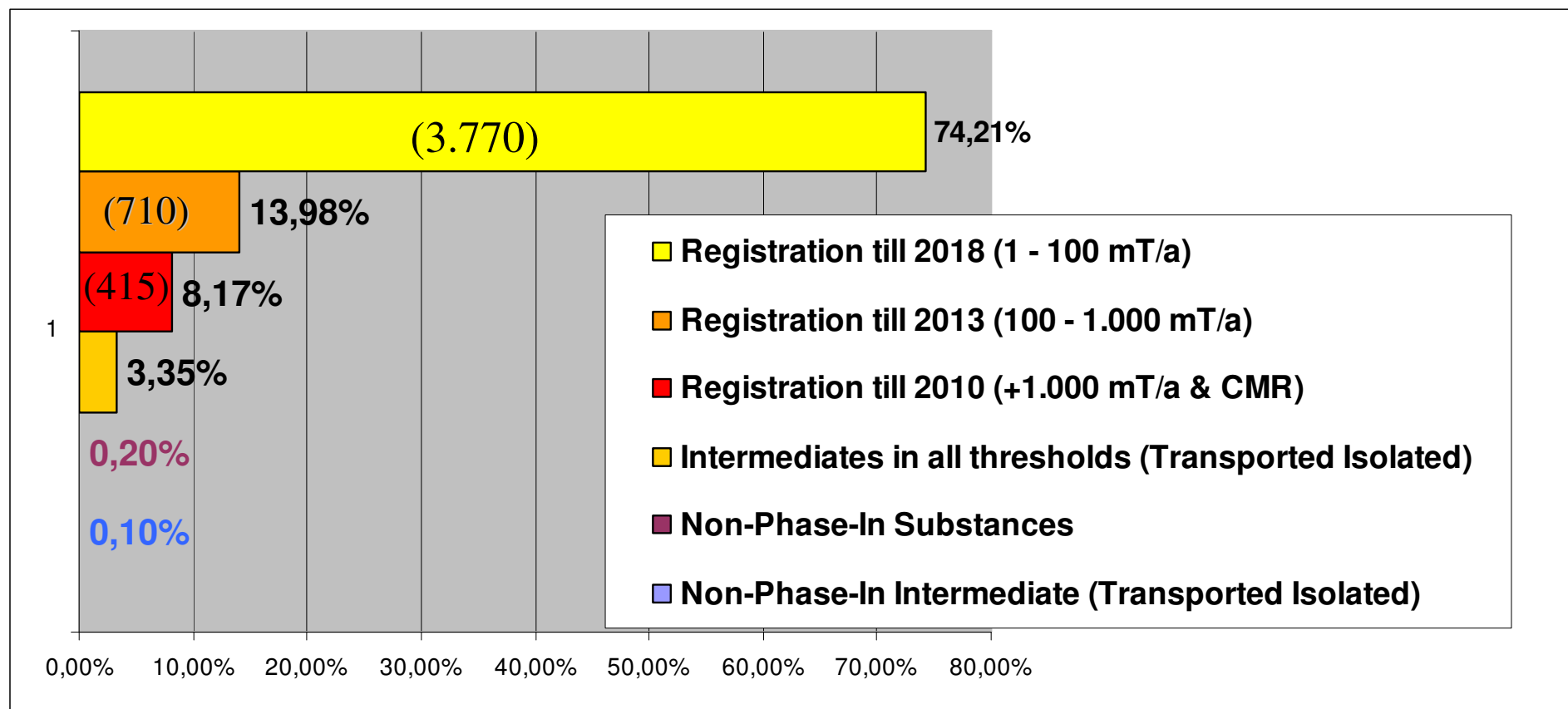
* Remark:

Date of the statistics July 2009

Statistic figures are approximates and where provided voluntary from the 10 ORO founding Members

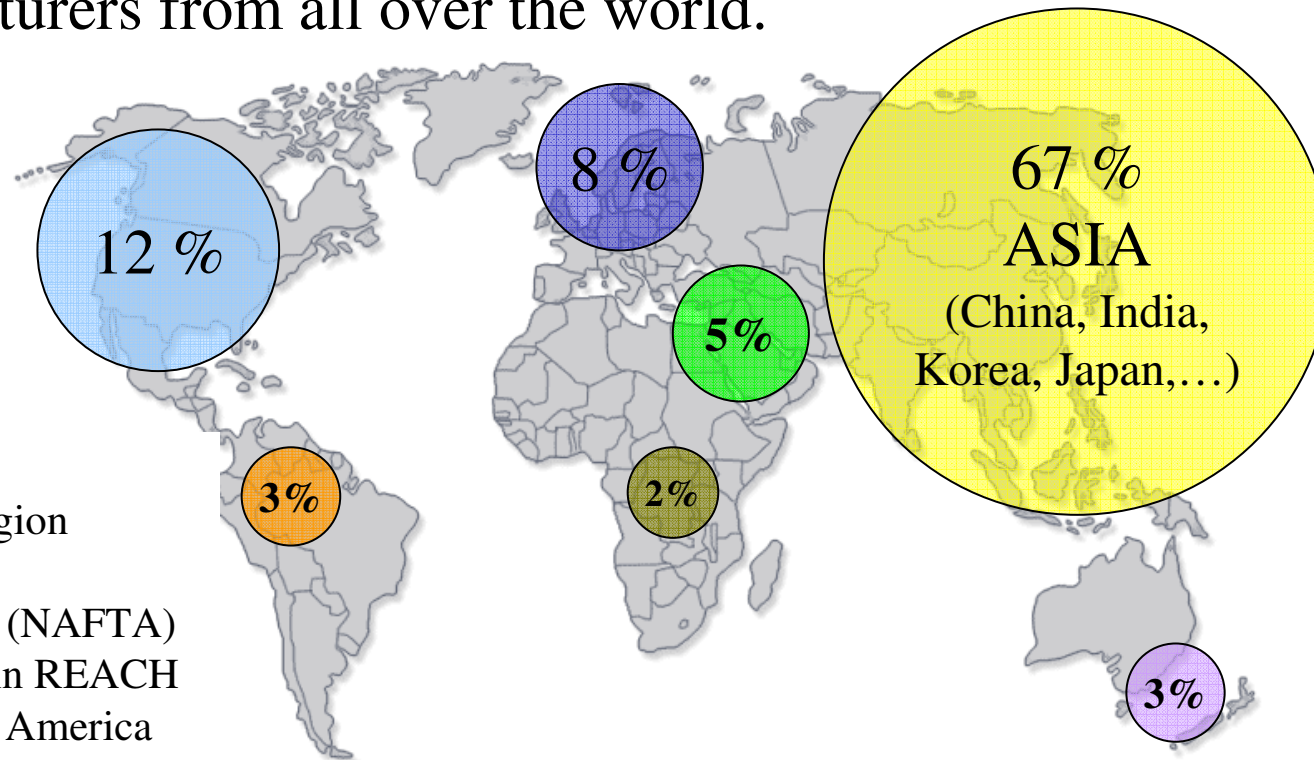
▶ 3. ORO Facts & Figures

ORO Members are responsible for approx. 5.100 chemical substances in the following chart



▶ 3. ORO Facts & Figures

Current ORO Members represent approx. 500 Non EU Manufacturers from all over the world.



Distribution of Clients by world region

1. Asia
2. North America (NAFTA)
3. Europe – not in REACH
4. South/Middle America
5. Oceania
6. Middle East
7. Africa

▶ 4. In summary:

ORO is:

- the voice of Only Representatives and “Non-EU manufacturers”
- determined to secure international trade relations by establishing quality standards for ORs
- the facility to protect the EU against WTO/TBT claims



ORO will ensure that it is recognised as the competent stakeholder in the REACH implementation and political discussions

Thank You For Your Interest

Contact:

Only Representative Organisation (ORO) AISBL
360 Boulevard du Souverain,
1160 Brussels,
Belgium

www.onlyrepresentatives.org
info@onlyrepresentatives.org