
REACH SIEF/컨소시아 동향 Report

– Vinyl chloride (EC No. 200-831-0) –

2009. 12

1. 물질 개요

□ 개요

EC number	CAS number	Name
200-831-0	75-01-4	Vinyl chloride Chloroethylene

□ Facilitator 및 Lead Registrant 현황

- Facilitator 및 선도등록자(Lead Registrant)는 INEOS Vinyls (UK) Ltd 社에서 맡고 있음.

2. SIEF 진행상황

① 물질동질성 확인 및 선도등록자 선임 (09.5)

INEOS ChlorVinyls

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www.ineoschlor.com

To: Members of pre-SIEF for Vinyl Chloride (EINECS Number 200-831-0; CAS Number 75-01-4)

From: Chris Howick
Product Stewardship Manager
INEOS Vinyls (UK) Ltd

Date: 18th May 2009

Dear pre-registrants of Vinyl Chloride Monomer

SUBSTANCE SAMENESS DISCUSSION

Thank you to those who have responded to the recent survey asking for companies to inform us of whether they intend to register the above substance.

Please note that the role of SIEF formation facilitator is voluntary. INEOS Vinyls' decision to act in this role is based on their role as chair and proposed lead registrant for the existing consortium held under the European Council of Vinyl Manufacturers (ECVM).

As part of the SIEF process we first need to establish that potential registrants are dealing with the same substance agree that they manufacture or import, or intend to manufacture or import, a substance that is sufficiently similar to allow a valid joint submission of data. Whilst it is expected that substance identity for this substance should be straightforward please can companies wishing to register confirm that the following is correct?

SUBSTANCE NAME: Chloroethylene, chloroethene, vinyl chloride, vinyl chloride monomer
CAS Number: 75-01-4
EINECS Number: 200-831-0

DESCRIPTION: Monomer (isolated and transported intermediate)

IDENTIFIED USES: As a monomer intermediate for polymerisation into Polyvinyl Chloride (PVC) homopolymers and co-polymers

LEAD REGISTRANT: INEOS Vinyls (UK) Ltd (Proposed)

LEAD REGISTRANT'S REGISTRATION DATE: Before 30th November 2010 (first registration deadline)* (Proposed)

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*Whilst this substance needs to be registered by 30th November 2010 it is envisaged that the registration by the lead registrant will take place significantly before this date so as to allow all due processing by the agency and subsequent communication of the token to co-registrants.

Please can companies confirm their agreement with this proposal or indicate additional information that they wish to be taken into account.

When this agreement is reached we will propose classification and labelling and propose a mechanism for data sharing and the development of a joint registration.

Yours sincerely



Chris Howick
Product Stewardship Manager

② 분류 및 표지 제안 (09.10)

- ☞ 현행 CLP 및 DSD(Dangerous Substance Directive)의 “분류 및 표지” 내용을 그대로 유지하자고 제안함.

Proposed Classification and Labelling

We propose to classify and label this substance according to the entry in the Regulation on classification, labelling and packaging (CLP) of substances and mixtures (Regulation 1272/2008):

Index Number:	602-023-00-7
International Chemical Identification:	Vinyl Chloride; chloroethylene
EC Number:	200-831-0
CAS Number:	75-01-4
Hazard Class and Category Code and Hazard Statement Codes:	Press. Gas H220 Flam. Gas 1 H350 Carc. 1A
Labelling:	
Pictogram, Signal, Word Code(s):	GHS02 GHS08 Dgr

We propose to classify and label this substance according to the Dangerous Substances Directive (Directive 67/548/EEC as amended):

Index Number:	602-023-00-7
International Chemical Identification:	Vinyl Chloride; chloroethylene
EC Number:	200-831-0
CAS Number:	75-01-4
Classification:	F+; R12 Carc. Cat. 1; R45
Labelling:	F+; T R: 45-12 S: 53-45

3. Vinyl chloride 컨소시아

- Vinyl chloride 컨소시아는 ECVM (European Council of Vinyl Manufacturers)에서 주관하여 Vinyl Chloride의 REACH 등록을 위해 2007년에 설립하였음.
- 컨소시아 가입시, OR은 대리하고 있는 Non-EU 제조업체명을 밝혀야 함.
- 컨소시아에 가입하고자 신규 Member는 운영위원회에서 과반수이상의 찬성을 얻어야 가입이 가능함.

□ 컨소시아 조직

- 운영위원회, 기술위원회, TF, 사무국으로 구성됨.
- ① 운영위원회 : 최고 의사 결정기구
 - 사무국 및 TF 임명
 - 정책, 비용, Scope 결정
 - 기술위원회 위원 임명
 - 시험제안서 승인 등
- ② 기술위원회
 - 시험제안서 제출
 - 전체 세부일정 조율
 - 시험 Data 및 CSR 준비
 - 분류 및 표지 정보 수집 등
- ③ TF (Task Force) : 운영위원회에서 필요한 경우 TF 지정/운영
- ④ 사무국 : ECVM(European Council of Vinyl Manufacturers)에서 운영

□ 컨소시아 비용

- 컨소시아 비용분담은 기본적으로 회원사의 톤수에 따른 비용분담을 원칙으로 함.
- 컨소시아 사무국에서는 3년(2008~2010)간 기술서류 준비를 위해 약 327,800€가 소요될 것으로 예상하고 있음. (CSR 작성 비용은 제외된 금액임.)

구분	예상 비용 (€)	비고
사무국 운영비용	100,000	☞ 위 비용을 30개 컨소시아 회원사가 동일하게 부담하게 된다고 가정하면 각 회원사당 약 10,927€을 부담하게 됨.
회의 비용	15,000	
선도등록자 비용	55,000	
추가 시험	20,000	
컨설팅 비용	61,000	
기술위원회 비용 등	76,800	
합계	327,800	

- 2009.3.1일 이후의 컨소시아 가입자는 “늦은 가입자”로 분류되어 추가비용을 지불해야 함.

☐ LoA (LoA 비용은 아직 미정임)

○ LoA 양식

Annex 10: Letter of Access⁸

Letter of Access for the registration of the substance vinyl chloride under *REACH* Regulation

By this letter, the Members of the Consortium⁷ on the registration of the substance Vinyl Chloride under *REACH* (hereafter referred to as "the Consortium") agree that the data, studies, summaries, waiving argumentations, reasoning of testing proposals and/or assessments specified in detail below owned by Members of the Consortium and submitted by the Consortium in support of the registration under REACH on

Substance Vinyl chloride (EINECS name chloroethene, CAS number 75-01-4, EINECS number 200-831-0)

(hereinafter collectively referred to as the "Registration Dossier"), may be referred

by Applicant: *Company XYZ*

in order to support Applicant's registration of the above mentioned substance under REACH.

The Dossier covers documents as follows: *[if reference is restricted to certain parts of the Dossier insert exact name of the data, studies, summaries, waiving arguments, testing proposals and/or assessments]*

It is agreed that:

1. The right to refer is restricted only for the registration purpose as specified above.
2. The right of refer is solely granted in favour of *Company XYZ* and is not transferable to any other entity or person.
3. *Company XYZ* is not authorised to receive any copies of the Dossier nor is *Company XYZ* authorised to inspect or view the Dossier or any related specific document in whole or in part.⁸
4. This Letter of Access shall in no event be construed as granting *Company XYZ* any property rights whatsoever in the Dossier.

Signature: Authorised Representative of the Consortium

□ 컨소시아 회원사 현황

① 정회원 (14개사)

<p>(1) ANWIL SA, a public company with limited liability under Polish law, whose registered office is at Ul. Torunska 222, 87-805 Wlodek, Poland</p> <p>And</p> <p>(2) Aragonesas Industrias y Energia S.A., a private company part of the Ercros Group with limited liability under Spanish law, whose registered office is at Avda. Diagonal nº 595, 2nd floor, Barcelona (Spain). Postal Code: 08014</p> <p>And</p> <p>(3) Arkema France SA a public company with limited liability under French law, whose registered office is at 420 rue d'Estienne d'Orves, 92700, Colombes, France</p> <p>And</p> <p>(4) BorsodChem Zrt., a private company limited by shares under Hungarian law, whose registered office is at 3700 Kazincbarcika, Bolyai tér 1, Hungary.</p> <p>And</p> <p>(5) Cires S.A., a public company with limited liability under Portuguese law, whose registered office is at P.O. Box 20, Samouqueiro – Avanca, P.3864-752 Estarreja, Portugal</p> <p>And</p> <p>(6) Dow Europe GmbH, a private company with limited liability under Swiss law, whose registered office is at Bachtoberstr. 3, 8810 Horgen, Switzerland</p> <p>And</p> <p>(7) INEOS Vinyls (UK) Ltd, a private company with limited liability under British law, whose registered office is at PO Box 9, South Parade, Runcom, Cheshire WA7 4JE, United Kingdom</p> <p>And</p> <p>(8) LVM N.V., a public company with limited liability under Belgian law, whose registered office is at Troonstraat 130, BE-1050 Brussels, Belgium</p> <p>And</p> <p>(9) Novacke Chemické Zavody a.s., a public company with limited liability under Slovak law, whose registered office is at ul. M.R. Stefanika 1, 97271 Novaky, Slovak Republic</p>	<p>And</p> <p>(10) Olchim S.A., a public company with limited liability under Romanian law, whose registered office is at Uzinei Street 1, 240050 Ramnicu Valcea, Valcea County, Romania</p> <p>And</p> <p>(11) Shin-Etsu PVC B.V., a private company with limited liability under Dutch law, whose registered office is at Noorderweg 68, 1221 AB Hilversum The Netherlands</p> <p>And</p> <p>(12) Solvin GmbH & Co KG, a private company with limited liability under German law, whose registered office is at Hans Boeckler Allee, 20, 30173 Hannover, Germany</p> <p>And</p> <p>(13) VESTOLIT GmbH & Co. KG, a private company with limited liability under German law, whose registered office is at Paul-Baumann-Strasse 1, 45772 Marl, Germany</p> <p>And</p> <p>(14) Vinnolit GmbH & Co. KG, a private company with limited liability under German law, whose registered office is at Carl-Zeiss-Ring 25, 85737 Ismaning, Germany</p>
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② 컨소시아 정회원 계열사 (Affiliates)

※ 컨소시아에는 각 계열사 모두 하나의 Member로 가입이 가능하기 때문에 법인이 많은 경우에는 컨소시아에 가입함으로써 비용을 절감할수 있음.

<p>ANWIL SA</p> <ul style="list-style-type: none"> SPOLANA a.s. Neratovice ul. Prace 657, 27 111 Neratovice, Czech Republic <p>ARKEMA FRANCE S.A.</p> <ul style="list-style-type: none"> Vinylfos 420 rue d'Estienne d'Orves, 92700, Colombes, FRANCE Arkema Quimica SA 12 Avenida de Burgos, 7p, 28036, Madrid, SPAIN <p>DOW EUROPE GMBH</p> <ul style="list-style-type: none"> Dow Olefinverbund GmbH, D-06258 Schkopau, Germany Dow Benelux B.V., HERBERT H. DOWWEG 5, PO BOX 48, 4530 AA Terneuzen, The Netherlands The Dow Chemical Company, 2030 Dow Center, Midland Michigan 48674, USA <p>INEOS VINYL (UK) LTD.</p> <p>Affiliates engaged in both the manufacture and use (for polymerisation operations) of vinyl chloride:</p> <ul style="list-style-type: none"> INEOS Vinyls Deutschland GmbH, Inhausersleier Straße 25, 26388 Wilhelmshaven, Germany INEOS Vinyls Italia SpA, Via della Chimica 5, 30175 Venezia-Marghera, Italy INEOS Vinyls Italia SpA, Zona Industriale La Maninella, 07046 Porto Torres (SS), Italy INEOS Sverige AB, SE-44483 Stenungsund, Sweden INEOS Norge AS, Rattnes, N-3966 Statthelle, Norway <p>In addition, the following affiliates are engaged in the use only of vinyl chloride in polymerization operations:</p> <ul style="list-style-type: none"> INEOS Vinyls UK Ltd, Sully Moors Road, Sully, Penarth (Barry), South Glamorgan CF64 5RP, United Kingdom 	<ul style="list-style-type: none"> INEOS Newton Aycliffe Limited, School Aycliffe Lane, Newton Aycliffe, Co. Durham DL5 6EA, United Kingdom INEOS Vinyls Deutschland GmbH, Werk Schkopau, Gebäude O 160, 06258 Schkopau, Germany INEOS Vinyls Italia SpA, Via Balona 107/111, 48100 Ravenna, Italy <p>LVM N.V.</p> <ul style="list-style-type: none"> Société Antérieure de Vinyle SAS, Chemin des Soldats, BP 49, FR-62160 Bully-les-Mines France LVM Limburg B.V., Koolwaterstofstraat, 1 NL-6161 RA Geleen, Netherlands <p>SHIN-ETSU PVC B.V.</p> <ul style="list-style-type: none"> Shin-Etsu Chemical Co., Ltd. 6-1, Ohtemachi 2-chome, Chiyoda-ku, Tokyo 100-0004, Japan Shintech Inc. 3 Greenway Plaza, Suite 1150 Houston, Texas 77046, U.S.A. Shin-Etsu International Europe B.V., World Trade Center Amsterdam, Strawinskylaan 5-627, 1077 XX Amsterdam, The Netherlands <p>SOLVIN GMBH & CO K.G.</p> <p>Solvay-Electrolyse-France S.A.S. (Paris) 25 RUE DE CLUCHY F-75008 PARIS</p> <p>Solvin GmbH & Co. KG LUOWIGSTRASSE 12 D-47495 RHEINBERG IG (Hannover) B-1095 BRUXELLES</p> <p>Affiliate of Solvin GmbH & Co. RUE DU PRINCE ALBERT, 44 IG (Hannover) F-38550 TALAUX</p> <p>Affiliate of Solvin GmbH & Co. AVENUE DE LA REPUBLIQUE 310 IG (Hannover) B-1120 BRUXELLES</p> <p>Affiliate of Solvin GmbH & Co. RUE DE FANSEBEEK 310 IG (Hannover) B-1120 BRUXELLES</p> <p>Affiliate of Solvin GmbH & Co. MARIE CURIE, 13-15 IG (Hannover) E-03760 MARTORELL (BARCELONA)</p> <p>Affiliate of Solvin GmbH & Co. VIA G. MARCONI, 73 IG (Hannover) I-44100 FERRARA FE</p> <p>Solvic SA (Ireland) Solvin France S.A. (Paris) Solvin SA (NOH) Vinis S.A. (Martorell) Vinyls Ferrara S.p.A. (Ferrara)</p>	<p>VINNOLIT GMBH & CO K.G.</p> <p>In addition to the producing sites of VINNOLIT GMBH & CO. KG, the following affiliates are engaged in the use only of Vinyl Chloride in polymerisation operations:</p> <ul style="list-style-type: none"> VINNOLIT Hillhouse Ltd., Hillhouse International Business Park, Thornton-Cleveleys, Lancashire, FY5 4QD United Kingdom VINNOLIT Schkopau GmbH, Dow Value Park, An der B91, D 06258 Schkopau, Germany
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4. 참고자료 및 사이트

<http://www.pvc.org>

□ 본 Report는 지식경제부 지원하에 국제환경규제기업지원센터와 공동으로 작성된 자료이며, 기타 본 자료에 대한 문의사항이 있으신 경우에는 다음 연락처로 연락주시기 바랍니다.

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