

- In what quantities (t pa) do I produce, import, or use the substances?
- How do my customers use the substances or formulations I produce?
- Find out from your supplier whether they are pre-registering their substances, and will subsequently register them for your uses (utilize the questionnaires provided by the chemical industry's associations).
- What data are already available on the substances I already produce, import, or use? What data have I yet to obtain?
- Do I want to perform the necessary substance tests individually, or jointly with other participants in the value chain (formation of consortia)?

How is Degussa implementing REACH?

Degussa is making intensive preparations for REACH. Degussa's business units are already gearing up for the new regulations and aligning their procedures accordingly.

Apart from recording the required data and analyzing it, we are talking to customers and suppliers about collaborating with them to clarify product status and to fill in any information gaps that may exist.

Any further questions about REACH?

You'll find a lot of information and more help on the Internet:

BDI (Federation of German Industry)
<http://reach.bdi.info/287.htm> (in German language only)

REACH Centrum:
<http://www.reachcentrum.org/>

Bundes-Helpdesk
 (German Federal Institute for Occupational Safety and Health)
http://www.baua.de/en/Chemicals-Act-biocide-procedure/Helpdesk/Reach-Helpdesk__en.html

If you like to talk to us directly regarding our products, our contact details are:

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The above information is provided in good faith on the basis of current knowledge.
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creating essentials

Registration
Evaluation
Authorisation and Restriction of
CHemicals



The new
 EU chemicals regulation

REACH

- stands for Registration, Evaluation, Authorisation, and Restriction of Chemicals.
- is the new chemicals regulation within the European Union.
- comes into force on June 1, 2007.

What does REACH mean?

The idea behind the new regulation on handling chemical substances was to ensure a high degree of protection for health and the environment. REACH transfers the responsibility for the safety of chemicals to the chemical industry. It is for the industry to ensure that all substances are tested, depending on the quantity in which they are produced or imported, and that all safety data regarding their uses are available.

The substances must be registered with the European Chemicals Agency (ECHA, Helsinki) by submitting a registration dossier. All products in the value chain, all the way from the manufacturer or importer to the downstream user, are affected by REACH. REACH will treat existing and new substances in the same way. REACH registration supersedes entries in EINECS (European **I**nventory of **E**xisting **C**hemical **S**ubstances) and ELINCS (European **L**ist of **N**ew **C**hemical **S**ubstances).

How we see it

REACH's goal of improving the protection of health and the environment is in line with Degussa's fundamental principles and their implementation in such programs as Product Stewardship and Responsible Care.

Degussa has actively supported the legislative process to keep REACH practicable, and feels obligated toward its customers and suppliers to ensure consistent and cooperative implementation of REACH. It goes without saying that we will treat sensitive data as confidential.

Affected substances

All substances produced in or imported into the European Union are subjected to the REACH regulation. Any substance produced or imported in a quantity exceeding 1 metric ton per annum (t pa) must be registered. All existing substances receive phase-in status; this means immediate registration is not necessary, and can occur during a transition period. However, transition periods are available only for those substances that have been pre-registered.

Pre-registration

Pre-registration requires submission of only a few details such as substance name, CAS and EINECS numbers, name and address of the registrant (legal entity), the tonnage band, and the projected registration deadline.

Pre-registration must occur by November 30, 2008, at the latest. It is free of charge.

Nov. 30, 2008

Pre-registration deadline for all substances

Dec. 1, 2010

Registration deadline for substances >1000 t pa
R50/R53 substances >100 t pa
CMR substances of categories 1 and 2 >1 t pa

June 1, 2013

Registration deadline for substances 100–1000 t pa

June 1, 2018

Registration deadline for substances 1–100 t pa

Registration

For existing substances (phase-in substances) in the tonnage band **1–10 t pa**, physical and chemical data are required (Annex VII) as well as already available data on toxicology and ecotoxicology.

For new substances (non-phase-in substances) in this tonnage band, a standard data set must be prepared in accordance with Annex VII and submitted to ECHA in a technical dossier (registration dossier).

For existing and new substances in quantities **>10 t pa**, additional tests are required (Annex VIII). In addition to the extended safety data sheet (eSDS), a chemical safety report (CSR) must also be prepared.

For substances in quantities greater than **>100 t pa**, additional requirements regarding possible risks to health and the environment must be fulfilled. Further test proposals must be submitted.

Evaluation and authorization

The Agency checks the submitted documents for completeness, and decides whether additional tests are necessary (dossier evaluation).

In cases of substances giving particular cause for concern, an authorization process may be needed. Information on these additional procedures under REACH will be made available at a later date.

How will you be affected by REACH if you are located *in* the European Union?

As a manufacturer or importer, you must ensure that all substances and components of preparations—whether produced or imported—that appear in your process chain in quantities **>1 t pa** are registered according to REACH requirements.

For intermediates (on-site or transported) there are reduced requirements from registration obligations, if certain conditions are met.

Moreover, for substances **>10 t pa** you must prepare a chemical safety report, containing, in addition to all uses of which you are aware (identified use), detailed data on exposure, risk management measures, and risk characterization. It might be the case that some of the uses of a substance cannot be supported by the manufacturer. Information from this chemical safety report is made available to the downstream user in compact form as an extended safety data sheet (eSDS).

As a downstream user, you must inform the manufacturer or importer about all uses that are not covered by the manufacturer's chemical safety report. If you fail to do this, you must prepare your own chemical safety report or stop using the substance.

How will you be affected by REACH if you are located *outside* the European Union?

As soon as you bring substances into the European Union, you are considered an importer, and must ensure that all substances have been registered under REACH in accordance with the criteria mentioned above. If substances are not registered, you yourself must carry out the registration or appoint a representative (“Only Representative”) to do so.

REACH is, unfortunately, unforgiving in this regard:

No registration, no market!

What should you be doing right now?

Get an overview of your substance flows, and identify the substances for which you are a manufacturer, importer, or downstream user. The registration process is cost intensive, and it may well be the case that certain substances can no longer be produced cost-effectively in the EU and must be withdrawn from the market.

Prepare a substance inventory and analyze your data, asking yourself these questions:

- What chemicals, raw materials, monomers, and formulations (mixtures of chemicals) do I produce, import, or use?
- Which of these substances are isolated intermediates (on-site or transported)?
- Do any of the exemptions (e. g., in Annexes IV and V) apply?