



Des solutions qui vous donnent de l'avance

October 2008, Letter n°3,
Following our letter n°2 of June 2008

Brussels, October 1st 2008

Subject:



REACH
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Dear Misses and Sirs,

Recently you inquired on information about "uses" under REACH. What we learned from the diverse inquiries that we receive from both customers and suppliers alike, is that there is much confusion about the REACH term "use". This letter is therefore to inform you about the current situation, to explain the notion "use" and to enable an understanding of **Climalife** current status.

While industry understands "use" as a way to describe the functionality or the application, under REACH the term "use" is related to the process and its derived exposures, i.e. "use" is any activity carried out with a substance as such or in a preparation, which could lead to an exposure to that substance.

According to section 5.2.1 of the Guidance for Downstream Users¹, "use is any activity carried out with a substance as such or in a preparation, which could lead to an exposure to that substance". Typical examples include processing, formulating, transfer from one container to another, etc.

The European Commission has developed a "Use Descriptor System"², in the Guidance on Information Requirements and Chemical Safety Assessment³, in order to allow Manufacturers/Importers and Downstream Users the efficient use of generic exposure scenarios (ES).

The use description is based on four elements: **sector of use (SU)**, **chemical product category (PC)**, **process category (PROC)** and **article category (AC)**.

Additionally, a fifth element that should be considered is **the Environmental Release Category (ERC)**.

In the registration dossiers that will require a Chemical Safety Assessment and an Exposure Scenario, the identified uses for which a specific exposure scenario is designed should be described according to the Use Descriptor system.

The Chemical Industry (Cefic/FECC) is preparing a so-called "Top-Down Approach" for the Supply Chain Communication. In this approach, Manufacturers/Importers will prepare Exposure Scenarios (ES) in cooperation with selected key customers and Downstream Users Associations.

The ES will be made available subsequently to all Downstream Users in the supply chain. Downstream users will be invited to review these ES and inform their suppliers if their use is not covered. Specific forms based on the Use Descriptor System (including the ERC) will be provided, in order to allow you to give more information about your use to your supplier.

Please note: there is no hurry to inform about uses. The first provisional Exposure Scenarios are not expected before mid 2009, while the final Cefic guidance on Supply Chain Communication is expected by the end of year 2008. Additionally, information on uses is not necessary for pre-registration.

If you have more questions about REACH compliance and Climalife products, M. Jan VANDE VELDE stays at your disposal: jvandevelde@climalife.dehon.com

Feel free to send also your questions to our REACH mailbox: reach.be@avantec.dehon.com

Please be ensured of our determination to help you with this new European change.

Eric DEHON
Manager

1: http://reach.jrc.it/docs/guidance_document/du_en.htm

2: http://reach.jrc.it/docs/guidance_document/information_requirements_r12_en.pdf

3: http://reach.jrc.it/docs/guidance_document/information_requirements_en.htm?time=1219846297