

Downstream users and REACH

Bridget Ginnity
Senior Scientific Officer
Risk Management

23 April, 2012
11:00 - 13:00 Helsinki Time (GMT +2)

Downstream users and REACH

- Who is a downstream user?
- Main obligations of downstream users



Who is a downstream user under REACH?

Downstream users are **companies** or **individuals** within the EU/EEA who **use a substance**, either on its own or in a mixture, in the course of their **industrial** or **professional** activities.



Industrial User



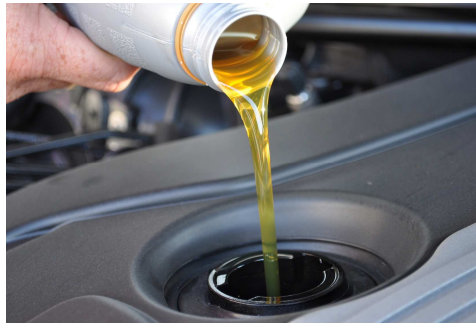
**Professional User
(Workshop/site)**

NOTE !

a **distributor** or a **consumer** ***is not*** a downstream user.

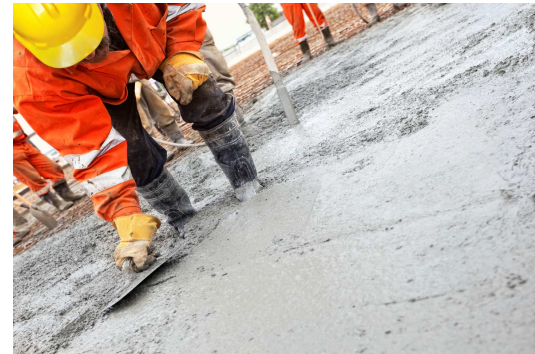
Types of downstream users - Formulators

Formulators: produce mixtures, which are usually supplied further downstream. This includes, for example; paints, lubricants, cleaning agents, adhesives and diagnostic kits.



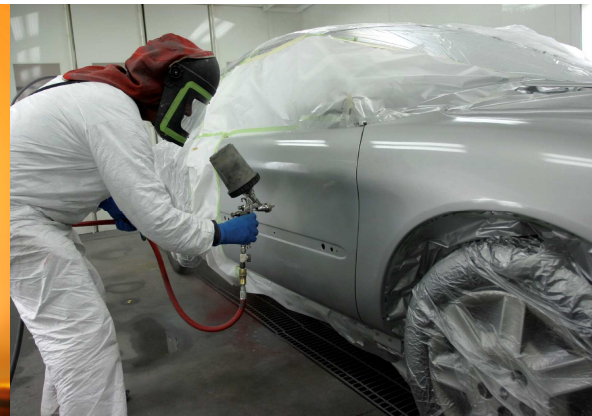
Types of downstream users – End users

End users: use substances or mixtures but do not supply them further downstream. Examples include users of chemical reagents, coatings and inks, construction chemicals, metal working fluids, cleaning agents and adhesives.



Types of downstream users – Article producers

Producers of articles: end-user incorporating substances/mixtures into articles (both components and finished goods). Examples include textiles, vehicles, toys, jewellery, and household appliances.



Additional types of downstream users

- **Re-fillers:** transfer substances or mixtures from one container to another, generally in the course of repackaging or rebranding.
- **Re-importers:** actors who import a substance, alone or in a mixture, which has originally been produced in the EU, and the substance has been registered by someone in the same supply chain.
- **Importers** whose **non-Community supplier** has nominated an **only representative**



Downstream user – Key obligations

1. to **provide information** regarding their uses to registrants of substances.
2. to **implement** relevant measures described in **exposure scenarios** to ensure safe use *or* **to take appropriate action.**
3. to inform their supplier if they have new information on the hazards of the substance or the Risk Management Measures are not appropriate.
4. for **formulators**, to **provide their customers with information** on hazards and conditions of safe use for their mixture.
5. for **producers of articles**, to establish if action is required according to Article 7 and Article 33.



...and the benefits

- **More and better information** on how chemicals are used in practice
- **Improved communication** in the supply chain regarding safe use
- Downstream users can **benefit from assessments undertaken by suppliers**
- **Systematic consideration** of safe use by consumers

REACH "should ensure a high level of protection of human health and the environment...while enhancing competitiveness and innovation"

Thank you

Bridget Ginnity
info@echa.europa.eu