

Substances in articles: Roles in the Supply Chain

Eighth Stakeholders' Day

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Content of presentation

- Registration
 - Assessment of service-life of articles
- Notification
 - Purpose
 - Exemption from notification
- Key messages

Registration

Assessment of article service life

-Responsibilities in the supply chain



Registration

- Chemical safety reports in registrations should cover the life-cycle steps resulting from the identified uses
 - i.e. exposure scenario and exposure assessment also cover the service-life of articles (use phase) and waste phase of articles
- Area for improvement in registrations
 - e.g. is it clear which uses of articles are covered by the registration?
- ECHA is working towards further advice on how to describe and assess the service-life of articles in CSAs

Registration

The responsibility until the very end of the life-cycle of the substance is challenging for manufacturers of substances, especially when supply chains are long

Registrant needs to know the use in articles and foreseen uses of the articles (incl. waste phase) in sufficient detail to make an exposure assessment

- o detailed enough communication in the supply chain needed
- o responsibility of both **registrant** and **producers of articles/DUs**

Substances in articles notification



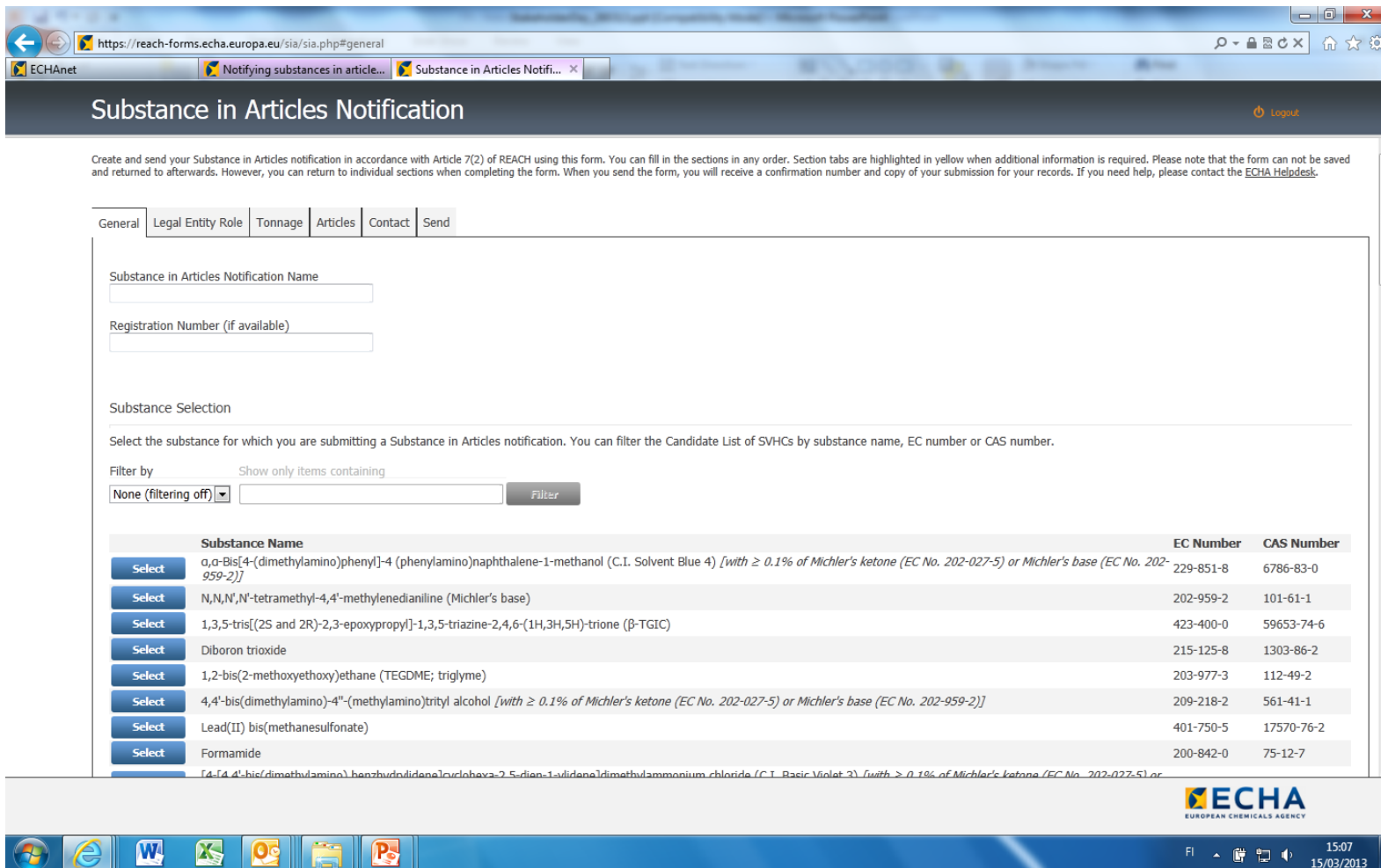
Notification of substances in articles

- Purpose of notification:
 - Ensure that sufficient information is available on use of substances of very high concern (SVHCs) in articles not covered by registrations
 - To support the identification of cases which may require regulatory risk management
- ECHA must consider restriction of Annex XIV substances in articles after the sunset date
 - Information on SVHCs in imported articles important to allow ECHA to understand possible needs for derogations from such restrictions
- Currently only a few notifications received (228 by 5 March 2013)
 - Need for improvement

Notification of substances in articles

- ECHA is trying to improve the situation by:
 - raising awareness among importers
 - providing support to notifiers
 - working with Member States to find ways to better support notifiers and encourage enforcement
- Please note the new submission option
 - new user friendly webform

Online notification webform



Substance in Articles Notification

Create and send your Substance in Articles notification in accordance with Article 7(2) of REACH using this form. You can fill in the sections in any order. Section tabs are highlighted in yellow when additional information is required. Please note that the form can not be saved and returned to afterwards. However, you can return to individual sections when completing the form. When you send the form, you will receive a confirmation number and copy of your submission for your records. If you need help, please contact the [ECHA Helpdesk](#).

General | Legal Entity Role | Tonnage | Articles | Contact | Send

Substance in Articles Notification Name

Registration Number (if available)

Substance Selection

Select the substance for which you are submitting a Substance in Articles notification. You can filter the Candidate List of SVHCs by substance name, EC number or CAS number.

Filter by Show only items containing

	Substance Name	EC Number	CAS Number
<input type="button" value="Select"/>	α,α -Bis[4-(dimethylamino)phenyl]-4 (phenylamino)naphthalene-1-methanol (C.I. Solvent Blue 4) [with $\geq 0.1\%$ of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)]	229-851-8	6786-83-0
<input type="button" value="Select"/>	N,N,N',N'-tetramethyl-4,4'-methylenedianiline (Michler's base)	202-959-2	101-61-1
<input type="button" value="Select"/>	1,3,5-tris[(2S and 2R)-2,3-epoxypropyl]-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione (β -TGIC)	423-400-0	59653-74-6
<input type="button" value="Select"/>	Diboron trioxide	215-125-8	1303-86-2
<input type="button" value="Select"/>	1,2-bis(2-methoxyethoxy)ethane (TEGDME; triglyme)	203-977-3	112-49-2
<input type="button" value="Select"/>	4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol [with $\geq 0.1\%$ of Michler's ketone (EC No. 202-027-5) or Michler's base (EC No. 202-959-2)]	209-218-2	561-41-1
<input type="button" value="Select"/>	Lead(II) bis(methanesulfonate)	401-750-5	17570-76-2
<input type="button" value="Select"/>	Formamide	200-842-0	75-12-7
<input type="button" value="Select"/>	[4-[4'-bis(dimethylamino)benzhydrolidene]cyclohexa-2,5-dien-1-ylidene]dimethylammonium chloride (C.I. Basic Violet 3) [with $\geq 0.1\%$ of Michler's ketone (EC No. 202-027-5) or		

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15:07
15/03/2013

Exemption from notification

- If the use is already covered by a registration
- **Producers of articles**: If the SVHC is registered and you comply with your downstream user obligations, you can benefit from the exemption.
- If the substance is not registered in your own supply chain: **Importers of articles**
 - Not enough to only check disseminated use descriptors, as this provides no certainty on whether the use of articles is covered and appropriately assessed in a registration
 - The workload to check and document whether the exemption applies may be considerably higher than to notify

Key messages

- Registrants, DUs/producers of articles and importers of articles all have responsibilities relating to substances in articles
- Registrations should also cover the service-life of articles
 - Need for improvement
- Notification of SVHCs in articles has been made easier with a webform
 - There will be further support activities to help you establish whether you need to notify
- It is in the interest of importers to notify specific applications in order to prepare for proportionate restrictions

Thank you

