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Downstream Users of Chemicals Co-ordination group



**Fecc**  
EUROPEAN ASSOCIATION OF  
CHEMICAL DISTRIBUTORS

Dear customer,

## **Re: Communication of uses along the supply chain for 2013 registration**

As you know, a large number of substances were registered in 2010 according to the REACH Regulation. Industry needs to prepare now for the next registration deadline based on the best practices identified so far.

One of the provisions of the REACH Regulation is that – under certain conditions<sup>1</sup> - suppliers will have to attach Exposure Scenarios (ES) to the Safety Data Sheets (extended SDS). These ES have to cover all identified uses of the substance during its life cycle. In order to make the uses ‘identified’, they need to be known to the registrant.

During preparation for 2010 registrations it was our experience that the initial communication within the supply chain of uses following the **top-down approach** -i.e. from manufacturer/importer to downstream user - developed by industry associations, was the least burdensome on all actors in the supply chain. For this reason, **we will be using this approach again as we prepare for 2013 registrations.** In short, this means that:

- Manufacturers/Importers have a process in place to make information on the uses they intend to cover in the registration available to their customers. There is no fixed way to make this information available. In our case [Indeed, we will inform you on the uses we intend to cover in our registration via this link/website/...] [we plan to cover the uses identified to the sector associations in their [use mappings](#)]
- Downstream users consult the available sources of information
- Unless you have a particular use, there is no need to pro-actively communicate common uses<sup>2</sup> up the supply chain. Common uses, such as those covered in the existing SDS, will normally be covered; therefore there is no need to communicate those.
- Particular uses should be communicated as soon as possible. In doing so, Downstream users should provide sufficient information to the suppliers.

After the registration deadline, downstream users still have several options in case they become aware that their use(s) is/are not covered. This has been addressed in detail in the guidance referred to in the footnote, in the chapter concerning what to do when receiving an extended SDS and the potential next steps. Note that, if your use is not covered, you do not need to stop your activities. Depending on the decision you take, you will have a period of time [6 to 12 months] to decide on your options for the next steps.

For more information on use communication, please refer to the attached Factsheet. Should you still have any concerns that your uses will not be covered at registration please contact [\[name/e-mail of company contact\]](#)

Kind regards,

*Annex: Factsheet: “Registration of a substance and use communication”*

<sup>1</sup>See Q&A number 7 at the Guidance available at:

[http://www.cefic.org/Documents/IndustrySupport/Cefic%20communication%20on%20extSDS\\_130711.pdf](http://www.cefic.org/Documents/IndustrySupport/Cefic%20communication%20on%20extSDS_130711.pdf)

<sup>2</sup>Common uses are those included in e.g. the [DU Associations use mapping websites](#), already registered uses, and /or previous SDS