



**REACH implementation status report
SSDC Chemical Industry
5 December Brussel**



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Estimations



- **30.000 substances**
- **Average of 5 manufacturers/importers per substance**
- **180.000 to 200.000 pre-registrations were expected by Commission and ECHA**

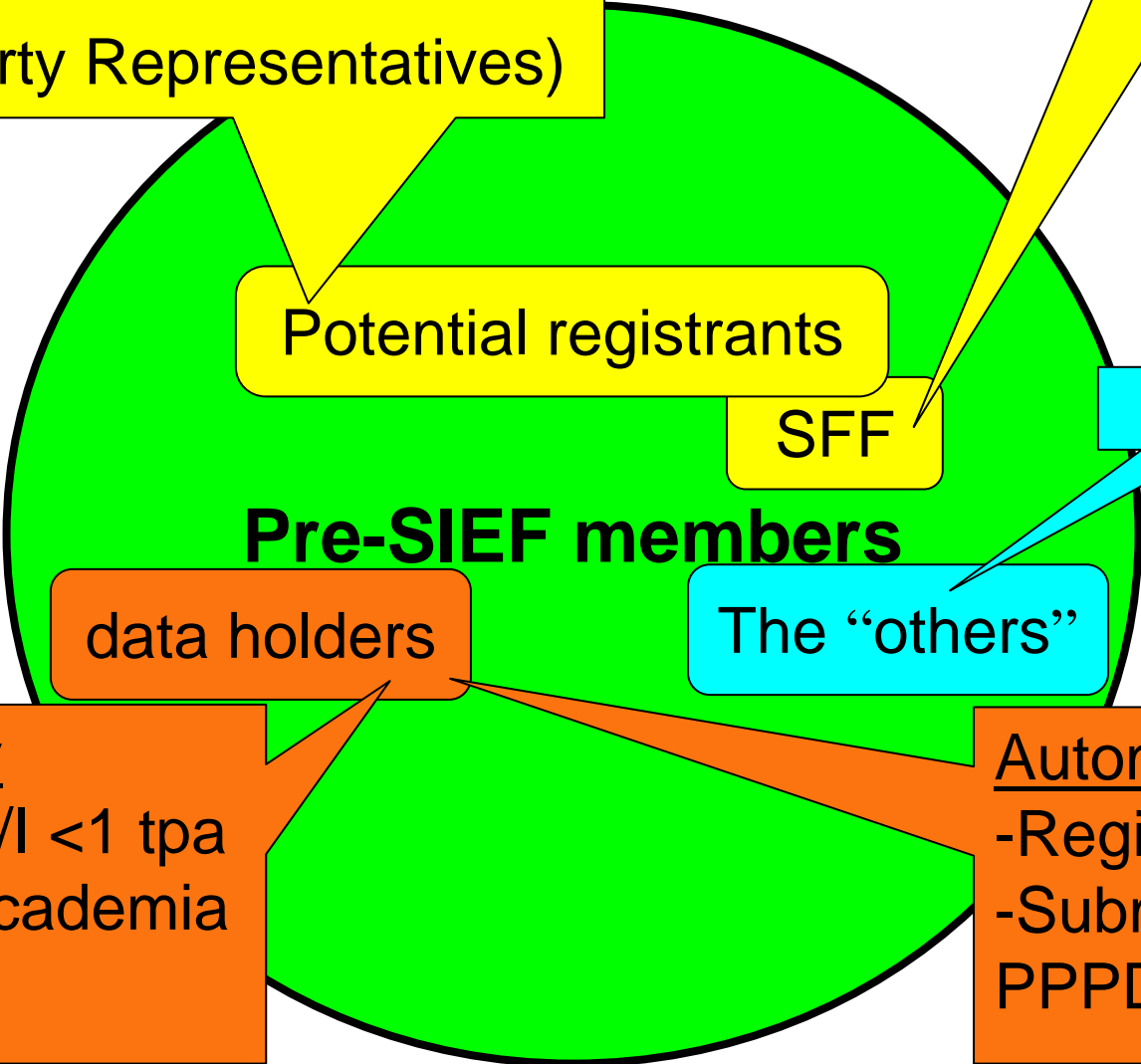
Reality



- **Status at the end of pre-registration**
 - **> 2.200.000 pre-registrations**
 - **> 100.000 substances**
 - **> 65.000 legal entities**
 - **> 6.000 files in queue**

Potential and current
manufacturers and importers
Only Representatives
(Third Party Representatives)

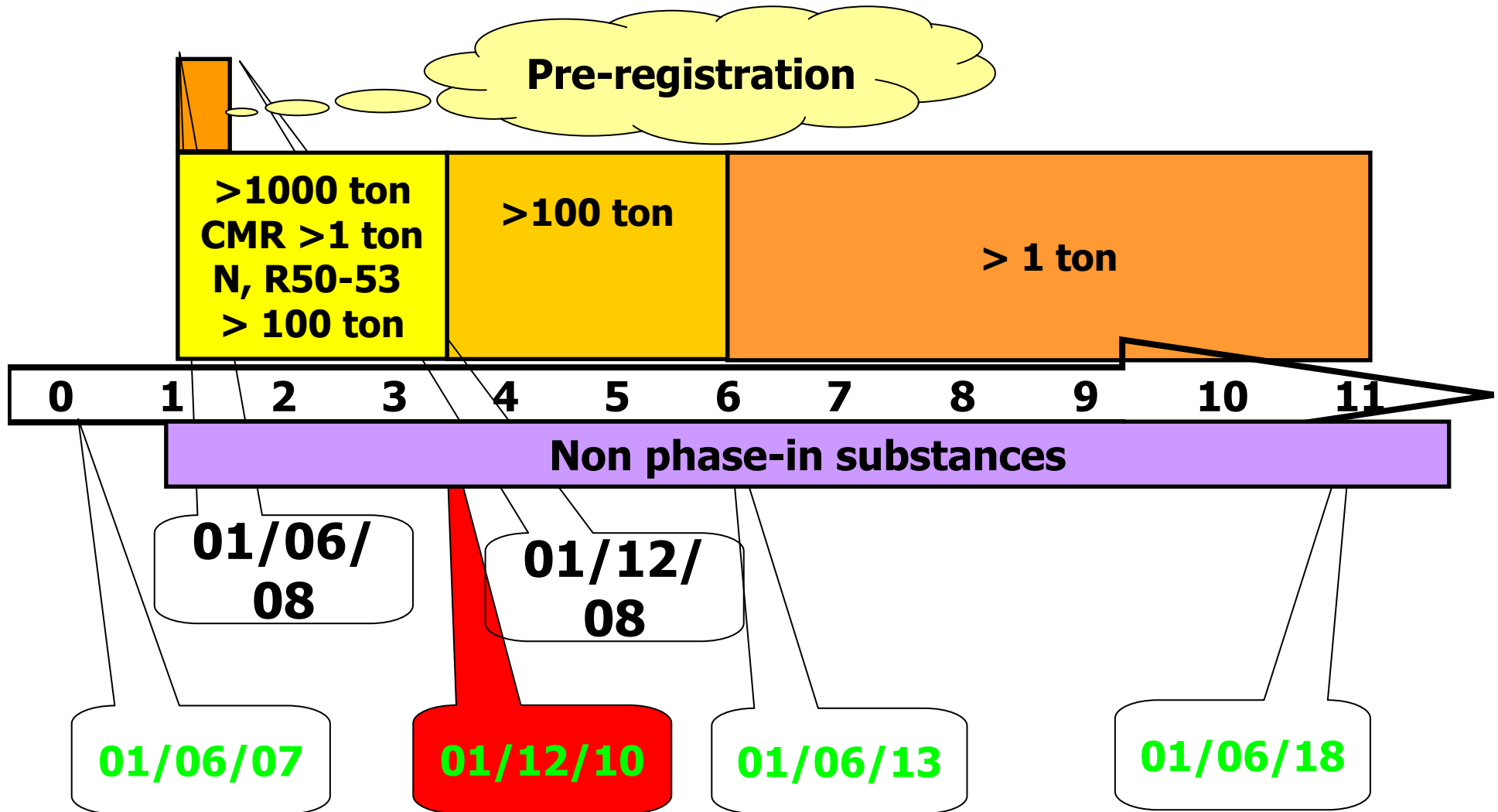
Any potential
registrant



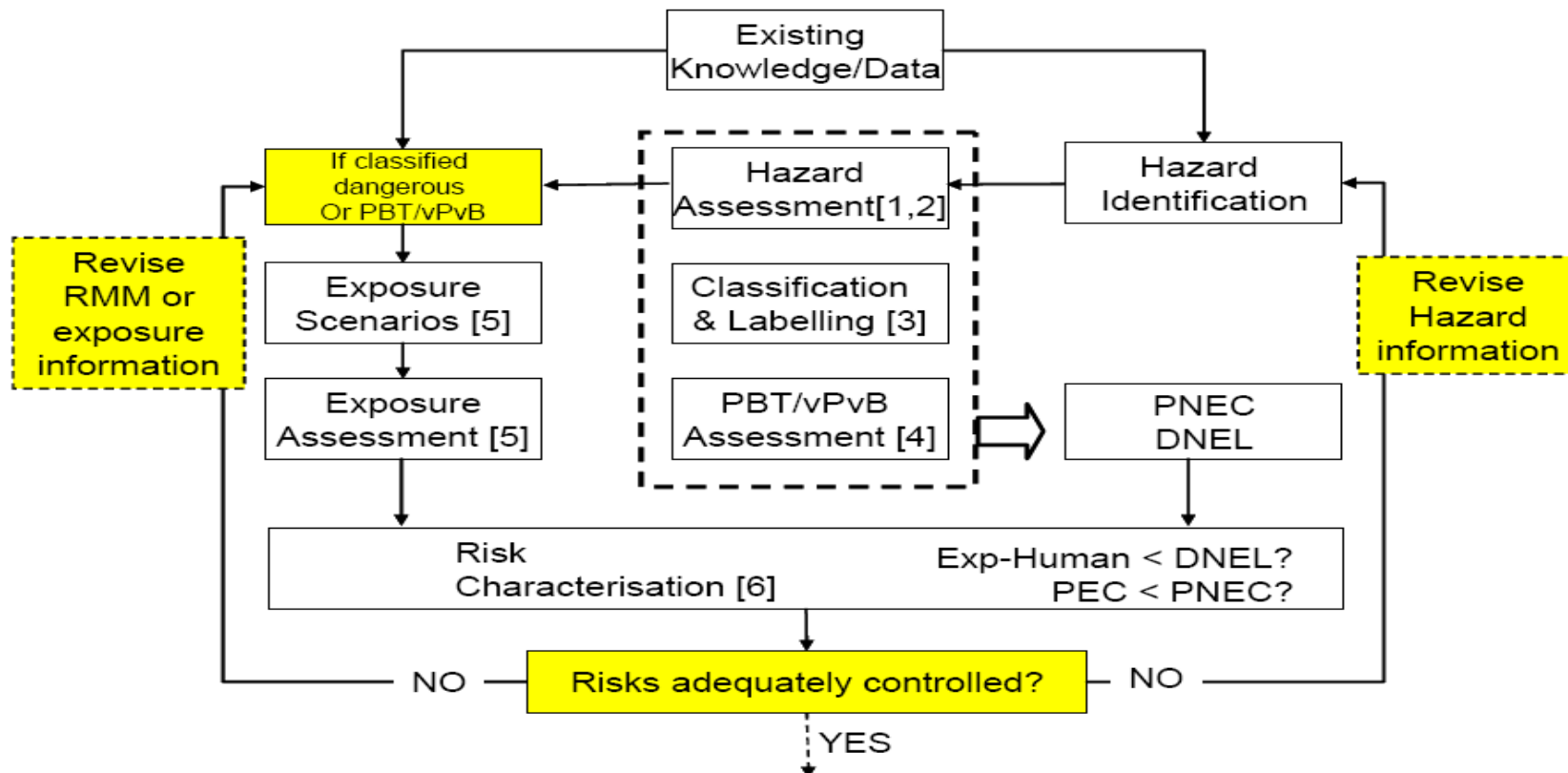
Voluntary
- DU & M/I <1 tpa
- NGO, academia
- Non EC

Automatic
-Registrants
-Submitters of data to
PPPD and BPD

Next challenge



Chemical Safety Assessment



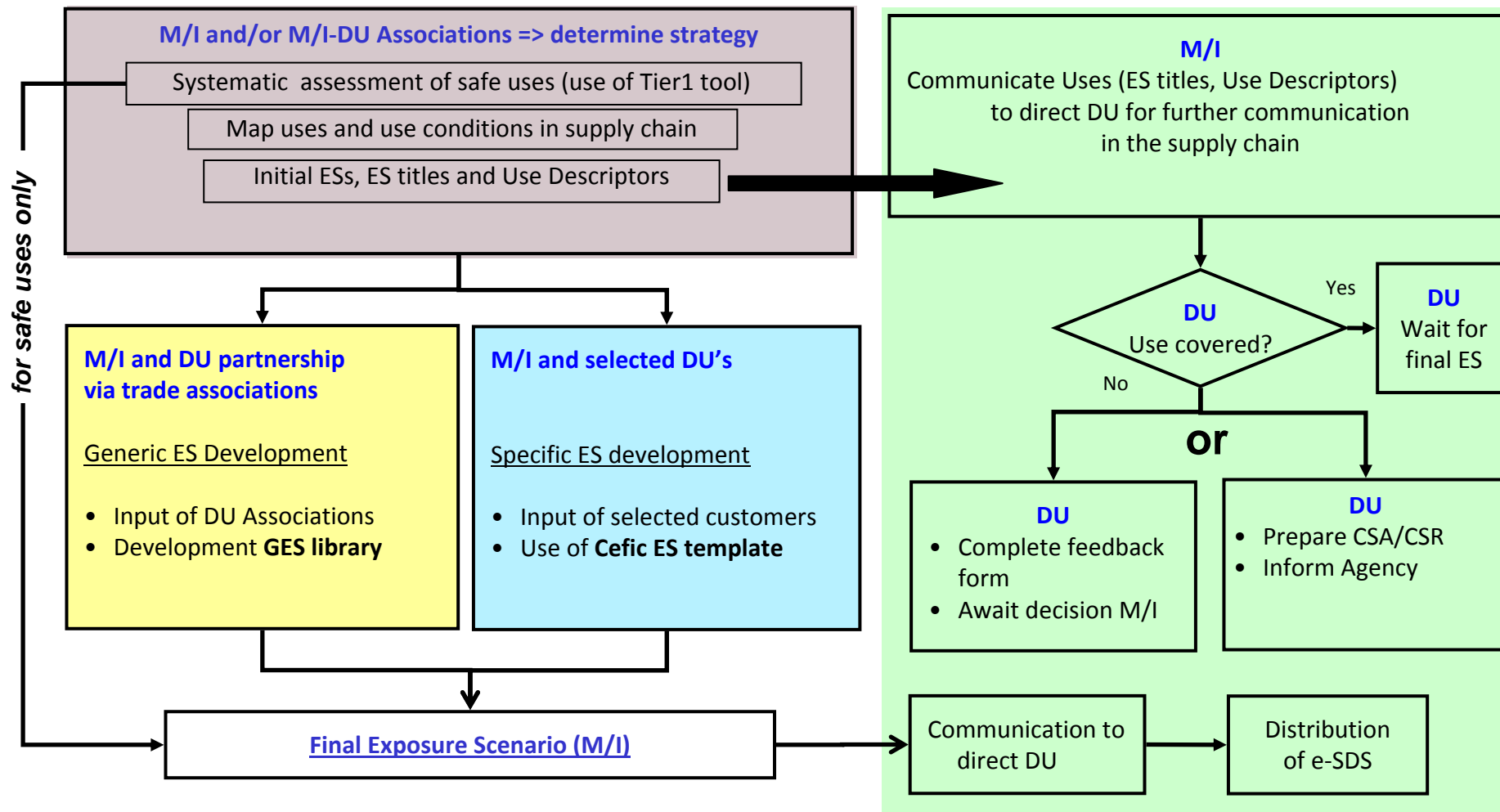
- Make Chemical Safety Report (CSR)
- CSR includes Exposure Scenario with Risk Management Measures (RMM)
- Implement RMMs for own manufacture or use
- Communicate ES and RMM down the supply chain with Safety Data Sheet (SDS)

Chemical Safety Assessment



- **Experience limited to the biggest companies**
- **Lack of specialists and everyone is looking for them**
 - **Toxicologists**
 - **Ecotoxicologists**
 - **Risk assessers**

Exposure Scenario Development & Communication model



Legend
 M/I = Manufacturer / Importer
 DU = Downstream User

For specific products and applications the appropriate (next) steps in the above diagram need to be determined based on expert judgement: not always all steps are needed and/or the order can be adapted.

Step 1: Identification of Parameters

CEPIC Use and Expectations

- A. Each form gives information on the parameters to be filled in
- B. The MI (together with DU) identifies the product
- C. The DU (Downstream User) identifies the use

The parameters in the yellow column are filled in by the manufacturer importer (M/I)

The parameters in the blue column are filled in by the downstream user (DU) if needed

Explanation colors

Yellow text	MI scenario
Green text	MI scenario
Blue text	DU scenario

No.	Information item	available options (plus explanatory notes)	Proposed ES (to be completed by MI)	Deviation from Proposed ES (to be completed by DU)
0	Product Identification			
0.1	Product name as it appears on SDS		GE Solvent	
1	Short title exposure scenario			
1.1	Internal name			
1.2	Sector(s) of Use	Selection from short list Selection from detailed list		
1.3	Product Category(ies).	Selection from short list Selection from detailed list		
1.4	Process Category(ies)	Selection from short list Selection from detailed list (preferably use descriptors from dropdown list with an *)		
1.5	Article Category(ies).	Selection from short list Selection from detailed list		
1.6	Environmental Release Category(ies)	Selection from short list Selection from detailed list		

Manufacturer / Importer identifies the product (substance or preparation) here
GE Solvent



Thanks for your attention