

ECHA-16-A-11-EN

The REACH regulation (EC) 1907/2006 includes the registration, evaluation, authorisation and restriction of chemicals. The aim is to protect human health and the environment from risks from chemicals. REACH supports and complements other EU legislation that also applies to users of chemicals, including environmental, health and safety legislations. This page explains how it affects users of chemicals in the workplace.

### WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

The main elements of REACH are outlined below, together with what they mean for a company that uses chemicals.

<b>Registration</b>	Companies that manufacture or import more than 1 tonne per year of a substance into the EEA must register with ECHA.	<ul style="list-style-type: none"> <li>You may need to register if you manufacture or import directly.</li> <li>For substances you purchase, check with your supplier if a registration is required.</li> <li>Substances must be registered by 31 May 2018.</li> </ul>
<b>Evaluation, Authorisation and Restriction</b>	There are a number of mechanisms within REACH to identify chemicals of concern and to manage the risks posed by these chemicals.	<ul style="list-style-type: none"> <li>Be aware if any chemicals you use are restricted, require authorisation, or have harmonised classification.</li> <li>Aim to substitute chemicals of concern whenever possible</li> </ul>
<b>Information in the supply chain</b>	When a substance is hazardous, registrants prepare a chemical safety assessment for all the uses of that substance. Relevant information to protect human health and the environment is provided in the safety data sheet and exposure scenarios.	<ul style="list-style-type: none"> <li>When you receive safety data sheets and exposure scenarios, check that you implement the recommended measures.</li> <li>If you supply hazardous substances or mixtures, provide information to users so they can use them safely.</li> <li>If you have new information on the hazards or risk management measures for a substance, communicate that to your supplier.</li> </ul>

### WHERE CAN I GET MORE INFORMATION ...about the REACH Regulation?



The technical, scientific and administrative aspects of REACH and CLP are managed by ECHA, the European Chemicals Agency. See <http://www.echa.europa.eu/regulations/reach> for an overview of the REACH regulation and useful links.

An interactive map on <http://www.echa.europa.eu/downstream-users> provides links to the support available to downstream users on the ECHA website.



## About the CLP Regulation

REACH/CLP tips for users of chemicals

ECHA-16-A-12-EN

The CLP Regulation (EC) 1272/2008 deals with the classification, labelling and packaging of chemicals within Europe. This page outlines how this affects users of chemicals in the workplace.

- Who classifies chemicals?
- Why is the same chemical classified differently by different suppliers?
- What should I do when I get different classifications?

- How do I find classification information on ECHA's website
- How do I determine whether the classification information from my supplier is reliable?
- What should I do if I receive information according to the previous legislation?



I'll find the answer in...  
"Tips for users of chemicals  
in the workplace" (CLP)

### WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

- You should be aware that CLP Regulation has fully replaced the Dangerous Substances Directive (DSD) 67/548/EEC and Dangerous Preparations Directive (DPD) 1999/45/EC since 1st June 2015.
- The classification and labelling of some chemicals has changed. This could affect the risk management measures that you take, both for workplace and environmental exposure.
- You are most likely to see classification changes for the hazards of acute toxicity and skin corrosion/irritation. There are also differences in the classification criteria for flammable liquids.
- You need to ensure that all employees handling chemicals recognise and understand the new CLP labels, including the pictograms and the hazard and precautionary statements.
- Your supplier is responsible for providing correct information to you. However, you need to check the labels and the safety data sheets for the chemicals you handle on site. You should recognise when the information is consistent and reliable – and when it is not!
- You might still receive mixtures that are classified, labelled and packaged in accordance with DPD until June 2017, if they were already labelled and packaged in accordance with DPD and in the supply chain before 1st June 2015.
- Contact your supplier if the information you get is inadequate, or you receive different information from different suppliers.
- If you supply mixtures, use the step-by-step guide at <http://echa.europa.eu/support/mixture-classification> to help you classify them. Make sure you update the label and safety data sheet as necessary.

## WHERE CAN I GET MORE INFORMATION ...about the CLP Regulation?

- See <http://www.echa.europa.eu/regulations/clp> for an overview of the CLP regulation and useful links.
- For Tips for users of chemicals in the workplace (CLP), see [http://echa.europa.eu/documents/10162/966058/tips\\_users\\_chemicals\\_workplace\\_en.pdf](http://echa.europa.eu/documents/10162/966058/tips_users_chemicals_workplace_en.pdf)
- If you are a formulator, see <http://echa.europa.eu/regulations/reach/downstream-users/who-is-a-downstream-user/formulators>



 Train employees to recognise the new pictograms using <http://echa.europa.eu/clp-quiz> and [https://echa.europa.eu/documents/10162/2621167/eu-osh\\_chemical\\_hazard\\_pictograms\\_leaflet\\_en.pdf](https://echa.europa.eu/documents/10162/2621167/eu-osh_chemical_hazard_pictograms_leaflet_en.pdf)

## About the ECHA DATABASE ON CHEMICALS

REACH/CLP tips for users of chemicals

ECHA-16-A-13-EN

The ECHA website is a unique source of information on the chemicals manufactured and imported in Europe. It provides their hazardous properties, classification and labelling, and information on how to use them safely. This page outlines the information most relevant to users of chemicals in companies.

- Have other suppliers registered my substance?
- Who are the active suppliers?
- What uses have been registered?
- What uses are advised against?

- Is classification harmonised in the EU?
- How have other suppliers classified a substance?
- Is the substance affected by any regulatory risk management measure?



I'll "search for chemicals" on the ECHA website (Search for chemicals)  
<http://echa.europa.eu>



### Infocards

Presents key substance and use information in a user friendly format. Includes overview of regulatory measures that apply

### Brief Profile

More detailed information than InfoCard, including suppliers and collated data from C&L inventory

### C&L Inventory

C&L of 120,000 substances from registrations and supplier notifications. Includes harmonised classification

### Registered substances

Non-confidential substance data and use information from over 15,000 registrations

### WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

- The ECHA database is a useful resource for many purposes. Be aware however that substance information in the ECHA database is based on notifications by companies and information provided in REACH registration dossiers. ECHA does not verify the accuracy of the information.
- Although the database is useful, the safety data sheet from your supplier is the primary source of information on the chemicals you purchase.

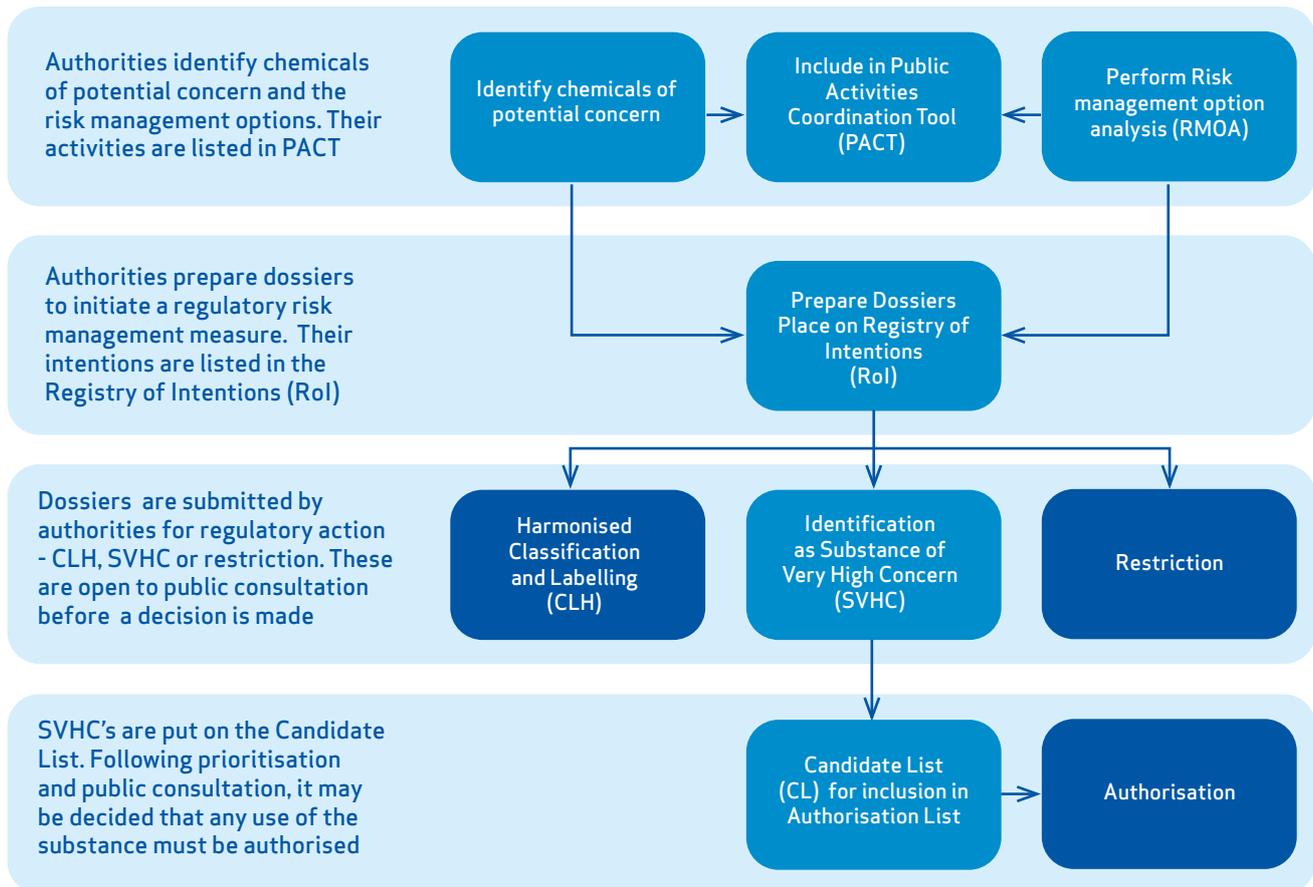
## WHERE CAN I GET MORE INFORMATION ...about the ECHA DATABASE ON CHEMICALS?



- See <http://www.echa.europa.eu> for the “search for chemicals” box
- For access to all databases, see <http://www.echa.europa.eu/information-on-chemicals>.
- For information on the regulatory process, see <http://echa.europa.eu/addressing-chemicals-of-concern/substances-of-potential-concern>
- For information on how downstream users can provide information to registrants, see <http://echa.europa.eu/csr-es-roadmap/use-maps>

ECHA-16-A-14-EN

A key policy objective of the REACH regulation is to encourage the substitution of chemicals of concern by less hazardous alternative substances or processes. This page describes the regulatory risk management processes in REACH and CLP that support that policy.



Decision processes involve ECHA's committees, Member States and the Commission

## WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

- Know the regulatory status and be proactive in preparing for change and in promoting the safe use of chemicals onsite.
- Be aware of the impact this could have on your company's operations
- Contact your suppliers if necessary, to ensure they are aware and taking appropriate action
- Investigate substituting any chemicals of concern you use with safer alternatives
- Participate in public consultations, to ensure that decisions are based on the best available information
- Check that you use substances in line with any applicable restriction or authorisation
- Apply for authorisation if your supplier does not apply or include your use but you need to continue using the substance
- If you produce or import articles, you have obligations if an SVHC on the Candidate List is incorporated into those articles. At concentrations above 0.1% (w/w), inform customers regarding safe use and, if required, notify ECHA

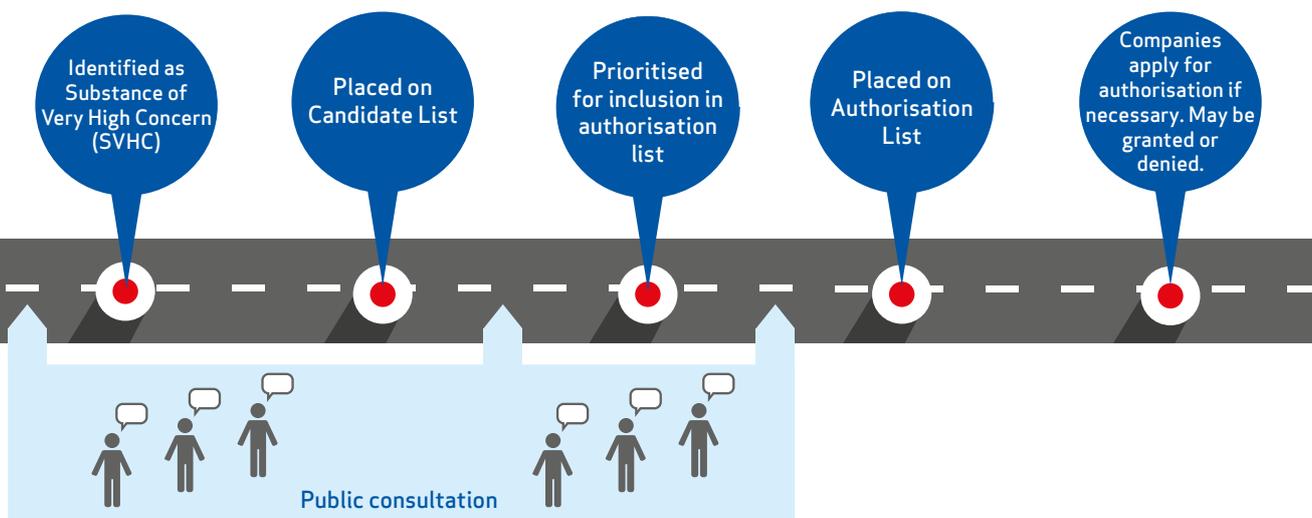
## WHERE CAN I GET MORE INFORMATION ...about CHEMICALS OF CONCERN?



- For information on how chemicals of concern are addressed, see <http://echa.europa.eu/addressing-chemicals-of-concern>
- For ideas on substitution: <http://www.echa.europa.eu/regulations/substituting-hazardous-chemicals>
- For a perspective on the role chemicals play in our lives: <http://www.echa.europa.eu/chemicals-in-our-life>
- For a presentation you can use on chemicals of concern: <http://echa.europa.eu/regulations/reach/downstream-users/presentations-for-downstream-users>

ECHA-16-A-15-EN

Authorisation aims to manage the risks of chemicals of concern by promoting their replacement with safer alternatives. After a specified date, only companies that have been authorised to use the substance in the EU can do so. Authorisation is granted only if there is adequate control or if the socio-economic benefits in continuing to use it outweigh the risk of continued use. Companies can apply for authorisation directly, or can be included in an application for authorisation by another company in their supply chain. This page outlines the main stages leading to authorisation and strategies for users of chemicals.



### WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

If you are a company that uses chemicals:

1. Establish whether you might be affected by authorisation.
  - Follow the regulatory status of chemicals you use in the ECHA website
2. Participate in public consultations.
  - The decision making process is based on the information available to it. Provide any relevant information about use, exposure, alternatives and so on
3. Engage with your suppliers
  - It helps to know what supplier intentions are
4. Evaluate the importance to your business and industry sector
  - This influences your strategy if the substance is placed on the authorisation list. Elements include profitability, production life-stage and projected lifetime, certification and market position.
5. When a substance is subject to authorisation, decide on your strategy. Your options include:
  - Substitute the substance or process with a safer alternative
  - Eliminate the substance if it is not important to your business and supply chain
  - Ensure your use is included in an application for authorisation by your suppliers
  - Apply for authorisation (individually or jointly with other applicants)\*
6. Involve all relevant personnel in the company, and engage external expertise as necessary.

\* If you are applying for authorisation as a downstream user and want to include your suppliers, you can only cover placing on the market by your immediate supplier. This means you cannot cover the uses of a formulator who supplies you.

## WHERE CAN I GET MORE INFORMATION ...about AUTHORISATION?

- ECHA's webpages on authorisation: <http://echa.europa.eu/addressing-chemicals-of-concern/authorisation>
- Guidance on the preparation for an AfA: [http://echa.europa.eu/documents/10162/13637/authorisation\\_application\\_en.pdf](http://echa.europa.eu/documents/10162/13637/authorisation_application_en.pdf)
- Committees common approach paper in opinion development on AfA: [https://echa.europa.eu/documents/10162/13555/common\\_approach\\_rac\\_seac\\_en.pdf](https://echa.europa.eu/documents/10162/13555/common_approach_rac_seac_en.pdf)
- AfAs and committees opinions: <http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/applications-for-authorisation-previous-consultations>



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You may have heard the term “downstream user” being used in connection with the REACH and CLP regulation. This page explains who is a downstream user, and outlines the main legal obligations under REACH.

### WHO IS A DOWNSTREAM USER?

“Downstream user” is the term used in the REACH and CLP regulation to describe users of chemicals. You are a downstream user if you or your company use chemicals in an industrial setting, or if you use chemicals in a professional activity such as cleaning, painting etc. Distributors are not normally downstream users, unless they undertake activities with open chemicals, such as formulation or transferring chemicals between containers (refilling). The general public, who use chemicals in a personal capacity, are not downstream users and are referred to as consumers.

### WHAT DOES THAT MEAN FOR A COMPANY THAT USES CHEMICALS?

A company that uses chemicals should know the rights and obligations they have as a downstream user. The main ones are outlined below. Downstream users who formulate mixtures for supply or produce articles which incorporate substances have additional obligations under both REACH and CLP that are not described here.



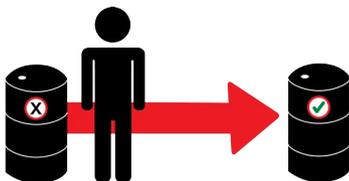
- Check your use is covered in any exposure scenarios you receive
- Implement measures specified by your supplier to ensure the safe use of the substance or take appropriate action.

*This information may help you in assessing the risk of chemicals under other environmental health and safety legislation*



- Inform your supplier if you have new information on the hazards of the substance or if the risk management advice is not appropriate.

*For example, you may be aware of adverse health effects being experienced by your workers, or have evidence that the proposed risk management measures are overly precautionary.*



- Take appropriate action if using a substance included in the Authorisation List or the List of Restrictions.

*The preferred measure is to substitute the substance or the process with a safer alternative. Avoid surprises by keeping an eye on which substances are involved in the regulatory process.*



- Provide information regarding how you use a substance to your suppliers

*This helps to ensure that you receive relevant information on safe use, because manufacturers and importers can base their chemical safety assessments on this information when they register a substance. This action is voluntary and often done via sector organisations and Use Maps. Confirm with your sector organisation that your use is included. This is particularly important before the REACH registration deadline 2018*

## WHERE CAN I GET MORE INFORMATION ...about the role of DOWNSTREAM USERS?

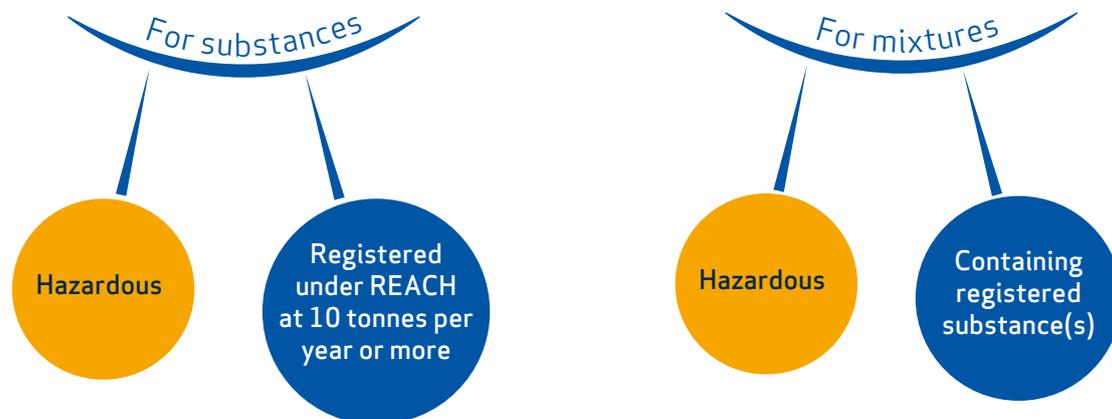


- For general downstream user information, including interactive map with links, see <http://www.echa.europa.eu/downstream>
- For presentations and videos about downstream users, see <http://echa.europa.eu/regulations/reach/downstream-users/presentations-for-downstream-users>
- For guidance for downstream users, see: [http://echa.europa.eu/documents/10162/13634/du\\_en.pdf](http://echa.europa.eu/documents/10162/13634/du_en.pdf)
- For information on substances involved in the regulatory process, see <http://echa.europa.eu/addressing-chemicals-of-concern>
- For information on how downstream users can provide information to registrants, see <http://echa.europa.eu/csr-es-roadmap/use-maps>

ECHA-16-A-17-EN

Exposure scenarios (ESs) are sometimes provided with safety data sheets (SDSs); together they are called extended safety data sheets. Exposure scenarios summarise the key information from the chemical safety assessment prepared for REACH registration. They describe how the registrant recommends that you control the exposure of workers, consumers and the environment, in order to ensure the safe use of the substance. This page explains when to expect exposure scenarios, and outlines what to do when you receive them.

## WHEN ARE EXPOSURE SCENARIOS PROVIDED?



## WHAT DOES THIS MEAN FOR A COMPANY THAT USES CHEMICALS?

A downstream user is obliged to apply the measures described in the exposure scenario or take alternative actions. This means that when you receive exposure scenarios, you need to check that your use is covered. Ensure that how you use the substance or mixture is consistent with the information provided. Contact your supplier if you have not received the information you expect or if you are uncertain whether your use is covered.

A period of 12 months is available to complete the necessary actions. To fulfil this, a system to organise and manage this process within your company is helpful. A link with your chemical inventory and other environmental health and safety systems on site is often found to increase effectiveness.

If the use and conditions of use are covered in the exposure scenario, document this. If they are not covered, you have several options:

1. implement the conditions in the exposure scenario; or
2. ask your supplier to cover your use; or
3. prepare a downstream user chemical safety report
4. change your supplier, substance or process

## WHERE CAN I GET MORE INFORMATION ...about EXPOSURE SCENARIOS?

An interactive map on <http://www.echa.europa.eu/downstream-users> provides links to the support available to downstream users on the ECHA website, including:



- Guide on Safety Data Sheets and Exposure Scenarios.: <http://view.pagetiger.com/ECHAeGuide1-1/Issue1>
- ECHA Practical Guide 13 “How downstream users can handle exposure scenarios”: [http://echa.europa.eu/documents/10162/13655/du\\_practical\\_guide\\_13\\_en.pdf](http://echa.europa.eu/documents/10162/13655/du_practical_guide_13_en.pdf)
- Annotated templates for exposure scenarios, which show the recommended structure and describe the type of information that is included in each section: <http://echa.europa.eu/support/guidance-on-reach-and-clp-implementation/formats>
- Safety Data Sheets and Exposure Scenarios factsheet: [http://echa.europa.eu/documents/10162/13563/downstream\\_en.pdf](http://echa.europa.eu/documents/10162/13563/downstream_en.pdf)

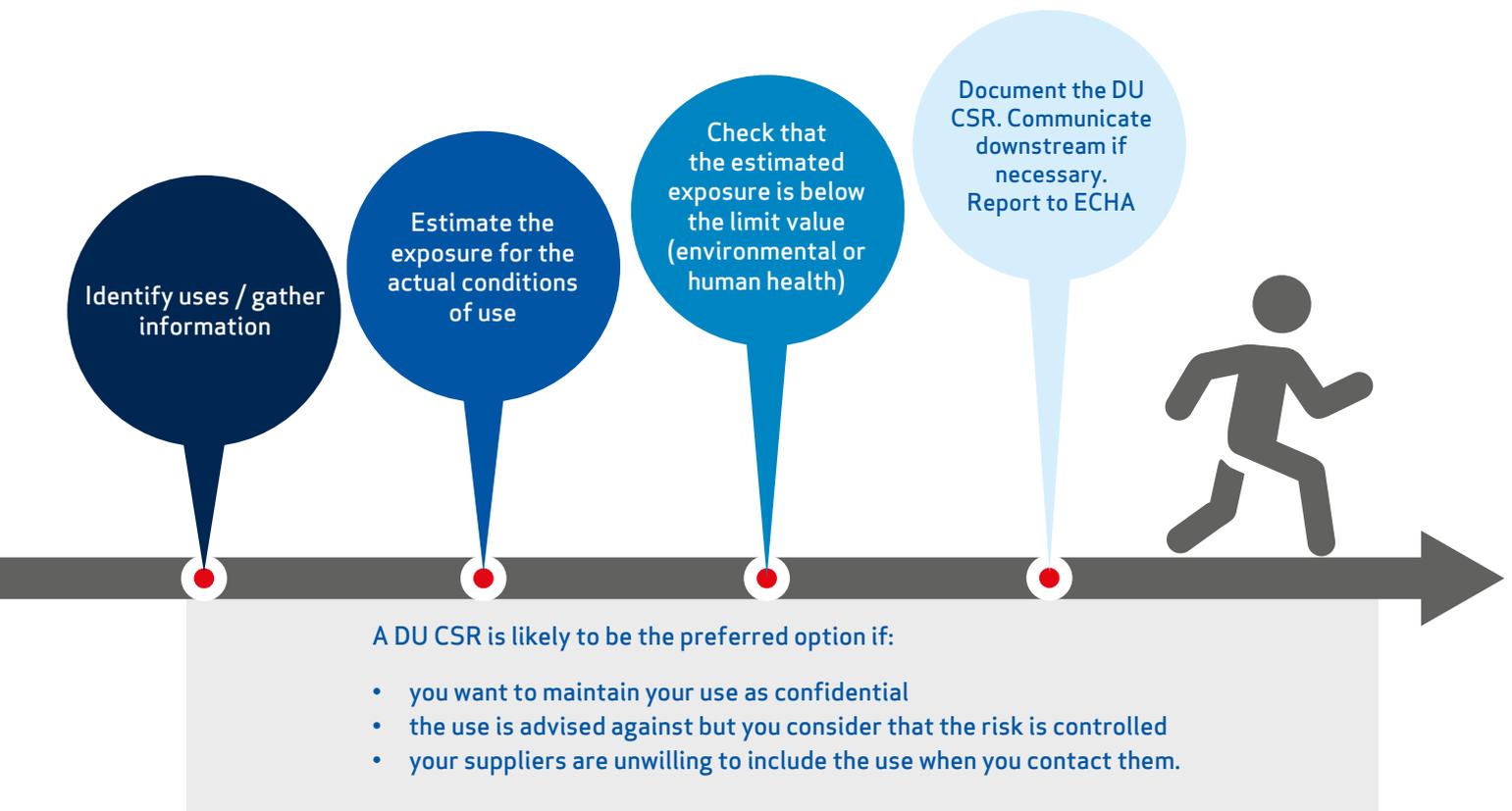
# About a DOWNSTREAM USER CHEMICAL SAFETY REPORT (DU CSR)

REACH/CLP tips for users of chemicals

ECHA-16-A-18-EN

When you receive exposure scenarios (ESs) annexed to safety data sheets (SDSs), you need to check that your use and conditions of use are covered in the ES provided by your supplier. If not, one option is to prepare a downstream user chemical safety report (DU CSR). This page outlines the main steps.

## PREPARING A DOWNSTREAM USER CHEMICAL SAFETY REPORT (DU CSR) - THE MAIN STEPS



## WHAT DOES THIS MEAN FOR A COMPANY THAT USES CHEMICALS?

A DU CSR can be simple or complex, depending on the situation. The competency required is typically that of an environmental health and safety (EHS) practitioner, who can check exposure scenarios and undertake risk assessments as required by other EHS legislation, and who can recognise when greater expertise is needed to undertake the chemical safety assessment.

Before you start, check the following:

- Are other options possible, such as implementing the conditions of use or substituting with a safer alternative substance/process or asking your supplier to cover your use?
- Do any exemptions apply (for example, is your use less than 1 tonne per year)?
- Has your sector organisation prepared suitable sector based assessments?
- Can you take advantage of risk assessments undertaken on site under other EHS legislation?

## WHERE CAN I GET MORE INFORMATION ... about a DOWNSTREAM USER CHEMICAL SAFETY REPORT (DU CSR)?

- ECHA Practical Guide 17 “How to prepare a downstream user chemical safety report”, see [http://echa.europa.eu/documents/10162/13655/pg17\\_du\\_csr\\_final\\_en.pdf](http://echa.europa.eu/documents/10162/13655/pg17_du_csr_final_en.pdf)
- For more about checking exposure scenarios, see:
  - eGuide on Safety Data Sheets and Exposure Scenarios, see <http://view.pagetiger.com/ECHAGuide1-1/Issue1>
  - ECHA Practical Guide 13 “How downstream users can handle exposure scenarios”, see [http://echa.europa.eu/documents/10162/13655/du\\_practical\\_guide\\_13\\_en.pdf](http://echa.europa.eu/documents/10162/13655/du_practical_guide_13_en.pdf)
- For general downstream user information, including interactive map, see <http://www.echa.europa.eu/downstream-users>

