

Information in the downstream user reports - ECHA viewpoint

Webinar "How and when downstream
users need to report to ECHA"

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What does REACH say?

Article 37

- Requirement for preparing DU chemical safety report if use not covered by supplier's exposure scenario

Article 38(2)

- Requirement to report use to ECHA
- Information requirements for the DU reports

Recital 60

- "For enforcement and evaluation purposes..."

Reasons to report – and what they indicate

- Downstream users' use not supported by registrants chemical safety assessment
 - DU CSRs supplement the information on registrants' CSRs in the ECHA database
 - Based on the report, authorities can request a full downstream user chemical safety report
- Downstream user unable to conclude whether his use is supported or not
 - Potential problems in the communication in the supply chain
- Different classification of the substance by downstream user
 - Supplements the information in the C&L Inventory

ECHA processes benefiting from DU reports

- Monitoring functioning of REACH
 - ECHA report every five years
- Preparing the Community Rolling Action Plan (CoRAP) list for substance evaluation
 - Getting a complete picture on uses of the substance
- Identification the need for further risk management measures
 - Getting a complete picture on uses of the substance
- Identification of registration dossiers for compliance check

Overview of downstream user reports received by ECHA



Overview of downstream user reports

Overview on downstream user reports

This data shows the number of downstream user reports received by ECHA, the number of substances reported and the number of legal entities from whom reports have been received. It also indicates the reasons for submitting the report.

Downstream users are required to inform ECHA if they have to prepare a downstream user chemical safety report or if they rely on certain exemptions from the obligation to prepare a chemical safety report.

This overview on downstream user reports is updated regularly.

Legal reference: Article 38(1) of REACH

Table 1

Overview of downstream user reports Reporting began in May 2011	Period Jul 2012 - Dec 2012	Total from May 2011 - Dec 2012
Number of reports received	72	172
Number of substances reported	38	99
Number of legal entities reporting	21	69

Available on the ECHA website at

<http://echa.europa.eu/information-on-chemicals/overview-on-downstream-user-reports>

Overview of reasons for submitting DU report

Overview of downstream user reports Reporting began in May 2011	Period Jul 2012 - Dec 2012	Total from May 2011 - Dec 2012
Reason for the downstream user report		
Downstream user to prepare chemical safety report	67	163
Substance used in total qty < 1 tonne/year		10
Substance used for PPORD	0	0
Classification differs from supplier	0	0
Reason for downstream user chemical safety report		
Use not covered despite communicating it to supplier		158
Confidential Business Information	3	5
Did not provide information due to burden of supply chain communication mechanisms		3
Use advised against		5
Other/not specified		9

Overview of DU reports by country

Overview of reporting by country: July 2012 to December 2012			
Country	Number of Reports	Number of Substances	Number of legal entities reporting
Total	74	38*	23
Belgium	2	2	2
France	11	11	3
Italy	5	5	3
Germany	18	18	7
Spain	10	10	2
Sweden	11	11	1
United Kingdom	15	14	3
All other countries	0	0	0

*This is not the sum of the rows below, as some substances were reported from more than one country

Further information



Downstream user support by ECHA

- <http://echa.europa.eu/web/guest/regulations/reach/downstream-users>
- Guidance for downstream users (update on-going)
- Practical Guide 13: How downstream users can handle exposure scenarios
- Q&A on Downstream user reports
- REACH Fact Sheet on Safety data sheets and exposure scenarios
- Data Submission Manual 21: How to prepare and submit a downstream user report

Thank you

