

Communication and notification duties with complex objects

Webinar: communicating information on substances in articles - what you need to know

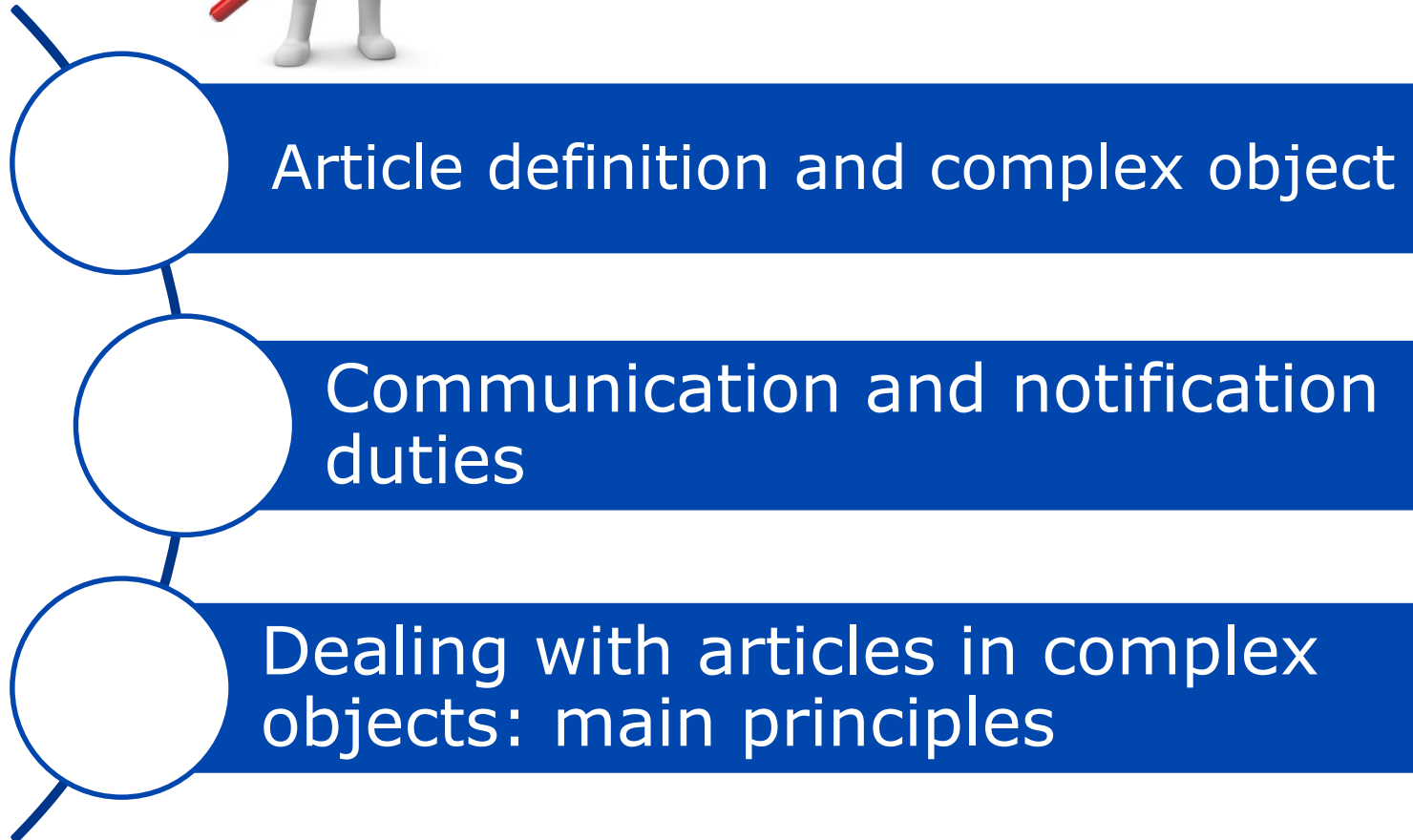
2 November 2017

Rémi Lefèvre

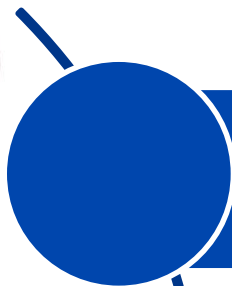




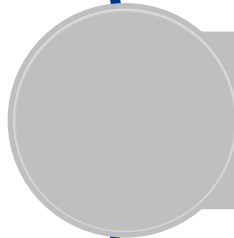
Content



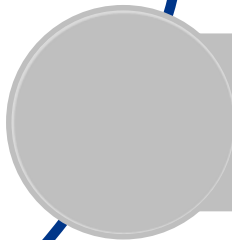
Content



Article definition and complex object



Communication and notification duties



Dealing with Articles in complex objects: main principles

Substance, mixture or article?

Article: An **object** which **during production** is given a **special shape, surface or design** which determines its **function** to a greater degree than does its chemical composition.



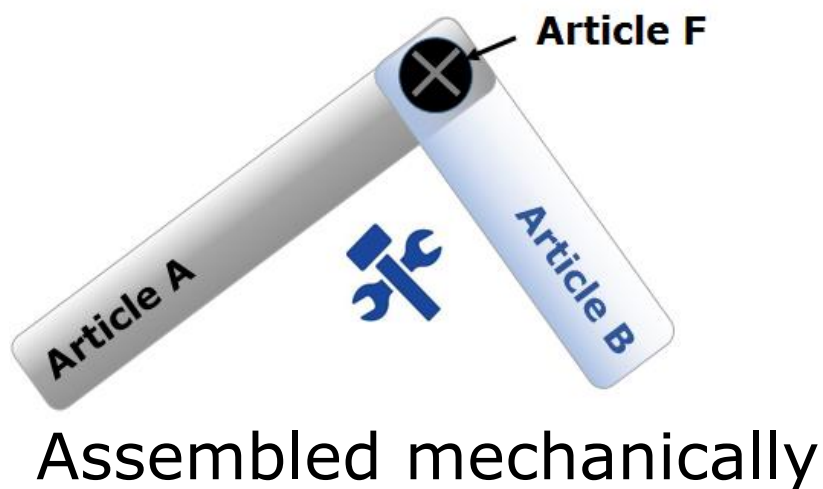
**Containers
= Articles**

Paint, oil =



**Substance
or
mixtures**

Articles can be assembled...



...to become a "complex object"

Objects can be very complex...



... but principles remain the same.

Content



Article definition and complex object

Communication and notification duties

Dealing with articles in complex objects: main principles

Who has duties?



When do duties apply?

Supply chain communication



AND



> 0.1% w/w

Notification to ECHA



AND



> 0.1% w/w

AND



> 1 tpa

What information to provide?

Supply chain communication

- Name of Candidate List substance
- Identification of article containing it
- Other information to enable safe use of the article

Notification to ECHA

- Identification of Candidate List substance
- Tonnage of the substance
- Description of the use of the substance in the article
- Brief description of the article
- Description of uses of the article

Content



Article definition and complex object

Communication and notification duties

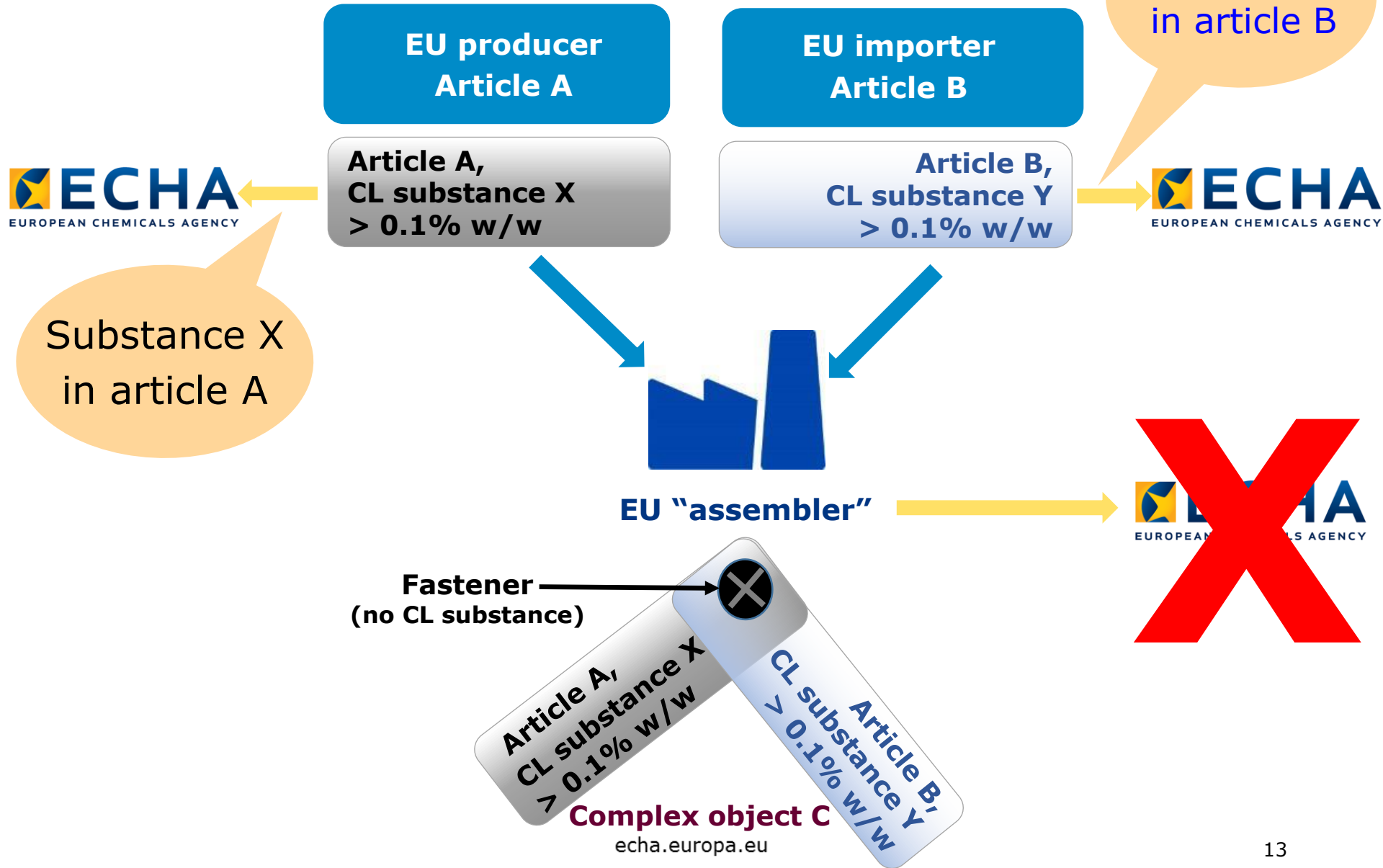
Dealing with articles in complex objects: main principles

Principle 1

Notify an article only once



Principle 1 - Case #1



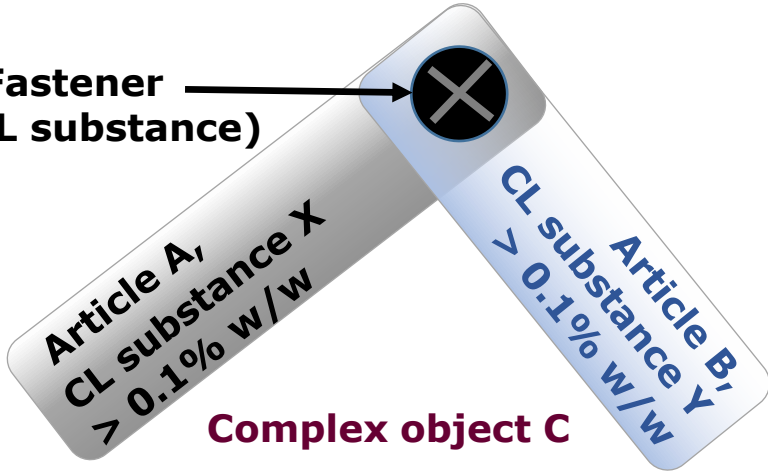
Principle 1 - Case #2

EU importer
Complex object C

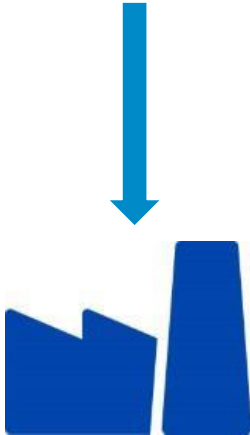


- Substance X in article A
- Substance Y in article B

Fastener
(no CL substance)



Complex object C



EU distributor



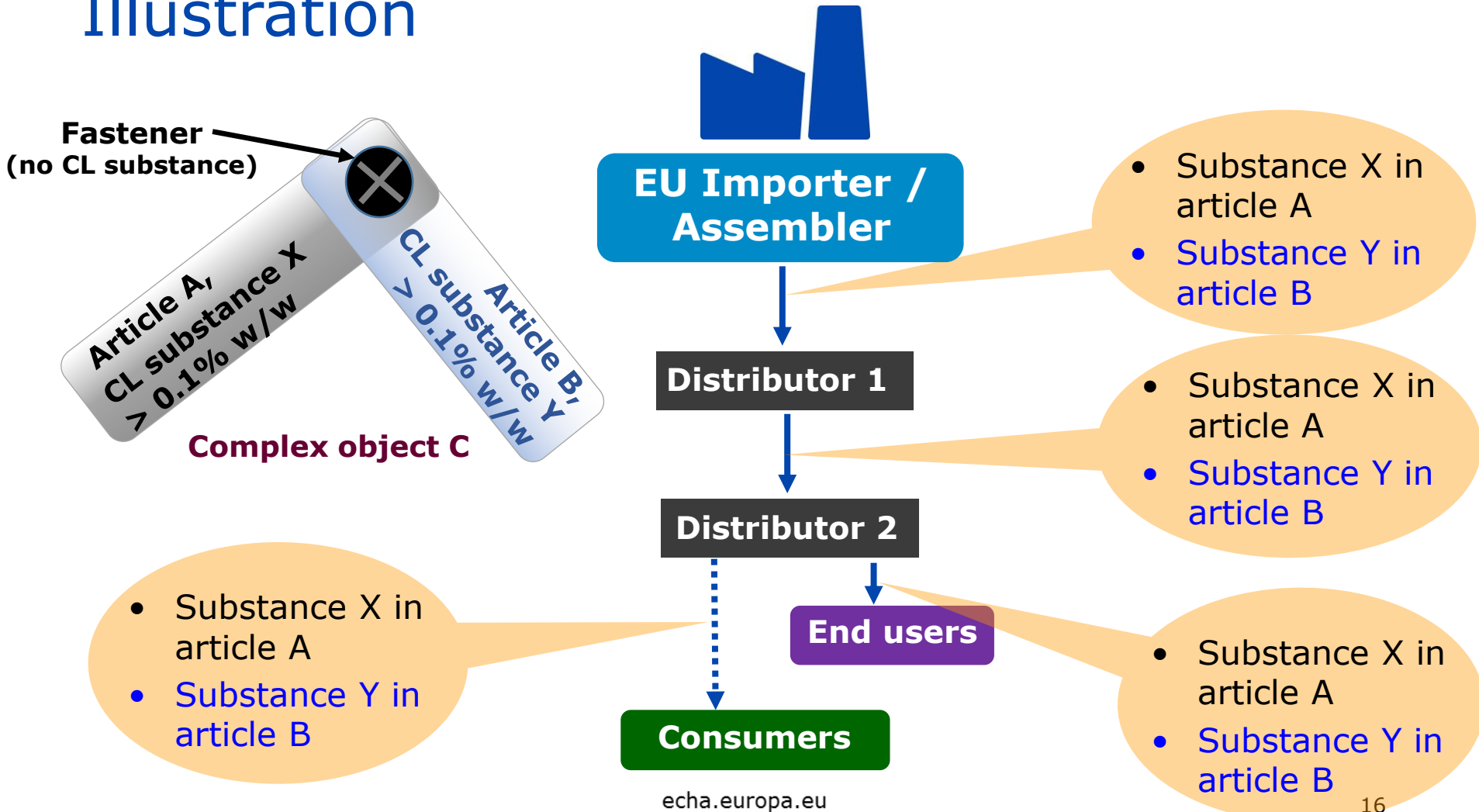
Principle 2

EU suppliers of complex objects should provide information on each article they supply



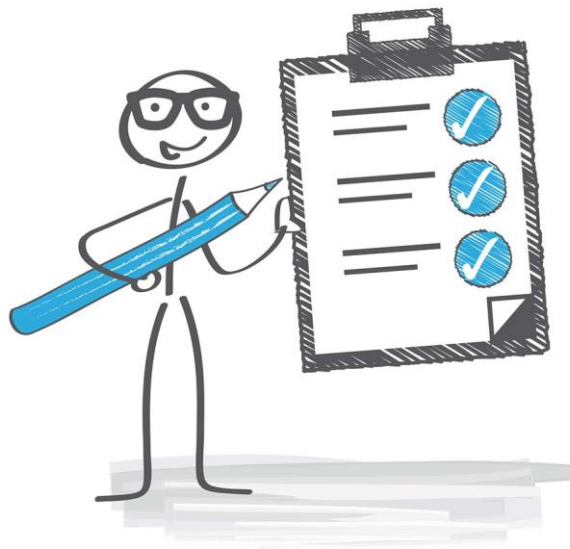
Principle 2

Illustration



Principle 3

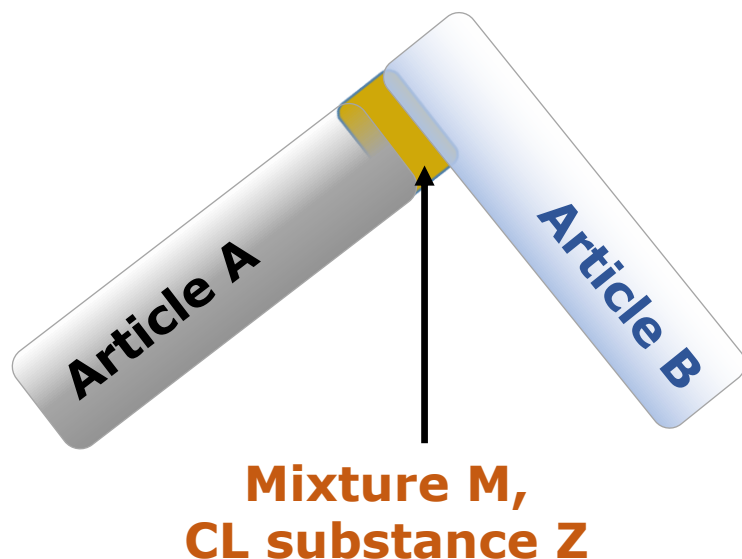
When two articles are joined with (a mixture containing) a Candidate List substance, the concentration of the Candidate List substance is calculated over the whole complex object



Principle 3

Illustration

Complex object D



→ concentration of CL substance Z calculated over the whole complex object D (A+B+M)

→ if above 0.1% w/w, the assembler should communicate and possibly notify ECHA

**Further practical
information**



How to submit a notification?

7 November 2017



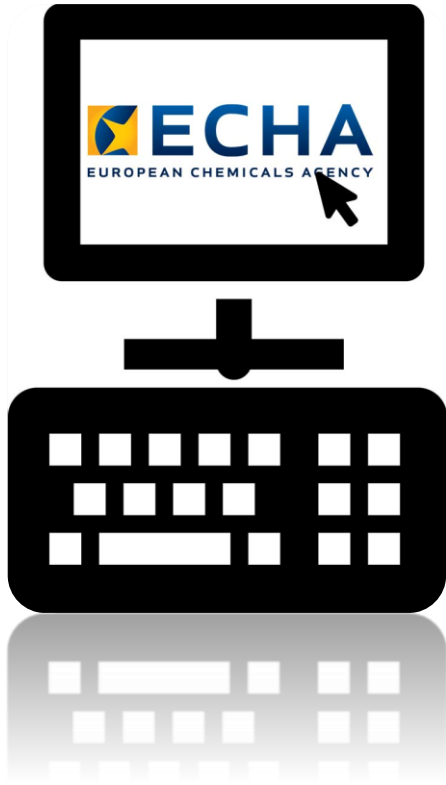
Substance in articles

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