



January 2011

Univar Europe SHE
RC Product Stewardship

REACH Bulletin 17 – First phase-in registrations

Dear Customer,

Substances that were within scope of the first phase-in REACH registration deadline required manufacturers and importers to submit their registrations to the European Chemicals Agency (ECHA) by the end of November 2010; this includes the high production/import tonnages and the most dangerous substances. Once the manufacturer or importer receives the registration number for their substance, they can prepare the updated SDS or extended SDS (eSDS) as necessary. Where the SDS only needs to be updated with the registration number, this is not classed as a significant change and manufacturers do not need to re-issue the SDS immediately, but should update their information and re-issue at the next appropriate time.

Only registered substances that are classified as dangerous must have Exposure Scenarios (ES) appended to the SDS to make an eSDS. The eSDS will indicate the only uses that the substance can be used for. Until you receive an eSDS for a dangerous substance you can continue to use products for their existing uses. This could take over 6 months to generate, translate and issue an eSDS. Once advised of a restriction on an eSDS, customers will need to comply with the advice given on that eSDS within 12 months of receipt of the eSDS. Substances that are not classified as dangerous using the criteria in the Classification, Labelling and Packaging regulations (CLP) will not need an eSDS and will normally continue to be used for their existing applications.

Low production/import tonnage substances are subject to the second and third phase-in registration deadlines (2013 & 2018 respectively) and can continue to be used for all their existing applications until the registration requires a change to the SDS.

Mixtures containing registered dangerous substances will have their SDS updated with the registration number(s) at the appropriate time; again, if the change to the SDS is simply the registration number, it is not a significant change and does not require an immediate re-issue. Dangerous substances that have been registered may only be used in mixtures if the use within that mixture is covered by the registration.

Many mixtures will contain substances that fall within scope of the second or third phase-in deadlines so will not be fully registered until the appropriate deadline. The mixtures can continue to be used for their existing applications until advised against on the SDS.

Univar continues to work alongside its manufacturers and importers to ensure continued availability of chemicals for our customers. Univar is aware of its legal obligations under REACH as they relate to products supplied and will continue to update and re-issue SDS or eSDS to customers as required.

Should you require any more information please contact us via your usual Univar contact.