

Standard Reply on the Use of ECHA's Use Descriptor System (FECC)

June 2009

Dear customer, Dear supplier,

As you know the REACH Regulation requires under certain conditions the development of a Chemical Safety Assessment (CSA), demonstrating safe Use of a substance through its lifecycle. Considering the number of substances and the various Uses that have to be identified, it should be stressed that a common framework is necessary to harmonise communication and to support effective and efficient information exchange on all Uses from all levels of the supply chain.

Brenntag is following the recommendations from CEFIC/FECC/DUCC on the alignment on uses, which is linked to the proposed Use Descriptor System developed by ECHA*.

Currently Manufacturers/Importers are preparing Exposure Scenarios (ES) in cooperation with Downstream Users Associations. This should result in a list that includes most of the Uses, in a standard format that utilizes the ECHA's Use Descriptor System, and will be subsequently made available by each supplier to all his customers.

Upon receiving of the list, the customer is well advised to verify that his Uses are included in the list. If this is the case no further action from the DU is needed. On the other hand, if a Use is missing the DU is well advised to use his right to make his use known. Specific forms based on the Use Descriptor System (including the ERC*) will be provided, to allow a more effective flow of information on the non-covered Uses to the supplier. If applicable, the list of uses should be communicated to the next level of customers.

The right to make a Use known to the Manufacturer expires one year before the registration deadline. For substances to be registered by the first registration deadline in December 2010, it means that DU's have until 1st December 2009 to make missing Uses known to the Manufacturers. The communication of uses is foreseen to start during the summer of 2009.

Standardised processes and tools for Exposure Scenario development are required and the ECHA's Use Descriptor System should be followed for a more consistent communication. Uses as currently available will be considered to be covered with corresponding Exposure Scenarios and within the timeframe required by REACH.

Meanwhile, for more information please refer to the Guidance on ES development and Supply Chain Communication and the relevant tools published at the CEFIC website. If you have any question, do not hesitate in contacting your Brenntag representative.

Kind regards,

(*) In the framework of the REACH Guidance on Information Requirements and Chemical Safety Assessment, a "Use Descriptor System" based on four elements has been developed. Those elements are: sector of use (SU), chemical product category (PC), process category (PROC) and article category (AC). Additionally, a fifth element that should be considered is the Environmental Release Category (ERC). Information about downstream uses is required in the format of the "Use Descriptors System" and will be integrated in that format in the registration dossier.