

Reporting to ECHA

Downstream user update

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DU notifications and reports to ECHA

- Article 66 notification – authorised uses **NEW**
- Article 7(2) notification – substances in articles
- Article 38(1) report – unsupported uses
- Article 38(4) report – classification difference

echa.europa.eu/support/dossier-submission-tools/reach-it

Article 66 – authorised uses



- Check if your substance is on the Authorisation List
- Check if your use is authorised
- Notify within three months
- How to submit the notification

Article 66 – authorised uses



- **Check if your substance is on the Authorisation List**

- echa.europa.eu/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list
- Sept 2015: 31 substances
- Check the sunset date
- Exemptions from authorisation:

echa.europa.eu/documents/10162/13640/generic_exemptions_authorisation_en.pdf

Article 66 – authorised uses



- **Check if your use is authorised**
 - Check the label of the product and the safety data sheet you receive
 - Authorised use: REACH Authorisation number in the format "REACH/xx/xx/x"
 - Exposure scenario describing conditions of use – comply
 - If no authorisation number, contact supplier

Article 66 – authorised uses

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- **Notify ECHA within three months**
 - From the first delivery of the substance after the publication of the authorisation decision
 - Through a webform on ECHA's website
 - Your customers may also need to notify ECHA
 - Situations where you don't need to notify:
 - you own the application
 - you are a distributor who doesn't use the substance
 - you use the substance as an intermediate

Article 66 – authorised uses

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- **How to submit the notification**

- Via the webform at the following link:

echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorised-use

Submit your notification using the webform

You must have an active REACH-IT account (see steps 1 and 2 below) to be able to submit your notification.

1. Sign up in REACH-IT (you can skip this step if your company already has a REACH-IT account).
2. Log into REACH-IT to have your user account activated (you can skip this step if you have already logged into the REACH-IT at least once).
3. Click on the button below and follow the instructions to submit your downstream user notification using the webform.

Downstream user notification
webform

Article 7(2) – substances in articles

- Importers/producers to notify ECHA if Candidate List substances are in their articles, under certain conditions
- Conditions:
 - Substance present > 0.1 % wt/wt
 - Substance present in total > 1 tonne/year
 - Exposure is foreseeable during the article lifetime
 - Substance has not already been registered for the use
- Check the Candidate List here:
 - echa.europa.eu/candidate-list-table
- Notify here (webform/REACH-IT):
 - echa.europa.eu/support/dossier-submission-tools/reach-it/notifying-substances-in-articles

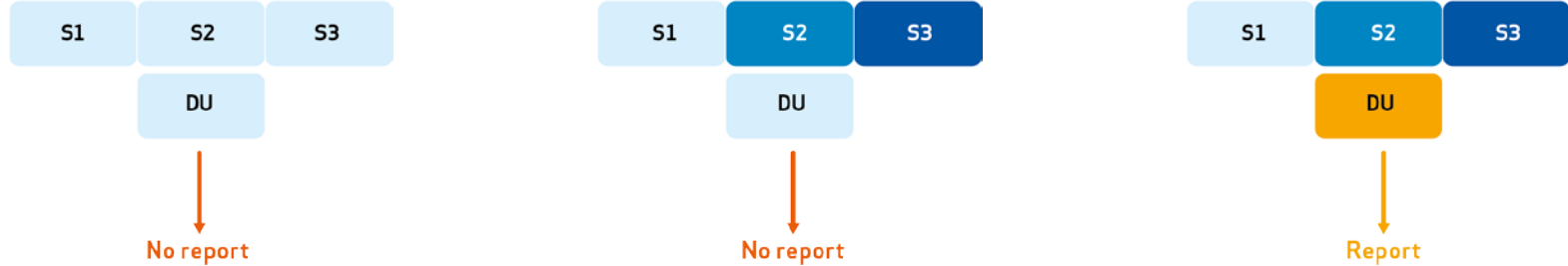
***ECJ**: An article used as component of a complex article remains an article

Article 38(1) – unsupported uses

- Unsupported uses are those that are not supported by the exposure scenarios of your supplier(s)
- Report within six months of receipt of SDS with registration number, under certain conditions
- Conditions:
 - Conduct a downstream user chemical safety report (DU CSR)
 - Claim exemption from conducting a DU CSR
- Report here (webform/REACH-IT):
 - echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-report

Article 38 (4) – classification difference

- If your classification is different to that of all of your suppliers, REACH requires you to report this to ECHA



- Contact suppliers
- Exempt if total quantity of use is < 1 tonne per year
- Report here (REACH-IT only):
 - echa.europa.eu/support/dossier-submission-tools/reach-it/submitting-a-downstream-user-report-classification-differences

Thank you!

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