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Standard Guide for European Union's Registration, Evaluation, and Authorization of Chemicals (REACH) Supply Chain Information Exchange[1]

This standard is issued under the fixed designation F2725; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (ε) indicates an editorial change since the last revision or reapproval.

1. Scope

1.1 This guide will assist companies that manufacture, buy, or sell, or both, substances, preparations, and articles to ensure that supply chains comply with the European Union's Registration, Evaluation, and Authorization of Chemicals (REACH) regulation. This is accomplished by identifying the specific information elements that must be specified, requested and exchanged in communication between actors in the supply chain.

1.2 The values stated in SI units are to be regarded as standard. No other units of measurement are included in this standard.

1.3 *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate ~~safety~~ safety, health, and ~~health~~environmental practices and determine the applicability of regulatory limitations prior to use.*

1.4 *This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.*

2. Referenced Documents

2.1 *ASTM Standards:*[2]

F2576 Terminology Relating to Declarable Substances in Materials

2.2 *European Union Directives and Regulations:*[3]

67/548/EEC Directive on Dangerous Substances

1999/45/EC Dangerous Preparations Directive

2006/121/EC Amending Directive 67/548/EEC

Regulation (EC) No. 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

2.3 *REACH Guidance Standards:*[3]

Annex 1: Automotive Industry Guidance

Annex 2: Aerospace Industry Guidance

Annex 3: European Engineering Industries (Orgalime) Guidance

Annex 4: Fragrance Industry Guidance

Annex 5: Semiconductor Industry Guidance

Annex 14: List of Substances Subject to Authorisation

REACH Title II Registration of Substances

REACH Title IV Information in the Supply Chain

2.4 *REACH Implementation Project (RIP) Guidance Documents:*[3]

Annex 6: RIP 3.4 Guidance on Data Sharing

Annex 7: RIP 3.5 Guidance for Downstream Users

[1] This guide is under the jurisdiction of ASTM Committee F40 on Declarable Substances in Materials and is the direct responsibility of Subcommittee F40.02 on Management Practices and Guides.

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[2] For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

[3] Available from ec.europa.eu or www.echa.eu.

Annex 8: RIP 3.8 Guidance on Requirements for Articles
Annex 9: EU Commission publication: REACH-in-Brief
Annex 17: List of Restricted Substances and Conditions of Restriction

3. Terminology

3.1 *Definitions:*

3.1.1 Terms and definitions related to declarable substances in materials may be found in Terminology F2576.

3.1.2 Terms and definitions in this guide not found in Terminology F2576 may be found in a common dictionary or other reference documents such as the *ASTM Dictionary of Engineering Science & Technology*.[4]

3.2 *Definitions of Terms Specific to This Standard:*

3.2.1 *actors in the supply chain, n*—all manufacturers, importers, or downstream users in a supply chain.

3.2.2 *article, n*—object that during production is given a special shape, surface, or design that determines its function to a greater degree than does its chemical composition.

3.2.3 *candidate list, n*—list of substances that are subject to appear on Annex 14 (authorization) list of substances and will someday require an authorization application for use.

3.2.4 *chemical safety report (CSR), n*—findings of a chemical safety assessment that shall consider the hazards and risks of a substances that is manufactured or imported in quantities greater than 10 metric tonnes per year.

3.2.5 *community, n*—27-member states of the European Union.

3.2.6 *downstream user, n*—any natural or legal person established within the European Community, other than the manufacturer or the importer, who uses a substance, either on its own or in a preparation, in the course of his or her industrial or professional activities.

3.2.6.1 *Discussion—*

A distributor or a consumer is not a downstream user. A re-importer exempted pursuant to REACH Article 2 (7)(c) in Directive 2006/121/EC shall be regarded as a downstream user.

3.2.7 *exposure scenario, n*—set of conditions, including operational conditions and risk management measures, that describes how the substance is manufactured or used during its lifecycle and how the manufacturer or importer controls, or recommends downstream users to control exposures of humans and the environment.

3.2.7.1 *Discussion—*

These exposure scenarios may cover one specific process or use or several process or uses as appropriate.

3.2.8 *import, v*—physical introduction into the customs territory of the community.

3.2.9 *importer, n*—any natural or legal ~~person established within the community~~ entity established who is responsible for the import.

3.2.10 *intermediate, n*—substance that is manufactured for and consumed in or used for chemical processing to be transformed into another substance.

3.2.11 *manufacturer, n*—any natural or legal person established within the community who manufactures a substance within the community.

3.2.12 *manufacturing, v*—production or extraction of substances in the natural ~~state.~~state for sale or use.

3.2.13 *mixture, n*—~~combination~~solution or ~~solution~~ preparation composed of two or more substances ~~that do not react.~~gained by blending two or more substances without any chemical reaction occurring.

3.2.13.1 *Discussion—*

While solution or preparation can contain several substances, they are not the same as a multiconstituent substance, which is the result of a chemical reaction. Examples of preparations include paints, varnishes, and inks.

3.2.14 *only representative, n*—~~third party who may serve~~ a third party established within the European Community that serves as importer of record on behalf of natural or legal persons established outside of the ~~community (see~~ European Community-~~preparation).~~

[4] Available from ASTM International, 100 Barr Harbor Dr., P.O. Box C700, West Conshohocken, PA 19428-2959, ASTM Stock Number: DEF00.

3.2.14.1 *Discussion—*

The Only Representative must not fulfill the obligations required for registering substances but must also fulfill all other responsibilities of an importer under the REACH directive. The only representative is required to have sufficient background in the practical handling of substances and the information related to them.

3.2.15 *per year, n*—per calendar year, unless stated otherwise, for phase-in substances that have been imported or manufactured for at least three consecutive years; quantities per year shall be calculated on the basis of the average production or import volumes for the three preceding calendar years.

3.2.16 *phase-in substance, n*—this is a substance that meets at least one of the following criteria: *(1)* ~~it~~ the substance is listed in the European Inventory of Existing Commercial Chemical Substances (EINECS) ~~and~~or *(2)* ~~it~~ the substance is manufactured in the community, or in the countries acceding to the European Union on January 1995 or 1 May 2004, but not placed on the market by the manufacturer or importer at least once in the 15 years before the entry into force of the REACH regulation, provided the manufacturer or importer has documentary evidence of this.

3.2.16.1 *Discussion—*

Only phase-in substances may be pre-registered under REACH. Non-phase-in substances are substances that do not meet the definition of phase-in substances as provided in Article 3(20) of the REACH Regulation. Non-phase-in substances are therefore normally new substances. It is important to proceed with registration as soon as possible from 1 June 2008 for these substances in order to minimize possible disruptions of manufacturing or placing on the market.

3.2.17 *placing on the market, v*—supplying or making available, whether in return for payment or free of charge, to a third party.

3.2.17.1 *Discussion—*

Import shall be deemed to be placing on the market.

3.2.18 *preparation, n*—mixture or solution composed of two or more ~~substances; preparations can contain several substances; they are not the same as multiconstituent substances; the difference between preparation and multiconstituent substance is that a preparation is gained by blending of two or more substances without any chemical reaction occurring, whereas a multiconstituent substance is the result of a chemical reaction; examples of preparations include paints, varnishes, and inks.~~substances.

3.2.18.1 *Discussion—*

Preparations can contain several substances; they are not the same as multiconstituent substances; the difference between preparation and multiconstituent substance is that a preparation is gained by blending of two or more substances without any chemical reaction occurring, whereas a multiconstituent substance is the result of a chemical reaction; examples of preparations include paints, varnishes, and inks.

3.2.18.2 *Discussion—*

REACH obligations apply individually to each of those substances depending on whether within the scope of REACH. Within the GHS, a preparation is known as a "mixture."

3.2.19 *producer of an article, n*—any natural or legal person who makes or assembles an article in the community.

3.2.20 *restriction, n*—any condition for a prohibition of the manufacture, use, or placing on the market.

3.2.21 *safety data sheet, n*—hazard and risk information required by community law to be passed on from supplier to customer for dangerous substances and dangerous substances in mixtures above a certain concentration.

3.2.22 *substance, n*—a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent that may be separated without affecting the stability of the substance or changing its composition.

3.2.22.1 *Discussion—*

Substances may be phase-in or non-phase-in. Pre-registration for phase-in substances ran from 1 June 2008 through 1 December 2008. Manufacturers of phase-in substances can benefit from extended deadlines. Manufacturers of non-phase-in substances must register the substance as quickly as possible in order to minimize or eliminate disruption of manufacturing or placing on market. Any phase-in substance not pre-registered by 1 December 2008 may not be placed on market in quantities greater than 1 tonne

per year until registration is complete. REACH applies to all substances with a few exemptions: radioactive substances, substances under customs supervision, the transport of substances and nonisolated intermediates are not covered under REACH. Waste is also specifically exempted. A number of other substances are exempted from parts of the provisions of REACH, where other equivalent legislation applies (for example substances used in medicinal products). Polymers are for the time being exempted from registration. Special rules apply for substances used for research and development and for the registration of isolated intermediates. Note that for substances intended to be released from an article, the substance must be registered for the particular use.

3.2.23 *use, n*—any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transferring from one container to another, mixing, production of an article, or any other utilization.

3.3 *Acronyms:*

3.3.1 *CAS*—Chemical Abstracts Service

3.3.2 *ECHA*—European Chemicals Agency

3.3.3 *EINECS*—European Inventory of Existing Commercial Chemical Substances

3.3.4 *ELINCS*—European List of Notified Chemical Substances

3.3.5 *ELV*—End-of-Life Vehicles Directive

3.3.6 *EPA*—United States Environmental Protection Agency

3.3.7 *EU*—European Union

3.3.8 *GHS*—Globally Harmonized System of Classification and Labeling of Chemicals

3.3.9 *IMDS*—International Materials Data System

3.3.10 *REACH*—Registration, Evaluation, and Authorization of Chemicals

3.3.11 *RIP*—REACH Implementation Project—technical guidance documents published by EU RoHS Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment

3.3.12 *SIEF*—Substance Information Exchange Forum

3.3.13 *SVHC*—substances of very high concern

4. Summary of Guide

NOTE 1—This guide does not provide assistance on the legal requirements of REACH such as registration, evaluation, authorization, and restrictions. For a basic introduction to REACH and guidance for assessing your legal obligations under the regulation, please consult the documentation in Annex 9. For actual text of REACH, see: http://reach.jrc.it/legislation_en.htm.

4.1 *What is REACH?*

4.1.1 Regulation (EC) No. 1907/2006 of the European Parliament and the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). REACH replaces 40 existing legal acts and creates a single system for all chemical substances.

4.1.1.1 *Registration*—Registration requires producers and importers to obtain and submit relevant information on chemical substances produced in or imported to the EU market in quantities greater than 1 tonne per year.

4.1.1.2 *Evaluation*—Evaluation allows the regulatory authorities to decide on proposals for further testing and assess whether dossier information provided by industry complies with the requirements.

4.1.1.3 *Authorization*—Authorization may be required for SVHC (carcinogens; mutagens; reproductive toxins; substances toxic, persistent, and bioaccumulative; substances very persistent and very bioaccumulative; and substances giving rise to equivalent concern).

4.1.1.4 *Restriction*—The safety net of the system; any substance on its own, in a preparation or in an article may be subject to community-wide restrictions if its use poses unacceptable risks to human health or the environment.

4.1.2 *Who Are the Actors in the Supply Chain?*

4.1.2.1 Manufacturers and importers of substances and preparations are obliged to register substances they produce or import in quantities greater than 1 tonne per year. Importers and producers of articles are required to register substances imported or produced in amounts greater than 1 tonne per year that are intentionally released from the articles. Failure to register means that the substance cannot be manufactured, imported, or used in the EU market.

4.1.2.2 Downstream users of chemicals shall apply the risk management measures for dangerous substances identified on the supplier safety data sheets. They shall also ensure that any substances they use in quantities greater than 1 tonne per year, which are manufactured or imported in quantities greater than 10 tonnes per year, are supported by a chemical safety report (CSR).

4.1.2.3 Other actors in the supply chain include distributors, retailers, and storage providers, all of whom are not classified as downstream users.

4.1.2.4 Consumers are not considered actors in the supply chain, but have certain rights under REACH, including the right to receive information about the presence of SVHC's in quantities >0.1 % in articles.

4.2 *Why Must REACH Information be Exchanged in Supply Chains?*

4.2.1 REACH Title IV, Information in the Supply Chain, specifically Articles 31 through 34, legally requires manufacturers and their supply chains to exchange certain information. Information exchange both upstream and downstream in the supply chain is also the only way to acquire the information necessary to meet many other requirements of the REACH regulation. Therefore, supply chain communication is both a legal requirement and a necessary activity ancillary to complying with other aspects of REACH.

4.2.1.1 Because of the often complex nature of global supply chains, a legal requirement falling upon an EU-based importer, manufacturer, or downstream user will often have both a downstream and upstream ripple effect that will extend beyond the EU and will require support from the entire supply chain. Therefore, companies based outside the EU, for example, in the United States, with no direct business in Europe, will be drawn into the supply chain information exchange process to support their customers' requirements to provide information. All global companies may find it helpful to map out their location within supply chains to determine if any substances, preparations, or articles are imported into, exported out of, or manufactured in the EU and, hence, at risk of being impacted by REACH.

4.2.2 Fig. 1 illustrates how REACH has the potential to impact all but the most isolated supply chains. Your company need not sell product in, or buy products from, the EU to be impacted, either directly or indirectly.

4.2.3 Fig. 2 depicts an example of "selling into a supply chain that imports into the EU." Note that there is no direct sale to an EU importer in this scenario, but that you sell to Customer A, who sells to the EU-based Customer D. Customer D's need for data will be cascaded down to you via the intermediary, Customer A. For example, Customer D may ask Customer A to identify the substance content of a preparation or article. Customer A may turn to you as having knowledge of this composition. Note that it is conceivable that you will need to turn to your own supplier(s) to obtain the chemical composition. Additionally, Customer D may need to describe their application to Customer A, who then may desire to provide related handling or toxicity information or both if available to help Customer D's registration process.

4.2.4 Similarly, Fig. 3 depicts an example of "purchasing out of a supply chain that exports from the EU." In this scenario, you buy from U.S.-based Supplier D, who formulates a preparation or article from Substances A and B and Preparation C. The substances in Preparation C are provided from an EU-based exporter. Any of a number of potential issues could result in an impact, including the following scenarios:

4.2.4.1 Should any of the substances in Preparation C be incorporated into the EU's candidate for authorization list, Preparation C (and hence Preparation/Article D) may no longer be available, or at least be subject to substantially increased costs.

4.2.4.2 The cost of registration may exceed Supplier C's desire to continue producing Preparation C.

4.2.4.3 Supplier C may choose to substitute substances/preparations used in Preparation C and may or may not tell Supplier D, who may or may not be able to pass this information along.

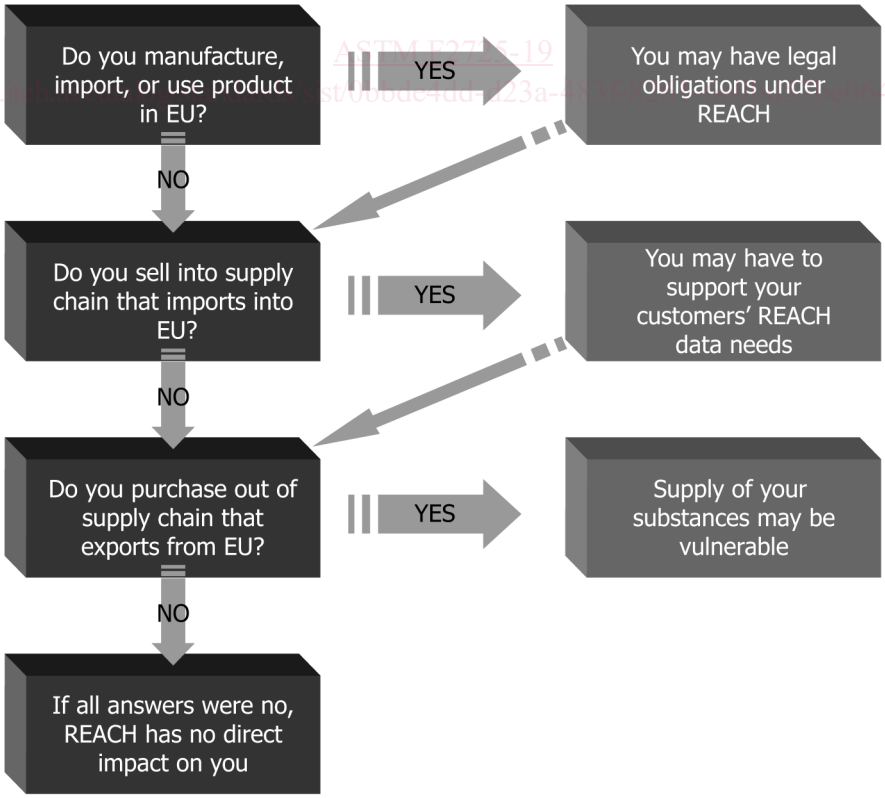
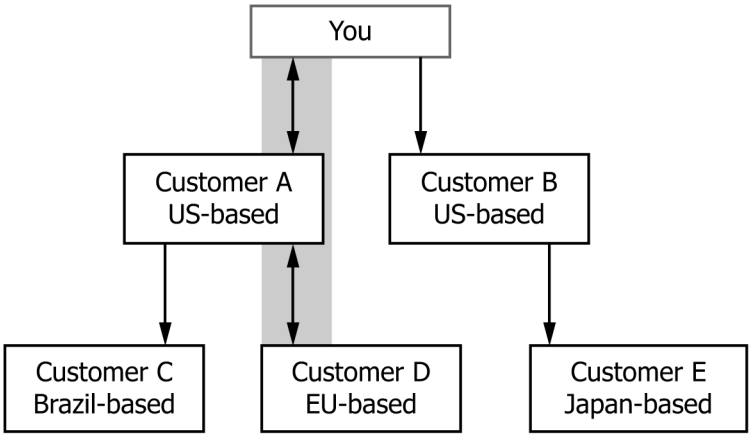
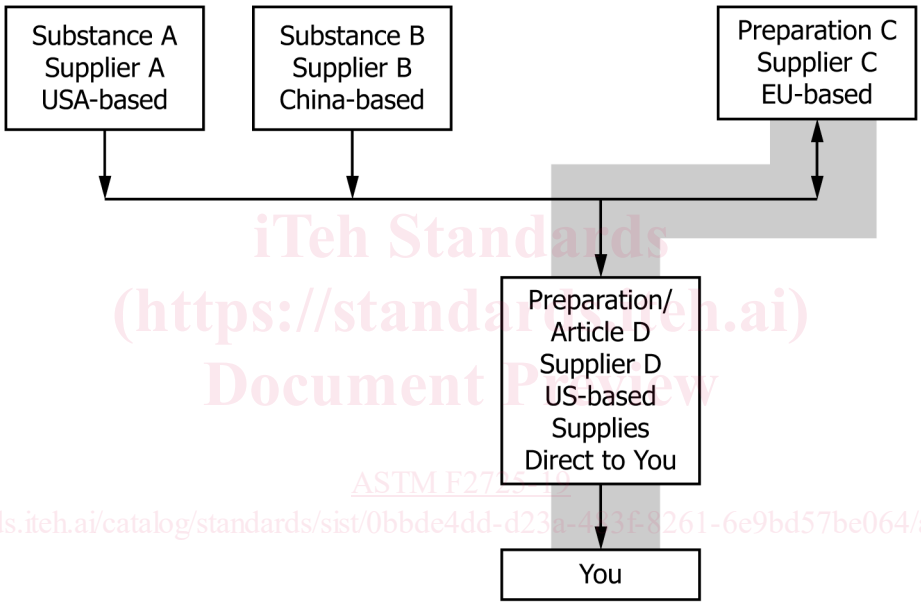


FIG. 1 Determining Your REACH Obligations



NOTE 1—Customer D requirements will be cascaded down to you via tier one supplier (Customer A)

FIG. 2 Example of Selling into a Supply Chain that Imports into EU



NOTE 1—You have a potentially vulnerable material, since Material C is supplied by an EU-based supplier. You will want to know about substances in Material C and whether they are on the Candidate List. You may have to work via Supplier D who has the direct contractual relationship with Supplier C.

FIG. 3 Example of Purchasing out of Supply Chain that Exports from EU

4.2.5 To avert surprise supply changes or price increases or both, proactively mapping out the supply chain and making a determination about the reliability of Preparation/Article D's supply is highly recommended. Note that this effort may be complicated by the fact that you have no direct contractual relationship with Supplier C and may therefore need to coordinate the investigation via Supplier D to address confidentiality and other concerns adequately.

5. Significance and Use

5.1 This guide recommends practices and solutions for global supply chain information exchange for substances, preparations, and articles as identified by REACH. The first five annexes of REACH guidance standards serve as a central repository for REACH industry guidance that spans industry sectors and facilitates collaboration across complex global supply chains. Annexes 6-9 provide key EU guidance on information exchange in the supply chain.

5.2 Section 6 outlines the information that is to be exchanged in the supply chain both in the upstream and downstream directions. ~~Fig. 4 provides a schematic depicting data flow in the upstream and downstream directions. A list of the elements to be included in this exchange is represented in Tables 1-5 that capture the necessary data fields for information exchange. Case studies 1-3 in Annex A1 – Annex A3 provide three sample scenarios wherein a customer and supplier complete these five tables to exchange data to address their REACH compliance issues.~~

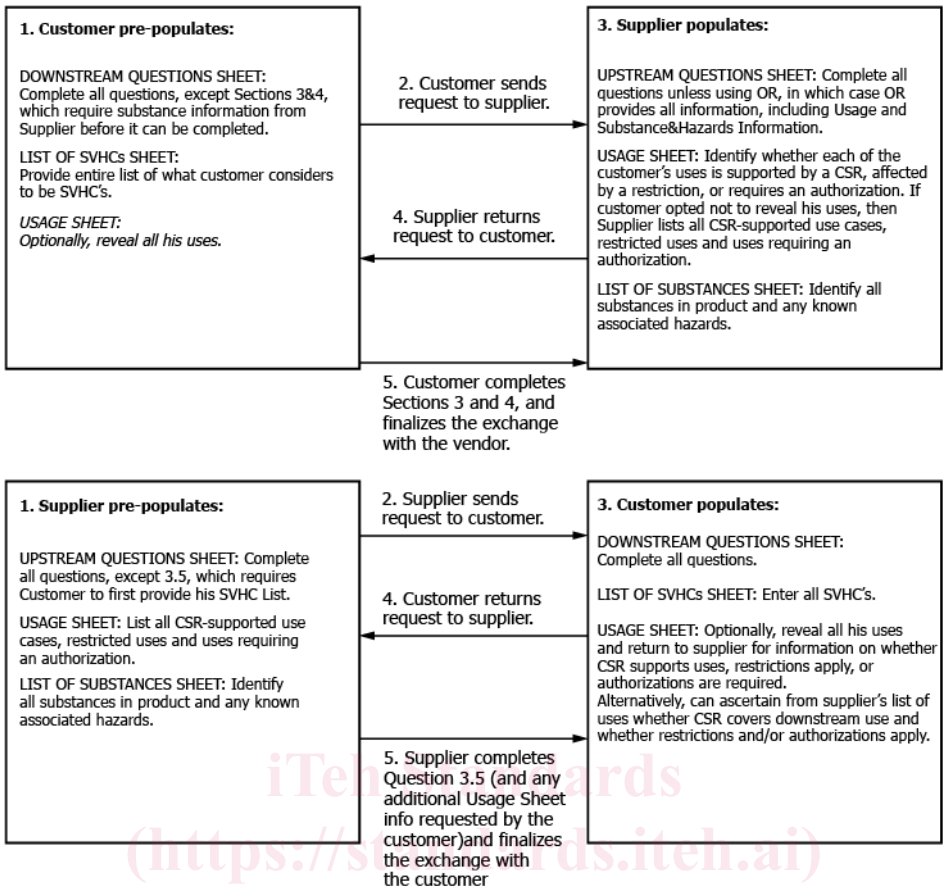


FIG. 4 Data Flow Pathway for F40 Supply Chain Communications

6. What Information Shall be Communicated Through the Supply Chain?

6.1 The REACH regulation provides certain obligatory data elements that shall be exchanged between certain actors in the supply chain, but does not stipulate a complete base set of data to be communicated throughout all supply chains for all actors. Rather, REACH's 15 Titles and 17 Annexes detail a set of obligations that affect EU-based companies. A collection of technical guidance documents, the RIPs, then provide general guidelines as to how companies might meet these obligations through collaborative engagement of their supply chains, both inside and outside of Europe.

6.2 If, however, one looks at the dataset that would be necessary to make informed decisions regarding the critical elements of REACH, that is, preregistration, registration, evaluation, authorization, restriction, notification, testing, exemptions, hazards, risks, exposure scenarios, alternative substances, and so forth, there are certain key data elements that emerge as having highest priority.

6.2.1 Some of these elements are described in the RIPs. For the purpose of supply chain communication of critical data elements, RIPs 3.4, 3.5, and 3.8, which are included in Annexes 6, 7 and 8 of REACH RIP Guidance Documents, are important in highlighting information exchange needs.

6.3 From the REACH Regulation itself, there are some directly mandated information exchange requirements for companies doing business in the EU. Most of the case studies contained in the RIPs envision that data will be exchanged on a product-by-product basis, as products are the most convenient units of currency in data exchange throughout the supply chain. However, as REACH regulates substances in products rather than the products themselves, all this product data shall be evaluated at the substance level.

6.3.1 A summary of these requirements follows. Note that this data shall flow bidirectionally up and down the supply chain.

6.3.1.1 *Article 31*—Safety data sheet requirements data needs:

(1) CAS number
(2) Registration number
(3) Identity of substance/preparation
(4) EINECS or ELINCS number
(5) Use of substance/preparation
(6) Company identity
(7) Emergency telephone number

TABLE 1 UPSTREAM QUESTIONS: Information Request–Upstream Direction, Supplier would populate for Customer

0.		Supplier-provided Data	Required or Optional?	Expected Response/Comments from the Customer
1. Company Information - Supplier	1.1	Company Name	Required	Name of supplier/manufacturer.
	1.2	Company ID #	Required	Supplier/Vendor ID #
	1.3	Mailing Address	Required	Physical post-office mailing address of company.
	1.4	REACH Responsible Individual Name	Required	Name of person whom all REACH communications go to.
	1.5	Contact Phone #	Required	Phone number of this person.
	1.6	Contact Fax #	Required	Fax number of this person.
	1.7	Contact Email	Required	Email address of this person.
2. Product Information	2.1	Product Name	Required	Common trade name.
	2.2	Supplier's Part/Material #	Required	Supplier's internal part/material #. May be same as customer's part/material #.
	2.3	Is product a Substance, Preparation or Article?	Required	See REACH definitions.
	2.4	If it is an Article, what is Article's weight (kg)?	Optional, provide justification if omitted	Preferably this information is exchanged as customer will need to roll-up substance info and divide by article weight to determine 0.1% threshold for SVHC's.
	2.5	Are you a Manufacturer or Importer of Product in EU?	Required	See REACH definitions.
	2.6	Are you a Downstream User of Product in EU?	Required	See REACH definitions.

(8) Classification and labeling consistent with REACH Title II

(9) Concentration of constituent substances (for preparations)—shall indicate for at least all hazardous substances as defined by Directives 1999/45/EC and 67/548/EC and for other hazardous substances of equivalent concern

(10) First aid measures

(11) Fire-fighting measures

(12) Accidental release measures

(13) Handling and storage

(14) Exposure controls/personal protection

(a) Exposure limits

(b) Occupational exposure controls

(c) Environmental exposure controls

(15) Physical properties, that is, boiling point, pH, and density

(16) Toxicological information

(17) Ecological information

(18) Disposal information

(19) Transport information

(20) Regulatory information (at community level)

6.3.1.2 *Article 32*—Downstream supply chain communication requirements for substances and preparations that do not require safety data sheets:

(1) Is the substance subject to authorization, restriction or registration? If so, what are the details of the plan and status of the process?

(2) Any other risk management information.

6.3.1.3 *Article 33*—Downstream information requirements for articles:

(1) For SVHC, in articles at above 0.1 weight %, what are the SVHC and what are the safe use requirements?

(2) SVHC information (at a minimum, identity of the substance) shall be available to consumers within 45 days of any request.[5]

6.3.1.4 *Article 34*—Upstream supply chain communication requirements for substances and preparations:

(1) New, updated information regarding risks or hazards shall be communicated by customers to upstream suppliers as soon as it becomes available to the customers.

6.3.1.5 *Article 35*—Information access for workers:

[5] Comments on choosing an SVHC List: If full substance disclosure is not used, suppliers must list all substances on an SVHC List. Several industries are developing their own SVHC Lists, however the Candidate List of the European Chemicals Agency will be the official legally binding list. This ASTM standard does not specify any particular industry list; it only specifies that, in the absence of full substance disclosure, some SVHC List must be referenced. Even if full supplier substance disclosure occurs, the customer must still evaluate these substances against an SVHC List.

TABLE 1 *Continued*

0.		Supplier-provided Data	Required or Optional?	Expected Response/Comments from the Customer
3. Substance Information NOTE: Must iterate through Section 3 for EACH SUBSTANCE IN PRODUCT ABOVE 0.1 % CONCENTRATION BY MASS	3.1	Substance Name	Optional, provide justification if omitted	Preferably official IUPAC name, but see RIP 3.10 for substance naming conventions.
	3.2	CAS number	Optional, provide justification if omitted	May not be applicable, as per RIP 3.10, CAS numbers do not always correspond to unique substances.
	3.3	EC Number (EINECS, ELINCS or NLP)	Optional, provide justification if omitted	See http://ecb.jrc.it/esis/ for #'s.
	3.4	Do you know of any company who will register this substance?	Optional, provide justification if omitted	Will rarely be available in early stages of REACH.
	~~3.5~~	~~Is it an SVHC, per the list we reference- see **"LIST OF SVHC's" Sheet**~~	~~Required.~~	~~Requestor should reference his own list, i.e. aerospace, automotive, EU candidate list, JIG list, or customized list.~~
	3.5	Is it an SVHC, ECHA. Use Table 5. **"LIST OF SVHC's"**	Required.	Requestor should reference his own list, i.e. aerospace, automotive, EU candidate list, JIG list, or customized list.
	3.6	Is it a phase-in-substance?	Optional, provide justification if omitted	Does it already exist on the market, per REACH definition of "existing substance"?
	3.7	If in Preparation or Article, what is wt/wt concentration (%) ?	Optional, provide justification if omitted	Should be supplied at least for all substances >0.1% concentration.
	3.8	If in Article, is it intentionally released?	Required	See REACH definitions.
	3.9	What is Classification and Labeling category?	Required	See Articles 4 and 6 of 67/548/EEC for categories; also, see ECHA-published Article 112 Classification and Labeling Inventory, when it becomes available.
	3.10	Do you plan to register substance?	Required	If not, should state reason why not.
	3.11	Do you plan to pre-register substance?	Required	If not, should state reason why not.
	3.12	Envisaged tonnage band/ registration deadline	Required	1-10 t, 10-100 t, 100-1000 t, >1000 t.
	~~3.13~~	~~Are there any restricted uses for the substance? If so, do any prohibit requestor's (customer's) uses per **"USAGE" Sheet**?~~	~~Required~~	~~Supplier must inform customer, if and when, any restricted use is included in Annex 17 of REACH. Requestor (customer) can specify uses on **"USAGE" Sheet**, Column C. Responder (supplier) can then answer whether each individual use is restricted in Column E. Alternatively, supplier can list all restricted uses in Column H, and customer can then ascertain whether his uses are restricted per Annex 17. Keep in mind restrictions apply to particular substances rather than whole products.~~
	3.13	Are there any restricted uses for the substance? If so, do any prohibit customer's uses per **Table 3, List of Uses**?	Required	Supplier must inform customer, if and when, any restricted use is included in Annex 17 of REACH. Customer can specify uses on **Table 3, List of Uses**, Column C. Responder (supplier) can then answer whether each individual use is restricted in Column E. Alternatively, supplier can list all restricted uses in Column H, and customer can then ascertain whether his uses are restricted per Annex 17. Keep in mind restrictions apply to particular substances rather than whole products.
	~~3.14~~	~~Has an authorization application been filed for use of substance in this product? If so, does it cover requestor's (customer's) uses per **"USAGE" Sheet**?~~	~~Required~~	~~Supplier should inform customer, if and when an authorization is sought. Requestor (customer) can specify uses on **"USAGE" Sheet**, Column C. Responder (supplier) can then answer whether each individual use has been applied for in Column F. Alternatively, supplier can list all authorization applications in Column I, and customer can then ascertain whether his uses will be applied for, or whether he must complete his own application for his use(s). Keep in mind authorizations apply to particular substances rather than whole products.~~
	3.14	Has an authorization application been filed for use of substance in this product? If so, does it cover Customer's uses per **Table 3, List of Uses**?	Required	Supplier should inform customer, if and when an authorization is sought. Commenter can specify uses on **Table 3, List of Uses**, Column C. Responder (supplier) can then answer whether each individual use has been applied for in Column F. Alternatively, supplier can list all authorization applications in Column I, and customer can then ascertain whether his uses will be applied for, or whether he must complete his own application for his use(s). Keep in mind authorizations apply to particular substances rather than whole products.
	3.15	If substance is subject to authorization, can it be substituted, and, if so, by what date do you plan to do so?	Required, if substance is on Annex 14 List.	For certain Annex 14 substances, if they can be adequately controlled, substitution is encouraged, but not legally required.

TABLE 1 *Continued*

0.		Supplier-provided Data	Required or Optional?	Expected Response/Comments from the Customer
3.16	Have you joined a SIEF or Consortium for this substance, and, if so, would you welcome our participation?	Optional, provide justification if omitted	Supplier may have useful information to contribute either directly to customer or as a third party data holder for the entire SIEF.	
3.17	Are there any relevant exemptions that you are aware of for uses of this substance in this product?	Required	Include exemptions from registration, evaluation, restriction, authorization, communication, etc...and any exemptions from the entire scope of REACH.	
~~3.18~~	~~Do you possess any hazard or toxicity data, or both, including basic physico-chemical properties of the substance? Unless this has been provided in an SDS or CSR, or both, please indicate possession of such data by placing a "Y" in appropriate column of "SUBSTANCES & HAZARDS" Sheet.~~	~~Required, if supplier possesses any such data. Any such data is likely to be in a lengthy report or study format and should be delivered separately from the information in this form.~~	~~The requirements of Section 3.18 can be fully met with a SDS or CSR, or both. If either of these have been communicated, Upstream Question 3.18's answer can simply reference those documents. However, since SDS's are not required for articles or for products purchased outside of EU, and CSR's are not required for substances manufactured/ imported<10 tonnes/yr, hazards data will need to be communicated via this question for many products.~~	

TABLE 1 *Continued*

0.		Supplier-provided Data	Required or Optional?	Expected Response/Comments from the Customer
3.18	Do you possess any hazard or toxicity data, or both, including basic physico-chemical properties of the substance? Unless this has been provided in an SDS or CSR, or both, please indicate possession of such data by placing a "Y" in appropriate column of **Table 4, List of Substances.**.	Required, if supplier possesses any such data. Any such data is likely to be in a lengthy report or study format and should be delivered separately from the information in this form.	The requirements of Section 3.18 can be fully met with a SDS or CSR, or both. If either of these have been communicated, Upstream Question 3.18's answer can simply reference those documents. However, since SDS's are not required for articles or for products purchased outside of EU, and CSR's are not required for substances manufactured/ imported<10 tonnes/yr, hazards data will need to be communicated via this question for many products.	
~~4. Business Information - Supplier~~	~~4.1~~	~~Will you continue to supply this product?~~	~~Required~~	~~If not, should specify when production will cease.~~
4. Business Information - Supplier	4.1	Will you continue to supply this product as described in Section 3?	Required	If not, shou
	4.2	Will your CSR cover my uses of your Product? See **"USAGE" Sheet**.	Response required (although covering such uses is not legally required, so answer can be "NO").	Requestor (customer) can specify uses on **"USAGE" Sheet**, Column C. Responder (supplier) can then answer whether each individual use is supported in Column D. Alternatively, supplier can list all uses supported in Column G, and customer can then ascertain whether his uses are encompassed in Column G.
5. Only Rep Information	5.1	Registrant Name	Required if answer to 3.4 is YES	Registrant will be required to provide registration number to its customers
	5.2	Registrant Physical Address	Required if answer to 3.4 is YES	Registrant will be required to provide registration number to its customers
	5.3	Registrant Contact Individual	Required if answer to 3.4 is YES	Registrant will be required to provide registration number to its customers
	5.4	Registrant Phone #	Required if answer to 3.4 is YES	Registrant will be required to provide registration number to its customers
	5.5	Registrant Email	Required if answer to 3.4 is YES	Registrant will be required to provide registration number to its customers
	5.6	Is this Registrant your Only Representative?	Required if answer to 3.4 is YES	Only Rep will be required to provide registration number to its customers

(1) Safety data sheet information (Articles 31 and 32 of REACH) shall be furnished to any workers who may be exposed to substances or preparations.

6.4 *Industry Guidance on Information to be Exchanged:*

6.4.1 Industry sector REACH guidance has provided lists of data to be collected from the supply chain. Official industry REACH guidance for several industries is given in REACH Guidance Standards, Annexes 1-5. Some of these guidance documents list data that would need to be communicated through the supply chain. For example, the Automotive and European Engineering Industries (Orgalime) Guides[6] both recommend information content to be gathered from supply chains for REACH compliance. Many of the data elements found in industry guides are already described in 6.3, as they were taken directly from the REACH regulation.

6.4.2 Additional information requirements/supply chain questions from the industry guides not discussed in 6.3 include:

(1) Amount used per year (kg)
(2) Supplier name and address
(3) Is it imported by you?
(4) Is the substance critical for your business?
(5) Have you contacted the supplier about registration for your use?
(6) Is there a confidentiality issue regarding specific uses?
(7) Will the substance be preregistered/registered? When?
(8) Will the substance/preparation continue to be available for purchase?
(9) Can SVHCs be substituted (if it is likely to be withdrawn in future)?
(10) If you need to produce data package for registration, what data are necessary?
(11) Who else supplies the substance or preparation and can you form a consortium?
(12) Who are your downstream users and for what use do they use the substance?

6.5 A standard REACH dataset to be exchanged within all supply chains is suggested in Tables 1-5. To use Tables 1-5, first, as per Fig. 1, determine your own legal and market obligations under REACH. Then per Figs. 2 and 3, map out your entire supply chain in upstream and downstream directions. Then, approach those actors in your supply chain in both the upstream and downstream directions.

6.6 Fig. 4 illustrates the information flow pathways for these data requirements, describing first an exchange initiated by a customer and then an exchange initiated by a supplier.

6.7 Case Studies 1-3 in ~~Annex A1~~ X1 – ~~Annex A3~~X3 illustrate the process of exchanging data for three representative scenarios. Fig. 4 provides a schematic depicting data flow in the upstream and downstream directions. A list of the elements to be included in this exchange is represented in Tables 1-5 that capture the necessary data fields for information exchange. Case studies 1-3 in X1 – X3 provide three sample scenarios wherein a customer and supplier complete these five tables to exchange data to address their REACH compliance issues.

7. Keywords

7.1 chemicals; REACH; supply chain

[6] Available from www.orgalime.org.

TABLE 2 DOWNSTREAM QUESTIONS: Information Request–Downstream Direction, Customer would populate for Supplier

0.		Customer provided Data	Required or Optional?	Expected Response/Comments from the Supplier
1. Company Information - Customer	1.1	Company Name	Required	Name of customer.
	1.2	Company ID #	Required	Customer ID #.
	1.3	Mailing Address	Required	Physical post-office mailing address of company.
	1.4	REACH Responsible Individual Name	Required	Name of person which all REACH communications go to.
	1.5	Contact Phone #	Required	Phone number of this person.
	1.6	Contact Fax #	Required	Fax number of this person.
	1.7	Contact Email	Required	Email address of this person.
2. Product Information	2.1	Product Name	Required	Common trade name.
	2.2	Customer's Part/Material #	Required	Customer's internal part/material #. May be same as Supplier's part/material #.
	~~2.3~~	~~Are you a Manufacturer or Importer of Product in EU?~~	~~Required~~	~~See REACH definitions.~~
	2.3	Are you a Manufacturer of Product in EU?	Required	See REACH definitions.
~~2.4~~	~~Are you a Downstream User of Product in EU?~~	~~Required~~	~~See REACH definitions.~~	
2.4	Are you an Importer or Downstream User of Product in EU?	Required	See REACH definitions.	

TABLE 2 *Continued*

0.		Customer provided Data	Required or Optional?	Expected Response/Comments from the Supplier	
3. Substance Information—Note: must be iterated for each substance in product. List of substances in product should be provided by Supplier to Customer, using **"SUBSTANCES & HAZARDS" Sheet** before Customer completes this section.	3.1	Substance Name	Required - but supplier should first provide list of substances in the product for the customer on **"SUBSTANCES & HAZARDS" Sheet**.	Take exact name from **"SUBSTANCES & HAZARDS" Sheet**, so will correspond to supplier's name.	
	3. Substance Information—Note: must be iterated for each substance in product. List of substances in product should be provided by Supplier to Customer, using **"LIST OF SUBSTANCES" Sheet** before Customer completes this section.	3.1	Substance Name	Required - but supplier should first provide list of substances in the product for the customer on **"LIST OF SUBSTANCES" Sheet**.	Take exact
		3.2	Do you plan to register this substance?	Required - but supplier should first provide list of substances in the product for the customer on **"SUBSTANCES & HAZARDS" Sheet**.	If not, shou
		3.2	Do you plan to register this substance?	Required - but supplier should first provide list of substances in the product for the customer on **"LIST OF SUBSTANCES" Sheet**.	If not, shou
		3.3	Do you plan to pre-register this substance?	Required - but supplier should first provide list of substances in the product for the customer on **"SUBSTANCES & HAZARDS" Sheet**.	If not, shou
		3.3	Do you plan to pre-register this substance?	Required - but supplier should first provide list of substances in the product for the customer on **"LIST OF SUBSTANCES" Sheet**.	If not, shou
3.4		Envisaged tonnage band/ registration deadline	Required, if answer to 3.1 or 3.2 is "YES"	1-10 t, 10-100 t, 100-1000 t, >1000 t.	
3.5	Are there any restricted uses for the substance? If so, do any prohibit your uses per **"USAGE" Sheet**?	Required - but supplier should first provide list of substances in the product for the customer on **"SUBSTANCES & HAZARDS" Sheet**.	Supplier must inform customer, if and when, any restricted use is included in Annex 17 of REACH. Requestor (supplier) can specify restricted uses on **"USAGE" Sheet**, Column H. Responder (customer) can then ascertain whether each individual use is restricted. Alternatively, customer can list all his uses in Column C, and supplier can then determine and inform customer whether his uses are restricted per Annex 17, by filling in Column E. Bear in mind restrictions apply to particular substances rather than whole products.		