

Communication in the supply chain: What information must you exchange under REACH and what do you not have to give?

Introduction

REACH is complicated enough without customers and suppliers asking questions that are irrelevant, incorrect or unnecessary. This extra administrative work can waste time for everyone, especially as suppliers do not want to appear uncooperative towards their customers.

This short guide lists some of the information you must give and information you do not have to give. It also suggests what information you may want to give to keep suppliers and customers happy.

The guide lists points of information and explains the circumstances, if any, that you need to provide such details and also suggests alternative replies that will help the person asking the question.

Questions from customers

Question	Fact	Polite response
Is your substance registered?	Many substances are likely to be registered due to the registration deadlines from 2010, 2013 and 2018. If a SDS is required for the substance or mixture the registration number must be quoted on the SDS (if the substance must be declared, in the case of mixtures).	If your tonnage is below 1 tonne/year or your substance falls into an exemption where it doesn't require registration explain this and that you are aware if the situation changes you may need to register
Is your mixture registered?	Mixtures cannot be registered, but the component substances may need to be registered.	Explain that registration is substance-based and include substance registration numbers in the SDS if required

We want to know every component in the formulation supplied so we can check it is registered.	You are under no obligation to provide details of your formulations, other than if there are hazardous components above certain threshold limits.	Confirm the identity of hazardous components and provide registration number (when registered). Inform the customer that the other non-hazardous components are, to the best of your knowledge registered.
We want to know every substance in the article.	You are under no obligation to provide details of your products, other than if there are substances of very high concern present at above 0.1% w/w of the article.	If true, state that to the best of you knowledge, the articles do not contain substances of very high concern. Remember to check with your own suppliers if buying in the articles or sub-components.
Do the articles we buy from you contain substances of very high concern / Annex XIV substances?	If your articles contain substances of very high concern on the Candidate List you must inform your customer of the hazards and recommend risk management measures.	If true, state that to the best of you knowledge, the articles do not contain substances of very high concern. Remember to check with your own suppliers if buying in the articles or sub-components.

Questions from suppliers

Question	Fact	Polite response
For what purpose do you use the substance we supply to you, and how do you use it?	Although you do not need to answer your supplier, if they do not register it for the use you have in mind, you may find you have extra work to do later with a Downstream User Chemical Safety Report.	As a minimum, we suggest you map your uses of the substance using the Use Descriptor Codes in Chapter R.12 of the ECHA guidance ¹ , or any relevant sectoral guidance.
Describe the precise conditions of use (e.g. the temperature, substances added, number of workers etc).	This information may help the supplier devise an exposure scenario for your use.	Prior to registration, only give generic information and avoid giving commercially sensitive details; if essential for risk assessment, discuss in person with the registrant.



REACHReady References

¹ ECHA guidance on use patterns and the use descriptors for the Chemical Safety Assessment may be found at

https://echa.europa.eu/documents/10162/13632/information_requirements_r12_en.pdf/ea8fa5a6-6ba1-47f4-9e47-c7216e180197