

REACH
THE NEW
LEGISLATION
AND
DISTRIBUTION OF
ACRYLIC SHEET
IN THE EU

REACH – THE BASICS

REACH requires all substances manufactured in the EU in a quantity greater than 1 tonne per annum (tpa) to be registered. It is the obligation of the manufacturer or importer of the substance to complete the registration.

Acrylic sheet can be classified as an article i.e. the shape and surface of the sheet determines its' function to a greater extent than chemical composition. As such, it is not a substance and it is exempt from registration. However, there are some obligations associated with substances in articles that need to be considered:

- 1.Any substance that is intended to be released upon use of the article needs to be registered.
- 2.If the article contains a substance of high concern above the threshold amount then the customer needs to be made aware of any measure required to ensure safe use.
- 3.If the article is imported and contains a substance of high concern above the threshold then the Agency must be notified (an EU manufacturer of an article has the same obligation).

This guide applies to the supply of the following materials from Lucite International:

Lucite Sheet Grades
Perspex Sheet Grades

This guide contains sections detailing the obligations throughout the supply chain and is split into purchasing, manufacturing and sales.

PURCHASING OF ARTICLES

The REACH process is phased according to the volume and hazards of the individual substance. However, each legal entity manufacturing or importing a material must register. As a result each supplier must register every substance. A substance registered by one supplier is not necessarily supported by another supplier. Consequently the following processes must be in place when purchasing articles:

1. Confirm with supplier if article contains a substance of high concern as determined in REACH
 1. An EU supplier has a duty to declare this information
 2. If importing an article then the importer has a duty to declare this to the Agency. A declaration will be required from non-EU suppliers
2. Pass information on safe use to customers (where article contains a substance of high concern)
3. Determine if the article contains a substance intended to be released and ensure the supplier has registered and passed on information on that substance

SALE OF ARTICLES UNDER REACH

Articles themselves are exempt from registration under REACH. If they contain a substance that is intended for release then the uses of that article should be assessed and included in the registration of that substance. The information that is required to be discussed with customers of articles is:

1. That the substances used in the manufacture of the article have been assessed and we are working with suppliers to ensure continuity of supply.
2. If any substance contained within the article is intended for release then the use of the article should be discussed with the customer. That use should be declared and reviewed with the substance supplier to determine any appropriate risk management measures.
3. If the article contains more than 0.1% of a substance of high concern then any information required to ensure safe use of the article must be passed onto the customer

USE OF ARTICLES UNDER REACH

Specific obligations under REACH will vary depending upon what substances are being used and how. Whilst this booklet covers the distribution of articles in the EU, we have prepared a number of similar booklets for our other operations. These may be of use for customers using other substances or types of products. These are:

MANUFACTURE OF SUBSTANCES IN THE EU

MANUFACTURE OF COMPOSITES IN THE EU

MANUFACTURE OF POLYMERS / RESINS IN THE EU

DISTRIBUTION OF ACRYLIC SHEET IN THE EU

MANUFACTURE OF SUBSTANCES OUTSIDE THE EU

MANUFACTURE OF COMPOSITES OUTSIDE THE EU

MANUFACTURE OF POLYMERS / RESINS OUTSIDE THE EU

MANUFACTURE OF ACRYLIC SHEET OUTSIDE THE EU

FREQUENTLY ASKED QUESTIONS ABOUT REACH

1. When do you need to generate an exposure scenario?

Exposure scenarios are required for the registration phase for substances manufactured or imported in a quantity ≥ 10 tpa (Article 10, 14.1) and classified as dangerous according to directive 67/548/EEC or Directive 199/45/EC or is assessed to be a PBT or vPvB (Annex I (0.6)).

2. What happens if my use is not covered by my supplier's registration?

A downstream user may make a request in writing for a use to be included. For phase-in substances this request must be made 12 months before the registration is due (Article 37.3). For registered substances, the supplier must complete the exposure assessment the later of prior to next supply (if the request was made at least 1 month before supply) or within 1 month (Article 37.3). A downstream user may prepare their own chemical safety report for any use outside the conditions described in an exposure scenario and this must be done within 12 months of receiving the registration number from the supplier (Article 37.4, 39.1).

3. What happens if my supplier fails to pre-register?

If a substance does not appear on the list of those pre-registered and published by the Agency by 1 January 2009 (i.e. no-one pre-registers) then a downstream user may notify the Agency of his interest and details of his current supplier. The Agency shall publish the name of this substance on its website in the event that there maybe a potential registrant (Article 28.5). Otherwise, it would be possible to look for an alternative supplier who has pre-registered, or to consider manufacturing or importing the substance. In the latter case, it is possible to submit a late pre-registration for that substance if completed within 6 months of first manufacture or import (Article 28.6) as long as it is more than 12 months before you would be due to fully register your volume. This option would allow import for 6 months whilst an alternative was sought.

4. What happens if I want to introduce a new use for a registered substance?

A downstream user may make a use known to the supplier and, if an exposure assessment is required, the supplier must provide that information before next supply or within 1 month of the request (Article 37.3). If a downstream user decides to register the new use directly to the Agency (potentially for reasons of confidentiality) then that assessment is required within 6 months (Article 38, 39.2)

5. What happens if I want to start manufacturing or importing a substance after pre-registration has ended?

See Q3.

6. How do I pre-register a substance?

IT tools are available from the ECB website which links from the ECHA website (see further info section for link). The system to be used for collating the data required for registration is IUCLID5 and is available as a free download from the website. Systems are being developed to allow this data to be submitted for pre-registration.

DEFINITION OF SOME COMMON REACH ACRONYMS

C&L	Classification and Labelling	IUCLID	International Uniform Chemical Information Database
CA	Competent Authority	LEO	Legal Entity Organisation
CAS	Chemical Abstracts Service Number	M/I	Manufacturer / Importer
CMR	Carcinogen, Mutagen or Reproductive Toxin	MS	Member State
CSA	Chemical Safety Assessment	MSDS	Material Safety Data Sheet
CSR	Chemical Safety Report	NLP	No Longer Polymers
DNEL	Derived No Effect Level	OECD	Organisation for Economic Co-operation and Development
DU	Downstream User	OSOR	One Substance One Registration
DUNS	D&B Unique Numbering System	PBT	Persistent, Bioaccumulative and Toxic
EBW	Exposure Based Waiving	PNEC	Predicted No Effect Concentration
EC	European Commission	PPORD	Product and Process Orientated Research and Development
ECHA	European Chemicals Agency	QSAR	Qualitative Structure Activity Relationship
EC No	EINECS or ELINCS Number	REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
EIF	Entry into Force	RIP	REACH Implementation Project
EINECS	European Inventory of Existing Chemical Substances	RMM	Risk Management Measure
ELINCS	European List of Notified Chemical Substances	RSS	Robust Study Summary
EP	European Parliament	SEA	Socio Economic Analysis
ES	Exposure Scenario	SIEF	Substance Information Exchange Forum
eSDS	Extended Safety Data Sheet	SME	Small and Medium Sized Enterprise
EU	European Union	SPORT	Strategic Partnership on REACH Testing
GHS	Global Harmonised System	SVHC	Substances of Very High Concern
GLP	Good Laboratory Practice	TGD	Technical Guidance Document
HPV	High Production Volume	vPvB	Very Persistent and Very Bioaccumulative

FURTHER SUPPORT FOR REACH

There are a number of REACH service providers available. Listed below are some additional sources of support to help you understand your obligations under REACH:

UK Chemical Industries Association REACH Service:

www.reachready.co.uk

UK National Competent Authority:

www.hse.gov.uk/reach

CEFIC REACH Service:

www.reachcentrum.eu

European Chemicals Agency:

www.echa.europa.eu

For more information on preparations for REACH within Lucite International:

www.reach-and-you.info

For more information about Lucite International:

www.luciteinternational.co.uk

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