## This is how FUCHS spells REACH

**P** **Pre-Registration**

The deadline for pre-registration passed on December 1, 2008. The large number of pre-registrations (approx. 2.6 million) indicates that all substances on the market have been pre-registered and will thus continue to be available at least to the end of a corresponding transitional period.

**T** **Timetable**

The following transitional periods apply to pre-registered substances:
November 30, 2010 for substances supplied at ≥ 1000 tonnes per annum and ≥ 100 tonnes p.a. with R50/53
June 1, 2013 deadline for substances supplied at ≥ 100 tonnes p.a.
June 1, 2018 deadline for registration of substances supplied at ≥ 1 tonne p.a.

**O** **Objectives of REACH**

The two most important objectives of REACH are the improved protection of human health and the environment against the risks posed by the use of chemicals. At the same time, industrial competitiveness in the EU should be strengthened.

**C** **Cooperation**

FUCHS will maintain timely, intensive, open and fair communication with all up-stream and down-stream partners in the supply chain.

## Links

http://echa.europa.eu/

http://www.baua.de/de/Themen-von-A-Z/REACH-Helpdesk/REACH-Helpdesk.html?

http://www.reach.bdi.info

http://www.reach-net.com/3.htm

http://www.reach-info.de

http://www.wko.at/reach

http://www.cefic.org

http://www.ereach.dhigroup.com

http://reach.startpagina.nl/

http://www.helsinkireachcentre.eu/abouthrc

http://www.hse.gov.uk/reach/index.htm

http://www.reachready.co.uk/index.php

http://www.acea.be/index.php/news/category/reach/


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# FUCHS for REACH

## Introduction

The most important objectives of REACH are the improved protection of human health and the environment from the risks associated with chemical substances. At the same time, the intention is to strengthen the competitiveness with the EU. Fuchs fully supports these objectives and is actively engaged in implementing the regulations.

In close cooperation with our suppliers, our experts ensured that all the substances contained in our products were pre-registered before the December 1, 2008 deadline. The first milestone in the implementation of REACH was thus achieved: FUCHS products will still be available in the future and to the same quality.

What's next? We will undertake all that is necessary to register our substances and raw materials. For this we will gather precise information concerning the use and application of our products from you, our customers and this registration-relevant information can then be used by us and our suppliers.

Ensuring the conformity of our products with all legislative demands involves considerable effort for our company and we are thus assuming our responsibility for human health, occupational safety and the environment. You will therefore continue to profit from our safe products in the future.

*The actual EU chemical law*
*1/2009*

If you have any further questions about REACH, please simply contact us.

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## A Agency

The REACH processes will be administered by the EU's European Chemicals Agency (ECHA) in Helsinki.

## E Exceptions

All substances are subject to the registration obligation unless they are explicitly excluded from this, e.g. a number of unmodified natural substances such as ores and crude oil, elements with a known risk potential such as oxygen and nitrogen as well as fats, oils and fatty acids obtained from natural sources.

## A Authorization

Authorization is mandatory for substances of very high concern (see SVHC) before they can be used or put on the market. In particular, these are substances which, according to scientific evidence, have harmful effects on human health or the environment such as carcinogenic substances or persistent, bioaccumulative and toxic substances.

## C Chemicals

REACH covers all (individual substances) of which the annual manufactured or imported volume exceeds 1 tonne per year.

## C Chemicals policy of the EU

The EU must resolve the following issues:

- Protection of human health and the environment,
- Improving the competitiveness of the EU's chemical industry,
- Avoiding the fragmentation of domestic market,
- Improving transparency and integration in international projects
- The promotion of testing procedures without tests on animals and
- Compliance with World Trade Organization obligations.

## D Data

Registration dossiers require the gathering of comprehensive and costly data. Unnecessary tests on animals should be avoided and cost controls should be exercised. As a consequence, substance data should be shared between applicants against financial remuneration.

## D Dossiers

For the registration of a substance, a dossier containing the details of its characteristics and application as well as guidelines for its safe use must be submitted to the agency.

## D Downstream-User

You as our customer are usually a downstream user and thus an important actor in the REACH process.

## E Evaluation

The evaluation of the data records and conclusions submitted for the individual substances by the ECHA.

## E Exposure

Exposure scenarios include all uses for a substance "from the cradle to the grave". They must include realistic use and operational conditions as well as adequate risk-management measures.

## F FUCHS Products

Fuchs products are nearly always mixtures ("preparations") of several substances. There is no obligation to register preparations, but there is for every single one of their constituents.

## F FUCHS Substances

FUCHS produces a number of substances itself. For these we have met all REACH obligations and performed pre-registration. FUCHS intends to register all the substances it produces.

## G GHS

The **G**lobally **H**armonised **S**ystem for the classification, labelling and packaging of hazardous substances should serve to reduce the hazards posed to human health and the environment during the manufacture, use and transport of chemical substances and mixtures. The GHS came into force on January 20, 2009 and will progressively replace the previous EU classification guidelines in the next few years and a large number of classification criteria, test methods and thresholds will change. This will lead to the more stringent classification of many products even though their composition remains the same. The EU has largely matched the transitional periods for the GHS directives to the timetable set for the REACH directives.

## I Imports from Non-EU Countries

All substances imported from non-EU countries (including substances in mixtures) will be subject to all obligations imposed by REACH.

## S Supply Chain

REACH prescribes intensive communication between the parties along the supply chain. In particular, information about health, safety, environmental impact as well as risks and risk-management measures should be exchanged between up-stream and down-stream actors (manufacturers-blenders-dealers-users).

## R REACH

The actual chemical legislation of the EU, which entered into force June 1, 2007, replaces lots of European and national regulations.

## R Registration Obligation

The obligation to register under REACH applies to manufacturers of substances or to importers who import substances into the EU. The manufacturers of substance mixtures or the users or consumers are known as down-stream users; they have no registration obligations, but they are obliged to share information along the supply chain.

## R Registration

The necessary registration of (almost) all substances without which no marketing of a substance is permitted: no data – no market. The registration obligation resides with the party that brings the substance into the EU: the manufacturer or the importer of the substance.

## S SIEF - Substance Information Exchange Forum

Furthermore these forums should promote the exchange of information to limit the number of animal tests and to avoid duplication of work.

## S SVHC - Substances of Very High Concern

The hazards of SVHC on human life and the environment can be serious and are sometimes irreversible. As a result, such substances are subject to authorization. These substances include, among others:

- Substances meeting the criteria for classification as carcinogenic, mutagenic or toxic for reproduction (CMR) category 1 or 2;
- Substances which are persistent, bioaccumulative and toxic in accordance with the criteria set out in Annex XIII of the REACH regulation (PBT and vPvB-Substances);
- Subtances having endocrine disrupting properties.

Every 6 months, the ECHA publishes an updated SVHC candidate list. (http://echa.europa.eu/chem_data/candidate_list_table_en.asp). Special obligations to provide information apply to SVHC. Every supplier of an article containing an SVHC which is included in the candidate list in a concentration above 0.1 % (w/w) shall provide the recipient of the article with sufficient information on the safe use of the article, at least with the name of the substance.

## I Implementation of REACH at FUCHS

To implement REACH, FUCHS has initiated a comprehensive program:

- We concentrated our expertise in our European REACH Project Team.
- Timetables, procedures and responsibilities were laid down, contacts to other companies were established and the formation of consortia was promoted.
- All substances (raw materials, additives and process products) were included in a substance inventory with a special focus on in-house manufactured substances.
- The use of SVHC was ended in the run-up to REACH.
- All necessary pre-registrations were completed before the deadline.
- For the registration procedure, we collect information from our customers and create realistic exposure scenarios.
- In partnership with our suppliers, our objective is to register all the substances we use in good time. This is only possible if open and fair communication and constructive cooperation takes place within the supply chain.

## R Responsibility

REACH has reversed the "burden of proof". Manufacturers must therefore characterize the potential risk of substances with their own data and develop risk management strategies.

## A Availability of Products

Our products will continue to be available in the same quality. REACH should not have any negative effects on the properties or formulation of our products.

## U Use and Application

The registration of a substance should also include details of its identified uses and applications…
We kindly request you to assist us in this by providing us with all necessary information concerning your uses, operational conditions and associated exposures to human life and the environment.

## Y Your Preparations for REACH

REACH also imposes obligations on your company.
What can your company do now as part of the supply chain?

- Complete inventory lists of substances
- Determine the exposure parameters of the substances in your supply chain to human life and the environment

What cannot be done at the moment?

- It is too early to expect "extended safety data sheets", substance data, PNECs, DNELs etc., especially for mixtures. We expect the necessary data to be available by 2010 at the earliest.
- Do not develop your own questionnaires - ask your trade or professional associations first.