REACH! We are experts in detail.

January 2023

We LUV it.

LEHVOSS Group

As a customer with us, you can be sure that all requirements of the EU REACH regulation will be met:

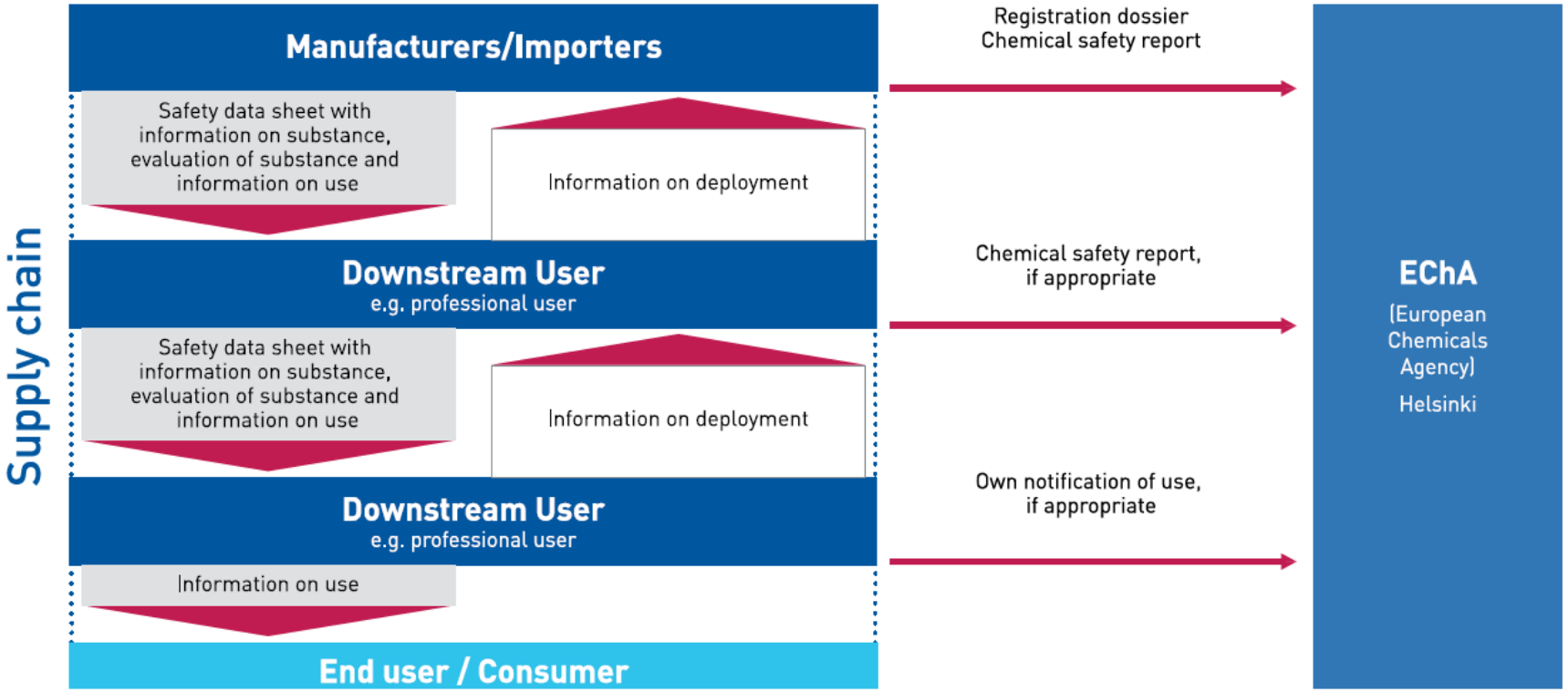
As a registrant, we are actively involved in the REACH process

Duties of importers (and manufacturers) of substances as registrants	Implementation within LuV/ LEHVOSS Group
Registration of phase-in substances and non-phase-in substances	many registrations have been carried out, others are planned
Clarification/ Transfer of the obligation to register to the only representative, if appropriate	Use of only representatives, documentation and regular checking of the only representative status
Ongoing inspection of the import/manufacturing quantities	Monitoring of the import quantities with a modern substance-volume tracking IT system (SVT)
Forwarding of safety data sheets compliant with REACH/CLP	Preparing, checking and forwarding of safety data sheets compliant with REACH/CLP (incl. information on SVHC status of a substance if appropriate)
Regular checks for restrictions and authorisation requirements	Proactive checking/ review of relevant information and lists to take timely action

Additionally:

- we use internal and external networks to regularly exchange experience (e.g. VCI Regionalverband Nord [northern regional association of the German Chemical Industry], REACH Hamburg network (Das REACH Hamburg Netzwerk - hamburg.de).
- we have developed standard operating procedures to ensure compliance with the requirements and the marketability of the products.

An overview of REACH implementation: the tasks within the supply chain



As a downstream user, you comply with the statutory REACH requirements if you proceed as follows:

Tasks of downstream users
Checking safety data sheets for consistency of the information
Determination and forwarding of identified uses for substances/products
Checking the identified uses (Annex of the safety data sheet)
If you as a downstream user establish that a registrant has not taken account of your application in the registration or does not wish to notify the downstream user of the application in order to maintain company secrecy, the downstream user may have to submit an independent use registration, detailing the hazard potential for humans and the environment together with safety precautions.

Terminology: An overview of the key aspects (I)

REACH term	Explanatory note
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals, EU Regulation 1907/2006/EC Understanding REACH - ECHA (europa.eu)
Phase-In substance	The substance is listed in the European Inventory of Existing Commercial Chemical Substances (EINECS). EINECS is the directory of substances that were on the market before 1981. It contains more than 100,000 existing substances. The substance was manufactured in the EU, but not placed on the market by the manufacturer or importer before the entry into force of REACH (for example substances used within a company). The substance was classified as a polymer until the start of the nineties (entry into force of the 7th amending directive 67/548/EEC) and counted as registered; however, it does not comply with the definition of a polymer according to the REACH Regulation. Certain emulsifiers and pre-polymers, for example, fall into this category. These substances are also termed „No-Longer Polymers“ (NLP) and are contained in the NLP list.
Non-Phase-In substance	Does not meet any of the criteria under ‘Phase-in substance’

Terminology: An overview of the key aspects (II)

REACH term	Explanatory note
Only representative (Article 8 REACH regulation)	A natural or legal person established outside the Community who manufactures a substance on its own, in mixtures or in articles, formulates an M3 mixture or produces an article that is imported into the Community may by mutual agreement appoint a natural or legal person established in the Community to fulfil, as his only representative, the obligations on importers under this Title. The representative shall also comply with all other obligations of importers under this Regulation. To this end, he shall have a sufficient background in the practical handling of substances and the information related to them and, without prejudice to Article 36, shall keep available and up-to-date information on quantities imported and customers sold to, as well as information on the supply of the latest update of the safety data sheet referred to in Article 31. If a representative is appointed in accordance with paragraphs 1 and 2, the non-Community manufacturer shall inform the importer(s) within the same supply chain of the appointment. These importers shall be regarded as downstream users for the purposes of this Regulation.
REACH objective	REACH unites numerous legal documents on EU chemical legislation that existed alongside each other and supplements them with new aspects. The aim of the regulation is to improve the information that exists on chemical substances manufactured within and imported into the EU. It additionally aims to reduce the risks associated with the use of chemical substances. **A revision of the REACH regulation, combined with adjustments to the existing processes, is in progress as part of the new EU chemicals strategy defined by the EU Green Deal** (Chemicals Strategy for Sustainability - ECHA (europa.eu))
ECHA (Homepage - ECHA (europa.eu))	European Chemicals Agency headquartered in Helsinki (Finland); its responsibilities include monitoring the implementation of REACH at European level as well as continuing to develop the process (guidelines, definition of substances of very high concern (SVHC), authorization/restriction etc.)

Terminology: An overview of the key aspects (III)

REACH term	Explanatory note
SVHC	Substances of very high concern are substances with properties that are carcinogenic, mutagenic or toxic to reproduction, hormonally active, allergenic, specific environmental hazards; they are placed on the “candidate list” as a first step of the authorization procedure in accordance with REACH. Candidate List of substances of very high concern for Authorisation - ECHA (europa.eu)
Authorisation and Restriction	The aim of the authorisation process is to ensure that the risks related to substances of very high concern (SVHCs) are properly controlled throughout their life cycle (Authorisation process - ECHA (europa.eu)) Restriction is a tool for protecting human health and the environment from the risks posed by chemicals. Restrictions usually limit or ban the manufacture, placing on the market or use of a substance (Restriction process - ECHA (europa.eu))
CLP	stands for ‘Classification, Labelling and Packaging’, European Regulation 1272/2008/EC which governs the classification and marking of hazardous substances and mixtures. (Understanding CLP - ECHA (europa.eu))

We’re there at your service. Contact us!

Coordination and control of the implementation of REACH is one of the tasks of our Service Group “Environment, Safety and Regulatory Affairs”

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