



Subject: REACH Registration & Use Communication Approach of SACHEM

To Whom It May Concern,

Introduction

The registration of substances under the REACH Regulation (EC 1907/2006) requires the identification and exchange of end-use information between supplier and their downstream users. SACHEM has received many correspondences for separate end-use descriptors from our customers & suppliers and more and more references to the standardized use descriptors and (Generic) exposure scenario (GES) proposals from specific downstream user (DU) organizations.

For those involved, we thank you kindly for your usage related correspondence provided. We understand and appreciate the relevance for you and all related stakeholders that the uses are covered as much as possible and as efficiently as possible in the appropriate registration dossier. Therefore, we like to inform you with this letter how we will proceed.

Collection & Processing of Your Usage Information

SACHEM is collecting all usage-related information received centrally and we are preparing for our registration requirements to cover the uses were appropriate and feasible. Our first focus is on our registration dossiers to be completed for 2010 and the related communications with our suppliers & customers accordingly.

In principle, SACHEM supports the usage of the standardized use descriptors and GES mapping proposals from DU organizations and Cefic. We appreciate the ones using the standard format from the DUCG (Downstream User of Chemicals Co-ordination group; www.duccplatform.org) although we realize that most of them are still under construction or might change in time (see overview attached in Annex 1).

Where appropriate, the relevant usage information collected will be made available to the lead registrants dealing with preparing the joint submission dossiers up to the final exposure scenarios (if appropriate) to be used in our downstream communications.

As you might be aware, the exposure scenarios (once finalized) will be part of the extended safety data sheet (eSDS) that will be distributed to you as our customers from end 2010 onwards. At that stage final decisions if and how your uses are covered are clear and in line with REACH (especially article 37 & 38) you can take your appropriate follow-up actions.



Current status

The products that have been identified for a 2010 registration by SACHEM are included in the annex 2 attached to this letter. From all information provided and to the best of our knowledge, we have included our Registration strategy.

We approach all our customers for the transported isolated intermediates to get a strictly controlled condition (SCC) confirmation.

For all other products not specifically listed in the annex, no further direct exchange of use information is envisaged to be required at this moment of time. This can be because:

- There is sufficient end-use information gathered via other means (e.g. for transported isolated intermediates);
- The substances are exempted for registration;
- The substances are scheduled for a later registration date.

More Information?

We trust that we have informed you sufficiently. If you have specific use mapping details by your relevant DU Organization for any of our SACHEM substances, please send them to our generic REACH support e-mail (REACH@sachemeurope.nl). If you have specific questions on the listed substances in the Annexes, please send them to the substance specific e-mail address for your relevant product as included in Annex 2 and Annex 3.

We will keep the annex up to date and contact relevant customers if there are significant changes in the registration strategy.

Kind regards

The SACHEM REACH Team

ANNEX 1 Sector organizations with a standardized Use description model in place

SECTOR	Sector Name	Use Mapping System	Website with more details
AISE	International Association for Soaps, Detergents and Maintenance Products	AISE Use mapping Manufacturing of detergents and maintenance products (DUCC Format)	http://www.aise.eu/reach/index.html
ATIEL	Technical Association of the European Lubricants Industry	ATIEL-ATC Use descriptors & GES Information for common lubricant end uses in the full supply chain (DUCC Format)	http://www.atiel.org/Reach_GES.htm
CEPE	European Council of the Paint, Printing Ink and Artists' Colours Industry	CEPE Use Categories for coatings, inks & artists colour manufacture and application (DUCC Format)	http://www.cepe.org/EPUB/easnet.dll/ExecReq/Page?eas:template_im=100087&eas:dat_im=101AED
COLIPA	European Cosmetics Association	COLIPA Use mapping manufacturing & end use of cosmetic products (DUCC Format)	http://www.colipa.eu/safety-a-science-colipa-the-european-cosmetic-cosmetics-association/reach-and-chemicals-.html
CONCAWE	European Association for Petroleum Product Manufacturers	Concawe list of Identified Uses & Mapping to GES and UD System	http://www.concawe.be/content/default.asp?PageID=555
ECCA	European Coil Coating Association	ECCA Generic Use descriptors for coating processes (DUCC Format)	http://www.prepaintedmetal.eu/reach
ECMA	European Carbon Making Association	Use mapping and GES development for Catalysts	http://www.ecma.org/templates/mercury.asp?page_id=1762
EFMA	European Fertilizer Manufacturers Association	EFMA Use descriptors for fertilizers & mapping to substances	http://www.efma.org/subcontent.asp?id=5&sid=21&ssid=17
EPDLA	EUROPEAN POLYMER DISPERSION AND LATEX ASSOCIATION	EPDLA Use Descriptors for applicable to the manufacture of organic solvent borne & solvent-free resins/products (DUCC Format)	http://www.cefic.be/Templates/shwAssocDetails.asp?NID=473&HID=359&ID=136
EPMA	European Powder Manufacturing Association	Use descriptor system for the Powder Metallurgy Industry	http://www.epma.com/New_non_members/tools.htm
ESIG	European Solvents Industry Group	ESVOC GES Titles for Solvents	http://www.esiq.info
ETRMA	European Tyre and Rubber Manufacturers Association	ETRMA Uses for General Rubber Goods and Tyres	http://www.etrma.org/public/activitieschemreach.asp
FCC	European Federation for Construction Chemicals	FCC Use reports for the formulation and end-use of construction chemicals (DUCC Format)	http://info.vci.de/user_cc/default.aspx
FEICA	Association of European Adhesives and Sealants Manufacturers	FEICA Use mapping adhesives and sealants (DUCC Format)	http://www.feica.com/index.php?option=com_content&view=article&id=103&Itemid=195
ISOPA	European trade association for producers of diisocyanates and polyols - main building blocks of polyurethanes	ISOPA Use descriptor system for manufacturing, formulation & use of MDI / TDI and Polyol substances	http://www.isopa.org/isopa/index.php?page=reach
PEST	Plastics Exposure Scenarios Team	PEST Use descriptors for: thermoplastic additives; FRP/ Composites manufacturing (using UP/VE resins & formulated resins)	http://pestpublic.plastics.net/public/
PPRM	Polyester Powder Resin Manufacturers	PPRM GES for manufacture of powder polyester resins (DUCC Format)	http://www.cefic.org/templates/shwAssocDetails.asp?NID=473&HID=359&ID=185
SRM	Solvent Resin Manufacturers	SSM GES for manufacture of organic solvent borne and solvent free products (DUCC Format)	http://www.cefic.org/templates/shwAssocDetails.asp?NID=473&HID=359&ID=184



ANNEX 2 Products registered by SACHEM Europe BV (status Nov 2010)

P-ID	Product name	Abbreviation	CAS No	EC No	Registration strategy
P083	1,3-Dichloro-2-propanol	DCP	96-23-1	202-491-9	Has been registered as Transported Isolated Intermediate under Strictly Controlled Conditions (TIUSCC).
P140	Glycidyltrimethylammonium chloride 70% in water	GMAC 70 W	3033-77-0	221-221-0	Has been registered as Transported Isolated Intermediate under Strictly Controlled Conditions (TIUSCC).
P242	3-Chloro-2-hydroxypropyltrimethyl ammonium chloride 65% in water	REAGENS-S-CFZ 65 W	3327-22-8	222-048-3	Has been registered as Transported Isolated Intermediate under Strictly Controlled Conditions (TIUSCC).
P243	3-Chloro-2-hydroxypropyltrimethyl ammonium chloride 69% in water	REAGENS-S-CFZ 69 W	3327-22-8	222-048-3	Has been registered as Transported Isolated Intermediate under Strictly Controlled Conditions (TIUSCC).



A NNEX 3 Products intended to be registered by SACHEM before 31-05-2013 (status Nov 2011)

P-ID	Product Name	Abbreviation	CAS No	EC No	Registration Strategy
P111	2-Ethylhexylglycidylether	EHGE (93%)	2461-15-6	219-553-6	Intended to be Registered as Transported Isolated Intermediate (TIUSCC).
P113	2-Ethylhexylglycidylether	EHGE (98%)	2461-15-6	219-553-6	Intended to be Registered as Transported Isolated Intermediate (TIUSCC).
P013	Allylglycidylether (1-Allyloxy-2,3-epoxypropan)	AGE	106-92-3	203-442-4	Intended to be Registered as Transported Isolated Intermediate (TIUSCC).
P041	Benzoxonium chloride	BEXOC	19379-90-9	243-008-1	To be registered as full dossier or TIUSCC
P042	Benzoxonium chloride 40% in water	BEXOC 40 W	19379-90-9	243-008-1	To be registered as full dossier or TIUSCC
P194	Methyltributylammonium chloride 75% in water	MTBAC 75 W	56375-79-2	260-135-8	To be registered as full dossier or TIUSCC
P144	Oxirane, [(tridecyloxy)methyl]	HAGE-13M	72689-40-8	276-765-1	Intended to be Registered as Transported Isolated Intermediate under SCC
P257	Tetrabutylammonium bromide	TBAB	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P258	Tetrabutylammonium bromide +3% silicium dioxide	TBAB +	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P259	Tetrabutylammonium bromide 50% in methanol	TBAB 50 M	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P260	Tetrabutylammonium bromide 50% in water	TBAB 50 W	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P261	Tetrabutylammonium bromide 65% in water - Low Metal	TBAB 65 W LM	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P262	Tetrabutylammonium bromide 75% in water	TBAB 75 W	1643-19-2	216-699-2	To be registered as full dossier or TIUSCC
P292	Tetramethylammonium chloride	TMAC	75-57-0	200-880-8	Intended to be registered as full dossier
P293	Tetramethylammonium chloride 30% in ethylene glycol	TMAC 30 EG	75-57-0	200-880-8	Intended to be registered as full dossier
P294	Tetramethylammonium chloride 35% in methanol	TMAC 35 M	75-57-0	200-880-8	Intended to be registered as full dossier
P295	Tetramethylammonium chloride 50% in water	TMAC 50 W	75-57-0	200-880-8	Intended to be registered as full dossier
P119	Tetramethylammonium hydroxide 10% in propylene glycol	TMA-OH 10 PG	75-59-2	200-882-9	Intended to be registered as full dossier
P301	Tetramethylammonium hydroxide 25% in methanol	TMA-OH 25 M	75-59-2	200-882-9	Intended to be registered as full dossier
P302	Tetramethylammonium hydroxide 25% in water	TMA-OH 25 W	75-59-2	200-882-9	Intended to be registered as full dossier
P303	Tetramethylammonium hydroxide pentahydrate	TMA-OH.5H ₂ O	75-59-2	200-882-9	Intended to be registered as full dossier
P310	Tetrapropylammonium bromide	TPAB	1941-30-6	217-727-6	Intended to be Registered as Transported Isolated Intermediate under SCC
P312	Tetrapropylammonium bromide 65% in water - Low Metal	TPAB 65 W LM	1941-30-6	217-727-6	Intended to be Registered as Transported Isolated Intermediate under SCC
P398	Tetrapropylammonium hydroxide 20% in water	TPA-OH 20 W	4499-86-9	224-800-6	Intended to be Registered as Transported Isolated Intermediate under SCC
P314	Tetrapropylammonium hydroxide 40% in water	TPA-OH 40 W	4499-86-9	224-800-6	Intended to be Registered as Transported Isolated Intermediate under SCC

