

# REACH – Creating an Inventory for Downstream Users

**A first step when preparing for REACH is to find out what substances are involved in your business. This leaflet aims to advise you how to go about this.**

## **REACH and your business**

REACH creates new duties for many businesses based on the part they play in making, selling or using chemicals. Most businesses in the UK use chemical substances in some way, even if it is only washing-up liquid for the staff kitchen. Many businesses are involved in buying and selling chemicals – some are specialist importers or distributors, others may be simply retailers selling other goods, for example, t-shirts containing a dye or fence panels containing wood-stain. Your duties under REACH depend to a large degree upon your position in a supply chain so you will need to understand how this impacts on you. This leaflet is aimed at those businesses that use chemical substances in their industrial or professional work activities – for a basic outline of the responsibilities of this group see our leaflet [UK REACH CA Information Leaflet Number 4 - What REACH Means for Users of Chemicals](#).

## **Why preparing an inventory is important**

An important first step in understanding what REACH will mean for your business is to work out which chemical substances you actually deal with and in what quantities. You also need to understand if you deal with substances on their own or in mixtures. A substance on its own is any chemical element or its compounds; for example calcium, sodium nitrate or propanol. A mixture is product made by deliberately mixing different substances; a mixture could be a solid, powder, liquid, solution etc. For example, powder coatings, wax polishes, paints, inks or cleaning products. Although not a legal requirement of REACH, a good way of finding out about the substances/mixtures you deal with is to develop an inventory of them. In its simplest form, an inventory could be a basic list of the substances or mixtures that come into your business.

How complex this inventory is will depend on the nature of your business and how many substances/mixtures you use. You are also likely to be relying on your suppliers to provide you with information that they may themselves not have readily available. If you are having difficulty getting the information you need it is important that you persevere. Without the right information, you will not be able to fully appreciate the impact REACH may have for your business. Even if you don't have a specific duty under REACH, it might affect the supply of a substance or product that is important to your business. For example, a printer who relies on a fast-drying ink might find that the ink becomes harder to obtain or even unavailable.

Amongst downstream users, there are different levels of responsibility depending on whether you blend or formulate mixtures, or simply use them as prescribed. Creating an inventory allows you to find out which substances or products you use and prioritise the ones that are important to your business. Remember to include everything that you buy into your business, either for your own use or to sell on. This doesn't just mean substances on their own, but may include formulated mixtures (e.g. cleaning fluids, paints, inks) and even substances in articles (e.g. flame retardant in some furniture).

## **Where to start**

To produce a full inventory of substances that you use within your business you first need to find out the details of the substances/products you use.

How far you need to go into this process depends on how you use chemicals - do you use them in the course of your work activities e.g. lubricating fluid for machinery, or do you take substances, formulate

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them and supply them on e.g. making paint? If you formulate substances into mixtures, then it is likely that your customers are already asking you about REACH so you should start making your inventory as soon as possible.

## What do you need to know?

You should already know the trade name of any mixtures you use. Similarly, if you formulate substances into mixtures, the names of the substances should be known or easily found out. You should also find out how much of these substances/mixtures you use per year, who your supplier is, and how to contact them. If any of your suppliers are based outside the EU and you import 1 tonne or more of a chemical substance per year from them, you may then have an obligation to register these substances (for further information see our leaflet [UK REACH CA Information Leaflet Number 3 - What REACH Means for EU Importers](#)).

Any associated chemical identification numbers such as CAS (Chemical Abstract Service) or EINECS (European Inventory of Existing Commercial Chemical Substances) numbers need to be recorded as this may make it easier to communicate clearly with others about substances. Any hazard classification and labelling of the substances or mixtures should be noted e.g. “T”; “R23”, or “toxic if swallowed”. This may help you predict whether the substances/mixtures you use are, or contain, substances that may in future be deemed ‘substances of very high concern’ (SVHC). One of the aims of REACH is to reduce the number of the most hazardous substances used in the EU. Certain substances of particular concern may be subject to controls under the Authorisation or Restriction parts of REACH.

The following criteria will be used to identify SVHCs:

- Those substances which can cause cancer, genetic mutations or cause reproductive problems (these substances will have at least one of the following CHIP Risk Phrases: R45, R49, R46, R60, R61; or the following CLP Hazard statements H350, H350i, H340, H360F, H360D, H360FD, H360Df, H360Fd)
- Substances that stay in the environment for a long time, build up in the tissue of animals and cause some form of harmful effect (persistent, bioaccumulative and toxic – PBT) , or those that stay in the environment for a very long time and build up in the tissue of animals very readily (very persistent, very bioaccumulative – vPvB)
- Substances that cause similarly serious effects to those above e.g. those having endocrine disrupting properties (i.e. chemicals which mimic hormones and disrupt the function of hormones that occur naturally in people and animals), or those for which there is scientific evidence of probable serious effects to human health or the environment giving rise to an equivalent level of concern to those of other substances listed above, and which are identified on a case-by-case basis

A list of SVHCs considered as priority for the authorisation process is developed each year by the European Chemicals Agency. Some of these priority substances are eventually included in what is known as Annex XIV of REACH. Substances on Annex XIV can not be used after a ‘sunset date’, unless the user is covered by an authorisation (see [UK REACH Competent Authority Information Leaflet Number 19 – Authorisation](#) for more details). Current restricted substances, those where the marketing or use of a substance is controlled, are already listed in Annex XVII of the REACH text and this list will increase as REACH progresses. The conditions of each restriction differ and you will need to consult Annex XVII for details.

REACH requires those who supply substances to account for the uses they have knowledge of. Therefore, you should also find out briefly what your company uses the mixture or substance for. Is your supplier likely to know what you do with the substance they supply to you? For example, do you use washing up detergent as intended (for washing dishes), or do you use it as a wetting agent e.g. damping

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down in a workshop; is a colouring pigment used exclusively in paint formulation or do you also use it in ink? Your supplier may also want to know about the control measures you use - for instance Local Exhaust Ventilation (LEV), enclosed processes and systems and/or PPE.

## Where can you find this information?

You may not be able to find out everything 'in-house' but should check all sources of information you do have on the substances/mixtures you buy into your business. This includes: safety data sheets (SDS); technical data sheets; any labelling or ingredient lists on packaging; risk assessments; or information gathered for other legislation (worker protection, environmental protection etc.). There may be information held within your company by departments concerned with purchasing, transport, storage, sales and operations. These departments will also be helpful in finding out the amount of the particular substance/mixture you get into your business.

Alternatively, you should be able to ask your supplier to provide you with information about the substances/mixtures you buy in to your business; they may be able to send you a SDS if they haven't already done so. Some SDS contain only limited information, so you may need to find out more via your suppliers. You can also ask them for details on their intention to register (and by when) and what the pre-registration number is for the substance(s) they supply to you; although in some cases the duty to register will fall on someone higher up the supply chain, so your supplier may need time to find this out.

## What you may want to do with this information.

You may want to set all the information you have gathered out in a table, the content of which is very much dependent on your particular situation. The following is an example of what you might decide to produce:

<b>Product list – VAC Engineering Ltd.</b>						
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>K</b>	<b>Z?</b>
Substance/ mixture name	Name and address of supplier	CAS/EINECS number	Amount bought in (tonnes per annum)	Classification and labelling	Use	Registration issues covered [Pre- registration Number] (y/n)?

## Once you have done this...

Once you know what chemicals play what role in your business, you can consider how important individual substances or mixtures are to you, and what the impact would be if REACH should affect the supply of a given substance. This should help you prioritise which supplier you should start communicating with as soon as possible to check continuity of supply – do they (or someone higher up in supply chain) intend to register. If not, are they aware of any competitors who intend to do so? In return, your supplier may want to know details of how you use your substance so they can decide if their registration will cover supply to your company, or alter it so that it does.

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It will also help you consider which substances/mixtures you need to look into further, e.g. alternative supply routes or substitution for similar substances/mixtures. This will help you to plan ahead to ensure that any transition into REACH is as smooth as possible.

## Further information

For advice on the application of REACH obligations, you can contact the UK REACH Competent Authority's national helpdesk:

Email: [UKREACHCA@hse.gov.uk](mailto:UKREACHCA@hse.gov.uk)

Website: [www.hse.gov.uk/reach](http://www.hse.gov.uk/reach)

