

Introduction to the Template for the communication on “PM uses” of Substances in the framework of REACH

Why does the PM industry need to communicate on “PM uses”?

According to Article 37(2) of the REACH Regulation, any Downstream User (DU) has **the right to inform his supplier** (Manufacturer or Importer -M/I- or DU) **about the use(s) of a substance** on its own or in preparation with the aim of making this an identified use.

For phase-in pre-registered Substances the supplier, according to Article 37(3), **must** take note of the request by the DU, provided that it is made **12 months before the registration deadline**. Thus for substances which were pre-registered for a 1000 tons per year tonnage band the request should be made before the 1 December 2009.

Finally, according to Article 37(4), the **DU of a substance must prepare the chemical safety report for any use which is not identified** by the Registrant (and therefore not included in the exposure scenario of the registration dossier).

Therefore it is important for the PM industry to make the PM uses of substances known to the supply chain and the REACH consortia.

How to fill in the information Form and the List of Substances

The EPMA will provide a 2 page information form TEMPLATE divided in four parts:

1. Process Step, Exposure Routes and RMM Table Overview:

List the process steps, put “yes” or “none” in the possible Routes of Exposure, put “yes” or the appropriate codes in the RMM in uses (see Table of RMM below).

2. Operational Condition (OC):

By answering the few questions on the form, it will be possible to describe the operational conditions. The associated substances will be listed in the corresponding **List of Substances**.

3. Table 1 of Risk Management Measures (RMM) in use:

Describe briefly the RMM in use for the Environment and the Workers by using the pre-defined codes or your own description terms.

4. Table 2 of Process Steps Full Descriptions:

Describe in more detail the process steps listed in the table overview.

Use several Information Forms with different List of Substances if necessary. A Sequence Number (Seq. Nb.) can be put on each Information Form.

Three Examples of Information Forms with some examples of possible associated Lists of Substances are also given for information: Powder Mixing, Pressing and Sintering.

In order to identify your use (Article 37(2) and 37(4)), it is strongly recommended to list **at the minimum** the Process steps with a detailed description in the corresponding Table 2 with the corresponding List of Substances containing the Substance Name and/or Substance Formula and/or CAS or EINECS Number.

Generic Codes for Exposure Scenarios for PM

In addition to the Information Forms, it may be necessary to provide generic codes provided by the European Chemical Agency to describe your use(s) of substances for Exposure Scenarios. The EPMA has recapitulated the corresponding codes for the PM industry in the Codes for Exposure Scenarios document.

To whom should this Information Form be addressed?

The Information Form should be addressed to:

- Direct supplier(s) dealing with the substances involved in the “List of substances”
- The REACH community in general (SIEF, Consortia, Substance Based Organisations etc...)
- **The EPMA who can help you finalize your Information form and forward it to the REACH community.**

Update of the documents

The present documents are drafts developed with the latest know-how status. They will be updated regularly according to the latest developments and you are invited to check the Revision Number of the drafts.