

# ECHA Guidance for Downstream users The essentials

Updated Guidance for downstream users  
– an overview

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# Updated Guidance for downstream users - overview

- Background for guidance update
- Addressee: the downstream users
- Structure of the webinar
- Structure of the updated guidance

# Background for guidance update



## Document history

First edition: January 2008



- Experience/best practices
- *ECHA-Stakeholder Exchange Network on Exposure Scenarios (ENES) and CSR/ES Roadmap activities*

2012: Drafting phase for the revised edition

2013: Consultation procedure (consultation [web page](#))

***December 2013***: Publication V.2

# Main drivers for update

- Content
  - Checking compliance with exposure scenario, with advice on scaling
  - Communication of information on mixtures
- Structure
  - Streamlining the guidance, with more readable and user-friendly text
  - Avoid duplication with documents published since 2008
  - Delete out-of-date information

# Chapter 2: Understanding roles under REACH



# Addressee: Downstream users



**Formulators**



**Industrial or professional end users**



## Guidance:

**DU definition in Ch. 2  
Obligations detailed  
in Ch. 3 to 8**



**Re-importers/-  
Importers with only  
representative**



**Re-fillers**



**Article producers**

## Other roles under REACH

**One company → several potential roles**

Activities to be checked in relation to each substance

Role	Duties under REACH	Reference
Manufacturer/ Importer	Registration (Authorisation)	Guidance on Registration
Distributor	Supply	Appendix 1
Consumer	No	




# Structure of the webinar









Guidance for DUs V2  
*General overview*

 Chapter 1  
Chapter 2



  Chapter xx  
  
 Appendix 2

**Focus of the webinar:** Illustrate how and where to find the relevant information in the Guidance

**Out of scope: Details on obligations**

# Structure of the Guidance for DUs V.2



# Structure of the Guidance

## Chapter 1

Main **REACH** processes  
focusing on aspects  
relevant for DUs

Definition of **key terms**  
relevant for the reader

## Chapter 2

Definition of **DU roles**  
and roles other than DUs

# Structure of the Guidance

## Chapter 3

Collection of information on DU and customer's **use(s)** and communication upstream

## Chapter 4 + App. 2

**DU and ES:** receipt of ES information, obligations and possible actions to take

# Structure of the Guidance

## Chapter 5

Prepare a **DU CSR**

## Chapter 6

Obligations to **communicate upstream** new hazard information, RMMs appropriateness + report to ECHA different classification

# Structure of the Guidance

Chapter 7 +  
App. 3

**Formulators:**  
obligations related to  
mixtures and guidelines  
on how to collect,  
identify and  
communicate relevant  
information

Chapter 8

Relevant requirements  
when dealing with SVHC  
**(authorisations,  
restrictions)** and  
**substances in articles  
(SiA)**

# Structure of the Guidance

App. 1

- **Distributors:** role and obligations under REACH

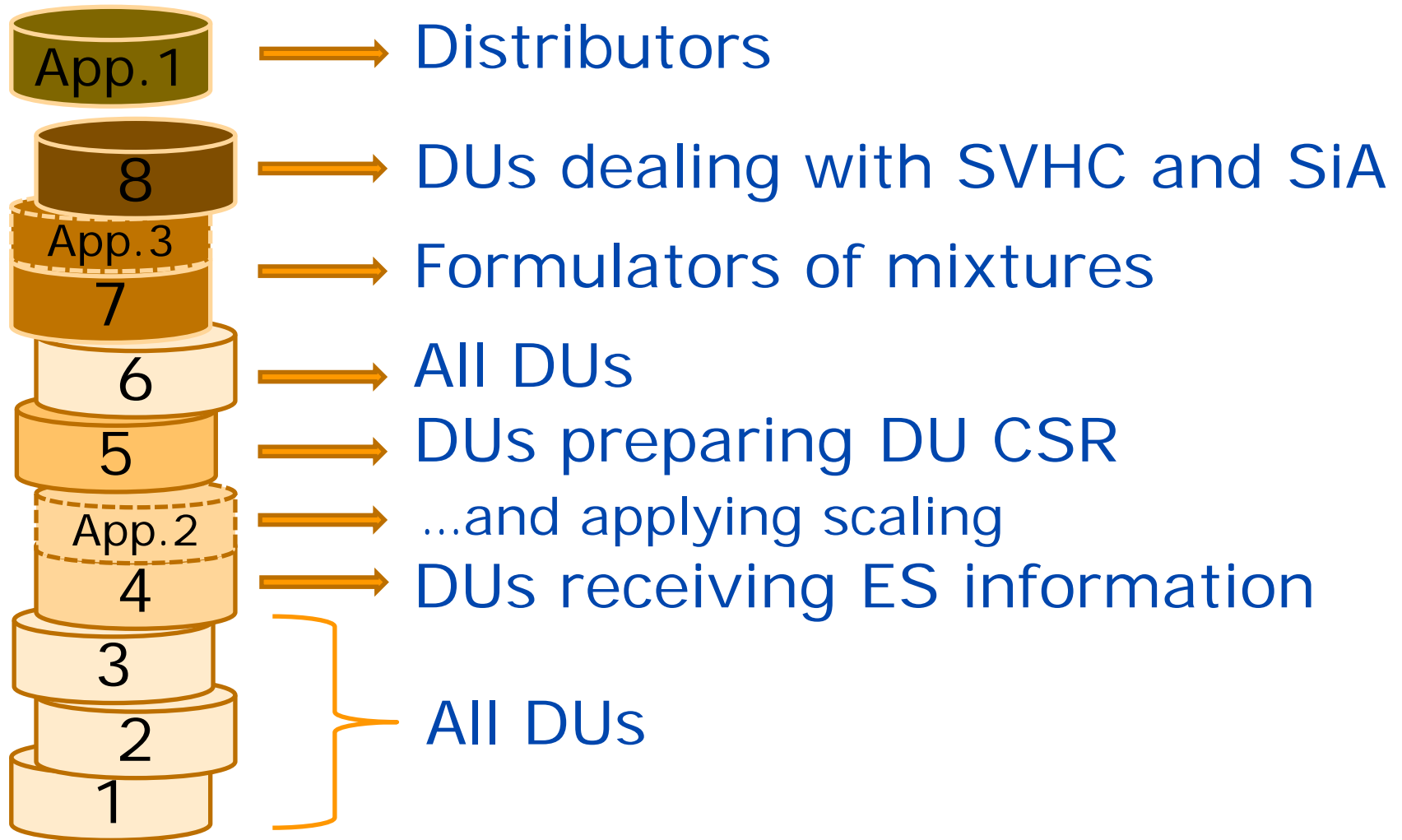
App. 4

- Overview of relevant **EU legislation** for DUs

App. 5

- Overview of **communication needs** within the supply chain





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