

Downstream User Reports – when to report to ECHA

Webinar "How and when downstream
users need to report to ECHA"

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When a downstream user needs to report to ECHA

1. Use is not supported in exposure scenario from your supplier and:
 - a) You wish to benefit from an exemption related to preparing a downstream user chemical safety report

or

 - a) You prepare a downstream user chemical safety report (DU CSR) and the particular use not supported exceeds 1 tonne per year

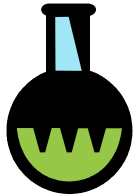
2. Your classification of a substance differs to that of all of your suppliers

Use not supported

When a downstream user need not prepare a chemical safety report	Report to ECHA?
Safety data sheet is not required	No
Chemical Safety Report is not required by registrant	No
The total use is less than 1 tonne per year	Yes
The conditions of use are implemented	No
The concentration in a mixture is below specified limits	No
The substance is used for Process and Product Oriented Research & Development (PPORD)	Yes



Exemptions and reporting to ECHA



- The total use is less than 1 tonne/year



- The substance is used for Process and Product Oriented Research & Development (PPORD)



Need to prepare
DU Chemical
Safety Report?

NO



Need to report to
ECHA?

YES

Process and Product Oriented Research & Development (PPORD)



"any scientific development related to product development or the further development of a substance, on it's own or in mixtures or in articles..."

- Pilot Plant
- Production trials (such as scaling up and improvement)
- Applications testing (such as new use)

Note:

The PPORD exemption applies whether or not the downstream user is listed as a selected customer in a PPORD notification

The risks to human health and the environment must be adequately controlled

Reporting requirements when you prepare a downstream user chemical safety report



Particular use

>1 tonne/year

<1 tonne/year



Need to report
to ECHA?






YES

NO






Note:

A downstream user report to ECHA is not the same as a downstream user CSR. The information to be provided is specified in Article 38(2)

Exemptions and Reporting Obligations

Total Use (tonnes per year) 	Particular Use (tonnes per year) 	Used for PPORD? 	DU CSR required? 	Need to report to ECHA? 
all	all	yes		
<1	-	no		
> 1	> 1	no		
>1	<1	no		

Exemptions and Reporting Obligations

Total Use (tonnes per year) 	Particular Use (tonnes per year) 	Used for PPORD? 	DU CSR required? 	Need to report to ECHA? 
all	all	yes	exempt	yes
<1	-	no	exempt	yes
> 1	> 1	no	yes	yes
>1	<1	no	yes	no





Notes:

“Particular Use” is the use that is not supported in the exposure scenario supplied





PPORD: Process and Product Oriented Research & Development

DU CSR: Downstream user chemical safety report

Exemption for tonnage - Examples

Ref	Total Use (tonnes per year) 	Particular use (tonnes per year) 	DU CSR required? 	Need to report to ECHA? 
A	8	2		
B	8	0.7		
C	0.9	0.9		

Exemption for tonnage - Examples

Ref	Total Use (tonnes per year) 	Particular use (tonnes per year) 	DU CSR required? 	Need to report to ECHA? 
A	8	2	yes	yes
B	8	0.7	yes	no
C	0.9	0.9	no	yes

Notes:

- A. A downstream user chemical safety report (DU CSR) is required for any use not covered by the exposure scenario, if the total use is > 1 tonne per year
- B. A downstream user does not have to report to ECHA if the total use is > 1 tonne per year but the quantity for that particular use not covered is < 1 tonne per year
- C. A downstream user chemical safety report is not required when the total use is < 1 tonne per year. However, the downstream user has to report to ECHA that he is relying on that exemption

Formulators and communicating information on mixtures

- Formulators use a range of approaches to identify the information to communicate about their mixtures to customers. This may include some type of assessment of the risks



Need to report to ECHA?

NO, if uses are supported

YES, if uses are not supported

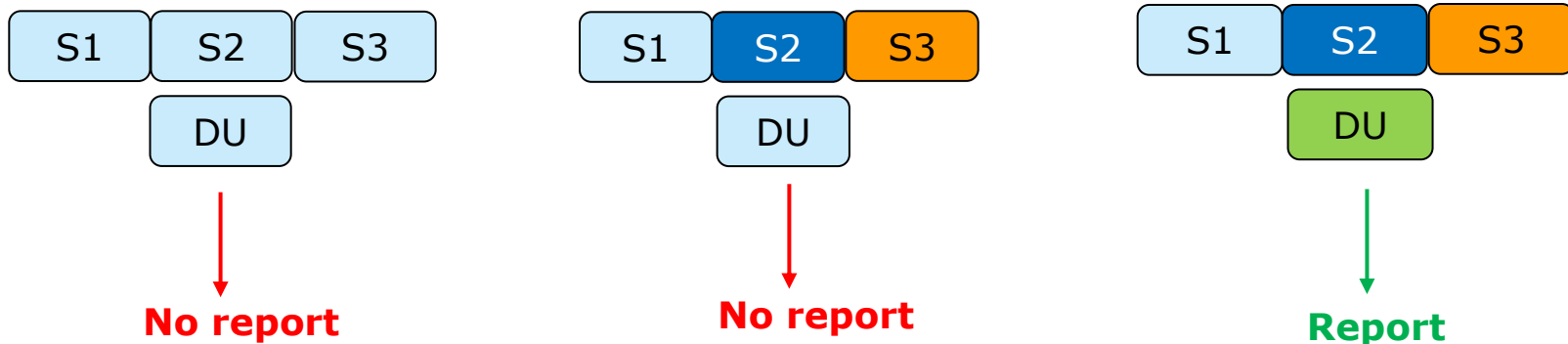
Notes:

- Communicate with your suppliers to ensure that they are aware of the uses and conditions of use you are communicating, and that these uses are supported at a generic level.



Reporting Classification Differences

- Report to ECHA if the downstream user classification is different to that of all of his suppliers (that is, an entirely new classification)



Note: Reporting classification differences is not required for a substance used in quantities less than 1 tonne per year

Report Classification Differences – Example 1

Supplier 1	Supplier 2	Downstream user
<ul style="list-style-type: none">• Flam. Liq 2• Eye irr. 2	<ul style="list-style-type: none">• Flam. Liq 3• Eye irr. 2	<ul style="list-style-type: none">• Flam. Liq 2• Eye irr. 2



Need to report
to ECHA?

NO

Report Classification Differences – Example 2

Supplier 1	Supplier 2	Downstream user
<ul style="list-style-type: none">• Flam. Liq 2• Eye irr. 2	<ul style="list-style-type: none">• Flam. Liq 3• Eye irr. 2	<ul style="list-style-type: none">• Flam. Liq 2• Eye dam. 1

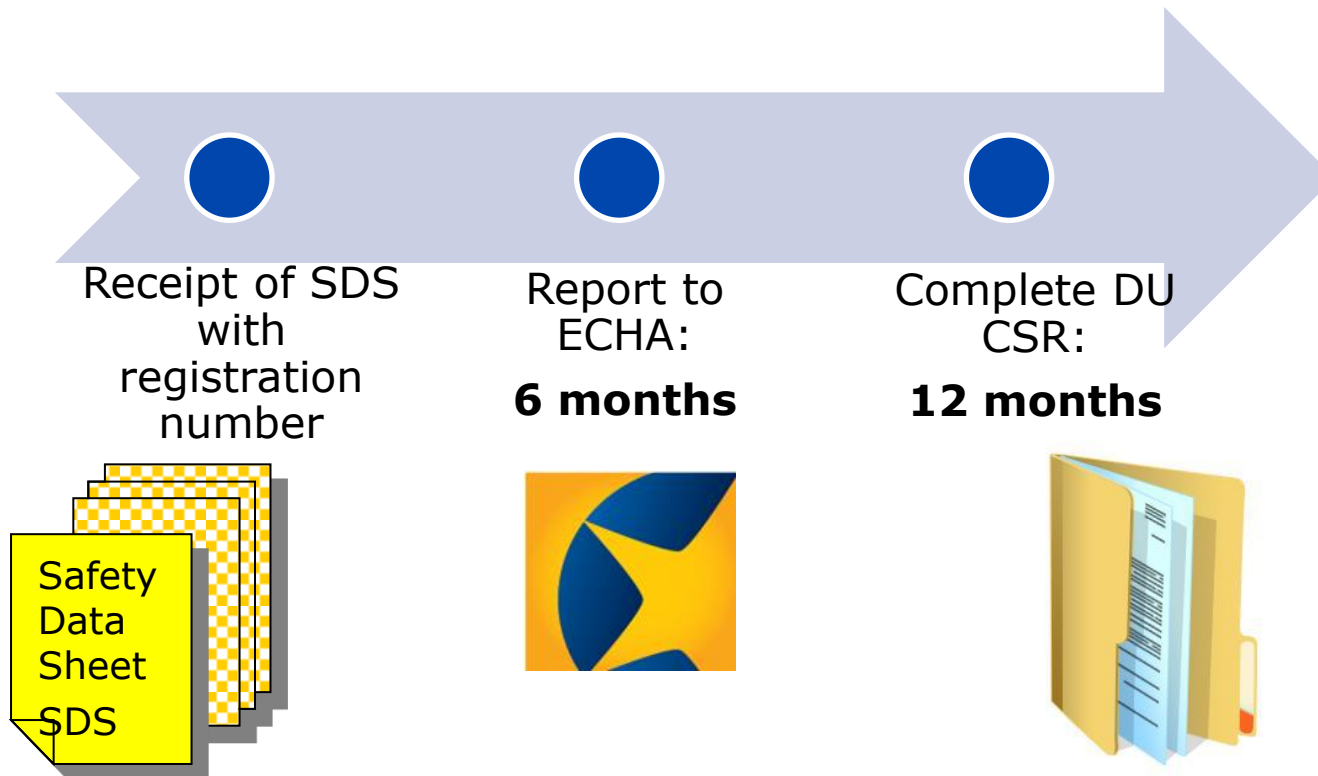


Need to report
to ECHA?

YES



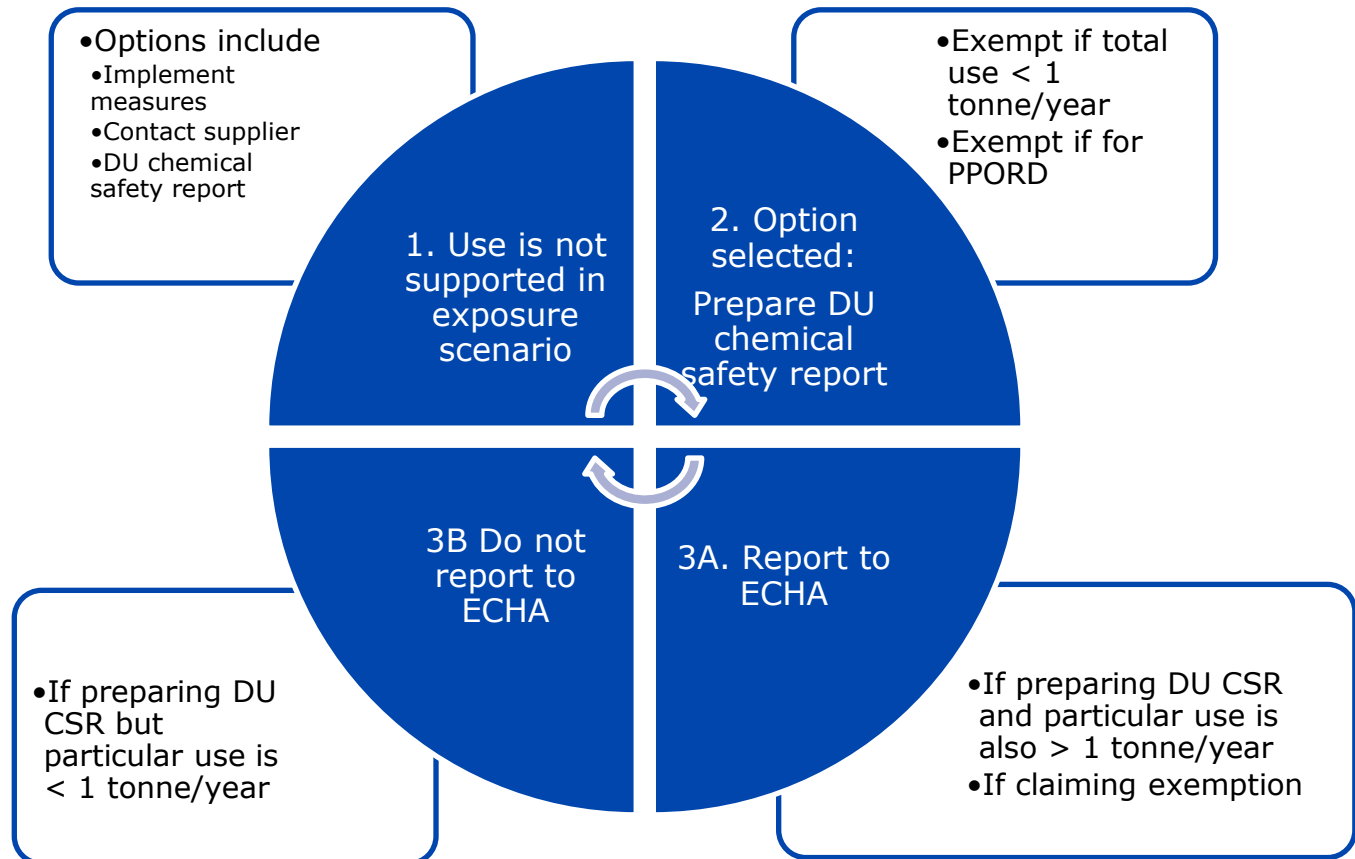
Timeline for Action



Notes:

- You may validly receive a registration number without exposure scenarios. Contact your supplier immediately if you think they should have been provided
- Classification differences should also be reported within 6 months
- DU CSR is a downstream user chemical safety report

Downstream user (DU) use is not supported - options and obligations



Options for reporting to ECHA

- Two options
 - Via Downstream User Report Webform
 - IUCLID / REACH-IT
- <http://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-report>

Thank you

