Communication and notification duties with complex objects

Webinar: communicating information on substances in articles - what you need to know

2 November 2017

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Content

- Article definition and complex object
- Communication and notification duties
- Dealing with articles in complex objects: main principles
Content

Article definition and complex object

Communication and notification duties

Dealing with Articles in complex objects: main principles
**Article:** An *object* which *during production* is given a *special shape, surface or design* which determines its *function* to a *greater degree* than does its chemical composition.

Containers = Articles

Paint, oil = Substance or mixtures
Articles can be assembled...

Assembled mechanically

Joined using substance/mixture

...to become a “complex object”
Objects can be very complex...

... but principles remain the same.
Content

- Article definition and complex object
- Communication and notification duties
- Dealing with articles in complex objects: main principles
Who has duties?

- Rest of the world
  - Non-EU article producer

- EU producer
  - "Assembler"
  - Distributor
  - End users
  - Consumers
  - Notification

- EU importer
  - "Assembler"
  - Distributor
  - End users
  - Consumers
  - Notification

Communication down the supply chain
Communication to consumers
When do duties apply?

Supply chain communication

- Candidate List substances
- AND
- > 0.1% w/w

Notification to ECHA

- Candidate List substances
- AND
- > 0.1% w/w
- AND
- > 1 tpa
What information to provide?

Supply chain communication

- Name of Candidate List substance
- Identification of article containing it
- Other information to enable safe use of the article

Notification to ECHA

- Identification of Candidate List substance
- Tonnage of the substance
- Description of the use of the substance in the article
- Brief description of the article
- Description of uses of the article
Content

Article definition and complex object

Communication and notification duties

Dealing with articles in complex objects: main principles
Principle 1

Notify an article only once
Principle 1 - Case #1

EU producer
Article A

EU importer
Article B

Article A, CL substance X > 0.1% w/w

Article B, CL substance Y > 0.1% w/w

EU “assembler”

Substance X in article A

Substance Y in article B

Fastener (no CL substance)

Complex object C

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Principle 1 - Case #2

EU importer
Complex object C

Fastener (no CL substance)

Article A
CL substance X > 0.1% w/w

Article B
CL substance Y > 0.1% w/w

Complex object C

Substance X in article A
Substance Y in article B

EU distributor
Principle 2

EU suppliers of complex objects should provide information on each article they supply
Principle 2
Illustration

Fastener (no CL substance)

Complex object C

EU Importer / Assembler

Distributor 1

Distributor 2

End users

Consumers

• Substance X in article A
• Substance Y in article B

• Substance X in article A
• Substance Y in article B

• Substance X in article A
• Substance Y in article B

• Substance X in article A
• Substance Y in article B

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Principle 3

When two articles are joined with (a mixture containing) a Candidate List substance, the concentration of the Candidate List substance is calculated over the whole complex object.
Principle 3

Illustration

Complex object D

- concentration of CL substance Z calculated over the whole complex object D (A+B+M)

- if above 0.1% w/w, the assembler should communicate and possibly notify ECHA
Further practical information
How to submit a notification?

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Substance in articles

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