



RIP 3.8

Guidance On Substances in Articles

RIP 3 workshop
25 September, Charlemagne, Brussels
Peter van der Zandt
DG Environment



What to do?

- q What articles do you produce/import: decide whether the objects are considered to be articles under REACH;
 - q Inventarise which substances are in articles you produce or import;
Have they already been registered for that use? Are they intentionally released? Are they substances of high concern contained in the Article? What concentration are they contained at? What is the total amount of the substance in your articles?
 - q Check if you should register the substances in articles;
 - q Check if you should notify the substances in articles;
 - q Provide information to recipients where appropriate.
-



What is an article?

- ❑ Article means an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition (REACH Article 3(3)).
 - ❑ An article is composed of one or more substances or preparations. Specific substances may be added to give the article special properties.
 - ❑ Examples: furniture, clothes, vehicles, toys.
-



Articles in REACH

q Article 6:

general obligation to register substances on their own or in a preparation:

Article producers may import substances on their own or in preparations for the production of their articles. In that case they have to register the substance (on its own or as part of preparations) if it is imported in volumes above 1 tonne/year.

- (.) When the article producer buys his substances from within the EU, he is of course a downstream user.
-



Articles in REACH

q **Article 7:**

defines under which circumstances article producers and importers are to register or notify substances in articles and details the notification requirements.

q **Article 32(4):**

duty of actors in the supply chain for articles containing identified substances of very high concern (SVHC) to communicate sufficient information to allow safe use down the supply chain.

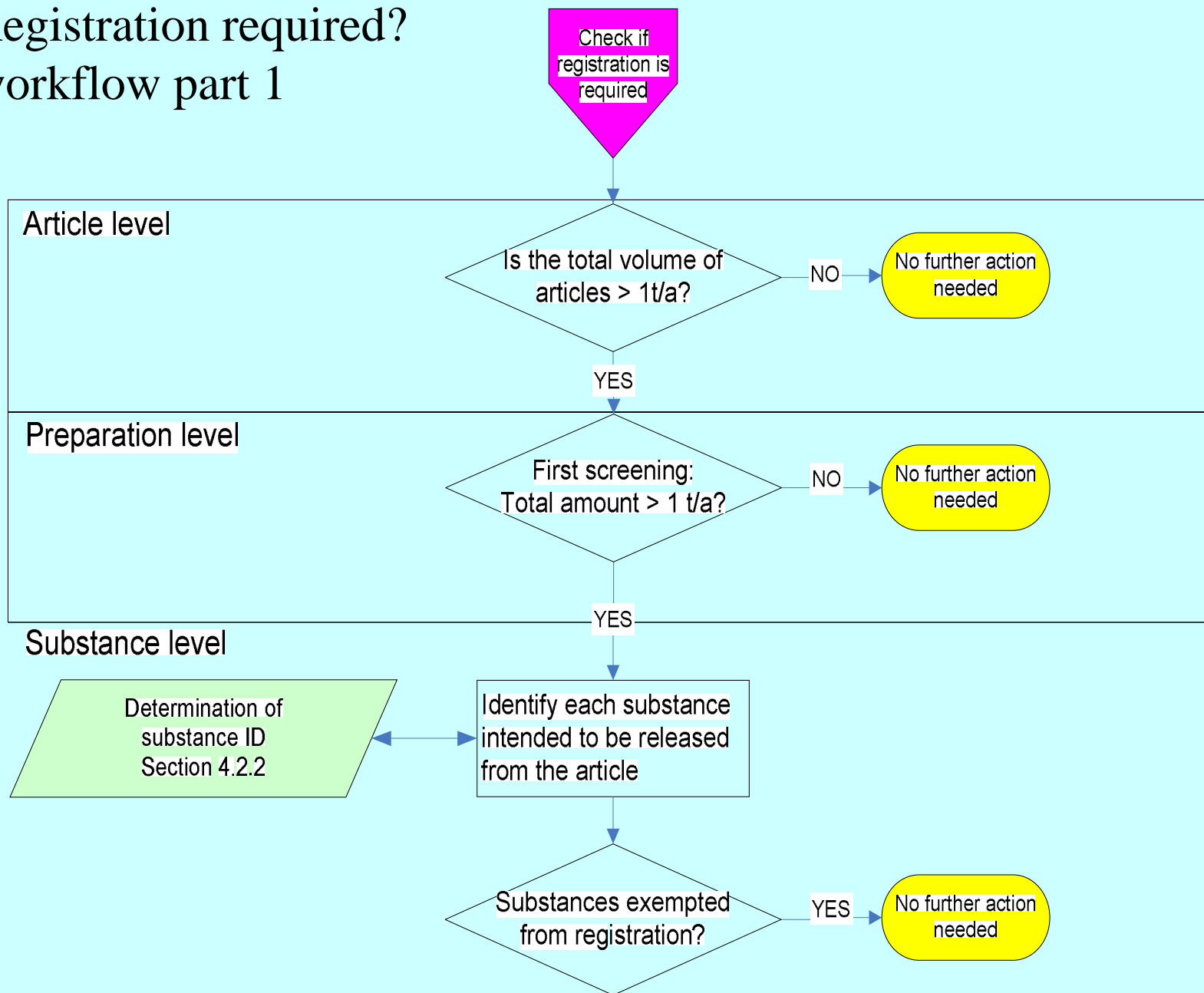


REACH Article 7.1

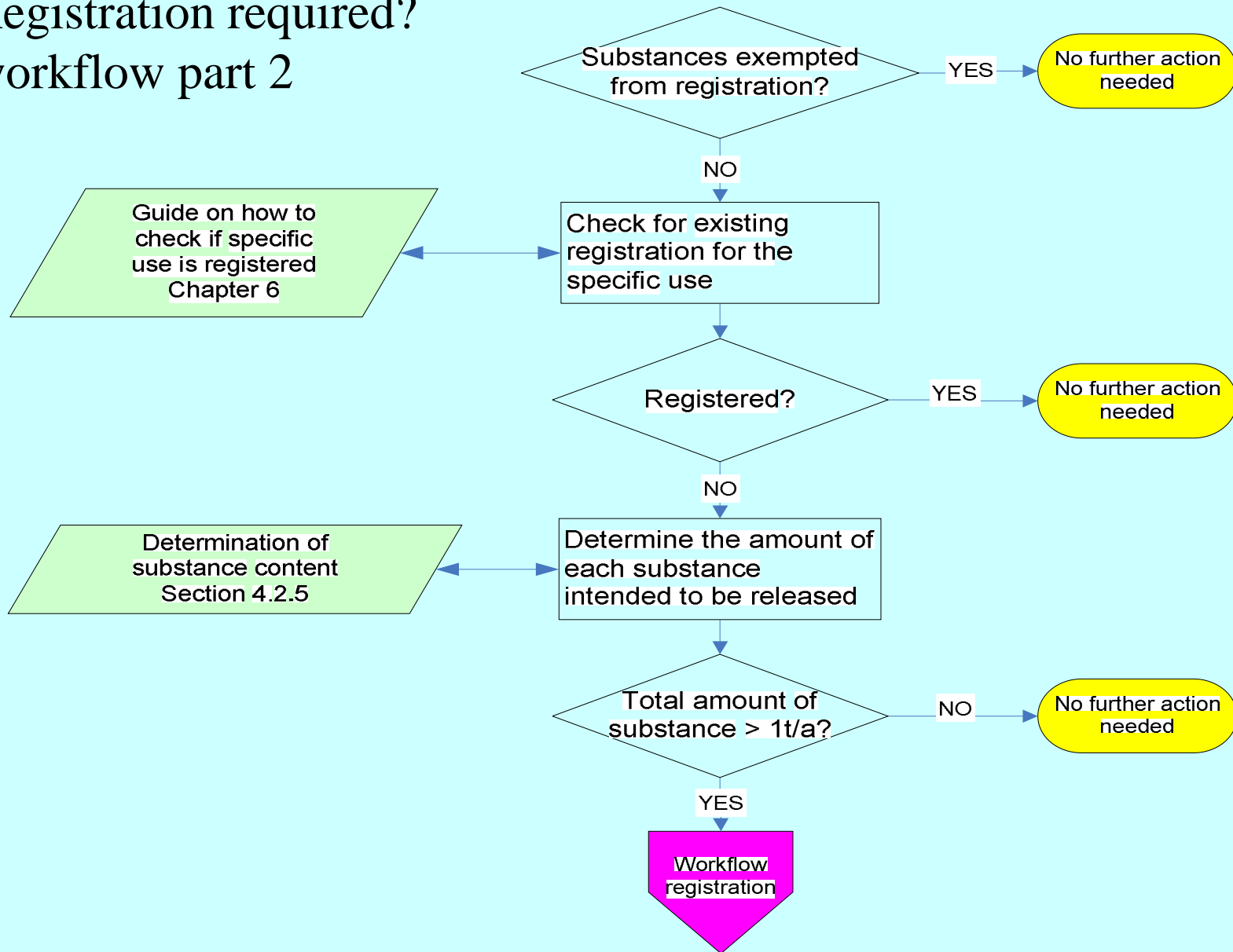
Substances in articles shall be registered when:

- q The substance is present in the articles in total over 1 tonne per producer/importer per year, and
 - q The substance is intended to be released during normal and reasonably foreseeable conditions of use.
-

Registration required? workflow part 1



Registration required? workflow part 2





Intended release of substances

Release of substances from articles is intended when:

- q the release is essential for the end use function of the article or when the article would not work sufficiently without the release,
e.g. release of ink from felt tip pens, release of detergents from cleaning wipes
 - q the release contributes to a quality or minor function of the article, i.e. the release contributes to an added value of the article, which is not directly connected to the end use function,
e.g. release of perfume from a perfumed eraser or dishwasher tablet
-

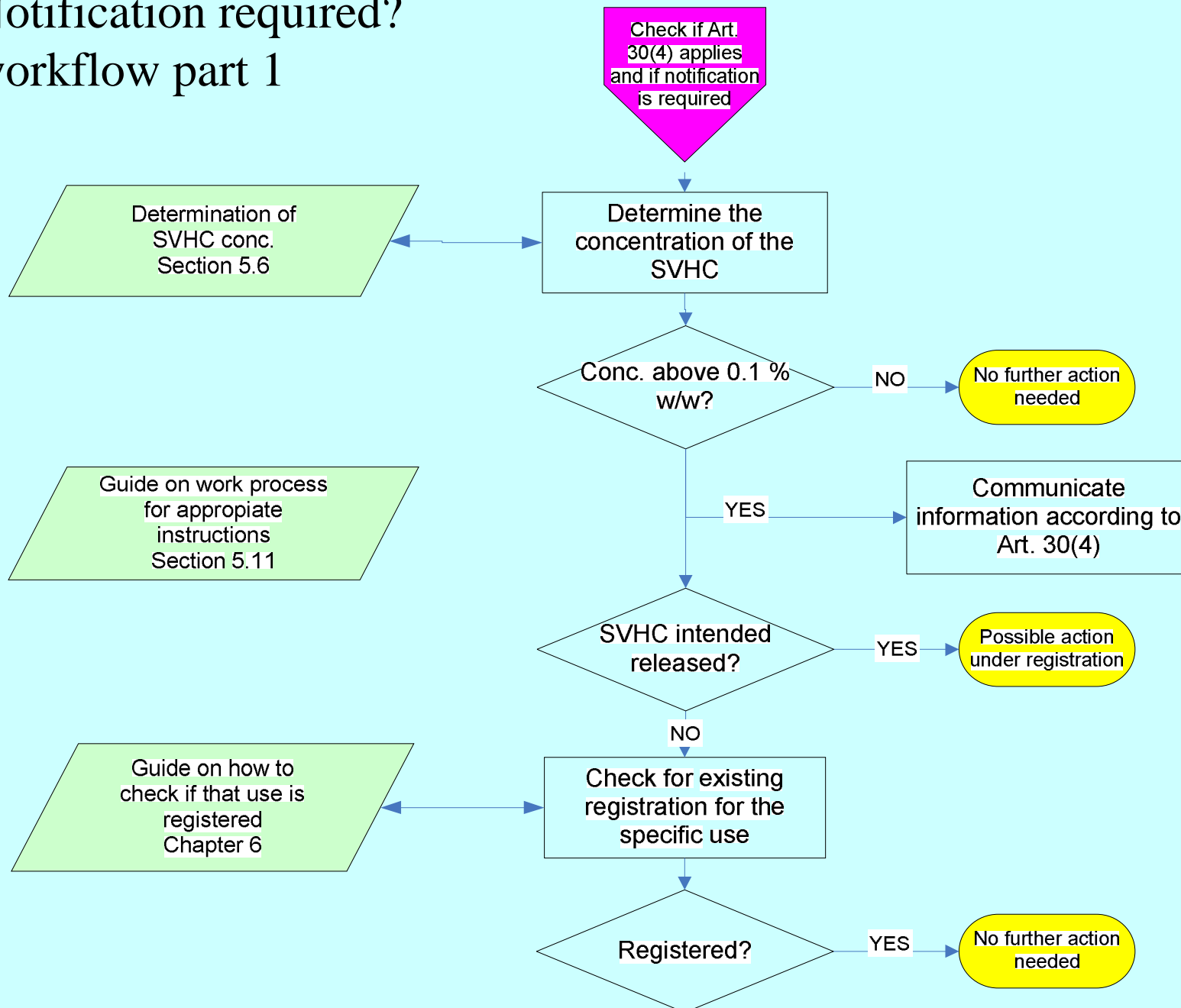


REACH Article 7.2 and 7.3

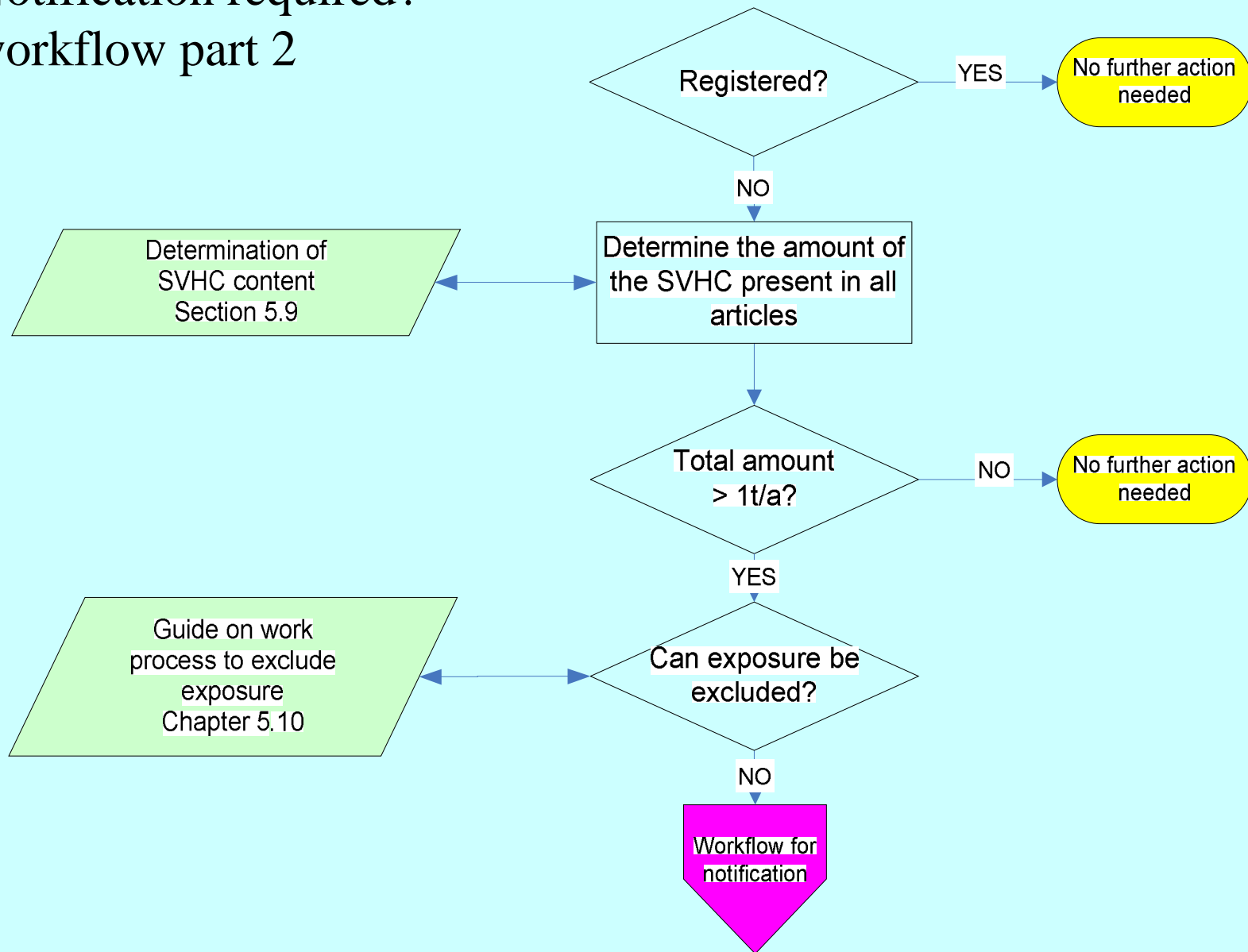
Identified Substances of Very High Concern in articles shall be notified when:

- q The substance is present in the articles in total over 1 tonne per producer/importer per year
 - q The substance is present in those articles in a concentration above 0.1% (w/w).
 - q If the producer/importer can exclude exposure of humans or environment he does not need to notify, but shall supply appropriate instructions to the recipients of the article.
-

Notification required? workflow part 1



Notification required? workflow part 2





Substances of very high concern

Substances of Very High Concern are:

- q PBT substances
 - q vPvB substances
 - q CMR cat 1,2 substances
 - q Substances of equivalent concern (Art. 56f)
-

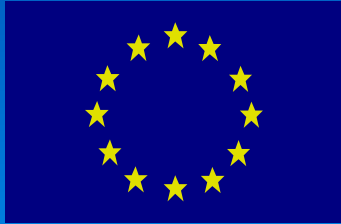


REACH Article 7.5

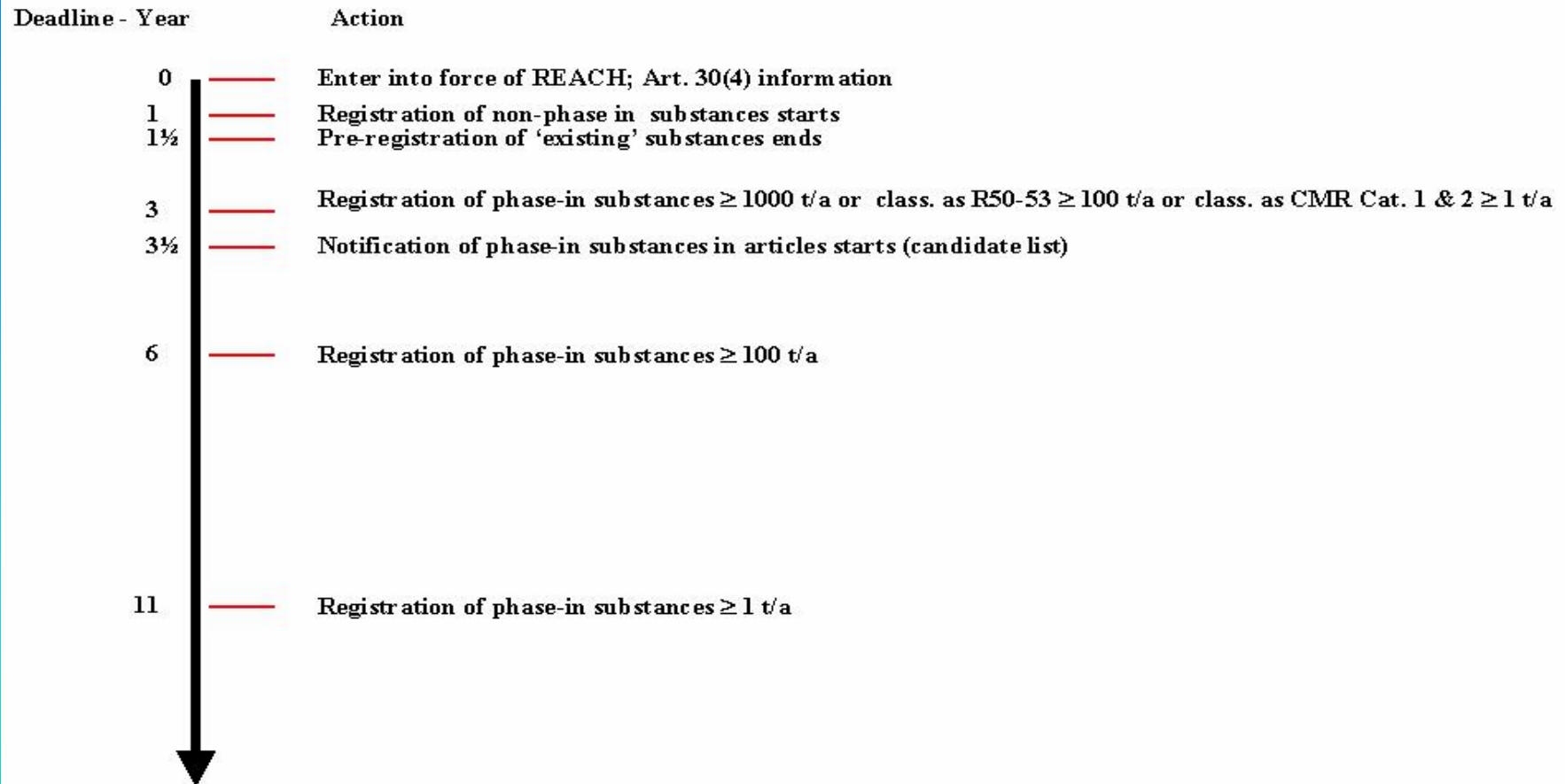
The Agency may require producers/importers of articles to submit a registration for any substance in those articles if:

- q The substance is present in the articles in total over 1 tonne per producer/importer per year, and
- q The Agency has ground for suspecting that the substance is released from articles and that release presents a risk to humans or the environment.

This may apply to SVHCs as well as other substances (not already required to be registered as substances in articles).



Registration deadlines





Start in time !

What?

- q Inventarise your articles
- q Inventarise the relevant substances in those articles
- q Check your obligations (see first slide)

How?

- q Use the guidance document on RIP 3.8 (ECB website)
 - q Communicate in your supply chain
 - q Use any contacts with/ help from branch organisations
-



European Commission - DG Environment

Informatie

E U R O P A

Thank you

<http://ecb.jrc.it/REACH/> > Documents > RIP final docs > RIP 3.8

<http://europa.eu.int/comm/environment/chemicals/index.htm>

<http://europa.eu.int/comm/enterprise/chemicals/index.htm>