

### A.3.2 Organise dialogues in the supply chain

The identification of uses of a substance is the first step in building exposure scenarios and carrying out a CSA for these scenarios. To carry out the CSA, the manufacturer or importer of a substance needs to possess or to collect sufficient information on how the substance is being used by the various actors in the supply chain. REACH does not require the M/I to collect all the details on uses. However the M/I is obliged to make himself aware of all the conditions which determine exposure, wherever his substance is used throughout his markets. This includes his immediate customers as well as the markets of his customers further down the chain. The level of detail required depends on the hazard profile of the substance, the principal exposure potential connected to the use, and the principal means of risk management the different user groups have at their disposal.

Two mechanisms are foreseen in REACH to increase the knowledge of M/I:

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<sup>10</sup> Companies re-introducing recovered substances (on its own or in preparations) as products into the market must however check whether or not they have to register these recovered substances.

#### **Interaction before registration:**

The downstream user has the right to make known his use(s), including supporting information on the conditions of use (or information on measured exposure levels) in writing one year before the corresponding registration deadline by the latest (December 1, 2009 for the first registration phase)<sup>11</sup>.

Also the manufacturers and importers may start a dialogue with representative customers to get more knowledge on the general or specific conditions of use downstream. There are various ways to start the dialogue. M/I may for example develop initial exposure scenarios based on in-house knowledge, and send these for feedback to selected/all customers before registration. Also visits to selected customer sites may be a useful way to promote the dialogue.