FAQ

What are my obligations as a customer of Brenntag under REACH?

As a customer of Brenntag your are, in terms of REACH, a Downstream User and as such you should follow the risk management advice and the operational conditions of use described in the extended safety data sheet (extSDS) received from the supplier. If applicable, forward the advice to actors further down the supply chain. If you as a Downstream User produce a preparation (you are a formulator), you must ensure that the extSDS for that preparation includes all relevant information received from the suppliers of the individual components. Please note: This was already a duty of downstream users under previous legislation. The new element under REACH is the receiving and forwarding of use-specific risk management advice and risk management measures relating to exposure to humans or the environment.

Under what conditions do I receive an extSDS?

A SDS extended by an Exposure Scenario is obligatory when the substance is classified dangerous and manufactured at a quantity of 10 tons or more or is assessed to be a PBT or vPvB. Depending on the registration deadline according to the manufacturer’s production volume of the dangerous substance the extSDS will be provided a few months after the respective registration deadline. If a substance is exempt, not classified as dangerous or produced at a volume below 10 tons, an extSDS will not be provided.

What – in a few words - is an Exposure Scenario?

By performing a Chemical Safety Assessment of a substance the registrant may conclude that the substance is dangerous and in that case the additional steps exposure assessment and risk characterization have to be made. The Exposure Scenario documents the result of the exposure assessment and risk characterization and describes under what conditions the chemical substance is manufactured or used safely in the areas environment, workplace and consumer during its life-cycle. The Exposure Scenario shall address all identified uses.

Will my uses be supported in the registration dossier?

We have communicated the information about uses which we received from our customers to our respective suppliers in accordance with Article 37. We believe that most of the common uses which have been identified by the various industry associations will be covered in the registration dossiers. Since Brenntag is a distributor we will not register any of the substances and we are not in the position to make any statements on which uses will or will not be included in the respective dossiers submit by our suppliers. The supported uses and conditions of use will be communicated via the SDS extended by Exposure Scenarios, the so called extended SDS (extSDS). Downstream Users are well advised to check their uses and conditions of use related to the substance soon upon receipt of the extSDS.

What if any of my use is not covered in the registration dossier?

If any of your uses / conditions of use appears not to be covered in the extSDS you have 12 months to make the missing use REACH compliant. According to Article 39-1 you may continue to apply this use / conditions of use during a 12 month period which starts at the date you receive the registration number communicated via the extSDS.

What options do I have, if my use is not covered?

During 12 months upon receipt of extSDS you may choose among several options to make your operations REACH compliant:

- Change conditions of use in order to be compliant
- Contact your supplier and inform about the missing use / conditions of use
- Select an alternative supplier which has covered missing use / conditions of use in his registration
- Special uses/conditions of use for which no registrant can be found may have to be assessed and reported to ECHA by the Downstream User himself (Articles 37-4, 38-1 and 39-2)

Can I continue to use substances supplied before registration deadline and that are not registered?

Pre-registered substances that were manufactured or imported and placed on the market before the relevant registration deadline can still be used and after this date by any downstream user, distributor or supplier in the supply chain even if the manufacturer did not submit a registration. Any actor down the supply chain who is not subject to the registration obligation may continue to use quantities of the substance that were supplied to them before the registration deadline.