



## **Frequently Asked Questions**

### **1. What is Solvay doing to implement the REACH Regulation?**

In order to ensure that the Solvay is well prepared to fulfil its REACH obligations, the implementation work started several years ago.

The Solvay REACH implementation structure was set up globally and is headed by a REACH Project Manager. This structure is organized around a REACH operational management team and it involves representatives of each business unit and experts in health, safety and environmental domains, in legal and public affairs, in communication, purchase and IT.

The pre-Registration was conducted successfully with dossiers submission in due time, ensuring supply and compliance continuity. With this pre-registration, Solvay confirms its intention to register its manufactured/imported substances, as such, in preparations or in articles.

Pre-SIEF discussions are already on-going as the consortia set up in order to organize cooperation modalities to prepare the joint submission dossiers with our competitors. Indeed the SIEF platforms will stay active over the next 10 years with a very first registration deadline by December 2010 for the high production/import volume substances and substances of high concern.

For all the chemical substances that Solvay is purchasing to be used in its manufacturing processes and/or in the formulations, Solvay has collected from its concerned suppliers the necessary information about their intention to pre-register and to register their substances in order to ensure the supply continuity.

### **2. How does Solvay facilitate communication with customers about registering substances and downstream uses?**

Facing the increase of its customers' questions and questionnaires, Solvay developed an efficient and helpful information management system to anticipate customers' requests.

Solvay is providing its supply chain with the information relating to the pre-registration status and registration intention on its substances subject to the REACH obligations. This information is delivered as "REACH Information Statement" (RIS); with the approval of the relevant business units, some of them are made publicly available on the Solvay internet site; the other RIS can be obtained upon request at the following e-mail address: [mailto: reachbox@solvay.com](mailto:reachbox@solvay.com)

Specific questions from customers will be managed on a case by case basis by the Strategic Business Units with support and validation by the relevant experts.





### **3. How Solvay has secured the supply continuity for its purchases?**

Two years ago, purchase, HSE and IT experts took the initiative to run a REACH impact study on the purchase materials involved in the Solvay manufacturing and maintenance processes. This aimed to identify REACH criticality of those materials in regards to purchase, HSE and process criteria.

In parallel, during the last 12 months a REACH supplier inquiry was run to get a clear position of our suppliers relating to their pre-registration commitment, registration intention and potential risk of de-selection of critical products and /or applications.

By the end of the pre-registration phase, more than 85 % answers were received from the suppliers showing more than 90 % pre-registration confirmation or REACH exemption status. Where uncertainty subsisted, Solvay contacted the suppliers individually and defined the further purchase strategy.

In those few cases, where no clear information has been obtained from the suppliers, Solvay has pre-registered the substances itself to benefit from the possibility to further import them if necessary.

In addition, all new purchasing contracts contain a REACH compliance clause.

### **4. How is it possible to find out whether a substance manufactured/imported by Solvay is pre-registered?**

ECHA shall publish on its website the list of all pre-registered substances by January 1, 2009. Downstream users of a substance not appearing on this list of pre-registered substances may notify ECHA of their interest in that substance and provide their contact details and, if relevant, the contact details of their suppliers.

The ECHA will then publish on its website the name of that substance and on request provide contact details of the downstream user to a potential registrant.

Regarding its own pre-registered substances, Solvay is providing its supply chain with the information relating to the pre-registration status and registration intention on its substances subject to the REACH obligations. This information is delivered as "REACH Information Statement" (RIS); with the approval of the relevant business units, some of them are made publicly available on the Solvay internet site; the other RIS can be obtained upon request at the following e-mail address:

*mailto:reachbox@solvay.com.*



## ***5. Can non pre-registered substances in stock continue to be used and marketed?***

Any downstream user can use and place on the market, without limitation in time, any batches of a substance that were supplied before 1st June 2008.

Any manufacturer or importer placing on the market after 1<sup>st</sup> June 2008 existing stocks of a substance manufactured or imported prior to 1<sup>st</sup> June 2008, is required to pre-register that substance before 1<sup>st</sup> December 2008.

If placing on the market happens after 1<sup>st</sup> December 2008, a late pre-registration is to be performed 6 months at the latest after 1<sup>st</sup> placing on the market and maximum 12 months before the registration deadline.

## ***6. How can a customer be ensured that his use is covered in the registration dossier?***

REACH requires manufacturers and importers to communicate how their substances can be used safely to protect humans and the environment.

The Safety Data Sheet is the main vehicle for communication down the supply chain. Such SDSs are mandatory for substances showing dangerous properties, i.e. substances classified as dangerous, and for preparations containing hazardous substances present at a certain concentration level.

The SDSs will report in the relevant sections the appropriate safety measures and recommendation as a result of the Chemical Safety Assessment (CSA) conducted on the substance for its intended uses. The CSA is required for substances produced or imported in quantities of 10 tonnes or more per year.

The new extended Safety Data Sheet (e-SDS) will include under the form of an annex the exposure scenarios relating to the intended uses of the substance with a description of the operating conditions, risk management measures and the substance use recommendations.

The workflow process on information exchange up and down the supply chain about intended uses and conditions of use is still under discussion; it aims to facilitate harmonized information flows by using as far as possible a Use Descriptors (UD) library and Generic Exposure Scenarios (GES) to document the intended uses and conditions of use.