

European Union (EU) legislation concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Summary

TICONA currently does not plan to withdraw products from the market because of REACH. The REACH process requires pre-registration and full registration of substances. On December 1st, 2008, at the end of the pre-registration phase, Ticona had pre-registered all critical substances for its polymer compounds. After pre-registration a transitional period allows the manufacture and import of substances with a registration at a later time between 2010 and 2018. The next step is the registration of substances manufactured or imported with a volume of greater than 1000 tons. To support this, Ticona is collecting data relating to exposure scenarios and exposure assessments.

Ticona believes that our customers' and suppliers' awareness of REACH is a key factor for an effective implementation, as their help and input will be required at the appropriate time.

Legislation

REACH is published as Regulation (EC) No 1907/2006 and came into force on June 1, 2007. Several steps need to be undertaken by the industry to comply with the legislation. Ticona is providing its customers and suppliers this communication to increase awareness of REACH and to detail actions TICONA is taking to become fully REACH compliant.

Pre-Registration

The first relevant step in the REACH process was pre-registration, which ended on December 1st, 2008. The list of substances we have pre-registered comprises the monomers for all our products manufactured or imported as well as performance additives where necessary. Meanwhile, Ticona has received confirmation from the European Chemical Agency (ECHA) that all our pre-registrations have been accepted. We have received a submission number and a "reference number" for each substance. These are administrative references intended to facilitate follow through of the substance from pre-registration to final registration. **The numbers are not product specific but specific to the registrant and will not be made publicly available. As they are not verifiable at ECHA, they cannot be used to prove pre-registrations to third parties.**

Registration

For substances that have been pre-registered, the registration dossier has to be submitted by the deadlines provided within the legislation. Information relevant for registration will have to be collected in coordination with other parties, mainly in the Substance Information Exchange Forums (SIEFs).

The outcome of the Chemical Safety Assessment as part of the registration dossier will depend on many factors including contributions from co-producers and other interested parties and cannot be fully predicted today. When preparing the Chemical Safety Report, TICONA will depend on the support and cooperation of our customers in order to procure the required information and documentation.

Unlike the former general listings under EINECS, the registrations under REACH are specific to the individual registrants.

The decision as to whether Ticona will register specific substances or not will eventually depend on a number of factors which might be beyond Ticona's control including environmental, safety and health concerns or business related considerations.

Use and Exposure Data

The minimum requirements for information on exposure are given in the REACH text. Currently, the Technical Guidance Document on preparing the Chemical Safety Report (CSR) [REACH Implementation Project (RIP) 3.2] is being discussed on an EU level with stakeholders from Industry and authorities. It has not yet been decided which information and in what level of detail will need to be utilised to develop exposure scenarios. This discussion includes questions regarding data confidentiality. **Ticona is collecting data to support registration of substances relating to exposure scenarios and exposure assessments.**

Products

Most of our products are polymers which are exempted from REACH. They are, by definition, preparations. It is the constituents of these preparations that fall under REACH. These include monomers and polymer additives at concentrations regulated by REACH. We will continue to take all necessary steps to become REACH compliant with all of our products.

In cases where our suppliers (manufacturers/importers) determine to discontinue supply of substances, i.e. to withdraw products, it will inevitably affect Ticona products. If this happens, Ticona will work closely with its customers to offer them acceptable alternatives.

Ticona believes that our customers' and suppliers' awareness of REACH is a key factor for an effective implementation, as their help and input will be required at the appropriate time. We trust that this communication has proven useful. Further information regarding REACH can be found at:

http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm

http://reach.jrc.it/navigator_en.htm

In order to support our customers and suppliers within the framework of their obligations under REACH as manufacturers or importers, we would be very receptive to suggestions and proposals in this area.

Kind regards



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