

To Vice-Presidents/Deans, Heads of Schools, HoFAs

From Dr Melanie Taylor

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cc Prof M Case, Dr S A Robson, Dr D Barker, Mrs C Barnes (Procurement Office),
School Safety Advisors, Safety Representatives

Reference Safety Circular 9/2009

REACH Update – the Registration, Evaluation, Authorisation and restriction of Chemicals

Action: HOSs are asked to ensure that all teaching and research staff are made aware of this circular, and the need to inform your chemicals supplier(s) of any uses not covered by the European Chemicals Agency (ECHA) "use descriptor system" .

This circular develops themes described in Safety Circular 1/2009.

Some suppliers of chemicals are contacting Downstream Users (DUs) at the University, and requesting completion of a return about their intended use of the substance. This is generally because they are starting the process of developing exposure scenarios and chemical safety assessments, as required by REACH. As implementation of REACH is phased, the first deadline of 30 November 2009 applies to pre-registered substances (the majority of existing ones) which are :

- manufactured or imported in quantities over 1000 tonne pa,
- substances that are class 1 and 2 carcinogens, mutagens or reproductive toxins, in quantities over 1 tonne pa, or
- substances that are very toxic to aquatic systems (risk phrases R50/53), in quantities over 100 tonnes pa,

[In each case, the quantity refers to a single manufacturer, supplier or importer into the EU, on any occasion since 2007.]

If your staff receive such a request for information, please ensure a suitable return is made promptly. This will ensure that the supplier includes your laboratory use in his exposure scenarios and chemical safety assessments. To improve and simplify the exchange of information between supplier and downstream user, the ECHA has set up a use descriptor system (so-called chapter R.12). In the majority of cases, you should be able to select the following descriptors:

Sector of Use (SU) - SU22 Public domain (administration, education, entertainment, services, craftsmen)

Chemical Product Category (PC) - PC21 Laboratory chemicals. (Many other descriptors could apply to specific uses, eg photochemicals, heat transfer fluids, biocidal products, polymer preparations, etc)

Process Category (PROC) - PROC15 Use as a laboratory reagent, non-industrial setting. Use of substances at small scale laboratory (<1 litre or 1kg). Larger laboratories and R&D installations should be treated as industrial processes.

Article categories (AC) – these apply to substances in articles with no intended release, such as cars, machinery, electrical and electronic products, etc. Generally speaking, the University does not produce such articles.

Please note: I have selected descriptors that seem most relevant to the majority of our activities. These will not necessarily apply where there is commercial exploitation of substances (eg with no educational use); or where larger scale trials are being conducted using > 1 litre/1kg per activity.

Additional guidance on information requirements and chemical safety assessment, Chapter R12: Use descriptor system is at http://guidance.echa.europa.eu/docs/guidance_document/information_requirements_r12_en.pdf.

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