

REACH – Downstream Users of Chemicals to Identify their Uses to their Suppliers before the 30th of November

The Textiles Uses-Descriptor

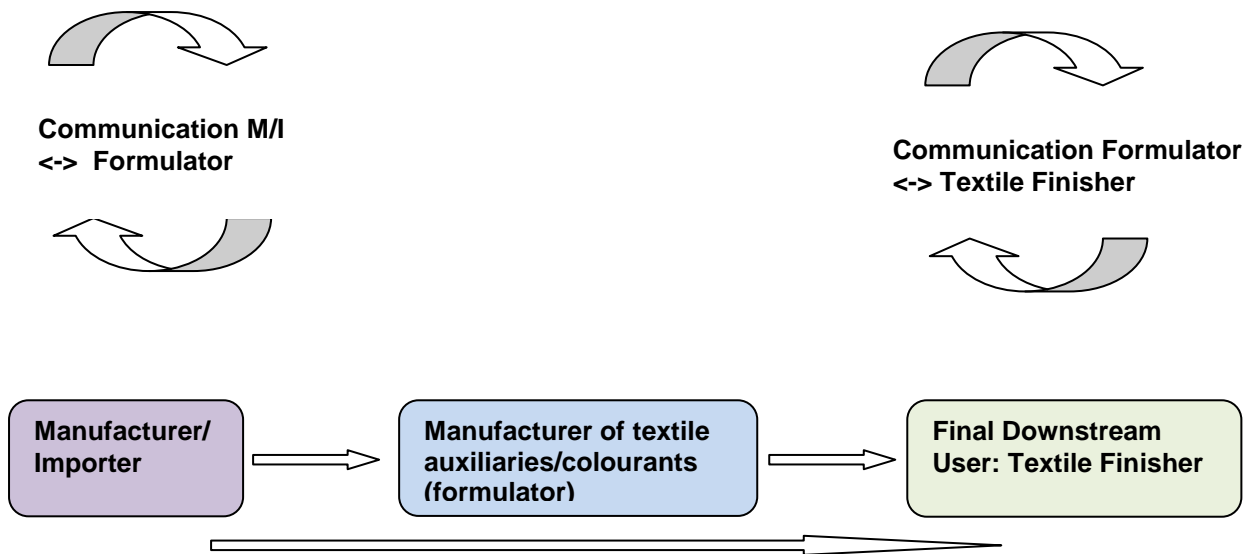
According to REACH, Downstream users of substances subject to registration may – after the end of the registration period – use these substances only if they are registered by the manufacturer/importer and if they are ‘permitted’ for specific uses by mentioning these uses in the safety data sheet. For substances in volumes of 10 tonnes or more per year, the registrant previously needs to perform a chemical safety assessment to demonstrate whether the substance can be used safely by the Downstream User, if necessary by following appropriate risk management measures.

Consequently, the Downstream User is motivated to make his uses known to the substance manufacturers (“identified uses”) – of course, without revealing any confidential business information.

According to Article 37 REACH the registrant explores within his chemical safety assessment, whether the substance can be used safely by the downstream user, provided that the Downstream user submits his request at least 12 months before the deadline in question – by 30 November 2009 for substances subject to registration by 30 November 2010 -. Since the Downstream User isn’t supposed to know the registration deadlines of all purchased substances it is to be expected that uses will be communicated independent of the registration deadlines of the substances.

Manufacturers of textile auxiliaries and their customers in the textile industry have to consider the following aspects:

- The formulator of textile auxiliaries and colourants should communicate the uses of his customers – i. e. uses of the chemical product in textile industry – to his supplier to make sure those uses will be covered by the exposure assessment carried out by the substance manufacturer/importer. Anyway, it has to be expected that the formulator will receive requests of his customers who ask for consideration of their uses.
- The finishers will have to communicate the use of chemical products not only to their suppliers of textile auxiliaries but to their suppliers of basic chemicals as well.



We have to consider a multiplicity of substances/mixtures as well as hundreds of customers and suppliers. Therefore all involved stakeholders depend on standardized formats and standardized terms concerning the transmission of the relevant information. That is why the Downstream User should know and accept the templates which have meanwhile been established within EU and should as possibly communicate his uses via the same format.

To speak the same language within the EU it is advisable to consider the „Use Descriptor Model“ which has been proposed by ECHA in the respective guideline („Guidance on information requirements and chemical safety assessment“, Chapters **R12 and R16**¹). With the help of those descriptors it is possible to communicate uses in a structured and standardized way. Concerning an appropriate communication format it is reasonable to use a template which has been developed by the Downstream Users of Chemicals Coordination (DUCC)-Group in Brussels.

There are more than 100 different descriptors that could theoretically be combined with each other (October 2009). But it is not advisable and not necessary to combine *all* those categories with each other.

This is why Centexbel, CIRFS, Essenscia, FEDERCHIMICA/AISPEC, TEGEWA and the respective textile associations in Belgium, Italy and Germany compiled the typical uses of the textile finisher. The typical uses in the fiber industry are communicated in a separate letter.

Twenty-one „**Standard Uses**“ have been identified, as well as some further uses which have to be communicated separately (see **Attachment**). With those 21 standard uses we presume to have covered 80-90% of all uses in textiles.

¹ At the moment revision by ECHA, finalization planned until the end of 2009.

It should be reasonable to proceed as follows:

The formulators of textile auxiliaries communicate the standard uses to their respective suppliers of chemical substances, asking them to cover these uses for all substances contained in textile auxiliaries/colourants. *(Please note: The intention is to inform the supplier about the uses he should explore within his chemical safety assessment. The registrant is not obliged to support those uses.)*

The formulator of auxiliaries may also use this compilation of standard uses to inform his customers about his efforts concerning the consideration of his customer's uses by forwarding the information to the registrant. It is to be expected that finishers will turn to their suppliers of auxiliaries and basic chemicals with such demands – and we expect them to do this with the help of the agreed format.

Concerning the uses not being identified as 'standard', the finisher will have to communicate those uses, e. g. niche applications, to his supplier with reference to the respective product. If possible, he should be motivated to do so by using the attached template and the information given there. The manufacturer of textile auxiliaries/colourants may ask his supplier of raw materials to support the ingredients of those products for the mentioned use.

CEFIC has already been informed about the results; the intention is to be included in the "overview of the activities relevant to REACH libraries carried out by industry associations". We therefore hope this joint approach will be widely accepted and adopted in the textile industry of all European countries.