

REACH & Supply Chain Risks

A Webinar for European Buyers of Chemicals



*Enabling Chemical Compliance
for A Safer World*

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Chapter I:

Case Studies: Common Risks Related to REACH

Case I: Fake REACH Certificate



Certificate No.: xxx-xxxxx-2010-001

Valid Until: 31/12/2010

REACH Certificate of Compliance

In compliance with the article 8 of the Regulation (EC) 1907/2006 of 18th December 2006 concerning the registration, evaluation, authorization and restriction of Chemicals (REACH), we hereby confirm that the non-EU manufacturer:

XXXXXXXXXXXXXXXXXXXXX Chemical LTD

having its principal place of business at

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

has appointed Chemical Inspection and Regulation Service Limited

having its principal place of business at

Singleton House, Laurence Street, Drogheda, Co. Louth, Republic of Ireland

as its Only Representative for REACH compliance of the following substances:

Substance Name	EC No.	CAS No.	Pre-registration / Registration No.	Tonnage (ton/y)	Registration Deadline
Paraffin waxes and hydrocarbon waxes	232-315-6	8002-74-2	17-211944xxx-19-0000	1~100	2018
White mineral oil (petroleum)	232-455-8	8042-47-5	17-211944xxx-17-0000	1~100	2018
Vinyl Acetate	203-545-4	108-05-4	17-xxx34xxx-17-0000	1~100	2018

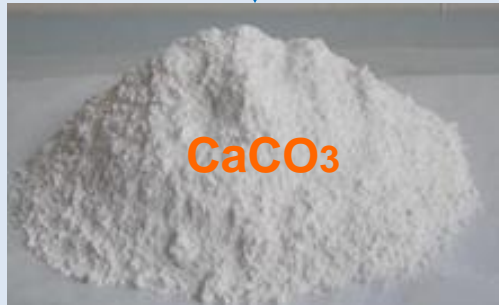
Challenges

- ☐ Template available to the public
- ☐ Hard to verify (pre)-registration No.
- ☐ You can essentially edit anything

Solutions

- ☐ Verify validity with issue body(OR)
- ☐ Ask for submission report

Case II: Valid REACH Certificate, Fake Product



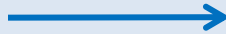
Challenges

- ☐ Valid REACH Certificate
- ☐ Similar Appearance
- ☐ Good Sample

Solutions

- ☐ Know Your Supplier
- ☐ Product Inspection Prior to Shipment
- ☐ Avoid Low Price & Small Traders

Case III: Is It Really An Intermediate?



Solutions

- ❑ Check type of registration with your supplier or OR(intermediate or full?)
- ❑ Check whether your use meets the definition of intermediate under SCCs

Case IV: Your Own Use Not Covered

Table 2. Identified uses for ZnO and corresponding Generic Exposure Scenario (GES)

IU number	Identified Use (IU) name	GES code
1	Zinc oxide production-Direct	GESZnO 0
2	Zinc oxide production-Indirect	GESZnO 0
3	Zinc oxide production-Wet	GESZnO 0
9	Component for production of inorganic zinc compounds	GESZnO 2
10	Electrogalvanizing	GESZnO 2
11	Electroplating	GESZnO 2
12	Zinc production by electrowinning	GESZnO 2
13	Laboratory reagent	GESZnO 3
14	Zinc production by pyrometallurgy	GESZnO 2
15	Zinc oxide production & refining	GESZnO 0
16	Component for production of organic zinc compounds	GESZnO 2
17	Component for production of Inorganic pigments	GESZnO 1, GESZnO 4
18	Component for production of Coatings / paints, inks, enamels, varnishes	GESZnO 1, GESZnO 4

Solutions

- ❑ Ask for identified uses
If suppliers have completed registration
- ❑ Ask for eSDS*
- ❑ Prepare CSR if not covered

eSDS of ZnO

Note*: eSDS is only required for substances that are sold in quantities of more than 10 tonnes per year **and** are classified as hazardous.

Case V: Is Your Supplier's SDS Compliant?



Challenges

- ❑ Wrong classification poses great risks to workers
- ❑ Legal obligations associated non-compliant SDSs on file

Solutions

- ❑ SDS Compliance Check(Classification/Format/Language/Section 8 &14)
- ❑ Designate a service provider to assist your suppliers; or
- ❑ Prepare your own SDSs & labels if needed.

Case VI: Have You Requested Tonnage Coverage Certificate?

The 'non-EU manufacturer' needs to inform all the EU importers in the same supply chain that he has appointed an only representative to conduct the registration thus relieving the importers from their registration obligations. A 'non-EU manufacturer' can only appoint one only representative per substance. The only representative's registration should clearly specify which quantity of the imported substance it covers – be it the entire import into the EU from a given 'non-EU manufacturer', or only specified quantities within that total. In cases where an importer is also importing quantities of the same substance from other non-EU sources, then both the only representative and the importer must be able to clearly document to enforcement authorities which imports are covered by the registration of the only representative; and which are covered by the importer; otherwise, the importer remains responsible for all his imports. In other words, an importer has to submit a registration for the quantity of a substance he imports, but does not have to cover the volume of the substance that is covered by the registration of the only representative.

Source: ECHA guidance on registration page 21

http://echa.europa.eu/documents/10162/13632/registration_en.pdf

Case VI: Have You Requested Tonnage Coverage Certificate?



Annex I: REACH Tonnage Coverage Certificate

According to "Guidance on REACH Registration (Version1.4)" published by ECHA, it is necessary that the "non-Community manufacturer" provides his only representative with up-to-date information on the list of EU importers which should be covered by the registration of the only representative and the quantities imported into the EU.

We hereby issue this volume tracking and tonnage coverage certificate to show the enforcement authorities of member states that the imported product delivered to the EU entity below is covered by the (pre)registration(s) of Chemical Inspection and Regulation Service Limited (OR) and is thus REACH compliant. The EU importer below will be regarded as downstream users and thus be exempt from REACH registration. However, the EU importer remains responsible for his import from other non-EU suppliers.

Exporter Information / Non-EU Entity Information

Non EU Entity / Exporter	Name	<-to be filled in->		
	Address			
	Contact person		Tel	
	Email		Fax	

EU Importer Information

EU Importer/Downstream User	Name	<-to be filled in->		
	Address			
	Contact person	<-to be filled in->	Tel	
	Email		Fax	

Imported Product Information

Trade Name and Description	<-to be filled in->			
Substance Name / Component Name	EC No.	CAS No.	Estimated Volume Covered	Uses of Substances
<-to be filled in->			<-to be filled in->	<-to be filled in->

Challenges

- ❑ Giving pre-registration certificate does not mean your import is covered
- ❑ Lack of documentation for inspection
- ❑ Suppliers may disagree with the volume of import

Solutions

- ❑ Ask OR for tonnage coverage certificate
- ❑ Free of Charge
- ❑ Document every import

Chapter II:

Obligations of Downstream Users

Obligations of Downstream Users/Importers - Checklist

- ❑ to provide information regarding their uses to suppliers of substances;
- ❑ to implement measures specified (in SDS, eSDS or CSR) by their supplier to ensure the safe use of the substance;
- ❑ to inform their supplier if they have new information on the substance;
- ❑ to comply with the conditions of any restriction which may apply to that substance
- ❑ to communicate with their supplier if using a substance included in the Authorisation List
- ❑ to comply with CLP regulation(classification/label/C&L notification)

Ref: <http://www.echa.europa.eu/web/guest/regulations/reach/downstream-users/downstream-user-roles-and-obligations>



Summary of Actions To Reduce Risks

- ❑ To verify the validity of REACH certificates received;
- ❑ To check the type of registration completed by suppliers/OR;
- ❑ To check if own use is covered;
- ❑ To request SDS/eSDS from suppliers or OR and conduct SDS compliance check;
- ❑ To request tonnage coverage certificate from OR to document that his own import is covered by the registration of OR/suppliers.

Chapter III:

REACH Compliance User Management System



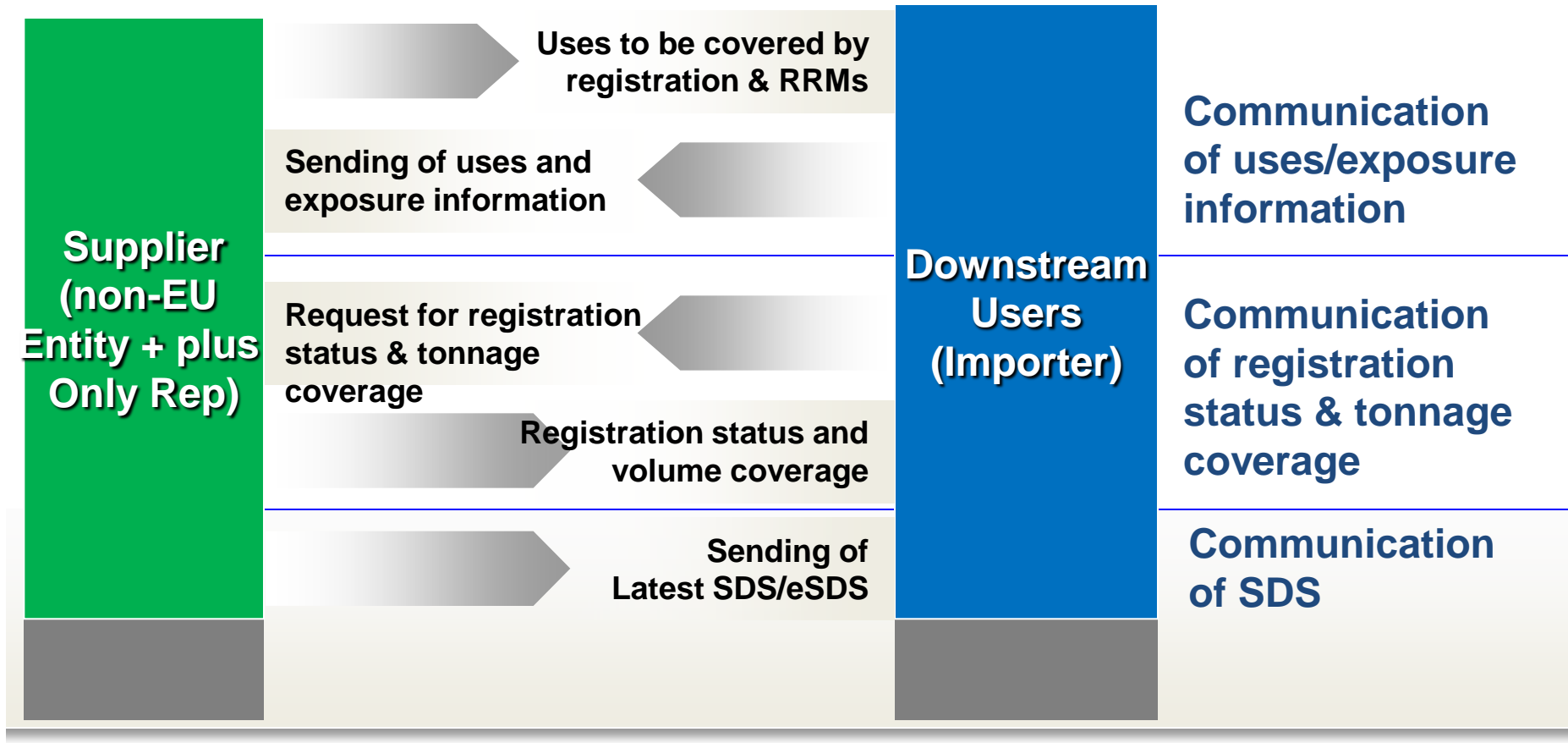
Why is RCUM system important?

Article 8(2) of REACH Regulation (EC) No 1907/2006

“The representative shall also comply with all other obligations of importers under this Regulation. To this end, he shall have a sufficient background in the practical handling of substances and the information related to them and, without prejudice to Article 36, shall keep available and up-to-date information on quantities imported and customers sold to, as well as information on the supply of the latest update of the safety data sheet referred to in Article 31.”



The Flow Chart of RCUM





1. Account Creation and Login
2. View (Pre-)registered Substance Info
3. Send SDS via RCUM
4. Apply for REACH Tonnage Coverage Certificate
5. Send REACH Certificate via RCUM
6. Company Info Management
7. Document Management
8. Account Management
9. About RCUM

Confirm REACH Tonnage Coverage Certificate

After a supplier has applied one, an email will be sent to importers/DUs for confirmation.

Dear Sir/Madam,

We have been appointed as REACH only representative of Hangzhou CIRS Co. Ltd and we have been requested to issue you a REACH certificate of compliance to confirm that the imported product delivered to you is covered by the (pre)registration(s) of Chemical Inspection and Regulation Service Limited (OR) and is thus REACH compliant. Could you please click the following link to confirm if the information below is correct?

Confirm link : http://rcum.cirs-group.com/confirm_Bussiness.html
Confirm Code : 4C60B86F-ABB4-4830-9423-AF1FFB106576

Confirmation Link, No Login Required

Non EU Entity / Exporter	Name	Hangzhou CIRS Co. Ltd		
	Address	1288 Chunbo Road		
	Contact person	Mr. Shi	Tel	
	Email	yunbo.shi@cirs-reach.com	Fax	
EU Importer / Downstream User	Name	CIRS Ireland Co. Ltd		
	Address	Dublin		
	Contact person	Yunbo Shi	Tel	
	Email	yunbo.shi@cirs-reach.com	Fax	

CAS	EC	EC Name	Tonnage	Use
65996-62-5	613-862-3	Starch, oxidized	8 tons	water treatment
590-00-1	611-771-3	2,4-Hexadienoic acid, potassium salt (1:1)	10 tons	leather processing

Substance , Tonnage & Use

By confirming above information, you will automatically receive a certificate of compliance for above import from CIRS free of charge. If above info is not correct, please click "reject" and inform your supplier of this.

Receive REACH Tonnage Certificate via Email

After you have confirmed the application, an email will be sent to you shortly with the certificate.

REACH Certificate of Compliance Issued for Hangzhou CIRS Co. Ltd for Year 2012



Inbox x



CIRS RCUM System

to me ▾

7:19 AM (1 minute ago) ☆



Dear Sir/Madam,

Attached REACH certificate of compliance is generated and sent automatically by REACH Compliance User Management System (RCUM) powered by Chemical Inspection and Regulation Service Limited(CIRS). It is recommended that importers or downstream users keep this certificate in a safe place and request a certificate for every import to show compliance to local authorities. To request a new certificate free of charge, please contact your suppliers or Ms Alice Qian(info@cirs-reach.com).

It is also recommended that importers verify the validity of a certificate received that is not directly sent by CIRS (OR) before paying any money to your trading partner or placing an order. To verify the validity of a certificate, please send email to Ms Alice Qian(info@cirs-reach.com).

For more info about practical REACH & CLP compliance tips, please go to:
http://www.cirs-reach.com/REACH/REACH_Guidance_Importers.html



C667B197-A8-F57-45A0.pdf

432K [View](#) [Download](#)

Download

Receive REACH Tonnage Coverage Certificate



Certificate No.: xxx-xxxx-2010-001
Valid Until: 31/12/2010

REACH Certificate of Compliance

In compliance with the article 8 of the Regulation (EC) 1907/2006 of 18th December 2006 concerning the registration, evaluation, authorization and restriction of Chemicals (REACH), we hereby confirm that the non-EU manufacturer:

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having its principal place of business at

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Vinyl Acetate	203-545-4	108-05-4	17-xxxx34xxxx-17-0000	1~100	2018

In capacity of the appointed Only Representative, Chemical Inspection & Regulation Service Limited is identified under the Universal Unique Identifier code (UUIID):

ECHA-03d098dd-4eb2-4740-ade9-7883xxxxxx

To fully comply with REACH, EU importers shall also apply for tonnage coverage certificate (see annex I) when importing products to EU. To verify the validity of this certificate or apply for new tonnage coverage certificate, please send email to info@crs-reach.com.

Signature (The Only Representative)

Yunbo Shi

Date: 30/07/2010

Yunbo Shi, Managing Director, Chemical Inspection and Regulation Service Limited



Contact: CRS LTD, SINGLETON HOUSE, LAURENCE STREET DROGHEDA, CO. LOUTH, IRELAND
TEL: +353 41 9806916 | FAX: +353 41 9806999 | WEBSITE: <http://www.crs-reach.com> | Email: info@crs-reach.com

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Annex I: REACH Tonnage Coverage Certificate

According to "Guidance on REACH Registration (Version 1.4)" published by ECHA, it is necessary that the "non-Community manufacturer" provides his only representative with up-to-date information on the list of EU importers which should be covered by the registration of the only representative and the quantities imported into the EU.

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Substance Name / Component Name	EC No.	CAS No.	Estimated Volume Covered	Uses of Substances
<-to be filled in->			<-to be filled in->	<-to be filled in->

Disclaimer: As only representative, we are obligated to keep above information confidential. We strictly abide by the EC competition law rules and will not disclose above information to any third party except enforcement authorities or use above information to get involved in the actual trade.

Signature (The Only Representative)

Yunbo Shi

Date: 30/07/2010

Yunbo Shi, Managing Director, Chemical Inspection and Regulation Service Limited



Contact: CRS LTD, SINGLETON HOUSE, LAURENCE STREET DROGHEDA, CO. LOUTH, IRELAND
TEL: +353 41 9806916 | FAX: +353 41 9806999 | WEBSITE: <http://www.crs-reach.com> | Email: info@crs-reach.com

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Summary

- ❑ Know your roles and take suggested actions to reduce your risks
- ❑ Have good documentation(SDS/Tonnage coverage certificate)
- ❑ REACH Registration 2013: time to ask if your suppliers will register or not before May 2013



*Enabling Chemical
Compliance
for A Safer World*



Thank You!



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