

*REACH – Communication of uses of chemical substances to the registrant; here: uses of leather auxiliaries and colourants in the leather industry*

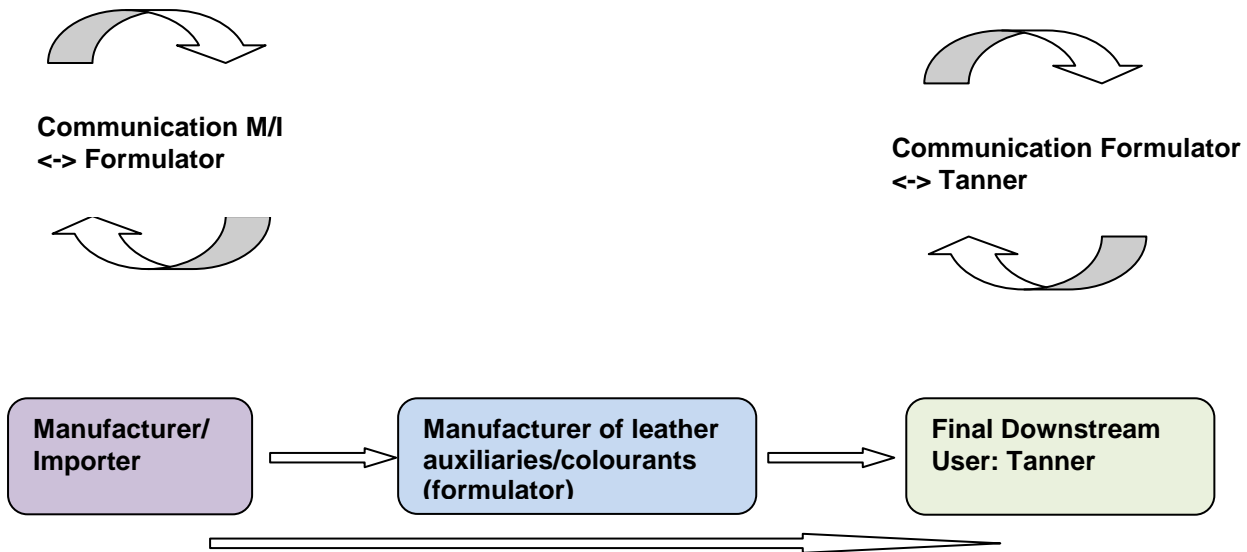
According to REACH, Downstream Users of substances subject to registration may – after the end of the registration period – use these substances only if they are registered by the manufacturer/importer and if they are „permitted“ for specific uses by mentioning these uses in the safety data sheet. For 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 – i. e. 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 leather auxiliaries and their customers in the leather industry have to consider the following aspects:

- The formulator of leather auxiliaries and colourants should communicate the uses of his customers – i. e. uses of the chemical product in leather 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 tanners will have to communicate the use of chemical products not only to their suppliers of leather auxiliaries but to their suppliers of basic chemicals like e. g. sulfuric acid 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“, Chapter **R12**). 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 Federchimica, TEGEWA and the relevant German customers' organization<sup>1</sup> compiled the typical uses of the tanneries.

Nineteen „**Standard Uses**“ have been identified, as well as some further uses which have to be communicated separately (see **Attachment**). With those nineteen standard uses we presume to have covered 80-90% of all uses at the tannery. It should be reasonable to proceed as follows:

<sup>1</sup> „Verband der deutschen Lederindustrie“

The formulators of leather auxiliaries communicate the standard uses to their respective suppliers of chemical substances, asking them to cover these uses for all substances contained in leather 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 tanners 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 tanner 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 leather auxiliaries/colourants may ask his supplier of raw materials to support the ingredients of those products for the mentioned use.