



Guidance on fulfilling the requirements on substances in articles under REACH (RIP 3.8)

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Direct contractor:

DHI Water & Environment

Carried out by:

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In co-operation with:

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Duration:

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Background

In October 2003 the EU Commission has proposed a regulation for a new European chemicals policy (REACH = Registration, Evaluation and Authorisation of Chemicals). Among other, article producers and importers will be required to ensure that intended or likely releases of dangerous substances from their articles do not pose a risk for human health or the environment.

In current EU legislation the term 'article' is not defined. The proposed definition in the current REACH proposals resembles the German definition and also some other international definitions of articles, but it leaves room for interpretation and misunderstandings. Furthermore, some other terms, like 'intended release' or 'reasonably foreseeable conditions of use' are not further explained.

The implementation of Article 6, which defines the requirements of article producers and importers, is not easy to understand. In particular the possibilities and strategies for identifying and quantifying dangerous substances in articles are not yet described.

Objectives and expected results

There are two main objectives of the REACH implementation project (RIP):

- Clarification, explanation and illustration of unclear definitions and terms of Article 6 in REACH
- Development of a guidance document for article producers and importers for the implementation of the requirements of Article 6.

In addition, discussion papers and inputs to other RIPs will be produced.

The results of the project will be a description of terms that facilitates the decision taking for industry actors on whether their products are articles or not, whether a release of dangerous substances from these is intended or



likely and if therefore the dangerous substances should be registered or notified to the European Chemicals Agency.

These clarifications and illustrations will be compiled in a guidance document, which will also contain concrete advise and work flows, by which the actions for decision taking are described.

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