# Good Practices Guidance

## Communication throughout the Supply Chain within the framework of REACH

Version 1.0

January 2015

**Translation in English made on April 2015.**

**PS : This Guidance does not replace at all any others Guidance such as AIG from Automotive industry or guidances from ETRMA. This Guidance is only focusing on some REACH items linked with the need to a better communication along the supply chain.**


### Writers

Estelle AUGARDE – SNCP: estelle.augarde@lecaoutchouc.com

Laurent SARABANDO – PSA Peugeot Citroën: laurent.sarabando1@mpsa.com

## Acknowledgments

This guidance is the result of a joint effort with the whole rubber supply chain, from the manufacturer/importer to the vehicle manufacturer. It was drafted with one representative of each supply chain actor and with the participation of the plastic manufacturing industry. We thank the professionals who gave their time and enabled this document to reflect in-field realities and challenges.

This joint effort was carried out as part of the GT FM 10 of the automotive sector platform (PFA).

## Contributors to the drafting of this guidance

Cooper Standard, Eric BRANCHEREAU –Plants purchasing manager
Hutchinson, Pascale GAROIS – Purchasing Department
Lanxess, Estelle MIETTON –HSEQ Manager — Regulatory Affairs
Lavollée, Pierre GABEFF – Head of the rubber & plastics department
UFCC, Gilles RICHARD – Executive Officer

## Companies / partner federations

Renault, Philippe ROLLAND – IMDS & substances manager
FIEV, Hugues BOUCHER – Innovation and Environment Engineer
Fédération de la Plasturgie et des composites, Marc MADEC – Head of Sustainable Development
Groupement Plasturgie Automobile, Amaury CORNILLEAU - Technical and Commercial Task Officer

# TABLE OF CONTENTS

# 1 Objectives

Since regulation (EC) n° 1907/2006 REACH came into force, the industry has been facing several challenges:

- Fulfil regulatory obligations (registration, communicating the required information, etc.) at risk of fines and/or prohibition of the marketing and/or use of a substance
- Anticipate obsolescence risks linked to the disappearance of substances:
  - For **regulatory reasons**
  - For strategic reasons

## • Purpose of this guidance

- Understand the main obligations of each supply chain actor in order to comply with the REACH regulation.
- Improve communication throughout the supply chain.
- Differentiate the regulatory obligations pertaining to aspects inherent to the customer/supplier relation or to the value chain.

## • Actors concerned by this guidance

All actors within a company concerned by the application of the REACH regulation, i.e. persons working in the following departments:

- Purchasing
- R&D
- HSEQ
- Sales

## • Revision of this guidance

This guidance aims to reflect in-field needs and issues. Therefore, it shall be revised as often as necessary. Consequently, feel free to address your comments on this guidance to the writers whose contact details are set out on page 1.

# 2 Glossary

- **Annex XIV:** List of substances subject to authorisation or forbidden.
Ex: The use of DEHP in Europe shall be forbidden as of 21/02/2015 except where an authorisation is granted.

- **Article:** An object which during production is given a special shape, surface or design determining its function to a greater degree than does its chemical composition.
Ex: Seal, tire, etc.

- **Article supplier:** Any manufacturer or importer of an article, as well as any distributor or any other supply chain actor who introduces an article on the market.

- **Authorisation:** Process enabling a substance of very high concern (art. 57), listed in appendix XIV to continue being marketed and/or used for a given application over a given period (Art. 55). The authorisation is granted by the European Commission.

- **Candidate List = list of substances candidate for authorisation under REACH:** List of identified SVHC substances likely to be included in annex XIV (Art 59).

- **CMR:** Carcinogenic mutagenic or toxic to reproduction substances.

- **CSR**: Chemical Safety Report.

- **Distributor**: Any natural or legal person established within the EC who stores and markets a substance, already introduced or imported, on behalf of a third party.

- **Downstream user:** Any natural or legal person established within the EC, other than the manufacturer or importer, who uses a substance, either as such or in a mixture, in the course of their industrial or professional activities.
Ex: rubber processor.

- **EFTA:** European Free Trade Association (Island, Lichtenstein, and Norway).

- **Extended SDS (eSDS)**: SDS + exposure scenarios. All substances do not require an extended SDS

- **Mixture:** preparation or solution composed of two or more substances.
Ex: Raw rubber Mixture, chemical substances on carrier materials.

- **OR (**Only representative): Entity in charge of REACH compliance for manufacturers based outside of the EU.

- **PBT:** Persistent, bioaccumulative and toxic.

- **Polymers:** Substances consisting of molecules characterised by the sequence of one or more types of monomer units. Such molecules must be distributed over a range of molecular

weights, where differences in the molecular weights are primarily attributable to differences in the number of monomer units. A polymer comprises:
a) a simple weight majority of molecules containing at least three monomer units which are covalently bound to at least one other monomer unit or other reactant;
b) less than a simple weight majority of molecules of the same molecular weight In the context of this definition a "monomer unit" means the reacted form of a monomer substance in a polymer.

- **Restriction**: "any condition or prohibition pertaining to the manufacture, use or marketing of certain dangerous substances, mixtures and articles.

- **RMOA:** Risk Management Option Analysis.

- **Substance:** A chemical element and its compounds in the natural state or obtained by a manufacturing process.
Ex: Carbon black, SBR, etc.

- **Substance manufacturer:** Any natural or legal person established within the EC who manufactures a substance within the Community.

- **SDS (**Safety Data Sheet): Where required, this document plays a key role in communicating the relevant information on substances and preparations throughout the supply chain (art.31).

- **Substance importer:** Any natural or legal person established within the EC who imports a substance within the community (responsible for the import).

- **Substance or mixture supplier:** any manufacturer, importer, downstream user or distributor introducing on the market a substance as such or contained in a mixture.

- **SVHC**: Substance of Very High Concern (Art 57): CMR 1A or 1B (according to regulation 1272/2008/EC), PBT, vPvB, or any other substance with a similar level of concern (endocrine disruptors, sensitizers, etc.).

- **vPvB:** Very persistent and very bioaccumulative. Substances of very high concern that are very persistent (very hard to degrade) and highly bioaccumulative in living organisms.

# 3 Reminder of the main processes of the REACH regulation which aims to improve health and environmental protection

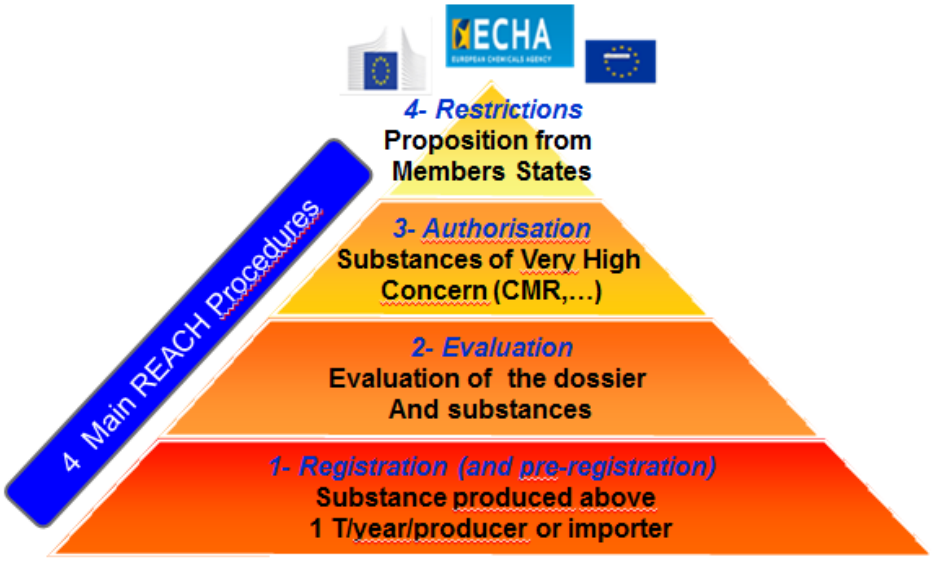
Since it came into force on 1 June 2007, REACH is the new single management system for chemical substances in Europe.

REACH aims to improve the protection of health and the environment while enhancing competitiveness of the EU chemicals industries.

To this end, the means adopted by the REACH regulation are as follows:

- Improve the knowledge of the dangerous hazardness nature of chemical substances used in the industry through the Registration procedure,
- Limit the use of substances of very high concern through the Authorisation and Restriction procedures.

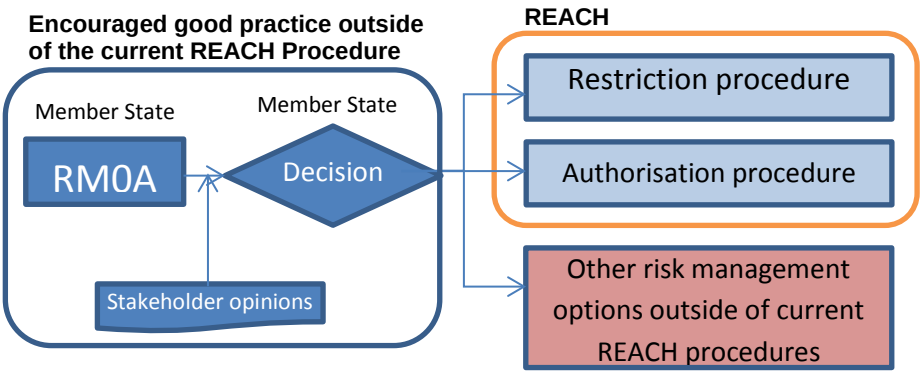
The REACH regulation relies on the 4 procedures set out below. These procedures concern the substances and apply differently for substances as such, or contained in mixtures or articles.



## 3.1 Towards a more balanced approach in selecting the authorisation or restriction procedure: compromise between protecting health and environment and preserving the European industry

For identified substances of concern, some Member States such as France have decided to carry out risk management option analyses (RMOA) in order to determine the most appropriate option:

- Authorisation or Restriction procedure,
- other risk management options outside of REACH procedures.




*This process from Industry point of view*

*Initially careful concerning the choice of some substances that have been integrated in the authorisation process and noticing the extreme difficulty to stop the process despite the authorities themselves recognising inconsistencies, the European industry warmly welcomed this new approach.*

*This process is all the more supported by the European Industry as the RMOA procedure includes the consultation of stakeholders, giving companies the opportunity to deliver its opinion on this RMOA.*

*The European Industry backed the implementation of this procedure with the European Commission and Member States in order to generalise this good practice.*

*A significant result was achieved as ECHA has now published PACT-RMOA substances, a list of substances for which the RMOA approach is or will be implemented by different Member States. This procedure is encouraged by the European Commission.*

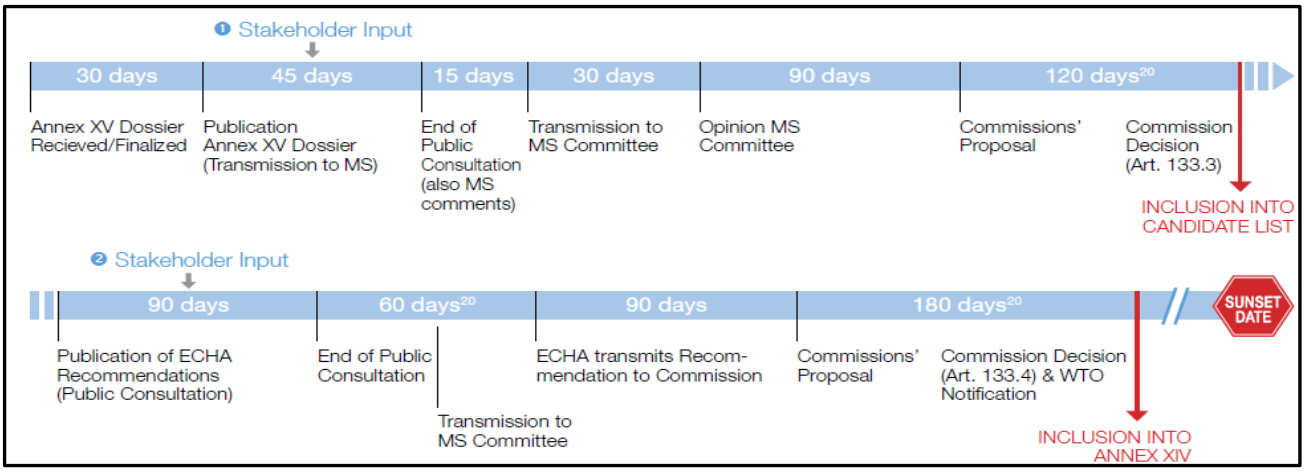
**> To go further:**

The preliminary RMOA procedure is a clear opportunity for the European Industry to defend the use of a substance in Europe by avoiding its integration in a REACH process (Restriction or Authorisation). If the industry is able to mobilise at this stage of the process, it may demonstrate, if necessary, that the best risk management option does not necessarily involve REACH processes. In this case, the substance would remain available on the market while still guaranteeing health and environmental protection.

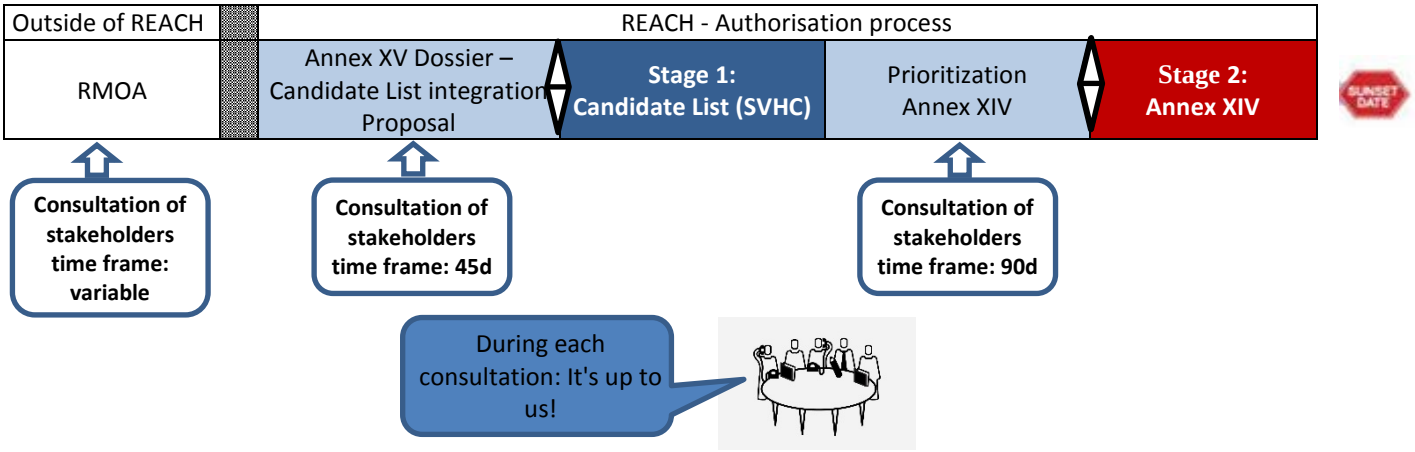
## 3.2 The Authorisation procedure

The Authorisation process ultimately aims at eliminating the marketing and use of substances of greatest concern for human health and the environment.

The diagram below shows the complexity of the process leading to authorisation which includes many decision-makers and stakeholders.




Below are set out the main phases of the Authorisation process to which companies are expected to contribute.




*An Example of a successful joint effort:*

ADCA is a blowing agent used in the manufacturing process of plastic and elastomer materials with many applications.

From 2012, several trade associations gathered together in order to analyse the impact of the inclusion of ADCA in the Candidate List and its prioritisation for annex XIV.

An "informal" multi-sector WG was created in order to:

- **Carry out a joint analysis of the impact of the authorisation of ADCA**
- **Draft a common supply chain argumentation**
- **Lead joint actions to raise the awareness of the authorities**

⇨ **Due to these joint actions, the authorities realised the authorisation process choice was not suitable for this substance.**

**> To go further:**

The Authorisation process enables companies to express themselves during **public consultations.**

The supply chain needs to be **responsive** and analyse as soon as possible the potential impact of introducing a given substance into this process. **Sharing analyses** provides a better view of risks and makes it possible to adopt the best strategy.

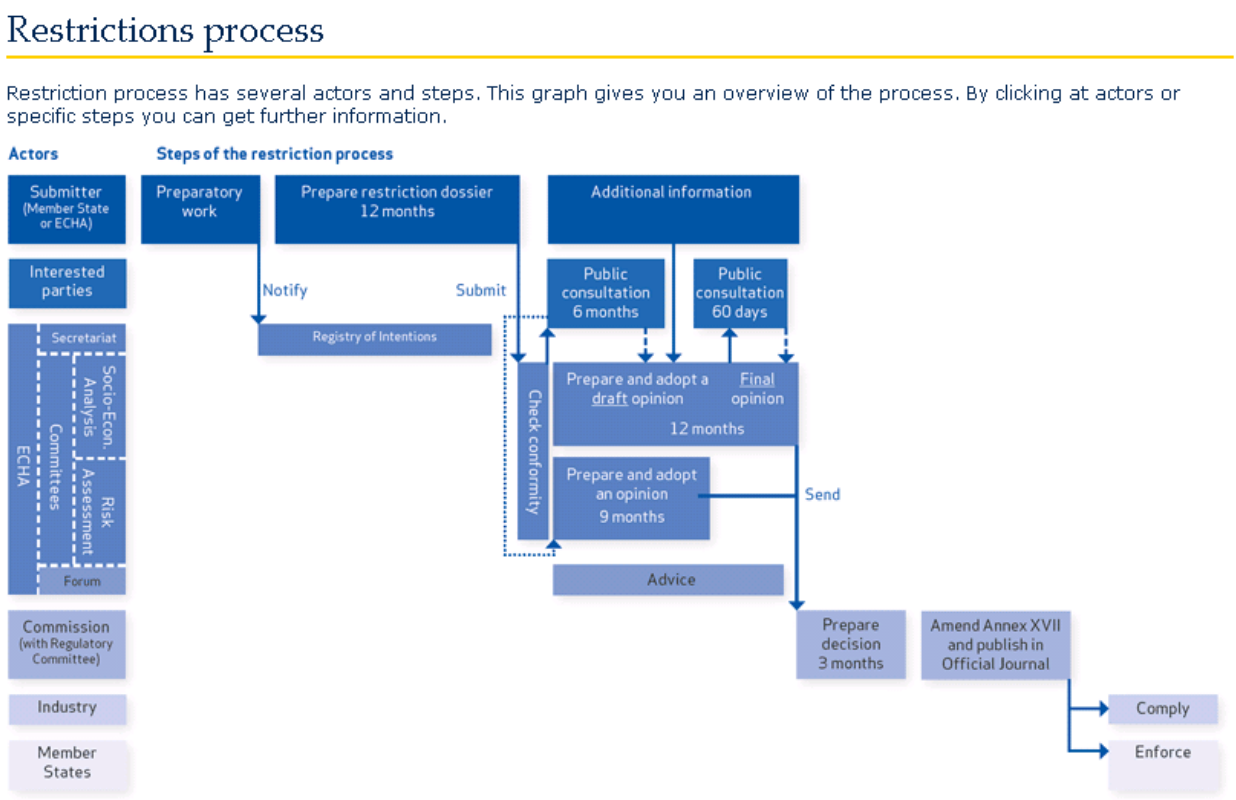
Providing information through trade associations is important and enables companies to keep their data confidential.

**Good practice**: Whenever the different lists (PACT-RMOA, Candidate List, Prioritization) are updated, analyse the presence of these substances in the products and processes.

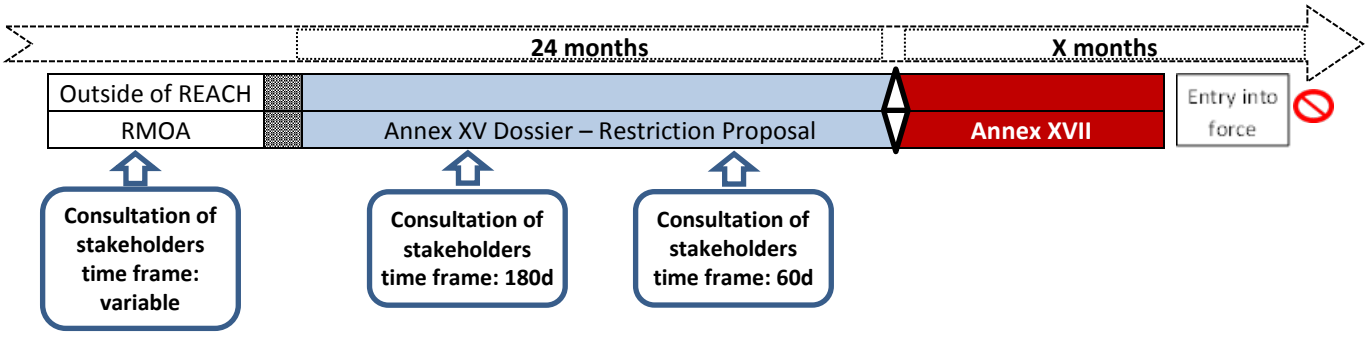
## 3.3 The Restriction procedure

This process aims to limit or forbid the presence of substances of very high concern in products (substances, mixtures, articles).

The diagram below shows the process leading to restriction which involves many decision-makers and stakeholders.




Below are set out the main phases of the Restriction process to which companies are expected to contribute.




# 4 Obligations of the supply chain

**Preamble**:
Each supply chain actor may have several roles/statuses in the REACH framework leading to different obligations.
→ It is thus necessary for each actor to carefully identify their different roles and corresponding obligations.

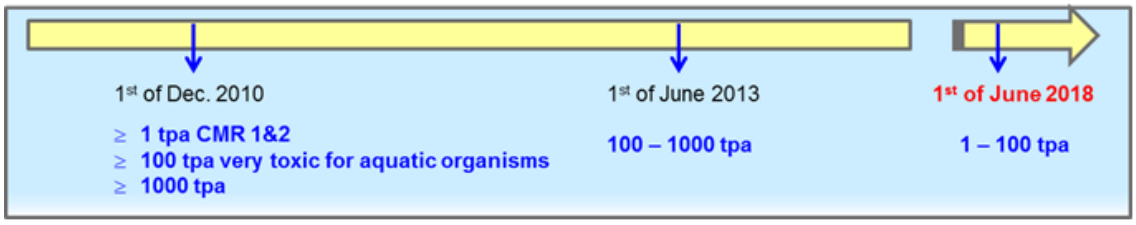
Example: a rubber processor may be:
- ✓ A substance importer
- ✓ A downstream user of the substance
- ✓ A manufacturer of articles

Some obligations are linked to the inclusion of substances in the Authorisation and Restriction processes. A reminder of these processes is set out in chapter 3 of this guidance.

## 4.1 Substance manufacturers

### Their obligations

- **Register** the substances they manufacture with a timeline depending on the tonnage band and/or toxicity, i.e. submit a registration dossier including toxicological and eco-toxicological data and the substance uses. Under Article 23, the substances pre-registered in 2008 were gradually registered according to the calendar set out in the diagram below. As regards newly marketed substances, these must be registered upon their introduction on the market.



## Reminder

Any registered substance for which the registration dossier was approved is given a registration number (in the 3 months following the submission of the dossier). This registration number must be communicated downstream in the supply chain for substances requiring a safety data sheet (SDS) or in one of the three cases set out in article 32 (where an SDS is not required but certain types of information must be communicated).
When registering a substance, the manufacturer shall indicate for which applications their substance may be used. **Any unregistered use may lead to difficulties in the use of the substance or may constitute an infraction in some cases.**

## Important

- *The quantities to be taken into account for registration are evaluated per legal entity. A substance may have been registered in 2010 by one manufacturer and only be registered in 2018 by another.*
- *Certain substances are exempted from registration (see article 2 and Annex IV), this is the **case for polymers** (macromolecular substances), food additives and certain substances pertaining to annex V, for example. These substances do not have a registration number. If in doubt, ask the supplier.*

### > To go further::

The substance registration obligation must be fulfilled in order to be placed on the market Registration costs may be high (Dossier preparation cost + ECHA fees ). Consequently, the decision falls under the company's business strategy.
However, the registration of a substance does not necessarily ensure the supply durability of the substance.

**Risks for the supply chain:** If a manufacturer decides not to register a substance, they shall no longer be able to sell it and the downstream user will no longer be able to buy it.

Where can the registration number be found in a SDS?
→ For a mono-substance product, the registration N° is indicated in section 1 of the SDS as shown on the following page.

SDS

**SECTION 1: Identification of the substance / mixture and of the company / undertaking**

**1.1 Product identifier:**

Product Name:

Reach substance Name : 2,6-Di-tert-butyl-p-cresol

REACH Registration No.: 01-2119555270-46-0000

***For further information:*** see the ECHA SDS guidance

**Note:** The allocation of a registration number does not lead to the update of the SDS. However, this number must be included in subsequent updates.

## • Communication of relevant information

### 1. Drafting SDS

In simple terms, the drafting of an SDS is required under article 31 of the REACH regulation and its Annex II (N° n°453/2010/EC) for:
- substances and mixtures classified as dangerous, PBTs, vPvBs or included in the Candidate List (art. 59)
- on request for a mixture classified as non-dangerous but containing:

- 1% (or 0.2% for gases) of substances hazardous for health or environment,
- 0.1% of PBTs/vPvBs or substances included in the candidate list, or a substance for which occupational exposure limit exist under European provisions

The SDS must be provided in one of the official languages of the Member States in which the substance / mixture is marketed. It is provided free of charge, in either paper or electronic format, upon ordering or whenever the SDS is updated (if an order was made within the past 12 months).

It must include the registration number of the substance where required under the regulation according to its nature (substance classified as dangerous or other criteria set out in the regulation), and where appropriate, the information linked with the Authorisation or Restriction.

### 2. Other documents

In certain cases, the registration number must be communicated while the substance or mixture does not require an SDS (art 32).
In this case, it may be communicated in electronic or paper format or, for example, be included on the delivery slip or order Acknowledgment of Receipt (AR) (free support).

The SDS format may also be used. If this option is chosen, it is recommended to specify that the SDS is not required under annex II of REACH.

**Note**
Downstream users often request an SDS even if it is not required. It is important to know that once an SDS is issued, the user has the obligation to apply the recommended safety measures, even if the SDS is not compulsory.

Example of an appropriate communication ➔ How may the question to the supplier be formulated in order to increase chances of obtaining a reply?

"Does this substance require an SDS under the REACH regulation? If not, could you please send me the necessary information for the use of this substance?

**> Reminder**

- Not all substances need to be registered (tonnage < to 1t or exemption).
- The different uses need to be identified in order to be covered by the registration dossier.
- Upon registration, a registration number is attributed to the substance even if the substance is not hazardous.
- If required under Art. 32, the registration number must be communicated within the supply chain through the SDS if required or through another communication medium (free format).
- The SDS does not need to be updated if the only modification is the addition of the registration number; it will be added during the first update following its attribution.

## 4.2 Importers of substances / mixtures from outside the EFTA

### Their obligations

**Under article 6**, when a substance is imported, the registrant is the entity responsible for its introduction on the customs territory of the European Community, whether as such or contained in a mixture or article.
The legal entity may either be the importer, an only representative (OR), or any other entity responsible for the import.

Importers have the same obligations as substance manufacturers (refer to paragraph 4.1).

## 4.3 Distributors of substances or mixtures

Either distributors or consumers, are not downstream users.
Distributors are companies or individuals who store and/or distribute chemical substances and/or mixtures. However, they may, depending on the case, cumulate different REACH statuses (importer, downstream user if they carry out formulation and/or repackaging/reconditioning operations) and thus cumulate the obligations of each status. It is important to clarify this in order to know which obligations apply to them.

### Their obligations

- Ensure the compliance of the products they distribute by fulfilling their general obligation to inform their customers (articles L 521-21 and R 521-2-14 of the Environmental code)
- Report the uses of their customers to their suppliers
- Communicate the information (SDS and other media) to their customers, for example whenever new substances are integrated into the Candidate List

## 4.4 Downstream users

### Their obligations

Whenever a downstream user uses a substance or mixture in their industrial processes, they must:

- Report the use they make of the substance to their supplier at least 1 year before the registration deadline.
  *Note: ETRMA created generic codes for rubbers in order to simplify this task.*
- Check that their use is included in section 1.2 of the SDS
- Notify ECHA if they use in their processes a substance set out in annex XIV for which an authorisation was granted for their use.
- For extended SDSs, check that the uses and conditions of use are taken into account in the exposure scenarios.

→ If their use is not taken into account, they must immediately contact their supplier as they cannot use the substance in question.

Where can the use be found in the SDS?

SDS **Section1.2**

**1.2. Relevant identified uses of the substance or mixture and uses advised against**

**Relevant identified uses:**

- Industrial uses [SU22]: Formulation of preparations (mixtures) - PC9a, PC18, PC24, PC31
- Professional uses [SU 3]: Lubricant and lubricant additive (PC24), Coatings and paints, thinners, paint removers (PC9a), Polishing agent (PC31), Ink and toners (PC18)

**Uses advised against:**

- Consumer uses [SU 21]: Coatings and paints, thinners, paint removers [PC9a].

**Reason why uses advised against:**

- Use on large surface area would potentially give excessive exposure to vapour

What to do if the use is not indicated?

⇨ In this case, the user must immediately inform their supplier. Under Art 37.3, the registrant has 1 month to update their dossier and include the use or were appropriate, inform their customer that the use shall not be taken into account. If the registrant does not wish to update their dossier (for human health or environmental protection reasons), the downstream user must then draw up their own CSR and transfer it to ECHA, unless the volume used is less than 1 tonne/year (article 37.4 c). They must in this case notify it to ECHA.

The downstream user shall have different obligations depending on whether they are marketing a mixture or an article.

- **Downstream User – supplier of mixtures (formulator)**

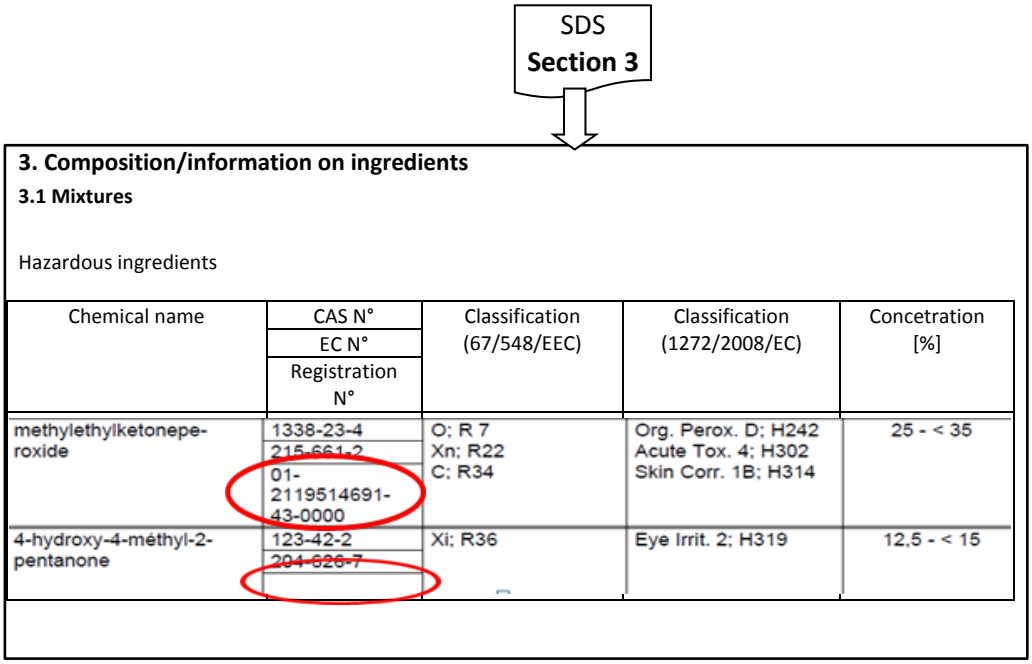
## Obligations to their customers

Under article 31, mixture suppliers shall provide recipients of the mixture with a safety datasheet established in compliance with annex II.

The mixture supplier shall draft the SDS in compliance with article 31 (see drafting of SDS in paragraph 4.1) and shall include the substance registration numbers set out in each substance's SDS. The relevant information for the drafting of a mixture SDS are set out in the SDS of each substance contained in the mixture.

***Note:*** *Only substances are registered, therefore there is no registration for mixtures and no registration number is attributed to these.*

*Where can the substance registration N° be found in a mixture SDS?*




⇨ This example highlights the fact that not all substances have a registration number yet.

*Extract from the ECHA Guidance*

**SECTION 3: Composition/information on ingredients**

**3.1 Substances**

| CAS No. | Substance Name | EC No. | REACH Registration No |
|---|---|---|---|
| 77777-77-1 | ECHA Substance | 11111-11-1 | XX-XXXXXXXXXX-XX-XXXX |
| - | Impurity 1 | 22222-22-2 | - |
| - | Impurity 2 | 33333-33-3 | - |

*In which section can the information on an SVHC subject to restriction or authorisation be found?*

⇨ *This information may be found in*

- ***Section 2 "Hazards identification"****: indicating the presence of substances set out in the "SVHC" Candidate List*
- ***Section 15.1 "Regulatory information"****: indicating complementary information if any.*

***Section 15.1 is privileged.***

*Section 15 illustration*

SDS

**SECTION 15: Regulatory Information**

**15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture**

**EU regulations:**

Authorisations and/or restrictions on use: None

Other EU legislation: Commission Regulation (EU) No 474/2014 of 8 May 2014 amending Annex XVII to Regulation (EC) No 1907/2006

Commission Regulation (EU) No 944/2013 of 2 October 2013 (5th ATP) amending Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures

Waste Framework Directive 2008/98/EC.

- **Downstream User: Manufacturer of articles**

### Obligations to their customers

Whenever a downstream user put an article on the market they must:

- Comply with article 33 of the REACH regulation by indicating to their customer if the article contains over 0.1% w/w of a substance of the the Candidate List and the conditions for safe use. This is referred to as article 33 declarations.

**Note:** It is not necessary to establish a declaration to indicate the absence of any substances of the candidate list.

- check whether any substances contained in their articles are included in the Candidate List upon each update of the latter.

Where can this list be found on the ECHA site?

At the following address: http://echa.europa.eu/fr/candidate-list-table

This list is updated twice a year, generally in June and December.

- Notify ECHA in compliance with article 7.2 of REACH. Substances in articles only need to be notified when all of the conditions below are met:
  - The article contains a substance of the "Candidate List" for which the % (weight/weight) > 0.1%
  - AND the volume of the substance in the article > 1T/year
  - AND health/environmental exposure cannot be avoided
  - AND the substance is not already registered for the use in question.

**> Reminder:**

- The downstream user has a real role to play in the implementation of REACH.
- Communication with the supply chain (Article 33) is a regulatory obligation.

*Note:* Interpretation of Art 33 by dissident States

Contrary to the European Commission's interpretation, France and 5 other countries (Belgium, Denmark, Germany, Norway and Sweden) have issued their own interpretation of Art. 33.

These 6 countries consider that the definition of the article does not correspond to the article marketed as such but to the smallest article composing the overall article (e.g.: in the case of a leather belt, the article must not be considered at the belt level, but at the metal buckle and leather strap levels). This interpretation has an impact on the application of articles 33 (Candidate List Communication) and Art7.2 (Notification)).

**> To go further:**

The French authorities have indicated that the audits aiming to check companies' compliance with the REACH regulation shall be carried out according to the French interpretation. The latter became admissible in France through a Notice issued in the French Official Journal JORF N°132. However, the European Court of Justice was seized and shall rule in order to determine a final interpretation applicable to all the Member States.

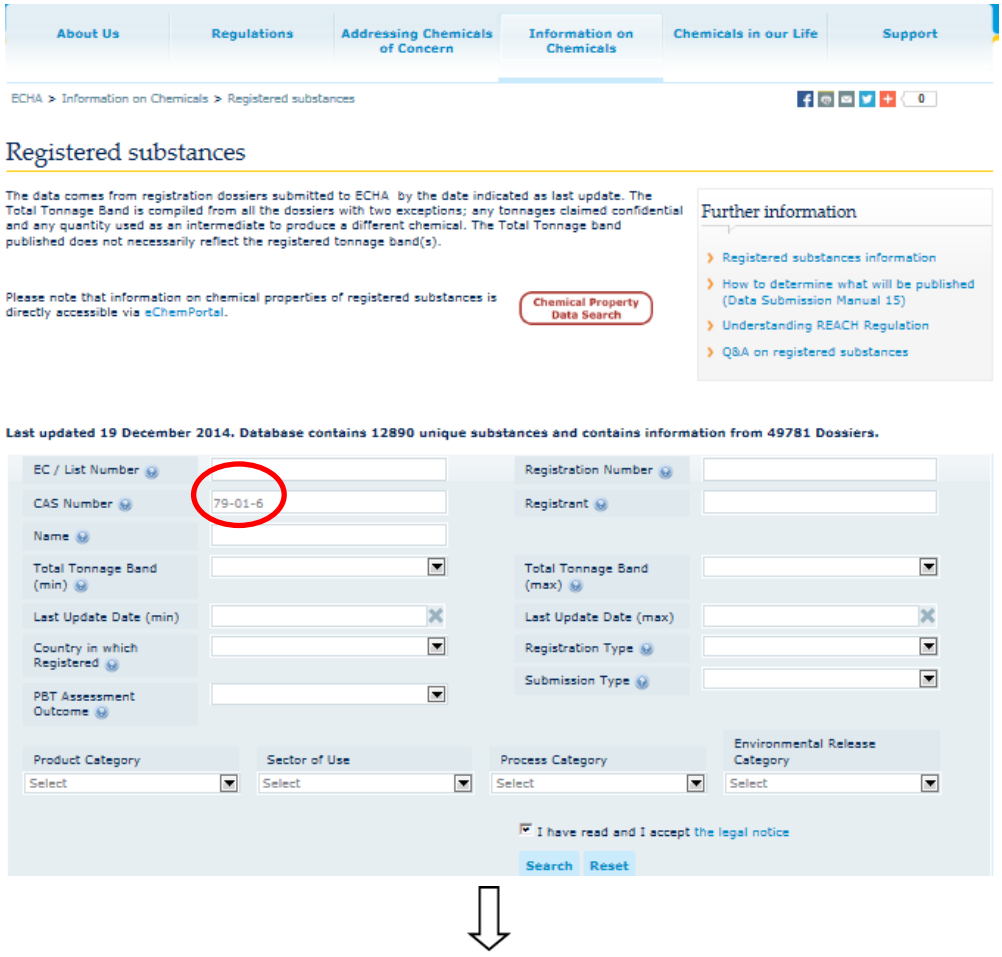
# 5 A few concrete cases

## • Communication to the suppliers

I have a substance but not its registration number. How can I find out whether the substance complies with the regulation?

Reminder: a substance may not be registered due to a tonnage band between 1 and 100T (or exempted). This may also vary according to the suppliers (for a same substance, one supplier may be over 100T and another under 100T).

⇨ A first indication may be obtained by checking whether the information is available on the ECHA website by entering the CAS number in the search area (ex: 79-01-6 trichloroethylene)




| EC / List No. | CAS No. | Name | Registration Type | Submission Type | Tonnage Band | Voir |
|---|---|---|---|---|---|---|
| 201-167-4 | 79-01-6 | trichloroethylene | Full | Individual Submission | 0 - 10 tonnes per annum | |
| 201-167-4 | 79-01-6 | trichloroethylene | Full | Joint Submission | 10,000 - 100,000 tonnes per annum | |

⇨ *In the screenshot above we notice that 2 registration dossiers were submitted for the same substance.*

Write a letter to the supplier.

⇨ Letter suggestion:

*You supply substances to us which must comply with regulation EC 1907/2006, REACH. Could you guarantee us that these substances fulfil the registration obligations?*
*By complying with the regulation, we mean that substances which should have been registered in 2010 and 2013, were indeed registered and those which need to be registered in 2018 are pre-registered*

**Note**: *It is important to keep a record of the exchanges with the supply chain. In the case of an inspection by the authorities, these letters may be used as evidence.*

## • Internal communication within a company

The person in charge of the regulation and the persons receiving the information (SDS or other document) may be different.

⇨ Internal communication between the departments that may receive information from suppliers and those sending information to customers is essential.
Consequently, it is vital to provide to operational persons the basic notions of the regulation allow them the analyse of relevant information when receiving an SDS or any other equivalent document and to answer questions from DREAL (French regional directorate for environment, planning and housing) during an inspection audit.
Services concerned by REACH:

- Purchases
- R&D
- HSEQ
- Sales

# 6 The main points to be remembered in order to comply with the REACH regulation and anticipate obsolescence risks

## • Identify your obligations:

- Determine your REACH statuses
- Inventory the substances used in your products and processes

## • Better communication within the supply chain:

- Communication must be concise to be efficient.
- Each communication must clearly define the purpose of the request and include the context and regulatory reference.
- The supply chain needs to be reactive and analyse as soon as possible the potential impact of introducing a substance in the PACT-RMOA list, or in the Authorisation or Restriction processes. Within each company, this means identifying the presence of these substances in the products and processes.
- Sharing analyses with your trade association and the supply chain provides a better view of risks and achieves the best approach (?).
- Either advocacy issues, or consultations carried out throughout the supply chain, must be consistent. This is a key factor for success to preserve, if necessary, the possibility to use the substance.

## • Better internal communication:

- Good communication within the company is essential.
- Set up a REACH communication process within the company
  "Information is often available but is not reported to the REACH manager".

> Let's go:

**Now, it's up to us to implement these recommendations:**
**Let's communicate and work together as we all stand to benefit from it!!**

We remind you that this guidance must reflect the needs and difficulties of all actors concerned. The implementation of this regulation is ongoing and new challenges still await us. Thus, please share your ideas and needs with us in order to improve this guidance.

# 7 Reference documents and websites

- ECHA website : http://echa.europa.eu/home
- French REACH HelpDesk: http://reach-info.ineris.fr/
- ECHA Guidance on SDSs: http://view.pagetiger.com/ECHAeGuide1-1/Issue1
- PACT-RMOA substances: *http://echa.europa.eu/fr/addressing-chemicals-of-concern/substances-of-potential-concern/svhc-roadmap-implementation-plan/pact;jsessionid=1334BFE1411A2797F6D6C86534920823.live1*
- Candidate List for authorisation: http://echa.europa.eu/candidate-list-table

Annex XIV: http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list

- Annex XVII: http://www.ineris.fr/aida/consultation_document/153
- ETRMA generic codes for rubber exposure scenarioshttp://www.etrma.org/activities/chemicals/reach/exposure-scenarios
- Link toward the Interpretation of Art 33 by dissident States: http://reach-info.ineris.fr/sites/reach-info.gesreg.fr/files/file_upload/File/pdf/Guides/Guide_articles_FR.pdf
- Link towards the MEDDE (French ministry for environment, sustainable development and energy) site: http://www.developpement-durable.gouv.fr/REACH,30375.html

# 8 Versions history

| Version index | Date of modification | Nature of the modifications |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |
| Version 1 | January 2015 | Creation |