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Synthomer Uses Document

REACH Registration of Substance Use

Synthomer manufactures, formulates and sells polymer products. Under REACH, it is the additives and other starting materials of Synthomer products that are subject to Registration.

REACH requires that identified uses are specified during Registration. These will typically be reported by a Use Descriptor System. It may also be appropriate to categorise uses of substances in more general Use and Exposure Categories.

Most Synthomer products are non-dangerous (i.e. non-hazardous). Therefore, these will not usually need specific Exposure Scenarios developed under REACH¹. Nevertheless, Synthomer wants to ensure that all registrations sufficiently cover the use of the raw material substances and additives that go into its products.

Synthomer Action

Through the Use Descriptor System, Synthomer aims to check that all its product uses in the EU are appropriately covered under REACH – see Appendix 1.

The following use descriptors apply across the Synthomer product ranges:

SU3 – Industrial Manufacturing (all manufacturing categories)
PC32 – Polymer Preparations and Compounds

Synthomer is currently applying the appropriate Use Descriptor System categories to our product ranges and organising products according to Use and Exposure Categories.

Therefore, for the moment, we ask that you please refer to our SELECTOR brochures for a better understanding of the product intended use.

Generally, Synthomer products have applications involving:

PROC1 to 13
AC02, AC03, AC05, AC06, AC08, AC09, AC10, AC11, AC12, AC13

Therefore, we generally expect to exclude certain categories from registration, specifically:

PROC 15, 16, 18, 20, 24, 25
AC04, AC07

As the Use Descriptor System is further developed, the assignment of Environmental Release Categories may be necessary.

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Supply Chain & Downstream Users

Under REACH, downstream users (i.e. customers and users) of Synthomer products can choose to let their uses be known to Synthomer, but this is in no way an obligation or requirement. If this is done at least 12 months prior to a relevant registration deadline (e.g. one year prior to Dec 2010 for high tonnage substances), then the downstream user may be required to supply exposure information relating to its use of a substance, which the downstream user may be obliged to generate, including a substance in a preparation (i.e. products).

After registration, it may be necessary to check that a use has been appropriately covered. At that time, it should then usually still be possible to cover uses by either updating registration dossiers or covering uses appropriately through Chemical Safety Assessments. These Chemical Safety Assessments may be performed by Synthomer or its downstream users, or in joint collaboration.

Updates & Contacts

If you seek to provide exposure information on the products that you use, please contact reach@synthomer.com with 'Use and Exposure' in the e-mail subject header. Please use the Use Descriptor System notation to describe your use categories from the official REACH guidance available at:

http://guidance.echa.europa.eu/docs/guidance_document/information_requirements_r12_en.pdf
(currently only available in English)

Failure to include the correct e-mail subject header or use the appended use descriptor system may result in an incorrect recording and assessment of your requirements.

Please note that the official Use Descriptor System may be subject to changes and updates. Synthomer will seek to ensure that descriptions are carried over appropriately.

For further information on REACH please see our Synthomer website at www.synthomer.com.

Ruth King

Regulatory Affairs Scientist and Reach Coordinator

¹ If a substance is dangerous (i.e. hazardous), then Exposure Scenarios are often necessary that describe the Operating Conditions and Risk Management Measures to ensure that substances can be used safely. Exposure Scenarios will then be annexed to Safety Data Sheets. For preparations (i.e. mixtures of substances), these must combine the relevant Exposure Scenarios of the ingredient substances.