

Dow Silicones' Product Uses & REACH Registration

The REACH regulation requires the registration of the intended uses of a chemical substance so that the risks associated to the use of that substance in a particular application can be adequately assessed and appropriate safe handling instructions provided by the supplier. Since the introduction of the REACH regulation, Dow has worked with our downstream users to understand and document the uses of our products. Please read on for further information on Dow's position on REACH product use registration and the possibility to communicate any non-standard use of Dow Silicones' products.

Dow Position on the Registration of Uses

1. Dow Silicones product is a pure substance produced by Dow:

Dow has registered, or intends to register, standard uses identified for this substance as sold to our customers according to deadlines set forth in the REACH regulation. Substances already registered by Dow, and their related uses covered in the registration dossiers, are available directly from the ECHA website:

http://echa.europa.eu/information-on-chemicals/registered-substances

2. Dow Silicones product is a polymer or a blend of polymers produced by Dow:

The REACH regulation does not require the registration of polymers. Dow has registered, or intends to register, the starting monomers used to produce these polymers. The identified uses of the polymers do not have to be reported in the registration dossiers of the corresponding monomers.

3. Dow Silicones product is a mixture of substances produced by Dow and purchased raw materials:

When the product is a mixture of substances produced by Dow and purchased raw materials, Dow has registered to the extent required standard uses identified for the product in the registration dossiers of those substances produced by Dow and present in the product. Substances already registered, and their related uses covered in the registration dossiers, are available directly from the ECHA website:

http://echa.europa.eu/information-on-chemicals/registered-substances

Dow has reported the identified standard uses to the suppliers of raw materials included in the product. In case the concerned raw materials are substances, Dow is currently working to confirm that these uses have been covered in our suppliers' registration dossiers. Until this confirmation process has been completed, Dow cannot confirm the registration status of any uses at the level of such product mixtures.

Questions or New Product Use Communication

Should you have questions related to a specific use of a Dow Silicones product, please contact us at: reach.support@dow.com.

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Updating REACH Dossiers with New Uses

Should a new use be identified for a particular Dow Silicones product, Dow will assess if this use is already covered by any exposure scenario already registered as part of our registration dossiers. Should this use not be covered, and provided this new use is supported by Dow and can be safely continued, Dow may include this additional use in the respective registration dossier(s).

In parallel, Dow will communicate the new identified use to the supplier of any raw materials contained in the respective product composition.

Please be aware that there will inevitably be a time delay between confirmation of acceptance of a new product use communicated to Dow and that new use being covered in the registration dossiers of the substances in that product. Dow will strive to update dossiers within a reasonable timeframe dependent on the priorities and workload within the silicone industry consortium managing our registrations.

Should customers, for confidentiality reasons, not wish to disclose their use of a Dow Silicones product (that contains substance(s) manufactured in or imported into the EEA by Dow), REACH allows for the downstream user to assume the sole responsibility to register their use of such substances directly with ECHA.

Generic Use Lists

Occasionally, Dow receives requests for the registration of entire lists of generic combinations of uses. Dow Silicones has adopted the policy that we will only consider requests for the inclusion of new uses that are communicated product by product and are a realistic reflection of the actual use of that product in that supply chain. Including all combinations of uses in such generic lists for all products purchased not only creates a huge and unnecessary workload but also has implications on the outcome of the risk assessment. It is possible that risk assessments on use combinations, that in practice are not relevant for that substance, may lead to overly-stringent risk management measures to which the Downstream User will then be obliged to comply. Therefore, Dow kindly requests that you communicate your specific uses for each specific Dow Silicones product you purchase.

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