



EU-REACH: Registration, Evaluation, Authorisation of Chemicals (Regulation EC 1907/2006)

Dow – one of the world’s leading manufacturers of silicone materials – has a long established commitment to Responsible Care and focus on sustainable development. Dow fully supports the aims of the REACH regulation. These include improving levels of protection to human health and the environment and requiring the chemical industry to have an appropriate level of knowledge of the properties of chemicals, their uses, and to manage risk through the supply chain.

REACH entered into force on 01 June, 2007. The regulation requires a significant amount of information to be generated and exchanged among supply chain partners and with the European Chemicals Agency (ECHA). Dow has developed tools to enable a structured, effective and secure exchange of information between customers, channel partners and suppliers.

As supply chain members work to comply with REACH, we have seen an increasing demand for information, which is accompanied by various forms and questionnaires. Dow will ensure that all information required for its REACH compliance will be made available on a timely basis.

Below, we outline some key aspects of Dow Silicones’ business REACH implementation and provide information on some frequently requested topics:

- **Registration:** Dow Silicones’ business has registered substances in its products in accordance with its REACH obligations. Dow has tools in place to monitor the volumes of its substances and will comply with the applicable registration requirements. Due to changing volumes produced or imported it may not be possible to provide specific deadlines per product in advance. For products sourced from European Economic Area (EEA) plants of our suppliers Dow will be considered a downstream user.

- **Registration Numbers:** Registration numbers of substances will appear in section 1 or 3 of the EU MSDS with the next safety relevant update of the MSDS. REACH requires the registration of substances, rather than products. Therefore, registration numbers exist only for substances already registered; substances which may be registered later will not yet have registration numbers. Polymers are currently exempt. Many of our products are mixtures of substances, therefore registration numbers for the Dow products themselves do not exist.

- **Supply Chain Responsibilities:** Dow takes its responsibilities under REACH very seriously and is committed to working closely with downstream users of our products. More information about the responsibilities of downstream users could be found at the [ECHA webpage](#) in the “guidance for downstream users”, the information requirement for registrants is documented in the “guidance on registration”.

Imported Products: Please note: The above information applies only to product supplies from the Dow Silicones’ business plants and warehouses within the EEA to EEA entity customers. For product supplies outside the EEA, please refer to the documentation below where you can also find the link to the REACH OR(T) Information Collection Form to apply for our Only Representative Trustee Service covering your exports into the EEA, if possible:



- [Supporting your Exports into Europe](#)
- [Only Representative Trustee – Workflow](#)
- Our Trustee – [Chemservice](#)
- [Chemservice: Code OR Model Overview](#)
- [REACH OR\(T\) Information Collection Form](#)

• **Composition disclosure:** The composition of our products is considered proprietary information, however Dow Silicones' business will seek to support continued and new business under Only Representative coverage where possible. For further information, please refer to the section on "Imported Products" above.

• **Substances of Very High Concern (SVHC):** Within our [REACH Resource Center](#) you can access a list of all current products containing substances that have been added to the REACH Candidate List. This list is updated twice per year as ECHA updates the Candidate List and can be located through the following link:

[REACH SVHC Customer Information](#)

• **[REACH Annex XVII](#)**

• **Supply Impact:** As REACH is only one reason contributing to potential product change, please find below our [Change Management Position Statement](#).

• **Letter of Access:** LoAs for registered silicon based substances are managed by the [Reconcile Consortium](#). Requests for purchase of LoA can be submitted via the link below:

<http://www.reachcentrum.eu/letters-of-access.html>

• **Downstream Use Communication:** We will work with our downstream users to understand the uses of our products. Should customers, for confidentiality reasons, not wish to disclose their use of Dow Silicones products (which contain 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 substance directly with ECHA:

[Dow Silicones' Product Uses & REACH Registration](#)

• **Upstream Use Communication:** Except where use of the substance is business confidential, Dow plans to provide information to our suppliers as reasonably required to ensure that key raw materials will be supported (and registered where required), and that our manufacturing processes will not be affected by REACH. Use and exposure guidelines provided under RIP 3.2.2-IV will form the basis of this exchange. Note: Use information is not required for industrial products which are not classified as hazardous (Annex III) and are produced at less than 10 tons per year.

Users of chemicals who are unfamiliar with their obligations under REACH are invited to refer to the [REACH Navigator – About REACH](#) provided by the European Chemicals Agency.

Dow Silicones has a team of regulatory specialists available to respond to further, specific questions with regards to this statement. Send your enquiry to: reach.support@dow.com.

IMPORTANT NOTE: The information contained herein is provided in the utmost good faith and intending only to indicate Dow's position on REACH compliance at the date issue of the statement. This information does not constitute legal advice or guidance on any legislation or regulation and should not be relied upon as such. Neither Dow nor any of its affiliated companies will have any liability to the recipient whatsoever howsoever arising from any reliance placed upon or use of this information by the recipient.