



5 February 2016

## Customer Letter 15

Dear Customer,

**Subject:** REACH and CLP notification requirements

This communication intends to provide information on the CLP notification requirements for DuPont and its customers.

The European Regulation (EC) No 1272/2006 (CLP)\*\* has introduced in Title V, Chapter 2 the obligation to notify the European Chemical Agency (ECHA) of chemical substances placed on the European market.

This obligation reads as follows:

1. Notification is required for all manufactured or imported substances with a volume  $\geq 1$  t/y (per manufacturing legal entity or importing legal entity). These substances are also subject to registration requirements under the European Regulation EC N° 1907/2006 (REACH)\*.
2. Notification is required for substances which are classified as hazardous even with a volume  $\leq 1$  t/y (per manufacturing legal entity or importing legal entity). This also concerns those substances that are not subject to registration requirements under the European Regulation EC N° 1907/2006 (REACH).
3. Notification is required for substances in preparations or mixtures that are classified as hazardous and are present above the relevant concentration limit, which results in the classification of the mixture as hazardous according to the CLP Regulation. This applies to imported preparations or mixtures only, since substances purchased in the European Economic Area (EEA) already have been notified by their manufacturer or importer. Notification requirements also apply to those substances that are not subject to registration requirements under the European Regulation EC N° 1907/2006 (REACH).
4. Pure polymers are considered as substances under CLP and REACH. However, polymers are not subject to registration requirements under REACH or notification requirements under CLP. As an exception, pure polymers classified as hazardous need to be notified under CLP, whatever their tonnage is.
5. Substances that have already been registered (completed registration, not pre-registration) do not need to be notified in addition to the registration. The registration satisfies the notification requirements.
6. The notification is required within 1 month of the first manufacturing or import. This notification requirement started on 1 December 2010. So the first notification deadline was 31 December 2010.
7. Only Representatives who may have been appointed to make the substance registrations for imported materials under the European Regulation EC N° 1907/2006 (REACH) cannot notify on behalf of the importers they represent. So the notification has to be made by each importer individually.



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**As to polymer materials from DuPont:**

1. For Polymer materials purchased from DuPont in Europe, all notifications required under CLP have been made by DuPont. There is no further notification requirement under CLP for its customers (downstream users).

2. Imported Polymer materials purchased from DuPont outside the EEA are in general preparations or mixtures. If these preparations or mixtures are not classified as hazardous, no notification obligation under CLP exists. The information whether the polymer material is classified as hazardous can be seen from the Material Safety Data Sheet (SDS), the extended Material Safety Data Sheet (eSDS) or the Product Safety Information Sheet (PSIS). The SDS / eSDS will also identify the hazardous chemical substance and its classification. Identity and classification are needed for the notification under CLP.

3. Imported pure Polymer materials purchased from DuPont outside the EEA are in general not hazardous. Please refer to the European Material Safety Data Sheet(SDS) or the Product Safety Information Sheet (PSIS) for confirmation.

European Material Safety Data Sheets (SDS) or Product Safety Information Sheet (PSIS) can be obtained from our local sales offices.

Yours faithfully,

Dr. Stefan Dully  
Regulatory Affairs Manager, DPM, EMEA

\* Regulation (EC) No 1907/2006 of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

\*\* Regulation (EC) No 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures (CLP). CLP is the European implementation of the Globally Harmonized System of Classification and Labelling of Chemicals, known as GHS, developed by the United Nations Economic Commission for Europe (UNECE)

Information on both Regulations as well as links to national helpdesks can be found on <http://echa.europa.eu/>  
For specific information concerning CLP notification; [http://echa.europa.eu/clp/inventory\\_notification\\_en.asp](http://echa.europa.eu/clp/inventory_notification_en.asp)

European Economic Area (EEA):

The European Economic Area includes the European Union Member States and Iceland, Liechtenstein and Norway.

This information is based on our current level of knowledge. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

As we cannot be aware of all aspects of your business and the impact REACH Regulation may have on your company, we strongly encourage you to get familiar with REACH, its requirements and timelines.

For your information, please see also the REACH web site of the EU commission:  
[http://ec.europa.eu/environment/chemicals/reach/reach\\_intro.htm](http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm)