

# REACH with Ecolab

REACH CENTRE OF EXCELLENCE



# REACH with Ecolab

## OUR COMMITMENT

It is Ecolab's commitment to comply fully with Regulation (EC) No 1907/2006 (REACH). Our commitment includes securing the long-term future of the cleaning, sanitizing, and water and energy management solutions customers rely on, helping customers understand their obligations under REACH and working with suppliers to ensure our expectations under REACH are understood.

## ABOUT ECOLAB

A trusted partner at more than one million customer locations, Ecolab is the global leader in water, hygiene and energy technologies and services that protect people and vital resources. With 2016 sales of \$13 billion and 48,000 associates, Ecolab delivers comprehensive solutions and on-site service to promote safe food, maintain clean environments, optimize water and energy use and improve operational efficiencies for customers in the food, healthcare, energy, hospitality and industrial markets in more than 170 countries around the world.

### Get in touch with us:

If you have any questions or need more information on our REACH strategy, please do not hesitate to ask your sales representative or contact our REACH Centre of Excellence directly at [reach@ecolab.com](mailto:reach@ecolab.com)



## SUBSTANCE REGISTRATION

Ecolab has actively registered all the chemicals we manufacture as well as those not covered by a supplier's registration. The chemistries we have registered are central to the long-term sustainability of our technologies and the registration process enhances our knowledge of each chemical's potential effects on people and the environment. Registration numbers are communicated via product Safety Data Sheets (SDS).

## SUBSTANCES OF VERY HIGH CONCERN

The European Chemicals Agency (ECHA) has continued its program of identifying Substances of Very High Concern (SVHC). With each update to the SVHC Candidate List, Ecolab has reviewed our portfolio of products in order to identify any potential impact. The effect of the SVHC Candidate List to our programs has been very small thus far; details about the affected products are available on [www.ecolab.com](http://www.ecolab.com).

## REACH USES AND EXTENDED SAFETY DATA SHEETS

Ecolab has implemented process and system changes to update our product Safety Data Sheets (SDS) to ensure downstream users handle and use our products safely and in ways that protect the environment. We are extending our SDS to meet the REACH Annex II requirements for mixtures, thus reflecting the information gathered during the assessments conducted for registering our chemicals. As always, we continue to ensure compliance and proper communication of safety standards for all of our substances and products.



## Frequently Asked Questions

### 1. Are all substances in Ecolab products REACH registered?

Ecolab successfully registered its portfolio of substances for REACH registration deadlines in 2010, 2013 and 2018. These were important milestones for Ecolab demonstrating our commitment to REACH. We have a highly-skilled REACH team in place to ensure we meet the ongoing REACH requirements after the transition phase. We also have a robust and proactive communication with our suppliers to avoid supply chain disruptions after the deadline. More specifically, we have contacted all our suppliers to ensure that they have fulfilled their registration requirements for all substances or mixtures for which Ecolab is considered as downstream user.

### 2. Where do I get the registration number of my substance?

For a substance or mixture requiring a Safety Data Sheet (SDS) according to Article 31 of the REACH Regulation, Annex II of REACH requires that the registration number assigned in accordance with Article 20 of REACH is mentioned on the SDS when it is available. Ecolab provides REACH registration numbers via the Safety Data Sheets according to REACH Article 31. In case the Ecolab product is a substance, the registration number is listed in chapter 1; in case the product is a mixture the registration numbers of components classified as hazardous are listed in chapter 3 of the Safety Data Sheet.

### 3. Do all Safety Data Sheets contain a registration number?

Article 31(9) of REACH gives specific occasions on which an updated SDS should be supplied without delay. While receipt of a registration number is not listed as one of these occasions, it is Ecolab's goal to update the SDS without undue delay and upload on ecolab.com, as the assignment of a registration number is of major potential interest to our customers as downstream users of the substance.

In the Safety Data Sheet there will be no registration number for any substances exempted from the registration requirements according to REACH. The substances include polymers according to Article 2(9) of REACH, substances manufactured or imported in quantities < 1 t/a according to Article 6(1) of REACH or for biocide actives (used as a biocidal product) according to Article 15(2).

### 4. Why is the exposure scenario 'missing' on the Safety Data Sheet?

According to Article 31(9) suppliers shall update their SDS without delay as soon as new information which may affect the risk management measures or new information on hazards (e.g. new classification) becomes available. Where an Exposure Scenario (ES) is developed as a result of conducting a chemical safety assessment as required by Article 14 or 37(4) of the REACH Regulation, it must be annexed to the safety data sheet (SDS), provided it is relevant for the customer. This means an exposure scenario is required if the product is classified as hazardous and contains registered components which contribute to the classification of the product. You will not find an exposure scenario if the components are not classified, registered in quantities < 10 t/a (REACH Article 14) or exempted from REACH registration (e.g. polymers).

According to Article 31(9) Ecolab updates the SDS without delay as soon as new information which may affect the risk management measures or new information on hazards becomes available. Where the information in an ES that becomes available does not affect the risk management measures and the ES contains no new information on hazards, the SDS will not be updated.



## Frequently Asked Questions

### 5. Is Ecolab always supporting all uses of a hazardous substance?

The use of a hazardous substance in a product must be in accordance with the exposure scenario delivered by Ecolab as an annex to the Safety Data Sheet. If a certain use is not identified in the registration dossier, please inform Ecolab via [reach@nalco.com](mailto:reach@nalco.com) or your sales representative. Based on the exposure information provided, we will check if it is possible to register the new use and add it to the Safety Data Sheet. Alternatively a downstream user (DU) can report to ECHA within 6 month if a respective DU-Chemical Safety Report is filed. No later than 12 months after receiving the registration number, the updated registration dossier including the new use or the downstream user report, has to be submitted. Otherwise, the product cannot be used for that purpose anymore.

### 6. Were can I find information about Substances of Very High Concern (SVHC)?

Based on our current assessment, less than two percent of Ecolab products sold in the European market contain an SVHC greater than 0.1 percent as listed on the Candidate List published by ECHA. A key element to our sustainability program is our ongoing effort to eliminate SVHCs from our portfolio where possible. If any substance categorized under REACH as a Substance of Very High Concern (SVHC), thus classified e.g. as CMR, PBT or vPvB and filed in the substance list of Annex XIV or in the related candidate list, is present (> 0.1% w/w) in our products, it is mentioned in chapter three and/or chapter 15 of the corresponding EU Safety Data Sheet. In addition, the whole list of Ecolab products containing substances on the SVHC candidate list is available on [ecolab.com](http://ecolab.com).

### 7. Can I still use SVHC substances?

Yes, you can still use SVHC from the candidate list as long as these are not also listed in REACH, Annex XIV. However, there are duties to communicate information in the supply chain for products containing SVHC substances.

### 8. Does an Ecolab product contain a substance included in Annex XIV of the REACH Regulation?

If a substance included in Annex XIV of the REACH Regulation (Authorisation List) is present (> 0.1 % w/w) in a product, the substance is listed in chapter three and mentioned in chapter 15 of the corresponding EU Safety Data Sheet. The product can be used until the sunset date, the date from which the placing on the market and the use of the substance shall be prohibited unless an authorization is granted. Ecolab will contact concerned downstream users to phase out the concerned products and to offer an alternative product.

### 9. Is Ecolab acting as Only Representative for customers outside EU wishing to import?

Ecolab acts as "Only Representative" (OR) for customers outside the EU wishing to import. Please contact us via [reach@ecolab.com](mailto:reach@ecolab.com).

