

# REACH – a regulatory system for chemicals management within the European Union

## Description

On June 1, 2007, REACH, a single regulatory system for chemicals management in the European Union (EU), entered into force. REACH stands for Registration, Evaluation and Authorization of Chemicals. The EU Parliament and Council adopted the new legislation in December 2006. The declared objective of REACH is to ensure the safe use of chemicals in Europe, improve innovation, and enhance the competitiveness of the European industry.

The legislation requires manufacturers and importers of chemicals to submit data on hazard and risk as well as on use for all substances manufactured in or imported into the EU in quantities of more than one metric tonne per year to a central European Chemical Agency (ECHA). Of an estimated 30,000 substances that will need to be registered, approximately 1,500 “substances of high concern” will have to go through an authorization process.

Substances produced or imported in quantities over 1,000 metric tonne per year will have to be registered by the end of 2010. By 2018, all substances will have to be registered. Currently, certain low-risk substances such as polymers, intermediates, and substances regulated by other legislation are totally or partly exempted from registration requirements.

## Dow's Position

Dow fully endorses REACH's objectives and the responsibility the legislation places on all members of the value chain to enhance the protection of human health and the environment, and to increase the knowledge base on hazards and risks of chemical substances and their uses. These objectives are fully aligned to Dow's commitment to sustainability and our 2015 goals.

Dow applauds the European institutions for reaching this agreement within the set time frame and for its constructive stakeholder dialogue during the development process. Dow has advocated a science- and risk based approach within REACH, particularly in the areas of prioritization of substances and the criteria for granting authorizations. The company regrets that the final legislation in its view mixed the science based approach with an arbitrary decision to exclude certain substances. Furthermore, Dow is concerned that the proposed system for granting authorizations may create a bureaucratic bottleneck. According to Dow, authorization for use of substances in specific applications needs to be granted if adequate control can be demonstrated. The company believes that when it is demonstrated that the risk can be adequately controlled, decisions on a potential substitution should be made by the market actors, based on their considerations of the implications of health and environmental risk management measures, and of cost and other factors.

## Dow's Action for Implementation of REACH

Since REACH was adopted at the end of 2006, Dow has shifted focus from the legislative process to implementation, thereby working internally with critical Dow functions and affected work processes and externally with its customers and suppliers for effective transition to meet REACH requirements and deadlines.

Dow intends to pre-register all of the eligible substances that it manufactures in the EU or manufactures outside the EU and imports into the EU. It anticipates that the majority of substances in its current portfolio will be registered for a range of typical downstream uses. Dow expects that only a small number of the substances it manufactures will likely be subject to the authorization process under EU REACH and that the company will be able to demonstrate proper levels of risk management for supported uses of these substances.

Dow also remains actively engaged in various REACH Implementation Projects initiated by the European Commission. These projects aim to develop the specific practical implementation guidelines for all value chain partners to ensure the successful implementation of REACH.

Although Dow anticipates increased costs for product testing, risk characterization and preparation of reports for EU government agencies to comply with the legislation, it will, whenever possible, share the costs of such activities with industry partners so as to avoid duplicated work and lessen the financial burden of implementing the legislation.

Last Updated: July 30, 2007

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Environmental Stewardship  
Product Safety

### For additional external resources visit:

European Union REACH information  
CEFIC position on REACH