









REACH Import Trustee

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Corporate Director Product Stewardship

Prepared for REACH



DOW CORNING













Importation into the EU/EEA

Prepared for REACH





Who registers imported substances originating from Dow Corning products?

Dow Corning assumes responsibility for registration when:

- Customer purchases from a Dow Corning EU/EEA legal entity
- Dow Corning imports to EU/EEA customer through direct or multi-tier orders
- Dow Corning has agreed to cover substances in our products contained in customer imports:
 - Dow Corning non EU legal entity can appoint Dow Corning EU SA as their Only Representative
 - Dow Corning EU SA can then cover all the uses of the downstream users in their registration
 - 3. Is managed by contacting the regional EHS coordinator through <u>Dow Corning REACH Resource Center</u>





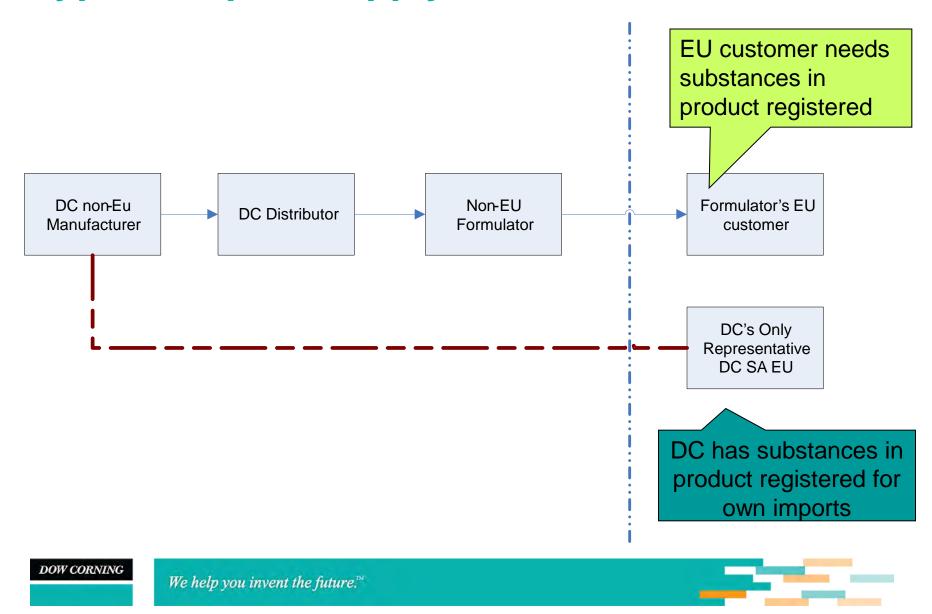
The Only Representative Trustee (ORT) Role

- For registration, the Only Representative (Dow Corning SA EU) must inform ECHA in the registration dossier of the names of the individual importers (our customer's customers) and the quantity of the substance they import.
- Exporters would be required to disclose up the supply chain to Dow Corning this potentially commercially sensitive information
- If its competitors are involved in the supply chain, Dow Corning should not have access to such commercially sensitive information under competition/anti-trust law
- To avoid transmission of such information up the supply chain a Trustee (Chemservice) is appointed to receive and store importer names and quantities and co-operate on behalf of the DC OR with Competent Authorities as required.
- Using Chemservice (ORT) means that Dow Corning will not need to see the commercially sensitive information of our importers





Typical Import Supply Chain













ORT Model for distributors

Options for distributors

Full code model

- 1) Distributor completes OR request form in their name.
- Dow Corning request code certificate from Chemservice for distributor.
- 3) Dow Corning send certificate to distributor.
- 4) Distributor requests code certificate from Chemservice for their customer.
- 5) Distributor send certificate to their customer.
- Customer request import certificates.

Distributor model

- 1) Distributor completes OR request form listing their and their customer's details.
- 2) Dow Corning request code certificate from Chemservice for distributor's customer.
- 3) Dow Corning send certificate to distributor.
- 4) Distributor send certificate to their customer.
- 5) Customer request import certificates.

Only the trustee knows the names of the distributor's customers.

Chemservice can prove the full supply chain to competent authorities.

Distributor does not pay for a code certificate.

One less certificate reduces confusion and risk of breaks in the chain.

Completing the ORT Request form (1)

REACh ORT Request

E-mail Address*:

Email address is address to which further correspondence concerning this request should be sent. This address will not be passed to third parties other than the trustee.

Title

Last Name*:

Name of person to receive correspondence.

Company Information

Company Name*:

Name and location of company procuring from Dow Corning.

Customer Number:

The customer number is required to fulfill our obligation under the legislation to trace the supply chain. This is a seven digit number beginning with a one found on documents from Dow Corning such as sales invoices. If such documents are not available, then your usual Dow Corning sales contact will be able to help. Note that this is not to be confused with any vendor number that you have allocated to Dow Corning. If you are not an immediate customer of Dow Corning, then please ask your supplier to complete this form (see Process Flow Chart).

First Name:

Last Name:

Company:

Address*: City*: This should be the customer's name and address.

The code certificate will list this information.

This should be the distributor's email address. The code certificate will be sent to this address

This should be the distributor's contact details in case of query with the data provided.

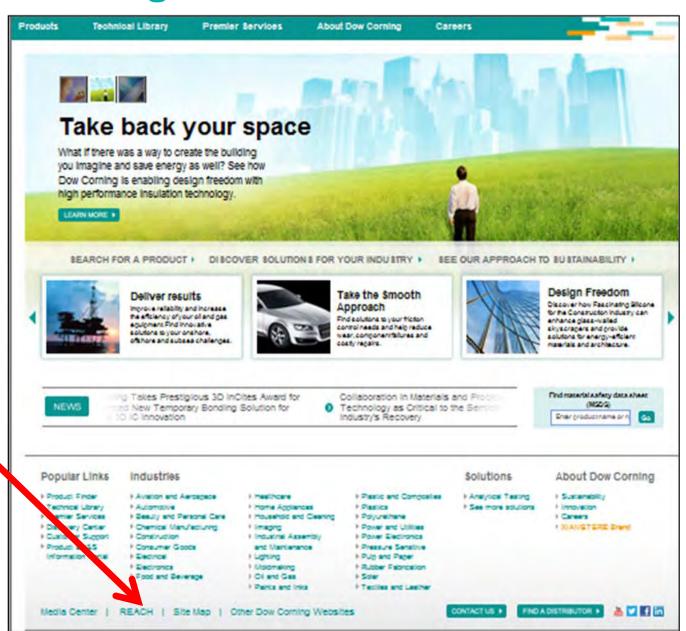
This should be the distributor's name and customer number so that we can confirm the supply chain.

Completing the ORT Request form (2)

Product Name*:	Enter the Dow Corning product sales name which
Product name should be Dow Coming's sales name. This is found on our sales invoices and product labels (unless relabeled yourselves upon arrival). Note that we will not be able to recognize generic names generated in your systems.	can be found on our invoices or labels
Volume (Te)*:	
The volume should represent the volume of the Dow Corning product in Metric Tonnes to be exported to the EU during the validity of this certificate. This may be significantly less than the purchased from Dow Corning. Product Name:	Enter the volume of the product anticipated to be
Volume (Te):	exported into the EU during the validity of this
Product Name:	certificate
Volume (Te):	
Product Name:	
Volume (Te):	
Product Name:	There is space on one form to submit requests
Volume (Te):	
Product Name:	for up to 10 products. If you require more than 10
Volume (Te):	certificates please submit an additional form
Product Name:	
Volume (Te):	
Product Name:	
Volume (Te):	
Product Name:	
Volume (Te):	
Product Name:	
Volume (Te):	
If you require coverage for additional products, please submit an additional form. I have read, and agree that the Only Representative Coverage will be subject to, the terms and conditions.*	Finally accept Dow Corning's Terms & Conditions
☐ Yes	then submit your request
Check here if you would like an e-mail copy of this request for your records.	

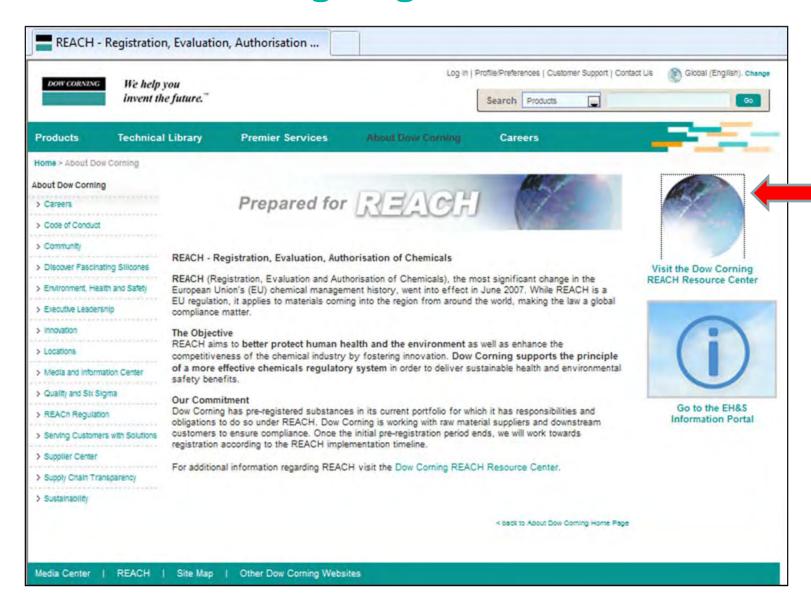
So that we may best serve you, please complete all items marked with an asterisk (*). For an explanation on how we use this information, please see our Privacy Statement.

www.dowcorning.com



Link to REACH Landing page

REACH Landing Page



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Dow Corning Position Paper on REACH Translations:

· English (PDF)

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Frequently Asked Questions

 English • 中文 - Chinese

Translations:

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Dow Corning's Only Representative Trustee Service for Exports

- Supporting Your Exports into the EU (PDF)
- . Overview of Dow Corning's Only Representative Trustee Service (PDF) Only Representative Trustee — Workflow (PDF)
- Our Trustee ChemService website
- . Code-OR Model Overview (PDF)
- Only Representative Trustee Request Form

Verifying and Communicating Product Uses · REACH uses for Dow Corning products (PDF)

- . CEFIC guidance on communication in the supply chain (PDF)

Dow Corning Registered Substances

 Instructions to Access Dow Corning Registered Substances & Registration Numbers via ECHA Website

Servicing Customer Needs

. Contact Dow Coming REACH Support Team

REACH Candidate List (SVHC) and ANNEX XVII

- · Products Impacted by REACH Candidate List (PDF) Deutsch | Français | Italiano | Español | Portugués
- · ANNEX XVII (PDF)

Other Resources

. Go to the EH&S Information Portal



. Go to the SDS Information Center





< back to REACH Portal Page

Dow Corning REACH Resources & Tools

- REACH Resource Center http://www.dowcorning.com/content/about/REACH.asp
 - Position statement
 - > FAQ documents
 - ORT Request form
 - ORT workflow chart
 - Substance registration information
 - Products impacted by SVHC
 - Additional resource links including links to
 - Dow Corning REACH support team
 - Chemservice







Thank You

For more information please visit our REACH Resource Center

http://www.dowcorning.com/content/about/REACH.asp















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