

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

Dow Corning – one of the world’s leading manufacturers of silicone and polycrystalline silicon– has a long established commitment to Responsible Care® and focus on sustainable development. Dow Corning 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 Corning 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 Corning 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 Corning’s REACH implementation and provide information on some frequently requested topics:

- **Pre-registration:** Dow Corning has been proactive in pre-registering all substances in its current portfolio for which it has responsibilities and obligations to do so under REACH, and we are working with raw material suppliers and downstream customers to confirm their compliance. This is important to minimize chances of supply chain interruptions.
- **Registration:** Dow Corning has registered substances in its products in accordance with its REACH obligations. Dow Corning has tools in place to monitor the volumes of its substances and will comply with the applicable phased 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 EU/EEA plants of our suppliers Dow Corning 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 have to be registered later will not yet have registration numbers. Polymers are currently exempt. Most of our products are mixtures of substances therefore registration numbers for the Dow Corning products themselves do not exist.

IMPORTANT NOTE:

Note: This information contained herein is provided in the utmost good faith and intending only to indicate Dow Corning’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 Corning Corporation 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.

- **Supply Chain Responsibilities:** Dow Corning 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 ECHA webpage in the “guidance for downstream users”, page 24/25: https://echa.europa.eu/documents/10162/13634/du_en.pdf ; the information requirement for registrants is documented in the “guidance on registration” https://echa.europa.eu/documents/10162/13632/registration_en.pdf , page 83/84.
- **Imported Products:** Please note: the above information applies only to product purchases from the Dow Corning plants and warehouses within the European Economic Area (EEA). For product purchases from outside the EEA please refer to our [REACH Resource Center](#) under the section “*Export Information for Non-European Entity Customers*” where you can find the link to the ORT Request form to apply for our Only Representative Trustee Service to cover your exports into the EU/EEA.
- **Composition disclosure:** The composition of our products is considered proprietary information, however Dow Corning will fully support continued and new business under Only Representative coverage where ever possible, for further information please refer to the section on “Imported Products” above.
- **Re-Import:** products sourced from a European legal entity of Dow Corning may be re-imported into EEA under certain conditions:
 - You use Dow Corning’s product(s) in your preparation without further chemical reaction (i.e. no new substances are produced).
 - The preparation is shipped into the EU/EEA.
 - You can provide customs authorities with evidence that the product that was procured from Dow Corning in Europe is present in the re-imported preparation.Confirmation for certain products available on demand from reach.support@dowcorning.com.
- **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:
 - [Products Impacted by REACH Candidate List](#) (PDF)
[Deutsch](#) | [Français](#) | [Italiano](#) | [Español](#) | [Português](#)
- **REACH Annex XVII:**
http://www.dowcorning.com/content/about/aboutehs/EHSPortalFiles/REACH_Annex_XVII_Letter_for_the_web_-EN-_V1.pdf

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- **Supply Impact:** In circumstances where we are unable to obtain an ingredient, due to its withdrawal by our suppliers, we aim to take whatever proactive steps are commercially feasible for Dow Corning to reformulate or revise our product. We shall keep our customers informed in these circumstances. 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>
- **GPS Safety Reports :** <http://www.dowcorning.com/content/about/aboutehs/safety.aspx>
- **Downstream Use Communication:** We will work with our downstream users to understand the uses of our products. Provided those uses are supported by Dow Corning, and can be safely continued, Dow Corning intends for such uses to be registered. Should customers, for confidentiality reasons, not wish to disclose their use of Dow Corning products (which contain substance(s) manufactured in or imported into the EU by Dow Corning), REACH allows for the downstream user to assume the sole responsibility to register their use of such substance directly with ECHA.
http://www.dowcorning.com/content/publishedlit/REACH_uses_for_Dow_Corning_products.pdf
- **Upstream Use Communication:** Except where use of the substance is business confidential, Dow Corning 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 Corning has a team of regulatory specialists available to respond to further, specific questions with regard to this Statement. Send your enquiry to: reach.support@dowcorning.com

Dow Corning Corporation
(Including its subsidiaries)

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