

**Supplier Self Assessment**

**REACH**

**Approved by TaylorWessing**

**Overview** > this assessment focuses on substances, mixtures and articles which contain chemicals under the REACH regulation (EC) 1907/2006 and WFD 2008/98/EC; <https://echa.europa.eu/candidate-list-table>

REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) is an EU regulation that addresses the production and use of chemical substances, and their potential impacts on both human health and the environment. REACH focuses on persistent, bioaccumulative or toxic chemicals with a spotlight on substances of very high concern (SVHC)

**Supplier target** > any supplier that produces or uses substances, mixtures or articles containing chemicals under the REACH regulation

**Scoring** > this assessment is scored based on the answers given

***🚩* Red flag questions** > there are no red flags in this assessment

**FAQ**

**What is REACH?**

REACH means Registration, Evaluation, Authorisation and Restrictions of Chemicals. It’s an EU regulation since 2006. It addresses the use of chemical substances and their potential impact on human health and the environment.

**What is the purpose of the REACH regulation?**

The purpose of REACH regulation is to minimize the risks posed by harmful chemicals through the reduction of their use in the product design phase.

**Who needs to comply?**

Any company that manufactures or imports one tonne or more of any chemical substance per year must record this in the EEA database. Many of these chemical substances are in use in our everyday lives, in paints, cleaning products, electrical appliances, furniture, etc. Thus, it affects most businesses in the EEA. It applies to manufacturers, importers, distributors and downstream users.

**What is the SCIP Database?**

SCIP is a database that intends to contain all information on Substances of Concern established by ECHA (European Chemicals Agency) under the Waste Framework Directive (WFD). It has been enforced since January, 2021.

**What is the purpose of SCIP?**

SCIP intends to reduce the negative impacts of waste materials on people and the environment by informing waste operators and consumers about how to properly recycle and dispose products containing SVHCs (Substances of Very High Concern). Whenever SVHCs content exceeds 0.1% in the article level, data should be submitted to the SCIP database.

**What are key differences between REACH report and SCIP Database report?**

Per REACH Article 33, the presence of SVHCs at a concentration above 0.1% at the article level must be declared, which is the same requirement for a submission to the SCIP Database.   
The key difference here is that there’s no formal declaration template for REACH. Declarations can be in the form of safety data sheets, certificates, test reports, etc. This data is meant to be used by other actors in the supply chain or by consumers using the product. However, SCIP has a standardized reporting process with specific requirements, which makes it much more complicated. It also requires data on exact articles which contain SVHCs, where they are in the product and the material which contains SVHC.

Substances of very high concern (SVHC) under REACH need to be within the following criteria;

* it is carcinogenic;
* it is mutagenic;
* it is toxic for reproduction;
* it is persistent, bioaccumulative and toxic[5] (PBT substances);
* it is very persistent and very bioaccumulative (vPvB substances);
* there is "scientific evidence of probable serious effects to human health or the environment which give rise to an equivalent level of concern"

**What are the top priority SVHCs?**

* 4,4'-Diaminodiphenylmethane (MDA) > carcinogen

A chemical is used in the rubber industry, in footwear and raw material used in magnet wire enamels. It is a rubber additive (accelerator, anti-degradant, retarder) in tires and heavy rubber products.

* Benzyl butyl phthalate (BBP) > toxic for reproduction

BBP is used mainly to make vinyl tiles, car upholstery, and adhesives, and it is often metabolized into DBP, a monobutyl phthalate

* Bis(2-ethylhexyl) phthalate (DEHP) > toxic for reproduction

DEHP is present in plastic products such as wall coverings, tablecloths, floor tiles, furniture upholstery, shower curtains, garden hoses, swimming pool liners, rainwear, baby pants, dolls, some toys, shoes, automobile upholstery and tops, packaging film and sheets, sheathing for wire and cable, medical tubing

* Dibutyl phthalate (DBP) > toxic for reproduction

Used in elastomers, lacquers, explosives, printing inks, resin solvents, perfume oil solvents, paper coatings, adhesives, and nail polish

* Hexabromocyclododecane (HBCDD) > including all major disaster

Used mainly in polystyrene insulation material for buildings – both in expandable polystyrene (EPS) and extruded polystyrene (XPS). It may also be found in packaging plastics made of EPS, for example in EPS packaging for globally traded electrical and electronic equipment.

* Short chain chlorinated paraffins > PBT

SCCPs are primarily used in metalworking applications and in polyvinyl chloride (PVC) processing. SCCPs are also used as plasticizers and flame retardants in a variety of applications, including in paints, adhesives and sealants, leather fat liquors, plastics, rubber, textiles and polymeric materials.

* Musk xylene (5-tert-butyl-2,4,6-trinitro-m-xylene) > vPvB

Used in detergents and soaps

**Useful links**

Link to the full regulation -> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1907>

Capturing the difference between the SCIP database and REACH Regulation

<https://apaengineering.com/compliance-blog/scip-database-reach-regulation-difference/#:~:text=The%20SCIP%20database's%20purpose%20is,in%20articles%20entering%20the%20EU.&text=Whenever%20SVHC%20content%20exceeds%200.1,It's%20a%20complex%20regulation>

SCIP Database vs REACH Regulation: A Comparison

<https://blog.sourceintelligence.com/scip-database-vs.-reach-regulation-a-comparison>

REGISTERING CHEMICALS - REACH  
<https://europa.eu/youreurope/business/product-requirements/chemicals/registering-chemicals-reach/index_en.htm#:~:text=Registering%20chemicals%20(REACH),-On%20this%20page&text=If%20you%20manufacture%20or%20import,Authorisation%20and%20Restriction%20of%20Chemicals>.

Does my substance need to be registered?   
<https://echa.europa.eu/support/registration/your-registration-obligations/does-my-substance-need-to-be-registered>