

**REACH: Standard Questionnaire for Communication Along the Supply Chain**

**Part I      Questions from Downstream User (Customer) to Supplier**  
**REACH: Pre-registration / Registration**

Concerning the Products (trade name): *as confirmed in the email*

Substance

Polymer

Preparation

Article

1. At this stage, do you expect that the substances, which are contained in the product above and require registration, will be **pre-registered** by your company or by your upstream supplier?

yes

no

too early to decide. Reply probably by ..... (expected date of reply)\*

2. At this stage, do you expect that the substances, which are contained in the product above and require registration, will be **registered**?

yes

no

too early to decide. Reply probably by ..... (expected date of reply)\*

3. If questions 1 or 2 are answered with "yes": Regarding the substances that are contained in the product and require registration – please mark the crucial REACH registration deadlines for those substances which are decisive for the product properties.

immediate registration

3.5 years

6 years

11 years

too early to decide. Reply probably by ..... (expected date of reply)\*

4. Contact details

Please provide full contact details for the person in your company responsible for REACH issues

## **Explanations regarding Part I**

### **Regarding question 1**

If the supplier is not the Manufacturer/Importer but the distributor of substances requiring registration that are contained in the listed products above, it must be clarified whether the supplier can assume that his upstream Manufacturer/Importer will carry out a pre-registration.

If the product is a polymer, the purpose of the question is to find out whether the monomers bound in the polymer or other substances bound in the polymer will be registered by the Manufacturer/Importer. This does not refer to residual monomers in the polymer.

### **Regarding question 1 and 2**

Somewhat more time might be needed to answer this question for preparations, because initially the supplier needs to obtain relevant information from his suppliers up till and including the manufacturer/importer. Answering this question with "yes" is no promise of a registration, as – besides REACH – further factors might exert an influence (e.g. unforeseeable future market situations).

### **Regarding question 3**

Example – Determining the crucial registration deadline for substances decisive for product properties:

A product consists of substances 1, 2 and 3. Substances 1 and 2 are decisive for the product properties; they have registration deadlines of 6, 6 and 11 years due to their production or import volumes. Substance 3 – which is not decisive for the specific use of the product and could be replaced, e.g. a solvent – has a registration deadline of 3.5 years because of higher production or import volumes. In this example, substance 3 is not crucial for the product as it can be replaced without affecting the required product properties. Here, substances 2 and 3 are decisive so that the box “6 years” should be ticked. Box “6 years” should be ticked.

The option "immediate registration" means that there is no pre-registration and the substance will be registered without delay, within 12 months after the entry into force of REACH.