

Dear customer,

This letter is to inform you about the recommended communication process which Dow Corning intends to follow about "Uses" under REACH.

**The Chemical Industry (CEFIC/FECC) has prepared a so-called “Top-Down Approach” workflow for the Supply Chain Communication (see [simplified diagram](#)). In this approach, Manufacturers/Importers are already developing Use Descriptors and Exposure Scenarios (ES) in cooperation with some customers and Downstream User Associations. The ES will be made available subsequently to all Downstream Users, who should inform their suppliers about their use if not covered. Dow Corning will provide an easy-to-use on-line tool which allows you to add your Use information in a few simple steps.**

We believe it is in the interest of industry to follow this harmonized communication process between the actors of a supply chain. As a consequence, we ask for your patience and not to communicate use and exposure information, as we will provide you with a reliable Exposure Scenario in due time. We plan to start this dialogue with you by early/mid 2009.

In the meantime, actors in the supply chain are encouraged to identify and contact their respective industry associations and become engaged in the building process of Generic Exposure Scenarios, which is currently under development.

This is the most efficient way to be reassured that intended uses are included, and that these cover appropriate conditions of use.

While industry understands “Use” as a way to describe the functionality or the application of the substance, under REACH this term is related to the process and its derived exposures. According to section 5.2.1 of the Guidance for Downstream Users, “*use is any activity carried out with a substance as such or in a preparation, which could lead to an exposure to that substance*”<sup>1</sup>. Typical examples include processing, formulating, transfer from one container to another etc.

In the framework of the REACH *Guidance on Information Requirements and Chemicals Safety Assessment*<sup>2</sup>, a "Use Descriptor System" based on four elements has been developed. Those elements are: sector of use (SU), chemical product category (PC), process category (PROC) and article category (AC)<sup>3</sup>. Additionally, a fifth element that should be considered is the Environmental Release Category (ERC).

Information about downstream uses is required in the format of the “Use Descriptors System” and will be integrated in the registration dossier.

Please note that there is no necessity to inform about uses yet, information on uses is **not necessary** for pre-registration. The Exposure Scenarios are not expected before mid 2009, while the final CEFIC “Top-Down Approach” guidance on Supply Chain Communication will be released by the end of October 2008.

Best regards,  
The CEFIC/FECC REACH Supply Chain Communication Task Force &  
Dow Corning

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<sup>1</sup> [http://reach.jrc.it/docs/guidance\\_document/du\\_en.htm](http://reach.jrc.it/docs/guidance_document/du_en.htm)

<sup>2</sup> [http://reach.jrc.it/docs/guidance\\_document/information\\_requirements\\_en.htm?time=1219846297](http://reach.jrc.it/docs/guidance_document/information_requirements_en.htm?time=1219846297)

<sup>3</sup> [http://reach.jrc.it/docs/guidance\\_document/information\\_requirements\\_r12\\_en.pdf](http://reach.jrc.it/docs/guidance_document/information_requirements_r12_en.pdf)