

VWR International Management Services GmbH & Co. KG Hilpertstraße 20 a · D-64295 Darmstadt Tel. 06151/3972-0 · www.vwr.com

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Bereich/Abt. Scientific Services

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# Subject: Regulations REACh and CLP

Dear Valued Customer,

With regulations (EC) No. 1907/2006 (REACh, Registration, Evaluation, Authorisation and Restriction of Chemicals) and (EC) No. 1272/2008 (CLP, Classification, Labelling and Packaging of Substances and Mixtures), the EU implemented the most important changes in chemical regulations in history.

VWR as a distributor of chemicals, both our own brand and the brands of a number of suppliers has several responsibilities to fulfil, to ensure we and our suppliers are complying with these regulations. This letter contains information on several different topics, but cannot be a full overview about all activities. For topics, which are not answered below, please contact your local VWR Company with your specific questions.

## Classification of Substances and Mixture

Since 2012 all chemicals carrying the VWR brand and manufactured by VWR or our associates for distribution in Europe are classified and labelled according to the regulation (EC) No. 1272/2008. The classification is given in VWR safety data sheets together with the former classification used which was according to 67/548/EWG and 1999/45/EG.

For products we distribute from other manufacturers, most of them have already changed to the new classification and labelling, nevertheless, some are still using former classification and labelling for mixtures in accordance with the regulations until June 2015.

#### Safety datasheets (SDS)

With regulation (EC) 453/2010, the requirements for SDS described in Annex II were updated. VWR implemented these changes and reworked all SDS for private label products, the most current version can be taken from internet (<a href="www.vwr.com">www.vwr.com</a>) in your local language.



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#### REACh registration

Laboratory use and research are usually in amounts less than 1 ton/annum in total and therefore most chemicals distributed by VWR do not need to be registered. For those which need to be and have been registered, the registration number will be given in the SDS.

## Extended Safety datasheets (eSDS)

Extended SDS (eSDS) are required for substances, which are being sold in quantities of more than 10 tons/annum. VWR sells very few products in these quantities and as such most products sold by VWR are for use in the laboratory and research areas and will be supplied with a simple SDS.

## Substance of Very High Concern (SVHC) status

The SVHC status for most chemicals VWR sells can be taken from the SDS VWR or our suppliers provide. In some rare cases where information is not available in SDS from our suppliers please contact your local sales office and we will address this issue with the supplier.

## **Authorisation**

Entitled to apply for authorisation are manufacturers, importers and downstream users. Topics on authorisation will be answered on request.

#### Transported isolated intermediates (TII)

Registration of substances as transported isolated intermediates (TII) allows a simplified registration. If a substance is registered as TII, the manufacturer of the product who has registered it accordingly has to ensure, that the product is only used under strictly controlled conditions. To ensure this, the manufacturer has to request a declaration along the supply chain, ensuring the agreed usage conditions are complied with. VWR will request these declarations from our customers for all products, where VWR is selling products registered in this way.

For further questions don't hesitate to contact your local VWR office.

Dr. Olaf C. Fehr

Chief Scientist Europe