

Nynas and REACH - November 2008

Pre-registration

Nynas has pre-registered all petroleum streams and substances that are currently manufactured and imported by Nynas in Europe. Before the final registration there may be a need to re-evaluate which of the pre-registered CAS/EC Numbers, if any, to be deactivated prior to the final registration. In case any CAS/EC Numbers will be deactivated Nynas will contact the affected customers. This evaluation is ongoing and our ambition is to have a well considered list of CAS/EC numbers for the final registration.

Nynas will act as the "Only Representative" (OR) for the non community manufacturers, (Nynas suppliers especially in the US), that do not intend to register their products themselves. It is our intention to cover all substances that we use in our products today to ensure that our customers will not get any problems importing their products into EU.

When a substance is pre-registered, a pre-registration number is received from ECHA. The provision of a pre-registration number by a supplier does not guarantee his future compliance with REACH or continuity of supply. According to the recommendation by CEFIC, published in the REACH Industry Preparation Letter No. 9. p.6: "Careful consideration should be given by each company to the communication of pre-registration numbers in the supply chain." There is also no legal requirement to communicate the pre-registration number in the supply chain.

Exposure Scenarios

General

An Exposure Scenario describes how a substance is manufactured or used during its life-cycle and how the exposures to humans and the environment need to be controlled to have a safe use. Exposure scenarios cover substances on their own and in preparations or articles. An Exposure Scenario includes risk management measures and operational conditions that ensure that the risks from the uses of the substance are adequately controlled. Exposure Scenarios need to cover all "identified uses". This includes the manufacturers or importers own uses and those of all downstream users. Exposure Scenarios have to be included in the registration dossier.

Nynas and Exposure Scenarios

Naphthenic oils

Nynas participates in the work done within CONCAWE, where the ambition is to create generic Exposure Scenarios to be used for a group of substances and uses. The data collection for the Exposure Scenarios of the naphthenic oils in all their applications will be coordinated by a project group lead by Nynas. The actual data collection will be carried out by the European sales force, which will contact selected customers and fill in a table based on the input from Concauwe. The data collection and compilation of the first part of the Exposure Scenario is expected to be ready by the end of 2008. The first draft of risk characterization and Chemical safety assessment part of the Exposure Scenario is expected to be ready 1Q 2009. So far, Nynas has identified a total of 66 applications in which naphthenic oils are used. During 2009 Nynas will continue the communication on Exposure Scenarios with customers in order to find out whether all identified uses are covered.

Bitumen

Data collection for different types of applications has been coordinated by a REACH ad-hoc group in Eurobitume. The ad-hoc group is working closely with Concauwe to ensure that the approach for bitumen is aligned with that of other oil products.

It is not possible at this stage to say precisely how the use mapping will look when finalized, but it is most likely that we will not use specific descriptors for the use. More likely, because temperature is the principal determinant of exposure, it will be based on temperature and process conditions (closed, open, etc.). A list with more than 230 different applications has been reviewed and consolidated into 5 draft generic Exposure Scenarios. The application temperature has been used to determine the draft exposure scenarios. The data collection and compilation of the first part of the Exposure Scenario is expected to be ready by end of Q1 2009. During 2009 Nynas will start communicating Exposure Scenarios with customers in order to find out whether all identified uses are covered.

If you have any questions, please contact Product HSE, producthse@nynas.com