

## Janet Greenwood

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**From:** MORRIS Helen <helen.morris@sartomer.com>  
**Sent:** 13 September 2021 10:28  
**To:** Janet Greenwood  
**Subject:** FW: REACH - Polymers - Monomers - DUIN - SDS - Composition - Additional information - helpdesk ref: 0709MWX21-0312

Hi Janet

I'm not sure if this is of any interest to any of our members. I was asking the HSE about how to do the DUIN for polymers you imported when the supplier won't disclose the monomer.

In summary they said 'just send what you can'!!

Many thanks

Helen

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**From:** UKREACHCA <UKREACHCA@hse.gov.uk>  
**Sent:** 09 September 2021 07:28  
**To:** MORRIS Helen <helen.morris@sartomer.com>  
**Subject:** REACH - Polymers - Monomers - DUIN - SDS - Composition - Additional information - helpdesk ref: 0709MWX21-0312

Dear Helen,

If you are eligible to the DUIN provision i.e. you were an existing GB-based downstream user under EU REACH in the 2 years before the end of the transition period, then on the DUIN spreadsheet you should provide information on the monomers and other substances contained in the polymer to the extent that it is available to you. If you are not sure what the monomers/other substances are, you could make an educated guess and list all the potential substances within the polymer (on the basis that listing a substance on the spreadsheet does not commit you to registering it later on). As you suggest, you could also list the polymer itself as including it on the spreadsheet would provide us with additional information that might be useful. The SDS can also be attached to the email along with your DUIN spreadsheet as part of your submission.

You will then need to find out the full information required for registration before the relevant deadline to you (i.e., 2, 4, or 6 years plus 300 days since the end of the transition period). There are several ways for you to approach getting the information regarding the monomers:

- Ask your supplier for information on the composition of the polymer (explaining that this information is necessary for you to fulfil your regulatory duties and continue buying from them).
- On the SDS for the polymer you import there could be a list of ingredients. This may be restricted to only those ingredients that contribute to the hazard classification of the mixture, but you do at least know the identity of these substances.
- You may be able to make an educated guess for some of the other ingredients and could include details of substances they are likely to be. For example, some of your products may contain a solvent and using your knowledge of the industry you may be able to narrow this down to 3 or 4 possible substances.

- You could contact the supplier and ask for broad information on the products. For example, if you were importing 10 tonnes of material you would only need to know which ingredients were present at 10% or more as it is these that will be being imported at 1 tonne per year (the threshold for registration). You would not need the exact concentration as with a total import volume of 10 tonnes no single ingredient would exceed the 10 tonne threshold. You should remember that multiple products may contain the same substances and the amounts need to be aggregated across the whole product range. As the volume of material increases you would need to know more about the composition.

If your supplier is reluctant to tell you the composition of their polymer and if they are a non-GB based manufacturer/formulator/producer of articles, you could suggest that they appoint a GB-based Only Representative (OR) to fulfil the UK REACH duties on behalf of their GB-based importers under Article 8 of UK REACH. The GB-based OR would then be responsible for submitting the DUIN and/or registration. This would absolve you from your UK REACH duties and therefore you would not need to know the composition of the polymer.

It will be a business decision for the non-GB based manufacturer/formulator/producer of articles to make as to whether they want to appoint a GB-based OR. If they do, we would advise that the substances, tonnages and GB-based importers that are covered by the OR should be established by the contractual arrangements in place between all parties before the GB-based OR completes any UK REACH duties. More information on this can be found [here](#).

Kind Regards,

Michelle



Michelle Wilson  
REACH & CLP Helpdesk  
Chemicals Regulation Division  
HSE, Redgrave Court, Bootle, Merseyside, L20 7HS

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**From:** MORRIS Helen <[helen.morris@sartomer.com](mailto:helen.morris@sartomer.com)>

**Sent:** 07 September 2021 11:51

**To:** UKREACHCA <[UKREACHCA@hse.gov.uk](mailto:UKREACHCA@hse.gov.uk)>

**Subject:** REACH - Polymers - Monomers - DUIN - SDS - Composition - Additional information

Dear Sir

Can I please ask for some advice on DUINS relating to imported polymers into the UK.

We have some polymers of which we would like to continue to import into the UK. They are purchased from fully registered EU suppliers. We have no information on the starting monomers, which are the required registrants for polymers. Can you please confirm if the polymer should be added to the spreadsheet along with the supplier SDS of the polymer and that this would meet the requirement of the notification?

Many thanks

Helen

Helen Morris  
Regulatory Affairs

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Arkema UK Ltd, Sartomer Business, Clifford House, York Road  
Wetherby, West Yorkshire, LS22 7NS, UK  
Tel: +44 (0) 1937 840 150  
Fax: +44 (0) 1937 840 151  
Web: [www.lambson.com](http://www.lambson.com)

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