

REACH frequently asked questions

Acronyms:

REACH:	Registration, Evaluation, Authorisation and Restriction of Chemicals
ECHA:	European Chemical Agency
SDS:	Safety Data Sheet
ES:	Exposure Scenario
LPG/LNG:	Liquified Petroleum / Natural Gas
CEFIC:	European Chemical Industry Council
SVHC:	Substance of Very High Concern
GHS:	Globally Harmonised System for Classification and Labelling
CMR:	Carcinogenic, Mutagenic; Reprotoxic

1. **Question:** How will REACH impact my business?

Answer: To ensure continuity of supply, Linde has pre-registered every substance it trades with the obligation to register. We strongly recommend you ensure that all your other suppliers do the same.

In the future some substances may be subjected to authorisation or restriction by ECHA. At the moment the list of substances that are candidates for this action has not been published.

2. **Question:** As a customer, what are my obligations under REACH?

Answer:

First step: define your exact role in the supply chain. As a customer of Linde you would most probably be a Downstream User.

Second step: Ensure that your use is included in the Safety Data Sheet (SDS).

Third step: Ensure that you only use the substance in line with the SDS.

3. **Question:** Has Linde assessed the impact of REACH on its activities and on the products that Linde supplies to our different companies and production sites?

Answer: Yes. The Linde Group is aware of the regulation and has pre-registered the required substances. There is a coordinated pan-European approach within Linde to ensure consistency across the European Union and we are actively working with trade associations and others to ensure compliance.

4. **Question:** Will Linde pre-register and register all products according to REACH?

Answer: Yes, we have pre-registered and will register the products that REACH requires us to register.

5. **Question:** According to REACH which gases do not need to be pre-registered and registered?

Answer: The exemption to register is given in Annex IV and V and they are:

- Hydrogen, Nitrogen, Oxygen, Carbon dioxide, Helium, Neon, Krypton, Argon, Xenon and gas mixtures of these
- Medical gases
- Food gases
- Natural gas
- LPG and LNG from natural sources.

6. **Question:** My product is for a biocidal application. Has it to be registered under REACH as well?

Answer: No. Products that comply with other directives such as "Plant Protection Products", "Biocidal Products", "Food Additives", "Medical Products" and others such as radioactive substances and waste do not require registration under REACH

7. **Question:** Please provide us with full contact details for the person in your company in charge of implementing the REACH regulation (Name, position, telephone number, mailing address and e-mail)

Answer: Linde installed Country email addresses. In each country's webpage you can find

more detail information about persons who will reply and provide you with any relevant information.

8. **Question:** What is the timeline and project-organisation of Linde to manage REACH?
Answer: Details of the substances that Linde has pre-registered including anticipated dead lines are available at www.reach.linde.com . Linde has a number of people actively working on REACH to a coordinated program with a dedicated REACH implementation manager.
9. **Question:** Will Linde be contacting its upstream suppliers to see if they will register?
Answer: Yes, we have contacted them already to ensure that they understand their obligations under REACH and they have pre-registered and will register where appropriate.
10. **Question:** Are any of the products Linde supplies to us at risk of reformulation or being withdrawn from the market?
Answer: To answer this question accurately, the products that you purchase from Linde need to be specified. ECHA has so far named 16 substances of very high concern which may eventually become controlled. None of the current substances listed on the ECHA web site ("SVHC") are supplied by Linde or its subsidiaries.
11. **Question:** Are any of the substances Linde provides subject to authorisation? And if so, do you intend to apply for authorisation?
Answer: Currently, there is no final list for substances that will require authorisation. The following substances that we provide are classified as carcinogenic, mutagenic or reprotoxic (cat.1+2): Butadiene 1,3 , Butane-n (containing 0,1 % Butadiene –1,3), Carbon monoxide, Ethylene oxide, Isobutane (containing 0,1 % Butadiene –1,3), Vinyl Bromide and Vinyl Chloride. They may require authorisation or restriction at a later date to be determined by ECHA.
12. **Question:** Will Linde require information from us e.g. uses or applications of products we purchase?
Answer: We will contact you concerning the applications of the substances which we supply according to the dates for registration. We are still awaiting a downstream communication tool, produced by CEFIC, which will allow customers to record their uses of substances up and down the supply chain in a structured way.
13. **Question:** Will non-EU countries e.g. Norway, Iceland and Lichtenstein apply REACH?
Answer: Yes, but not Switzerland. Chemicals bought from Switzerland are considered as imported to EU and therefore subject to registration.
14. **Question:** Are Linde's Safety Data Sheets compliant with REACH?
Answer: To be fully compliant an SDS must contain amongst other things uses, risk management measures, exposure scenarios etc. As no products have been registered yet none of these are available to be included.
This is common for the chemical industry and understood by the enforcing authorities, the current SDS are technically correct and remain suitable for use.
It is Lindes intention to have fully compliant SDS available in 2010 for all its products.
15. **Question:** How many Exposure Scenarios (ES) will be attached to an SDS for a gas or a gas mixture?
Answer: The number and type of Exposure Scenarios will depend on the hazard and the uses of the respective gas. At this time, no ES's have been generated. So it is not possible to give a detailed answer.
16. **Question:** Will Linde send us the pre-registration numbers?
Answer: No. The pre-registration number is randomly generated and does not have the structure and meaning of a registration number and is not substance or company specific. Therefore the recommendation of both the EU Commission and CEFIC is that this number does not have to be published.
All the substances that The Linde Group has pre-registered, including the anticipated registration dates, are available to be viewed at the following URL: www.reach.linde.com

17. **Question:** Are there any substances apart from those that are exempt that Linde does not intend to pre-register?

Answer: No. The only substances that we haven't pre-registered, are those exempt substances listed in Annex IV and V these are:

- Hydrogen, Nitrogen, Oxygen, Carbon dioxide, Helium, Neon, Krypton, Argon, Xenon and gas mixtures of these
- Medical gases
- Food gases
- Natural gas
- LPG and LNG from natural sources.

18. **Question:** Can Linde send us a list of products that we purchase from you to check if they have been pre-registered.

Answer: This is not done automatically due to the number of customers that Linde has, please contact directly to your local REACH specialist, who will reply and provide you with any relevant information.

19. **Question:** Do gases (e.g. refrigerants) that are recycled have to be registered?

Answer: Recycled products are not exempt from the requirements of REACH. If the refrigerants have already been registered, then the recycler is a downstream user, otherwise registration is required.

20. **Question:** What effect will the GHS (Globally Harmonised System for Classification and Labelling) have on REACH?

Answer: The classification of some substances may change, if substances are subsequently re-classified as either dangerous to the environment or CMR, the registration timeline would be reduced. The content of the SDS will change, i.e. different risk- and safety phrases and additional pictograms. In addition all labels on the packages have to be altered