

# REACH-Code-Model

## Short introduction and overview

REACH<sup>1</sup> introduced several new challenges for EU importers of chemicals. One of these challenges is the REACH compliance of imported confidential product formulations, especially in combination with indirect suppliers. The goal of the REACH-Code-Model (operated by Chemservice) is to avoid the need to disclose confidential business information and finally to provide a watertight documentation to the EU importers in order to make them become so-called Downstream Users (DU) under REACH.

With the REACH-Code-Model an independent EU company (Chemservice S.A.) acts as a trustee of the non-EU manufacturers, their Only Representatives (OR), the traders, formulators and importers and for their respective substances or formulations in order to maintain confidentiality for all steps of the supply chains. A coding system is being used for exchanging the relevant supplier, product and volume information between the different parties of the supply chains and the trustee. The trustee generates and provides unique, time-limited and volume-limited codes (by means of certificates) to all participants of the supply chains. This is being done for all product supplies containing material from non-EU manufacturers and intended to be imported into the EU. The trustee keeps track of all importers, substances and volumes through a central database and finally issues Import Certificates to the importers, related to their imported products and volumes covered.

### Basic principles

- The code process follows exactly the supply chains and is a simple chain of certificates, up from the non-EU manufacturers, down to the EU importers.
- Any information on suppliers, importers and product details is kept at the trustee only.
- All product volumes are controlled by the trustee at every step of the supply chain in order to avoid „free riding“.
- The ORs of the non-EU manufacturers remain responsible for the correctness of all information provided to and certified by the trustee.
- All issued certificates are immediately valid, without the need to wait for any information on importers and their imported substance volumes first.
- The system allows the trustee to demonstrate REACH compliance to REACH enforcement authorities at the push of a button.
- No individual contracts between the downstream customers and the trustee are required (standard Terms & Conditions).

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<sup>1</sup> Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

## **Contents of the REACH-Code-Model package (ZIP file):**

### **REACH-Code-Model\_Flyer.pdf**

General service flyer on the REACH-Code-Model, including sample documents.

### **REACH-Code-Model\_FAQ & Samples\_”date”.pdf**

This file contains a few frequently asked questions & answers and it provides some more detailed explanations.

### **REACH-Code-Model\_Terms & Conditions.pdf**

This file contains the general Terms & Conditions for participating in the REACH-Code-Model. Basically it is a non-disclosure agreement of Chemservice, it describes the process and it defines the costs for the Code and Import Certificates that are being requested and issued.

**Please note that this is not a contract and that the T&Cs will not have to be countersigned by the participants in the REACH-Code-Model. Participants will have to pay for certificates in advance and by doing this they automatically agree to the Terms & Conditions.**

### **Code request form.doc**

This form has to be filled out by every product supplier who wants to request a Code or Import Certificate for their next customer. This form should be filled out electronically only and will have to be sent to [code@chemservice-group.com](mailto:code@chemservice-group.com) in order to have the request processed by Chemservice. Once Chemservice has entered and verified the request, an electronic invoice will be sent to the code requester. The requested Code or Import Certificate will be sent out as a PDF file as soon as the invoice has been paid and the payment is visible on the Chemservice bank account.

### **Code request form\_help.pdf**

This help file provides detailed explanations for each of the fields on the “Code request form”.

You may download the latest REACH-Code-Model package and further information through the following link: [http://www.chemservice-group.com/reach\\_code\\_model.html](http://www.chemservice-group.com/reach_code_model.html)

In case that you have any questions or face any difficulties with the process, please feel free to contact Chemservice at [code@chemservice-group.com](mailto:code@chemservice-group.com).