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Actions for Trichloroethylene Customers Prior and After the Sunset Date

The use of Trichloroethylene (TRI) after the Sunset Date is only allowed for customers if an authorisation is granted to their supplier or to themselves. In order to continue the use of TRI in Industrial Parts Cleaning by Vapour Degreasing in Closed Systems where specific requirements (system of use-parameters) exist, customers need to take actions prior and after the Sunset Date. The checklists in this document should help Downstream Users* to complete these actions.

Prior to the Sunset Date Downstream Users need to document that a first series of requirements has been fulfilled.

Actions Prior to the Sunset Date	Check
1. The “Risk Management Measures” (RMM) as they are described in the REACH authorisation application dossier must be fully implemented. A checklist of these measures can be downloaded at www.chemaware.org .	
2. The cleaning equipment classified as ECSC machine type III was excluded from the scope of the authorisation dossier; therefore, only Downstream Users equipped with cleaning machines type IV or V can be covered by the authorisation once granted.	
3. Downstream Users* have to prove that there is no suitable alternative to TRI (technical, chemical or a combination of both) for the cleaning process. This can be carried out with the “Analysis of Alternatives”. It is a fundamental requirement, and if a suitable alternative is detected, the Downstream User has a mandatory duty to substitute.	
4. To confirm the implementation of the action items 1.-3. above, Downstream Users are required to fill and sign a Declaration of Conformity. After the Sunset Date, TRI will only be delivered to Downstream Users who did return the Declaration of Conformity, provided an authorisation is granted.	

*Downstream User is a REACH specific term and is used as synonym for customer in this communication.



After the Sunset Date Downstream Users will as well be required to take actions and document their achievements.

Actions After the Sunset Date	Check
1. Downstream Users have a duty to notify the first shipment of TRI received after the Sunset Date to ECHA.	
2. The TRI exposure must be measured annually as mentioned in the final ECHA opinion. The measurement conditions need to be identical with the exposure scenarios described in the Chemical Safety Report from Dow/SAFECEM. As a service to customers, this annual exposure measurement will be part of the COMPLEASE™ Chemical Leasing offer. After the measurement Downstream Users will receive detailed results which have to be documented and which will help to improve their occupational hygiene program.	
3. Downstream Users must attend and document the participation in a training informing about alternatives to TRI provided by Dow/SAFECEM or an accredited partner. The CHEMAWARE™ Choosing the Right Solvent Workshop represents such training.	
4. The Analysis of Alternatives must be repeated three and six years after the Sunset Date under consideration of technology which represents the state-of-the-art at that future point in time. Downstream Users have to complete and return a second and third Declaration of Conformity to SAFECEM respectively in April 2019 and April 2022. With this Declaration of Conformity, Downstream Users will certify that these Analyses of Alternatives have been conducted and that no suitable alternative was found.	

Simplified Use of TRI with COMPLEASE™ Chemical Leasing

The final opinion on Dow/SAFECEM application for authorisation published by ECHA includes best practices for the safe and sustainable use of chemicals, in particular the function-oriented and sustainable chemical leasing business model. COMPLEASE™ Chemical Leasing stimulates resource efficiency, continuous innovation, collaboration, and enhanced performance. It contains incentives for all partners in the value chain such as increasing performance while reducing volume and better managing the product specific risks. SAFECEM is committed to convert all TRI customers to COMPLEASE™ Chemical Leasing within the shortest possible time.