



Dow Europe GmbH  
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## Trichloroethylene and Authorisation under REACH (1907/2006)

### Information Letter no. 7:

*For customers using Trichloroethylene (TRI) in surface cleaning*

Dear Mme/Sir,

This letter informs about the authorisation process and considerations on the continued use of TRI in surface cleaning applications.

#### 1. What are the timelines in the authorisation process?

In a recent EU Member State Committee meeting the exact entry into ANNEX XIV for TRI has been discussed and a voting took place. The outcome is seen as a final proposal and will most likely be taken up as such into the ANNEX in March 2013.

- Application Date<sup>1</sup>: Date of inclusion into Annex XIV plus 18 months (**September 2014**)
- Sunset Date<sup>2</sup>: 18 months after the application date, 36<sup>th</sup> months after inclusion into ANNEX XIV (**March 2016**)

The request for exemption from the authorisation for the industrial use in surface cleaning (closed systems), as put forward by the supplier consortium for TRI, has not been taken up and will presumably not be included.

#### 2. Will Dow consider to apply for authorisation using the substance as described in the exposure scenario "Industrial use in surface cleaning (closed systems)"?

Dow started the preparation of a dossier to apply for authorisation for the above use. An authorisation dossier has to contain the following information:

- a) **Identity of the substance**
- b) **Contact details**
- c) **Use**
- d) **Chemical safety report**
- e) **Analysis of alternatives: Equivalent function, reduced overall risks, technically and economically feasible**
- f) **Substitution plan (if suitable alternatives exist)**
- g) **Socio-economic analysis**

The use and use description will need to be refined. As it is known that alternatives exist for the use in surface cleaning the authorisation will only be applicable for downstream users who cannot substitute TRI. The particular applications concerned will need to be extracted from information provided by downstream users.

Dow will **not** apply for authorisation for the **Industrial Use in Surface Cleaning (enclosed systems)**. Even though our Safety Data Sheet (SDS) contains an exposure scenario for this use and calculations have shown that under certain risk management measures safe use can be achieved, this technology is not

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<sup>1</sup> Date by which applications for authorisation must be submitted to allow continued uses after the sunset date

<sup>2</sup> Date from which placing on the market and the use is prohibited unless authorisation is granted



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considered as “Best Available Technology (BAT)” or state-of the art technology and therefore is not seen as sustainable.

Our offering also includes potential alternatives such as:

- Perchloroethylene (tetrachloroethylene, PER, Perc or PCE)
- Methylene chloride (dichloromethane or DCM)
- Modified alcohol solvents from the DOWCLENETM series

All solvents are specially developed to address high surface cleaning requirements.

### **3. What is expected from downstream users?**

#### **3.1. Is a suitable alternative available?**

Downstream users are strongly recommended to substitute TRI before the sunset date, if suitable alternatives exist!

If a suitable alternative is available but the substitution to this alternative is impossible before the sunset date, please provide a substitution plan including reasons for late substitution and exact timeline. In this case Dow will need to attach a substitution plan to the authorisation request. The request will be reviewed by ECHA committees and become subject to a public consultation, where third parties can place comments.

Please review the guidance documentation at the ECHA homepage. You will find more information under 3. Preparing for Authorisation (<http://echa.europa.eu/web/guest/applying-for-authorisation>) or in the “guidance on the preparation of an Application for Authorisation” at the bottom of the page.

#### **3.2. Is no suitable alternative available?**

If it can be demonstrated with data that no suitable alternative is available, downstream users should provide information about their research on alternatives. This information should list all efforts to identify possible alternatives and review the technical and economical feasibility and availability of the substance. The consolidated information of alternatives as part of the authorisation dossier will be made publicly available so that third parties can provide comments and proposals for alternatives. Hence it is necessary to provide a comprehensive analysis of alternatives.

It is highly recommended that you as downstream user provide information to make sure your application is sufficiently covered and you can continue to use TRI.

Please contact your SAFECHEM Europe GmbH representative if you have information to provide. Thank you for your support and continuous confidence into Dow and SAFECHEM.

P. Angelov

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