



TECHNICAL GUIDANCE FOR FILLING IN THE QUESTIONNAIRE

This sheet has been created to enable you to fill in the “*Substance Information Project*” Questionnaire more swiftly and effectively.

Section 1: General Information.

Are you a Producer or Importer of the product mentioned below?

In this questionnaire, Importer refers to importing the substance/product into the EU. Under REACH the duties of a producer or importer of a substance during Registration are slightly different, therefore it is important for the CDI to be aware of which of these categories our members fall under. This is why there are distinct questions for producers and importers.

Company’s Estimated Tonnage Band per annum for this product/substance from the Entry into Force of REACH (2007)

The Tonnage band is important, as assuming the cobalt industry follows the one substance – one registration model put forward in the legislation, the producer/importer with the highest tonnage band will determine when everyone has to register that substance.

Section 2: Substance/Product Information for the producer (2.1) and importer (2.2)

Do you intentionally add anything to this substance/product during its creation / processing? (dilution compound, stabilising, free flowing agent, additive, etc)

Due to the way in which the term “substance” is defined under REACH it is imperative that this question is both clearly understood and answered correctly. Under REACH only *substances* have to be registered, although their uses and the preparations (i.e. a mixture of two or more substances) which the substance goes into have to be recorded in the registration dossier.

Under the definitions in REACH, a substance is still counted as a substance rather than a preparation if it contains impurities derived from the processing or “*any additive necessary to preserve its stability*”. However, other additions which change the properties of the substance e.g. a free flowing agent to make powder flow more smoothly, will turn the substance into a preparation. The difference in how to treat substances and preparations under REACH is very large and it is imperative for the decisions to be made on the basis of this questionnaire that the CDI understands whether the substance/product which you fill in the questionnaire for is one or the other.

EXAMPLE: If you make a powder and add a stabiliser to avoid degradation, this commercial product is still a substance.

If you make a powder and then add a free flowing agent, this commercial product is a preparation



CAS Number

CAS (Chemical Abstract Service) numbers should be available on the Safety Data Sheets of the products you use or produce, if you are unsure they can be looked up on free to use database web sites such as <http://chemfinder.cambridgesoft.com/> or <http://www.cas.org>

EC Number

The term EC numbers has replaced the phrase EINECS / ELINCS number. Substance EC numbers should be able to be found at <http://ecb.jrc.it/esis/> by searching on EINECS, ELINCS and Annex I of 67/548/EEC.

Typical Conc.

This is requesting the typical concentration of the constituent in question in your substance/product, on a weight by weight basis.

Conc. Range

It is understood that many substances/products are heterogeneous through a production run, this column allows companies to state the range of the constituents. This is important as large range variations may alter the classification and labelling or identity of the substance under the REACH regulations.

If your substance / product is a “complex substance or product” (e.g. a residue, slag, ore) please define it further below but do also fill the composition...

In cases such as residues, slags and ores, the composition itself is not enough to fully identify the substance/product. In these cases please provide a short description of the substance/product in this section to allow the CDI to decide how best to include it, in the CDI's future plans.

Section 3: Classification and Labelling

One of REACH's aims is to ensure that the same substances and products are given the same classification and labelling by different companies. By appending this information onto the end of this questionnaire the CDI will be able to see the current degree of agreement across the industry.

Further electronic copies of the questionnaire are available from the SIP webpage (www.thecdi.com/sip)

Please return filled in questionnaires to the Cobalt Development Institute by 15th September 2006,

If you have any further questions please contact Dr Ryan Welton at rwelton@thecdi.com