

**Business impact assessment of the GHS and REACH system for
the metal industry (EU New Chemical Policy)**

Questionnaire on INTERMEDIATES (EXCEL Sheet 2)

All information submitted will be treated in full confidence by ENIA. Only aggregated information will be used for communication purposes.

This explanatory note aims to provide some background information to help you to complete the questionnaire.

Please comply information for most recent relevant year available (e.g. 2005)

DEFINITION OF THE TERM "INTERMEDIATE"

According to the Common Position on REACH published on 27/06/2006 (Title I, Chapter 2, Article 3 Definitions, §14), an **intermediate** means "*a substance that is manufactured for and consumed in or used for chemical processing in order to be transformed into another substance (hereinafter called synthesis)*" (e.g. Ni matte)

The legislation further makes the distinction between: Non-isolated intermediates, On-site isolated intermediates, Transported isolated intermediates.

i) **Non-isolated intermediate** "*means an intermediate that during synthesis is not intentionally removed (except for sampling) from the equipment in which the synthesis takes place. Such equipment includes the reaction vessel, its ancillary equipment, and any equipment through which the substance(s) pass(es) during a continuous flow or batch process as well as the pipework for transfer from one vessel to another for the purpose of the next reaction step, but it excludes tanks or other vessels in which the substance(s) are stored after the manufacture.*"

ii) **On site isolated intermediate** "*means an intermediate not meeting the criteria of a non-isolated intermediate and where the manufacture of the intermediate and the synthesis of (an)other substance(s) from that intermediate take place on the same site, operated by one or more legal entities.*"

iii) **Transported isolated intermediate** "*means an intermediate not meeting the criteria of a non-isolated intermediate and transported between or supplied to other sites.*"

Only (ii) on-site isolated intermediates and (iii) transported isolated intermediates iii) need to be reported here, since (i) non-isolated intermediates fall outside the scope of REACH. Isolated intermediates have reduced registration requirements vis-à-vis other substances on its own or in preparation.

Questionnaire on Intermediates

Guidance on the excel spread sheet

To facilitate the completion of this questionnaire, we have included a typical example in the first row.

- (x). The number listed below refers to the same reference number in the questionnaire.
- (1). Please indicate the **type of each intermediate** your company produces and/or imports in the EU.

Only isolated intermediates (ii) on-site isolated intermediates and iii) transported isolated intermediates) need to be reported here.

- (2). For each intermediate, please indicate if these are classified and the R Phrase.
- (3). For each of your intermediates, please tick the column corresponding to the **annual tonnage category** (total annual tonnage produced in the EU and/or imported* into the EU):
- between 1 tonne and 10 tonnes
 - between 10 tonne and 100 tonnes
 - between 100 tonne and 1000 tonnes
 - above 1000 tonnes

*The company that carries out the customs clearance is considered as the "legal importer" cf. the proposed regulation

- (4). For each of your intermediates individually, please indicate if you have information on hazard or risk: Yes/No/Don't know.
- (5). For each of your intermediates, please indicate the various **direct use categories** (e.g. production of metals)
- (6). **Voluntary consortium**
ENIA and NI have planned to set up voluntary consortia from the 1st January of April 2007. The aims are to prepare the pre-registration and the registration phases and to have solved most of the questions related to data sharing as soon as possible.

Do you want to join a voluntary consortium in case of Registration?