

# Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)

## 1. Preliminary remarks

### 1.1 Description of obligations

There is a good description of the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH) in the guidance document of the BDI and HDE „3.2.6 Communication in the supply chain – Substances of very high concern in articles “, which can be obtained from the following internet address: <http://reach.bdi.info/BDIHS326.doc>.

It is particularly important to note that the publication or update of the candidate list directly triggers the duty to provide information and that no transitional period is foreseen. Publication of the first candidate list has been announced for end of October 2008.

### 1.2 Ways of fulfilling the communication requirements

#### 1.2.1 Communication of information according to article 33(1) (along the supply chain)

According to article 33(1) information about the substances included on the candidate list has to be provided automatically. The following approaches can be taken:

- Communication of information online;
- Explicit and easily accessible information in the product literature<sup>1</sup>;
- Indication of a website in the product literature with up-to-date information<sup>2</sup>.

#### 1.2.2 Communication of information according to article 33(2) (Consumer information)

According to article 33(2) information available to the supplier of an article that is necessary to ensure safe use of the article has to be provided also to consumers upon request. This obligation can be met in the following ways:

- By means of electronic data communicated to the retailer;
- By means of explicit data in the product literature, provided the supplier has communicated the information in this way;
- By means of the website indicated in the product literature with up-to-date information.

### 1.3 Remarks and recommendations (these apply to all three approaches)

- It is recommended to use the name of the substance that is used in the candidate list itself<sup>3</sup>.
- Current product safety legislation already stipulates that data on the safe use of an article must be provided on packaging materials, in instruction manuals or in product specifications.

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<sup>1</sup> It is not recommended to provide this information on the inside of packaging materials, because the information should be readily available for the entire supply chain so as not to hinder the flow of information unnecessarily. It cannot be expected from a recipient of an article or a retailer to systematically search for relevant information in instruction manuals.

<sup>2</sup> Footnote 30 on page 59 of the non-binding guidance document „Guidance on requirements for substances in articles“, (May 2008) reads as follows: „As the candidate list is subject to change, a link to a website with up-to-date information could be provided in addition to a paper label. However, a link would not be sufficient since the information is then not readily available.“ This applies neither to recipients nor to consumers purchasing online. In the case of consumers purchasing in retail shops, the retailer can provide information on request. It is important that the website is established on a permanent basis and accessible at any time.

<sup>3</sup> These names will most probably be communicated only in English. It is recommended to provide also the German name so as to make them easier for the consumer to understand.

- The (chemical) industry sectors concerned shall develop and make accessible to retailers suitable information on those substances from the candidate list which are regularly contained in consumer products, in relevant concentrations. This ensures that the same information (in particular about possible health effects) is provided to everybody about one and the same substance.
- According to article 33, the obligation to provide information is only applicable if a substance included on the candidate list is present in an article in a concentration above 0.1 % weight by weight. However, it can also be useful to indicate that an article contains no substance included on the candidate list („negative information“). This can help:
  - to pre-empt requests for information by recipients,
  - to avoid many queries,
  - because recipients and consumers of articles cannot be sure, if no statement has been made, that the information requirements according to article 33 have been sufficiently complied with. The samples provided therefore also include negative information.

#### 1.4 Recommendations regarding product literature

It is recommended to indicate in the product literature a link to a website with up-to-date information. This could be worded as follows: "Please consult the following website ..... for information about the presence in our articles of substances included on the candidate list according to article 59(1) of Regulation (EC) No 1907/2006 („REACH“) in a concentration above 0.1 % weight by weight."

Any data provided online should be readily available, and it is recommended to set up a website on a permanent basis specifically for the purpose of guidance on REACH, e.g. [www.hersteller.de/info/reach](http://www.hersteller.de/info/reach).

## 2. Samples of phrases

The following wording can be used to communicate information about substances included on the candidate list:

### *On request of recipients or consumers of articles:*

Thank you very much for your request for compliance with Regulation (EC) No 1907/2006 (REACH). It is our intention to meet the requirements set by REACH, and we shall inform you in the framework of our business relations *[only in the case of recipients]* about the changes to our products resulting from REACH and agree on suitable measures on a case-by-case basis. As far as article 33 of REACH is concerned, we would like to communicate the following information:

**Please use the model wording in the table relating to the respective case [e.g. article supplied without packaging materials] and time [e.g. the candidate list is not yet available].**

### **Timeline:**

- Stage 1: The candidate list has not yet been published
- Stage 2: The first candidate list was published on dd.mm.yyyy, full knowledge about all substances included on the candidate list is not available yet
- Stage 3: The first candidate list was published on dd.mm.yyyy, full knowledge about the substances included on the list is available
- Stage 4: A revised candidate list was published on dd.mm.yyyy.

**Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 1: The candidate list has not yet been published**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied with packaging materials:	Possible additional details, if applicable:
<p>The candidate list* according to article 59 (1, 10) of Regulation (EC) No. 1907/2006 („REACH“) has not yet been published. It is therefore not possible to provide information whether substances included on the candidate list are present in the article in a concentration above 0.1 % weight by weight.</p>	<p>The candidate list* according to article 59 (1, 10) of Regulation (EC) No. 1907/2006 („REACH“) has not yet been published. It is therefore not possible to provide information whether substances included on the candidate list are present in the packaging materials in a concentration above 0.1 % weight by weight.</p>	<p>The candidate list* according to article 59 (1, 10) of Regulation (EC) No. 1907/2006 („REACH“) has not yet been published. It is therefore not possible to provide information whether substances included on the candidate list are present in the article or in its packaging materials in a concentration above 0.1 % weight by weight.</p>	<p>The article/the packaging materials/the article and its packaging materials does/do not contain any of the substances included in the draft candidate list in a concentration above 0.1 % weight by weight. (Reference: <a href="http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp">http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp</a>)</p>

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

**Samples of phrasing and templates to fulfill the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 2:**

**The first candidate list was published on dd.mm.yyyy, full knowledge about all substances included on the list is not yet available**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied with packaging:	Possible additional details, if applicable:
<p>The candidate list* (date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) has been published (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>). It is not possible yet to provide information whether substances included on the candidate list are contained in the article in a concentration above 0.1 % weight by weight, because we must first obtain the relevant information from our suppliers.</p>	<p>The candidate list* (date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) has been published (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>). It is not possible yet to provide information whether substances included on the candidate list are contained in the packaging materials in a concentration above 0.1 % weight by weight, because we must first obtain the relevant information from our suppliers.</p>	<p>The candidate list* (date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) has been published (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>). It is not possible yet to provide information whether substances included on the candidate list are contained in the article or its packaging materials in a concentration above 0.1 % weight by weight, because we must first obtain the relevant information from our suppliers.</p>	<p>The article/the packaging materials/the article and its packaging materials does/do not contain any of the substances included in the candidate list in a concentration above 0.1 % weight by weight. (<a href="http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp">http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp</a>)</p>

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

**Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 3:**

**The first candidate list was published on dd.mm.yyyy, full knowledge about the substances included on the list is available**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
<p>1. The article contains (optional: our articles contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</p> <p>2. The article contains the following substances included on the candidate list (date ...) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...</p>	<p>1. The packaging materials contain (optional: our packaging materials contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</p> <p>2. The packaging materials contain the following substances included on the candidate list (date ...) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...</p>	<p>1. The article and its packaging materials contain (optional: our articles and their packaging materials contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</p> <p>2. The article contains the following substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...The packaging materials contain no substances included on the candidate list in a concentration</p>	<p>Details relating to the safe use of this article can be found in ...</p>

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

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**Stage 3:**

**The first candidate list was published on dd.mm.yyyy, full knowledge about the substances included on the list is available**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
		<p>above 0.1 % weight by weight.</p> <p>3. The article contains (optional: our articles contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight. The packaging materials contain the following substances included on the candidate list (date ...) in a concentration above 0,1 % by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...</p> <p>4. The article contains the following substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 %</p>	

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

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**Stage 3:**

**The first candidate list was published on dd.mm.yyyy, full knowledge about the substances included on the list is available**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
		weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i). The packaging materials contain the following substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a> ). in a concentration above 0.1 %	weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

**Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 4:**  
**A revised candidate list was published on dd.mm.yyyy.**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
<ol style="list-style-type: none"> <li>1. The article contains (optional: our articles contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</li> <li>2. The article contains the following substances included on the candidate list (date ...) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), .....</li> <li>3. It is not possible yet to provide information whether the substances that have been added to the candidate list (new date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) (Name of the substance) are contained in</li> </ol>	<ol style="list-style-type: none"> <li>1. The packaging materials contain (optional: our packaging materials contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</li> <li>2. The packaging materials contain the following substances included on the candidate list (date ...) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), .....</li> </ol> <p>It is not possible yet to provide information whether the substances that have been added to the candidate list (new date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) (Name of the substance) are contained in</p>	<ol style="list-style-type: none"> <li>1. The article and its packaging materials contain (optional: our articles contain) no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight.</li> <li>2. The article contains the following substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i):... The packaging materials contain no substances included on the candidate list in a concentration above 0.1 % weight by weight.</li> <li>3. The article contains no substances included on the candidate list (date ...) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA)</li> </ol>	

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

**Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 4:**  
**A revised candidate list was published on dd.mm.yyyy.**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
<p>the article in a concentration above 0.1 % weight by weight, because we must first obtain the relevant information from our suppliers. As regards the substances included on the previous candidate list (earlier date dd.mm.yyyy), we would like to inform you of the following:</p> <ul style="list-style-type: none"> <li>a) The article contains no substances included on the candidate list (earlier date dd.mm.yyyy) in a concentration above 0.1 % weight by weight.</li> <li>b) The article contains the following substances included on the candidate list (earlier date dd.mm.yyyy) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...</li> </ul>	<p>the packaging materials in a concentration above 0.1 % weight by weight, because we must first obtain the relevant information from our suppliers. As regards the substances included on the previous candidate list (earlier date dd.mm.yyyy), we would like to inform you of the following:</p> <ul style="list-style-type: none"> <li>a) The packaging materials contain no substances included on the candidate list (earlier date dd.mm.yyyy) in a concentration above 0.1 % weight by weight.</li> <li>b) The packaging materials contain the following substances included on the candidate list (earlier date dd.mm.yyyy) in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i), ...</li> </ul>	<p>http://echa.europa.eu/) in a concentration above 0.1 % weight by weight. The packaging materials contain the following substances included in the candidate list in a concentration above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EC iii-iii-i), B (CAS i...-ii-i, EC iii-iii-i), ...</p> <ul style="list-style-type: none"> <li>4. The article contains the following substances included on the candidate list (date ...) in a concentration above 0,1 % by weight: Substance A (CAS i...-ii-i, EG iii-iii-i), B (CAS i...-ii-i, EG iii-iii-i):... The packaging materials contain the following substances included in the candidate list in concentrations above 0.1 % weight by weight: Substance A (CAS i...-ii-i, EC iii-iii-i), B (CAS i...-ii-i, EC iii-iii-i), ...</li> <li>5. It is not possible yet to provide information whether the substances that have been added to the candidate list (new date dd.mm.yyyy) according to article 59 (1, 10) of Regulation (EC) No 1907/2006 („REACH“) (see the website of the European Chemicals Agency (EChA) <a href="http://echa.europa.eu/">http://echa.europa.eu/</a>) (Name of the substance) are contained in the article or in the packaging materials in a concentration above 0.1 % weight by</li> </ul>	

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

**Samples of phrasing and templates to fulfil the communication requirements according to article 33 of Regulation (EC) No 1907/2006 (REACH)**

**Stage 4:**  
**A revised candidate list was published on dd.mm.yyyy.**

The article is supplied without packaging materials:	Packaging materials are supplied:	The article is supplied in packaging:	Possible additional details, if applicable:
		<p>weight, because we must first obtain the relevant information from our suppliers. As regards the substances included on the previous candidate list (earlier date dd.mm.yyyy), we would like to inform you of the following</p> <ul style="list-style-type: none"> <li>a. Analogously to point 1 above, replace (new date dd.mm.yyyy) by (previous date dd.mm.yyyy).</li> <li>b. Analogously to point 2 above, replace (new date dd.mm.yyyy) by (previous date dd.mm.yyyy).</li> <li>c. Analogously to point 3 above, replace (new date dd.mm.yyyy) by (previous date dd.mm.yyyy).</li> <li>d. Analogously to point 4 above, replace (new date dd.mm.yyyy) by (previous date dd.mm.yyyy).</li> <li>e. Analogously to point 5 above, replace (new date dd.mm.yyyy) by (previous date dd.mm.yyyy).</li> </ul>	

<sup>1)</sup> The candidate list may contain the following substances: CMR-substances (substances that are carcinogenic, mutagenic or toxic for reproduction) (category 1 or 2 respectively), PBT-substances (persistent, bioaccumulative, toxic) and vPvB-substances (very persistent, very bioaccumulative) as well as similarly dangerous substances that can be individually determined on the basis of scientific criteria.

### Electronic communication of information in accordance with article 33

It is possible to integrate the electronic communication of information into existing electronic data exchange formats.

If information is forwarded electronically it will no longer be unnecessary at the latest from stage 3 onwards to provide any information in writing within the supply chain. If changes are needed at stage 4 these would only have to be carried out once it is known that one or several new substances are contained in an article. Only then would the new substances need to be added to the candidate list and the date be adapted.

The document IEC PAS 61906:2005 „Procedure for the declaration of materials in products of the electro-technical and electronic industry“ defines a procedure to provide information about substances in hardware products (articles). The following is a simple example of how data could be provided electronically according to article 33 and in conformity with IEC PAS 61906<sup>4)</sup>.

**Table 1: Identity of producer/supplier**

Date:
Name of producer/supplier:
DUNS Number:
Address:
Internet address:
Contact:
Name, Telephone, email-address:
Date of candidate list:
Date:
Remarks:

**Table 2: Identity of product (article)**

Name of article:
Number of article:
EAN Number:
Typical mass of article [kg]:
Remarks:

**Table 3: Substances included on the candidate list contained in the article**

Lfd. Nr.	Name of substance	CAS No	EC No	Typical (Ty) % weight in relation to article	Remark
1	M1	i...i-ii-i	iii-iii-i	xy.z	
2	M2	i...i-ii-i	iii-iii-i	xy.z	

**Table 4: Substances included on the candidate list contained in the packaging materials**

Lfd. No.	Name of substance	CAS No	EC No	Typical (Ty) % weight in relation to article	Remarks
1	M1	i...i-ii-i	iii-iii-i	xy.z	
2	M2	i...i-ii-i	iii-iii-i	xy.z	

<sup>4</sup> IEC PAS 61906 does not yet foresee the possibility of providing another identification number next to the CAS Registry Number (in short CAS Number). However, it is recommended to also indicate the EC Number when providing information according to article 33 of REACH.

If the name of the substance is communicated by electronic means, the following rules should be complied with:

Name of substance:

- Alpha-numerical symbols (letters, figures) (a, b, ..., z, A, B, ..., Z, 0, 1, ..., 9), empty spaces, apostrophe (Apostrophe U+0027 according to ISO/IEC 8859-1), no vowels with umlaut, replace ß by ss.
- Greek letters must be replaced by roman letters in accordance with ISO 843 with a preceding "&" (ampersand).
- Only the following symbols: - + +/- ( ), brackets {, [ and ], } have to be replaced by ( and ) , arrows must be replaced by ->.
- Superscript letters/figures x must be replaced by "|x" (vertical line + x), subscript is replaced by "\_x" (low line + x).
- Maximum length 120 (including symbols &, \_ and |, -> counts as a character).

CAS and EC No:

- No left-aligned zeros. Left-aligned input.
- Structures as indicated. For CAS numbers 12 characters are sufficient, for EC numbers 9 characters are sufficient.

For the purpose of electronic forwarding of general information about substances in articles, the IEC PAS 61906 can be used as a basis for how to provide the data. The following details must be given:

- Identity of producer/supplier
- Identity of product
- nominal (No), minimum (Mi), maximum (Ma), typical (Ty) mass of product in kg [Indication either No or Ty or Mi + Ma, Mi + Ma mainly in the case of product categories]
- In the case of product categories: nominal mass of products in the product category
- Remark: One of the above-mentioned text blocks could refer to the product. Then the following wording could be used: „Only those substances included on the candidate list (date ....) have been mentioned that are contained in the article in a concentration > 0.1 % weight by weight.“

Optional: Assembly of an article from several product parts<sup>\*)</sup>. Packaging materials can also be defined as a part.

<sup>\*)</sup> IEC PAS 61906 foresees three levels of product assembly. It is recommendable however to use only two levels, because this allows for the greatest flexibility.

The following information has to be provided for each product part:

- Identity of the product part
- Number of identical product parts
- Either:  
Nominal (No), minimum (Mi), maximum (Ma), typical (Ty) mass of product part in kg [Indication either No or Ty or Mi + Ma, Mi + Ma mainly in the case of product categories]  
or:  
Nominal (No), minimum (Mi), maximum (Ma), typical (Ty) percentage of weight of the product part in relation to the product [Indication either No or Ty or Mi + Ma, Mi + Ma mainly in the case of product categories]
- Remark: One of the above-mentioned text blocks could be used for the product part.

In the case of products or defined product parts, the materials they are composed of have to be declared. If a substance included on the candidate list is contained in a product in a concentration > 0.1 % weight by weight and this substance has been declared as a material, the following information has to be provided for each substance:

- Internationally recognised name of substance [it is recommendable to use the name that is also used in the candidate list]
- CAS number
- Additional identification number: EC number<sup>\*)</sup>

- Type of additional identification number: EC number
- Nominal (No), minimum (Mi), maximum (Ma), typical (Ty) percentage of weight of substance in relation to the material [Indication either No or Ty or Mi or Mi + Ma]
- Remark: e.g. for safe use.

In the case of defined product parts, a clear relation has to be established between the product part and its materials.

If a substance included on the candidate list is contained in an article in a concentration > 0.1 % weight by weight and the substance has been declared as a component of a material, the following information has to be provided about each substance:

- Internationally recognised name of substance [it is recommendable to use the name that is also used in the candidate list]
- CAS number
- Additional identification number: EC number
- Type of additional identification number: EC number
- Nominal (No), minimum (Mi), maximum (Ma), typical (Ty) percentage of weight of substance in relation to the material [indication either No or Ty or Mi or Mi + Ma]
- Remark: e.g. for safe use.

It is necessary to establish a clear relation between the materials and their components.