
esa
REACHLAW
COMPLIANCE. SUSTAINABILITY.
ESA REACH Tool Webinar
Oliver Reiff-Musgrove (Senior Product Manager at REACHLaw)
& Premysl Janik (ESA REACH Officer)
26th February 2025 | ESA SME Office | Webex

Disclaimer

Do NOT Register for the ESA REACH Tool until the END of this Webinar!

You will not be approved until *after* this Webinar

For any REACH Questions, please refer to the Previous **REACH Awareness Webinar** (Held 29/01/25)

Disclaimer and Copyright

We hope this material will be of good benefit for your activities!

REACHLAW
COMPLIANCE. SUSTAINABILITY.

ABOUT US

- Contractor to ESA since 2011
- Established in Helsinki, Finland 2006
- Subsidiaries in 7 Countries
- Multidisciplinary team - Business, Legal & Technical: *Eco-/Toxicologists, Chemists, Lawyers, Socio-econ. analysts and Environmental specialists*
- Support in 10+ different languages
- Major industries served: *Oil, Chemicals, Specialty Chemicals, Metals, Aerospace and Defence sector, Electronics, Pulp & Paper and Other Downstream User (DU) industries, etc.*
- More info at: www.reachlaw.fi

Regulations Supported:

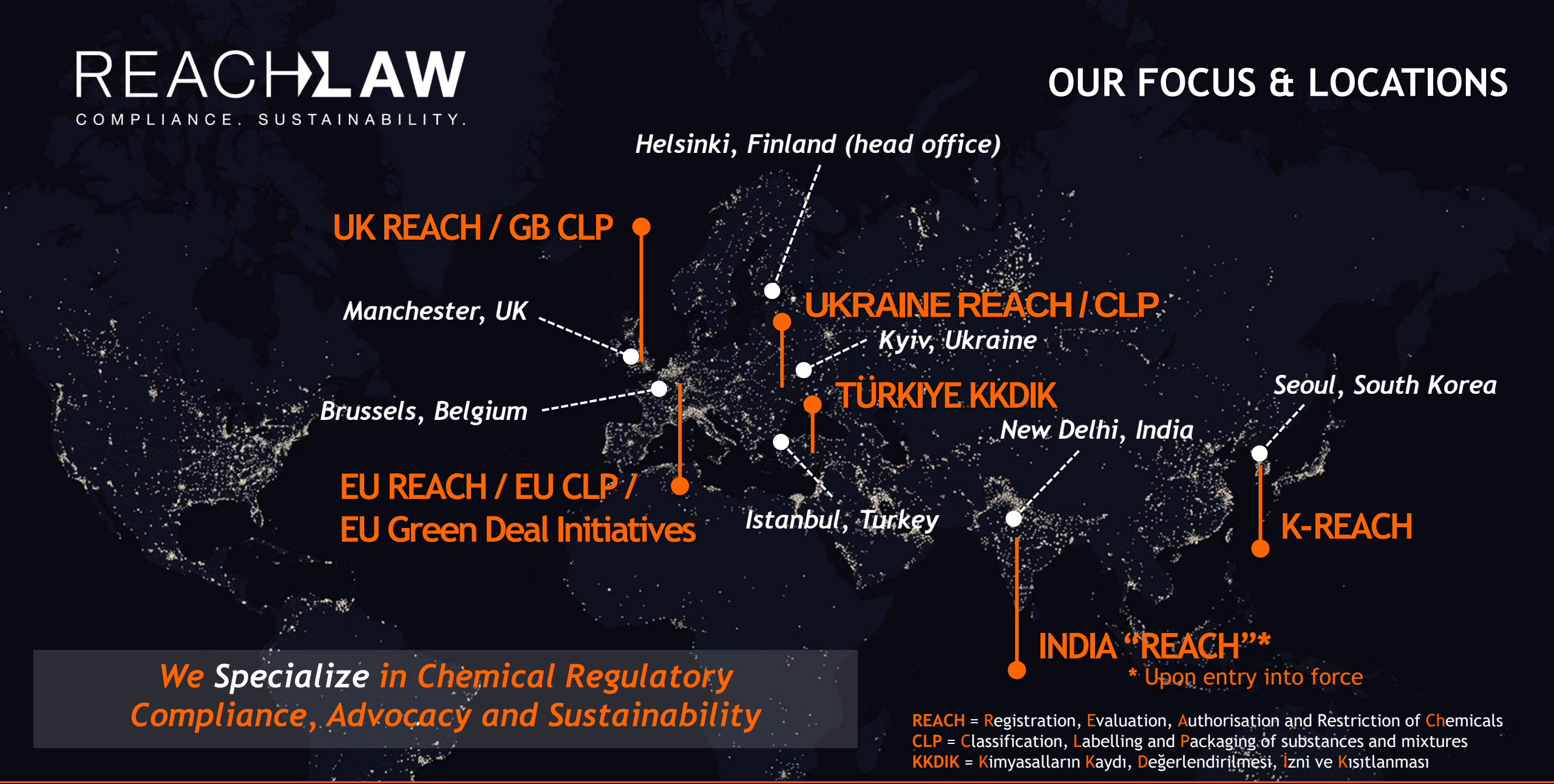
- *EU REACH / CLP, WFD / SCIP, ESPR / Other European Green Deal initiatives*
- *UK REACH / GB / CLP*
- *Turkey KKDIK / SEA / GBF*
- *India "REACH"* / BIS*
- *Korea REACH*
- *UKRAINE REACH*
- *Swiss ChemO*

...and more

* *Upon Entry Into Force*

REACHLAW
COMPLIANCE. SUSTAINABILITY.

OUR FOCUS & LOCATIONS



We Specialize in Chemical Regulatory Compliance, Advocacy and Sustainability

REACH = Registration, Evaluation, Authorisation and Restriction of Chemicals
CLP = Classification, Labelling and Packaging of substances and mixtures
KKDIK = Kimyasalların Kaydı, Değerlendirilmesi, İzni ve Kısıtlanması

ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

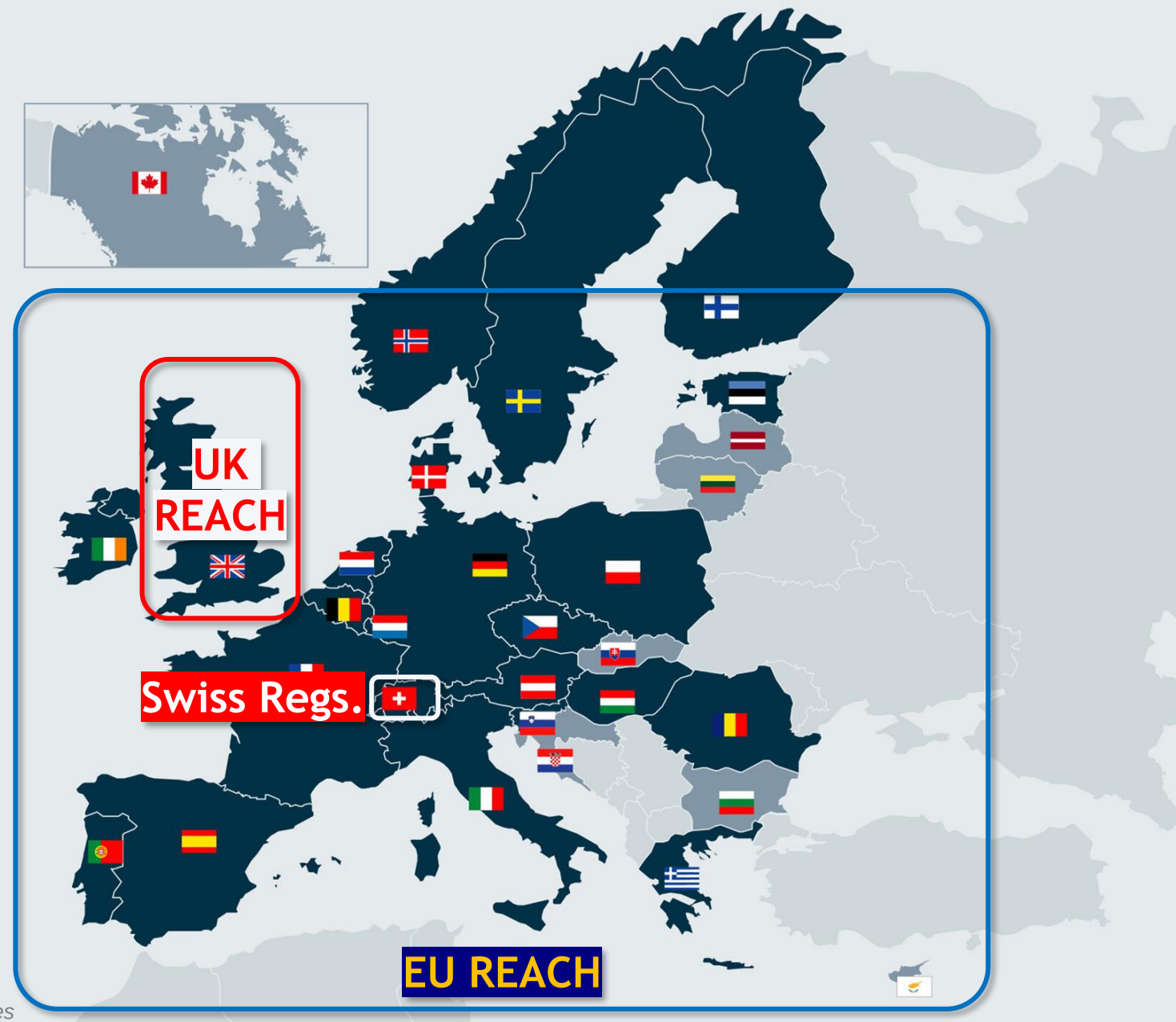
ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Recap of REACH
European Space Agency

REACH = Chemical Regulations
Registration
Evaluation
Authorisation
and Restriction
of Chemicals



ESA Regulatory Jurisdictions
- EU REACH
- UK REACH
- Swiss ChemO/ORRChem

Source: https://www.esa.int/About_Us/Corporate_news/Member_States_Cooperating_States

Recap of REACH EU REACH Substance Lists

Space-relevant EU REACH Substance Lists

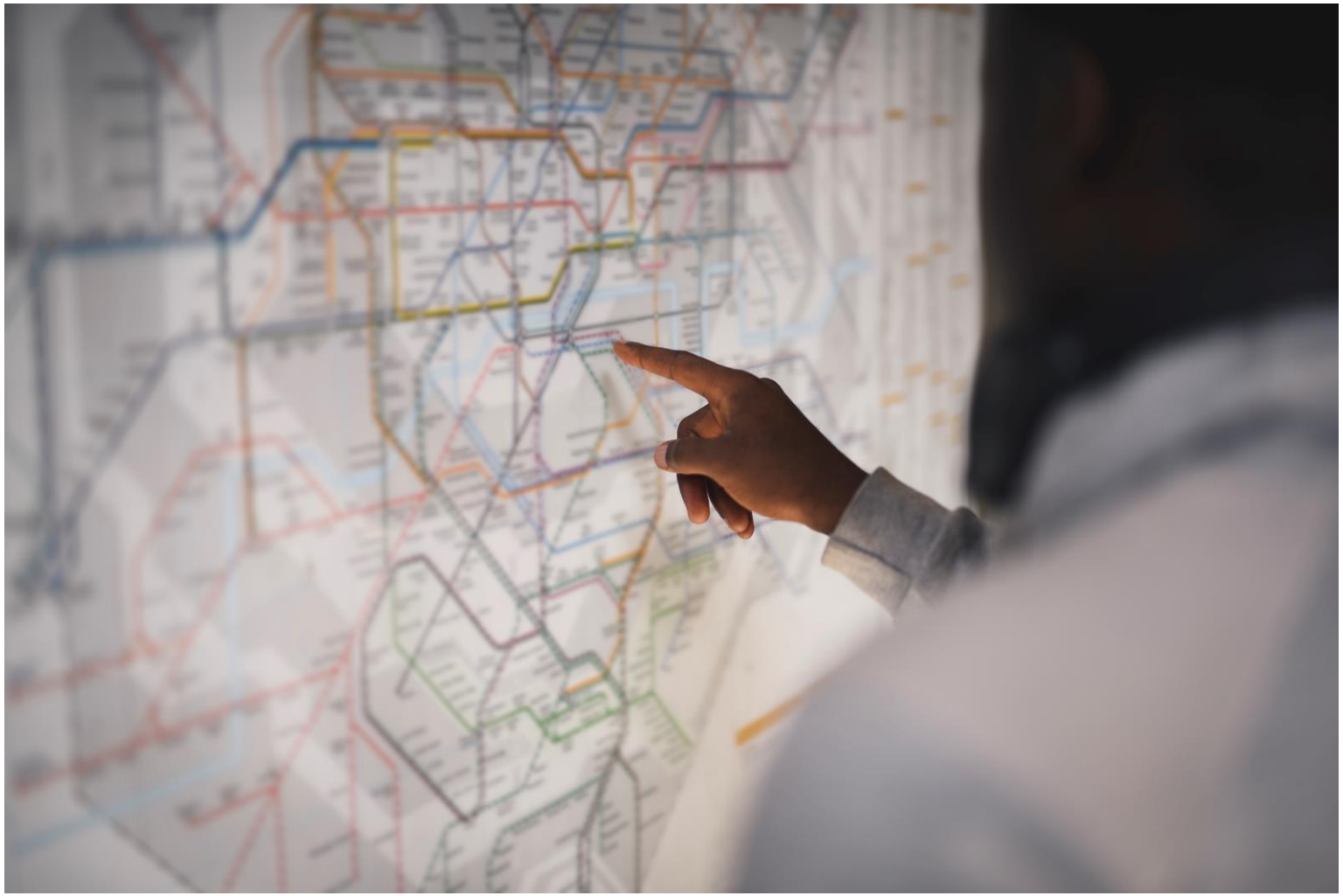
	Candidate List (SVHC)	Restrictions (Annex XVII)	Authorisation (Annex XIV)
Also known as			
Compliance Obligations	Reporting duties	Restriction on certain uses	Ban without authorisation
Obsolescence Risk	Medium	High* (for ban)	Very High
Update Frequency	2x/year	No schedule	No schedule
Entries (Δ Since Mar. 2024)	247 (+7)	74 (+1)	59

*Restriction entry text specific

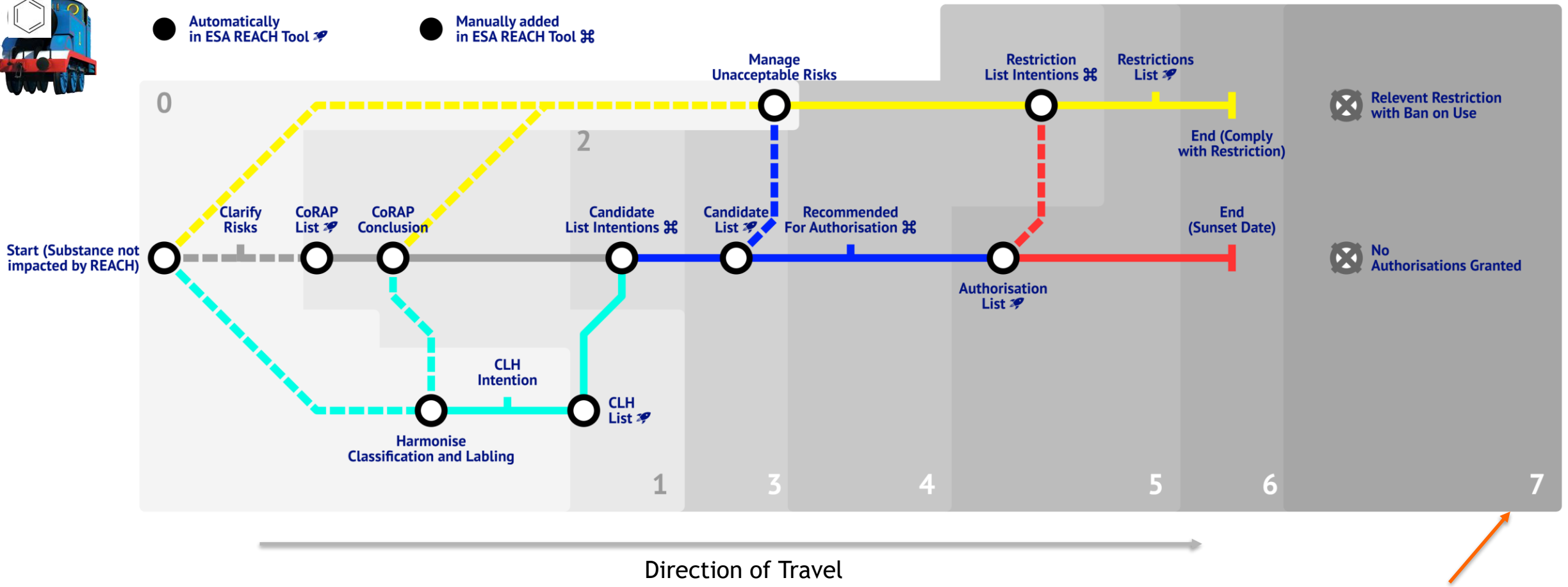
Multiple regulatory updates each year from EU REACH alone!

SVHC = Substance of Very High Concern

Recap of REACH EU REACH High Level Substance Pathway



Recap of REACH EU REACH High Level Substance Pathway



Please note: This is a simplified representation.
Passing from one stop to the next is never guaranteed!

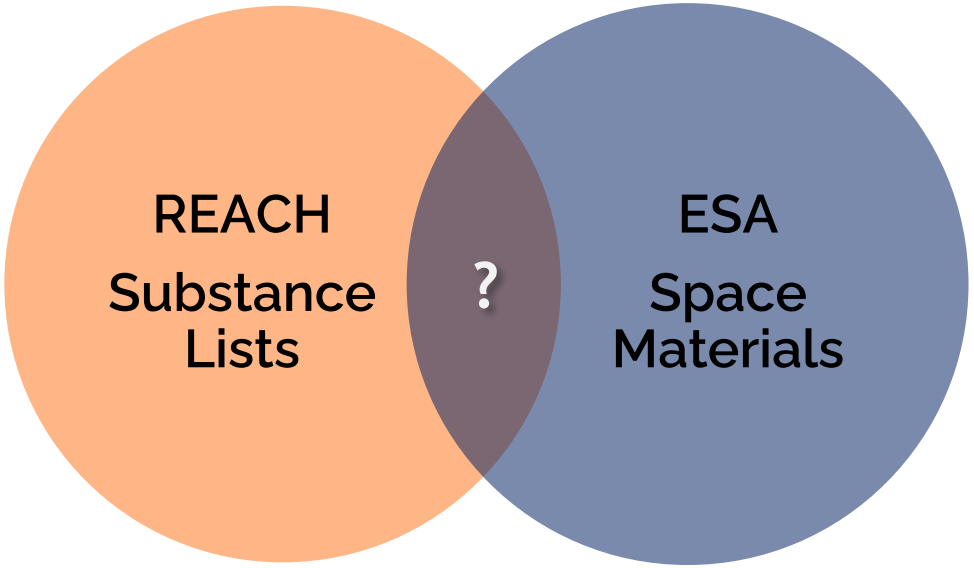
Source: MPTB List of Lists

ESA REACH Tool Webinar

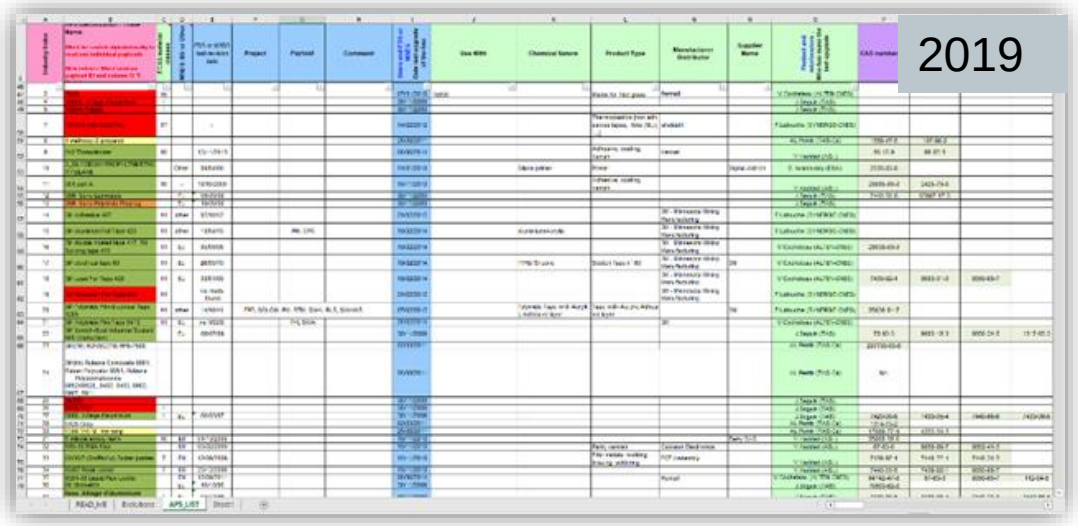
Agenda

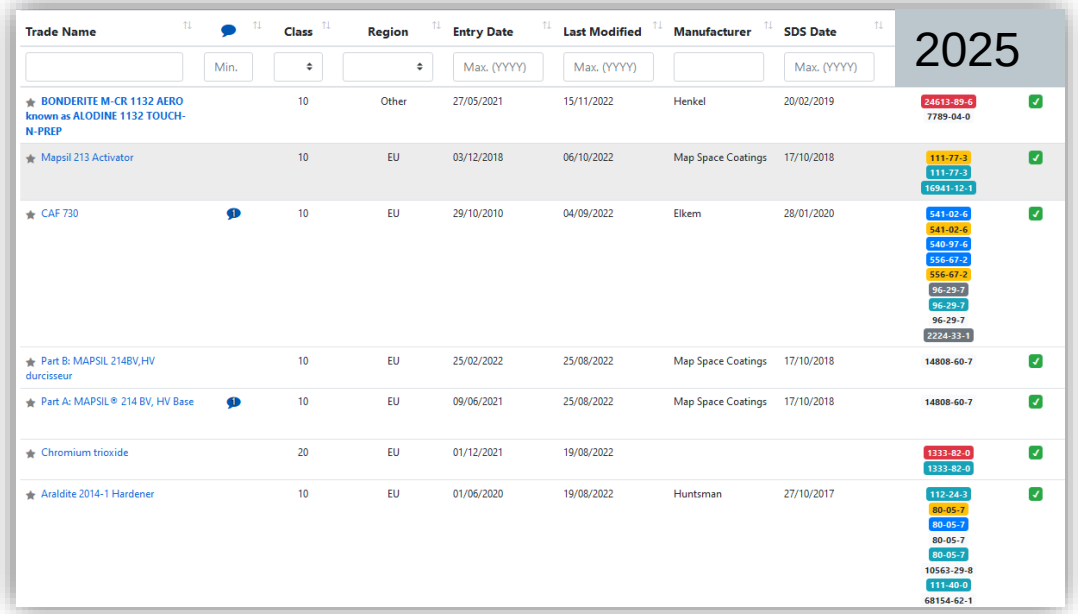
1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Introduction Background



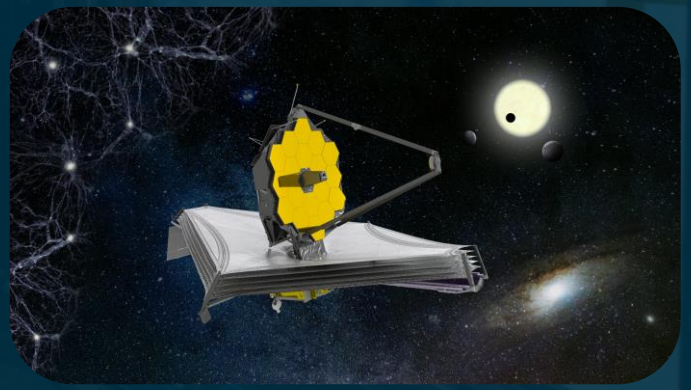
- ✓ Automate REACH substance list monitoring
- ✓ Automate REACH list impact assessment
- ✓ Automate **materials obsolescence risk management**





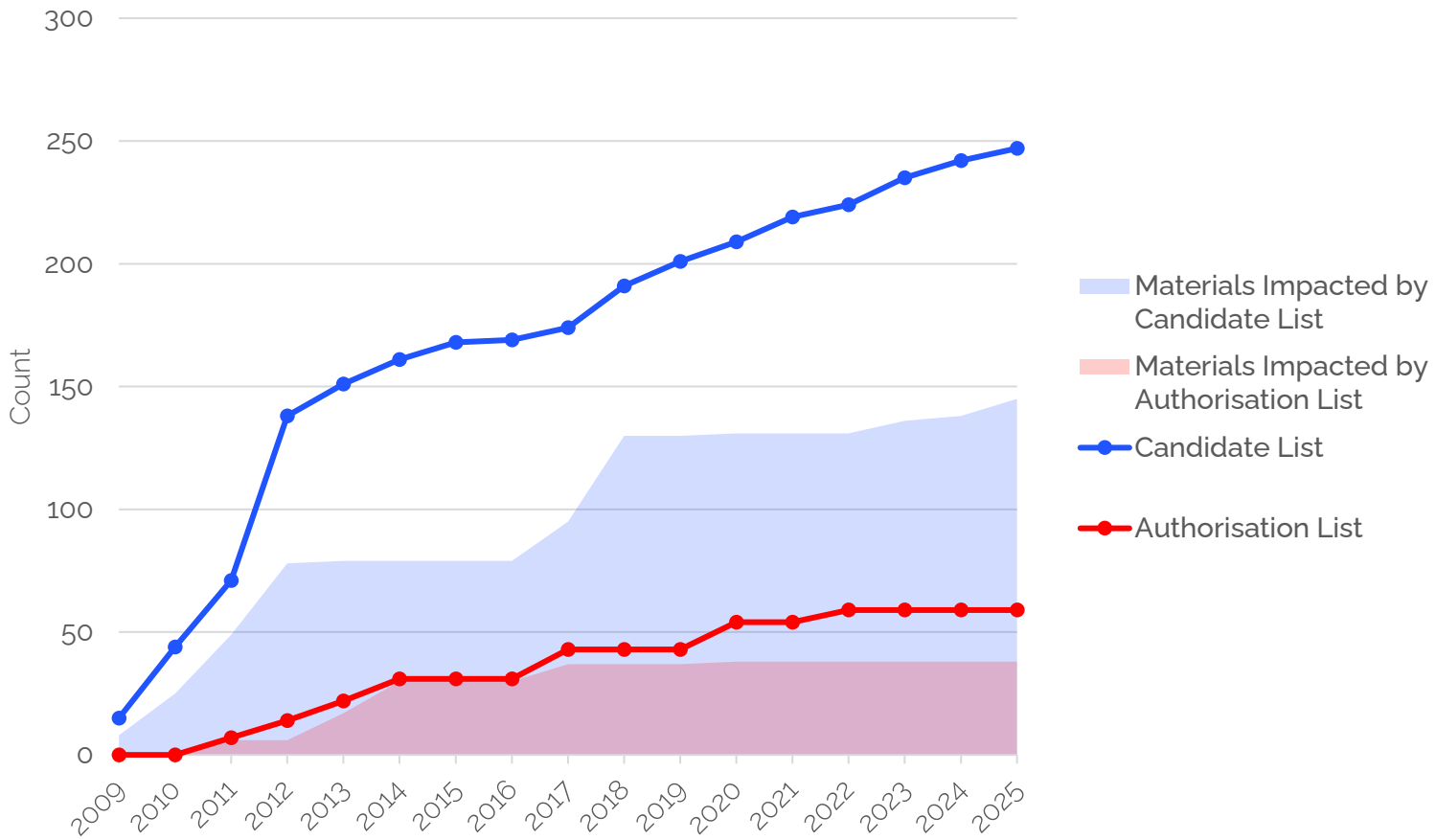
Introduction
REACH @ European Space Agency

- ESA does **not** build anything, but is rather the end user
  - Industry builds spacecraft through a complex supply chain
- ESA projects can take >15 years
  - At odds with REACH timelines
- REACH-driven obsolescence can be very costly, so ESA helps industry mitigate these risks through the MPTB
  - Materials and Processes Technology Board of the European Space Components Coordination (ESCC)



Source: https://www.esa.int

Introduction Space Materials Statistics



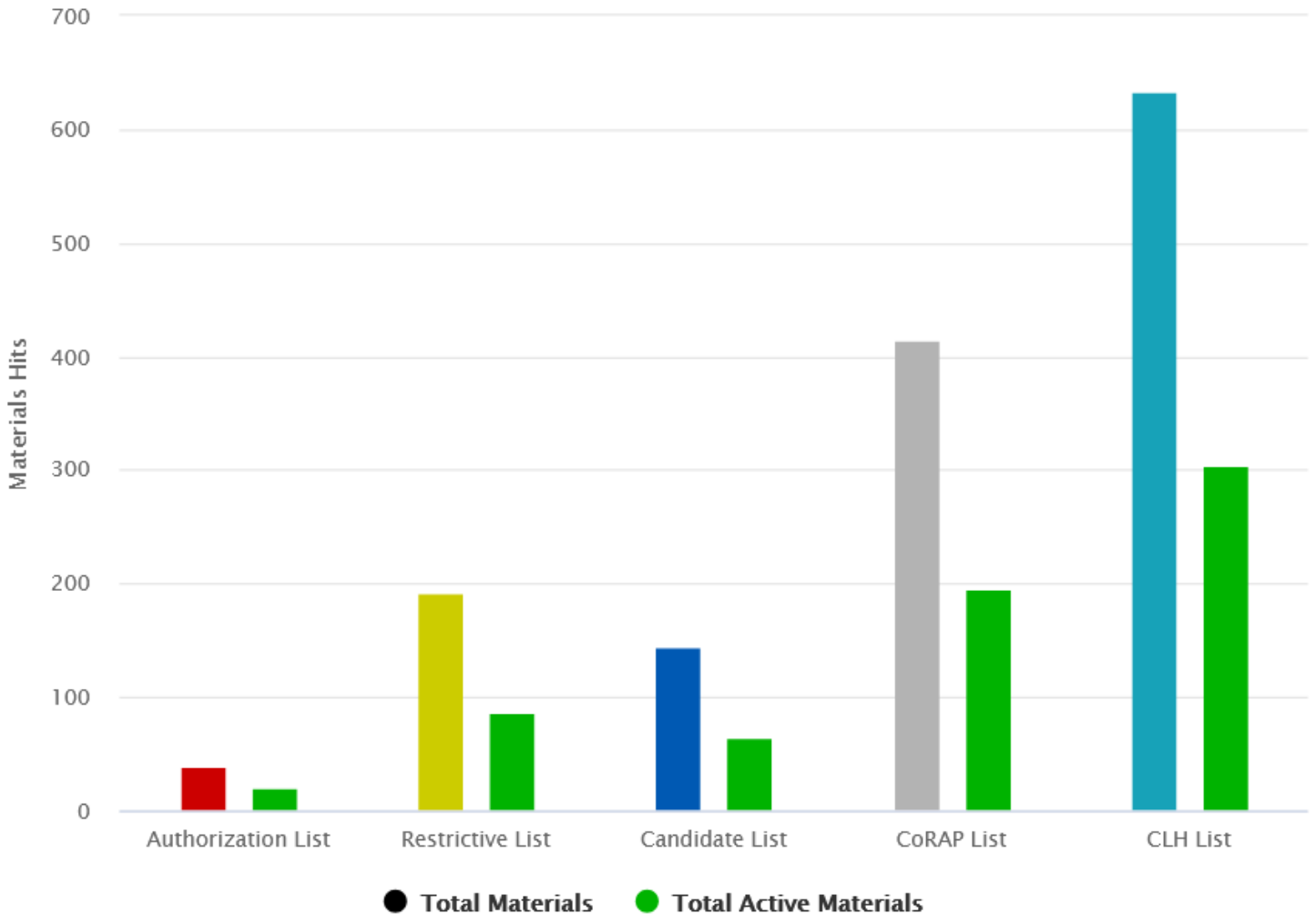
ESA REACH Tool

18170 (+196)
Tracked Substances

1055 (+86)
Tracked Materials

Source: ESA REACH Tool

Introduction Space Materials Statistics



ESA REACH Tool

18170 (+196)
Tracked
Substances

1055 (+86)
Tracked
Materials

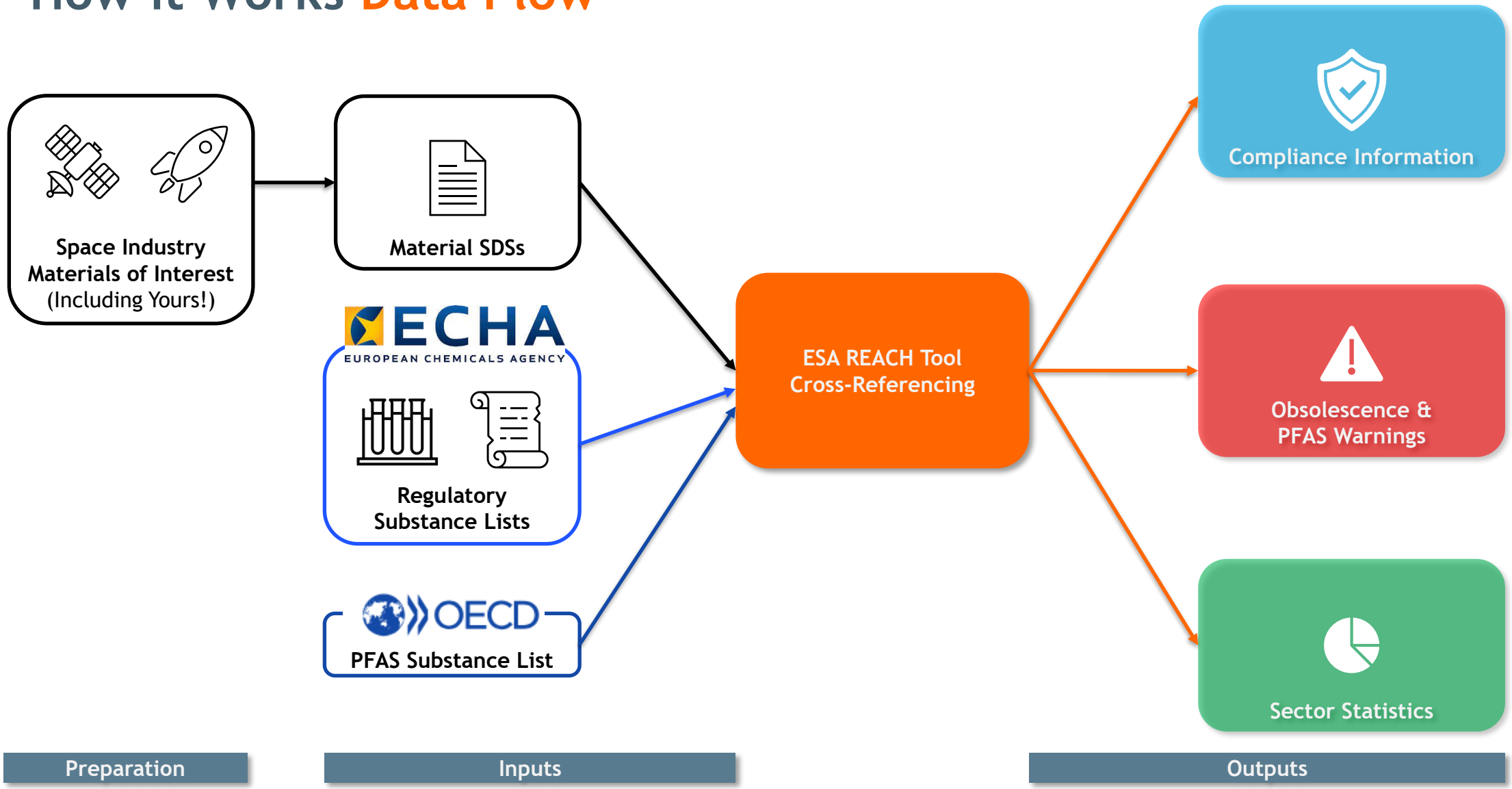
Source: ESA REACH Tool

ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

How it Works Data Flow



How it Works Application

Trade Name	Min.	Class	Region	Entry Date	Last Modified	Manufacturer	SDS Date	CAS Numbers	Active	⚠
HV 998				Max. (YYYY)	Max. (YYYY)		Max. (YYYY)	All		
☆ HARDENER HV 998 v2		10	EU	01/06/2020	24/01/2023	Huntsman	15/06/2020	80-05-7 80-05-7 111-40-0 10563-29-8	✓	!

Contains…

Substance Name	CAS Numbers	Reasons	Regulatory Status
4,4'-isopropylidenediphenol	80-05-7	• Potential endocrine disruptor • High (aggregated) tonnage • Wide dispersive use • Consumer use • Toxic for reproduction (Article 57c) • Endocrine disrupting properties (Article 57(f) - environment) • Endocrine disrupting properties (Article 57(f) - human health)	CLH | Aquatic Acute 1, Aquatic Chronic 1, Eye Damage 1, Skin Sens. 1, STOT Single Exp. 3, Repr. 1B CoRAP | Concluded Candidate List | Inclusion Date: 12/1/2017 | Recommended for Authorisation Restrictions List | Indirectly Space Relevant Restriction
2,2'-iminodiethylamine	111-40-0		CLH | Skin Sens. 1, Acute Tox. 4, Skin Corr. 1B

Showing 1 to 2 of 2 entries

Previous 1 Next

What does this mean?

Production of HARDENER HV 998 may now be **obsolete**

Regulatory Compliance

Restriction List

Based on the known composition, indexed from the SDS with the above revision date, the REACH Tool has identified that HARDENER HV 998 contains a restricted substance

HARDENER HV 998 contains a substance found in the Restrictions List (REACH Annex XVII), therefore **action may be required**. Restrictions may be any condition for or prohibition of the manufacture, use or placing on the EEA market. Please consult the ECHA website for further details on the specific entry that covers the substance(s) in question, the latest EU REACH Safety Data Sheet provided by the substance/mixture supplier and – if in doubt – regulatory experts. Please use the restriction space relevancy note (indirectly space relevant vs directly space relevant) purely as a guide, and make sure to make your own assessment before taking any decisions based on this information.

Candidate List

Based on the known composition, indexed from the SDS with the above revision date, the REACH Tool has identified that HARDENER HV 998 contains a SVHC included in the REACH Candidate List.

HARDENER HV 998 contains a substance found in the Candidate List of Substances of Very High Concern for Authorisation*, therefore **action may be required**. If the material (qualifying as article as such or assembly of articles) containing this substance above 0.1 % weight by weight in the article is supplied to another entity in the EEA after the substance's inclusion in the Candidate List, the EEA supplier is required to provide a REACH Article 33 Declaration. Furthermore, as from 5 January 2021 EEA suppliers of such articles/assemblies (including EEA importers) are required to submit a SCIP notification based on Article 9(1)(i) & (2) of the EU Waste Framework Directive 2008/98/EC in association with the applicable national law.

*Note: In a worst-case scenario, the substance may subsequently also enter the Authorization List (REACH Annex XIV) within about 2 years from the Candidate List inclusion date, banning its use within the EEA without authorisation after the specified sunset date.

ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Main Updates

PFAS (Per- and Polyfluoroalkyl Substances) Badge

- Materials with PFAS have a unique and **evolving obsolescence risk**
- Filter available to all users in the warnings column

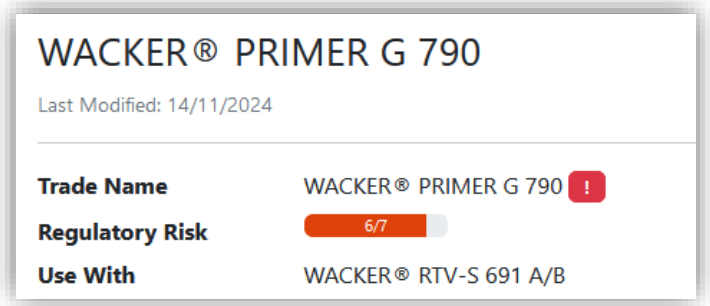
3M to Exit PFAS Manufacturing by the End of 2025

ST. PAUL, Minn., Dec. 20, 2022 /PRNewswire/ -- (NYSE: MMM) today announced it will exit per- polyfluoroalkyl substance (PFAS) manufacturing

Showing 1 to 49 of 49 entries (filtered from 978 total entries)

Trade Name		Class	Region	Entry Date	Last Modified	Manufacturer	SDS Date	CAS Numbers	Active	
	Min.			Max. (YYYY)	Max. (YYYY)		Max. (YYYY)	All		PFAS
3M Novec HFE-7500		20	EU	16/06/2023	23/08/2024	3M	14/03/2019	297730-93-9	✓	! PFAS
Tetradecafluorohexane		20	EU	02/06/2023	02/06/2023	Sigma-Aldrich	05/12/2012	355-42-0	-	- PFAS
Galden DET		20	EU	02/06/2023	02/06/2023	Solvay	21/03/2023	69991-67-9	-	- PFAS
Galden D02		20	EU	02/06/2023	02/06/2023	Solvay	17/07/2022	69991-67-9	-	- PFAS
PROMOSOLV DR3		20	EU	02/06/2023	02/06/2023	INVENTEC PERFORMANCE CHEMICALS SAS	12/05/2021	163702-08-7	-	- PFAS
3M™ Fluorinert™ FC-72 Electronic Liquid	1	20	EU	02/06/2023	23/08/2024	3M	07/09/2022	86508-42-1	✓	! PFAS

Main Updates
Regulatory Risk Thermometer



- Simplified regulatory risk levels
- Not to scale, nor can it be added to a numerical value
- Try to avoid using substances/materials with a high risk value

Obsolescence Risk

0/7	Substance has no known regulatory risks
1/7	Substance has a hazard code in CLH and/or CoRAP
2/7	Substance has an SVHC level hazard code but is not in the Candidate List
3/7	Substance is an SVHC and has entered the Candidate List
4/7	Substance has been prioritised for Authorisation List (Annex XIV) inclusion, or the substance has a space-irrelevant entry in the Restriction List (Annex XVII) or contains PFAS (which does not currently meet a higher regulatory threshold).
5/7	Substance is in the Authorisation List (Annex XIV) but pre-sunset date or the substance has an indirectly space relevant entry in the Restriction List (Annex XVII).
6/7	Substance is in the Authorisation List (Annex XIV) but Applications for Authorisation (AfAs) have been granted for specific use of the substance, or the substance has a directly space relevant entry in the Restriction List (Annex XVII).
7/7	Substance is in the Authorisation List (Annex XIV) but NO Applications for Authorisation (AfAs) have been received for use of the substance, or the substance has a directly space relevant entry in the Restriction List (Annex XVII) that bans its use.

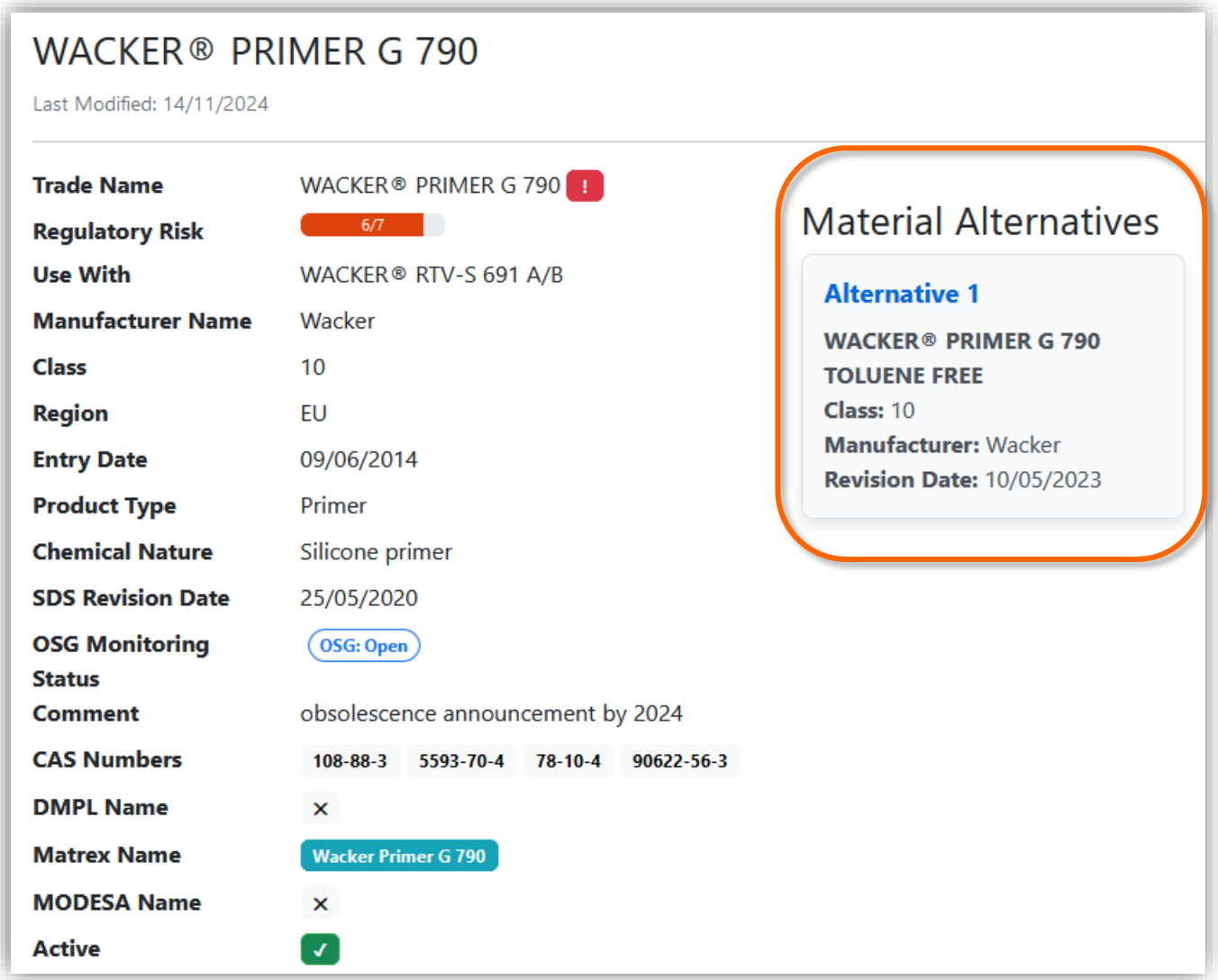
Main Updates Risk Thermometer

Substance Name	Risk		EC Numbers	CAS Numbers	Reasons	CLH	CoRAP	CL	Restr	Auth
form										
					• CMR • Exposure of workers					
formaldehyde ...%	2/7		200-001-8	50-00-0		✓ !	×	×	×	×
formaldehyde and formaldehyde releasers *formaldehyde and formaldehyde releasers*	4/7		200-001-8	50-00-0		×	×	×	✓	×
Formaldehyde, oligomeric reaction products with aniline	6/7		500-036-1	25214-70-4	• Carcinogenic (Article 57a)	×	×	✓	×	✓
N,N-dimethylformamide	5/7		200-679-5	68-12-2	• Toxic for reproduction (Article 57c)	×	×	✓	✓	×
N,N-dimethylformamide *dimethyl formamide*	2/7		200-679-5	68-12-2		✓ !	×	×	×	×
Chloroform *trichloromethane*	6/7		200-663-8	67-66-3		✓	×	×	✓	×
Reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP)	5/7		300-298-5	93925-00-9 1471311-26-8	• Endocrine disrupting properties (Article 57(f) - environment)	×	×	✓	×	✓
Formamide	3/7		200-842-0	75-12-7	• Toxic for reproduction (Article 57c)	✓ !	×	✓	×	×
C,C'-azodi(formamide)	4/7		204-650-8	123-77-3	• Respiratory sensitising properties (Article 57(f) - human health)	✓	×	✓	×	×
Octene, hydroformylation products, low-boiling	1/7		273-110-1	68938-03-4	• High (aggregated) tonnage • Suspected PBT/vPvB • Consumer use	×	✓	×	×	×

Main Updates
Material Alternatives

- Up to 3 material alternatives can be marked per material
- These have been selected by ESA or Industry Obsolescence Experts
- The card links to the REACH Tool entry for the material
- New feature so not much data yet, but more alternatives will be added soon

Note: Currently the alternatives can only be other materials in the REACH Tool!



ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Short Break and then…

Why Use the ESA REACH Tool?

Michal Gabco / INVENT

ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

ESA REACH Tool User Guide (v5.4) – for READERS

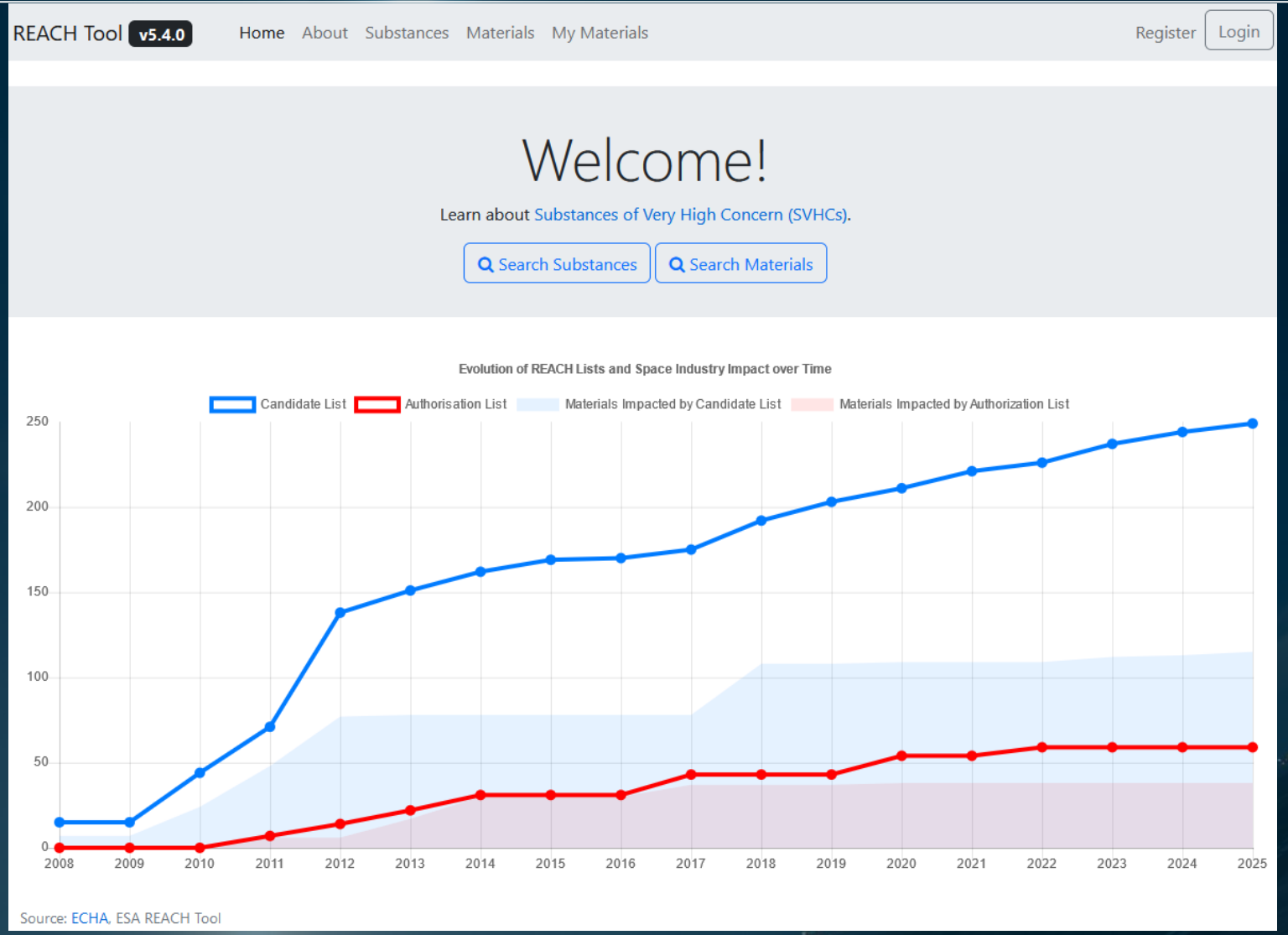
Oliver Reiff-Musgrove & Premysl Janik

26/02/2025

Contents

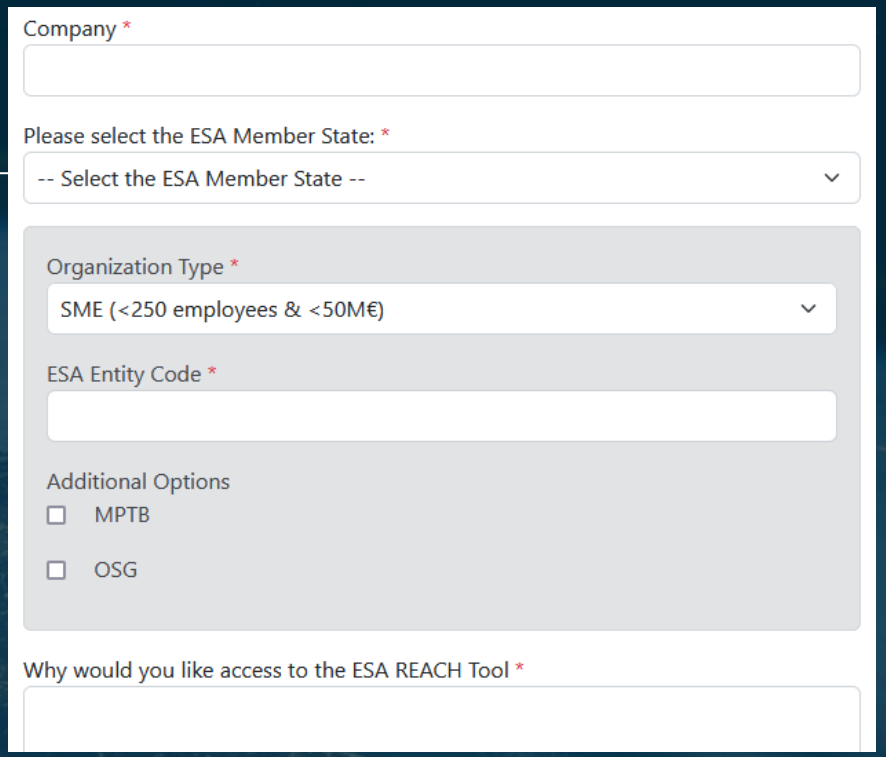
1. Registration
2. Substances
    a. Search
    b. Evaluate
3. Materials
    a. Search
    b. Evaluate
    c. Favourite
    d. Versioning
    e. Request

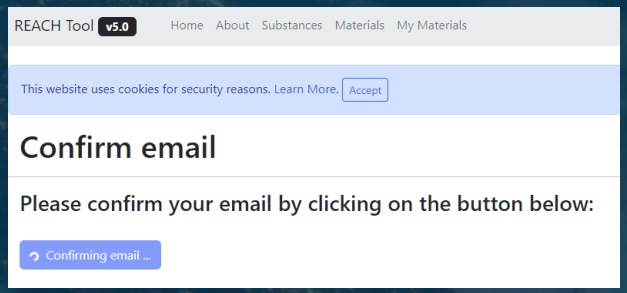
https://reachtool.esa.int/

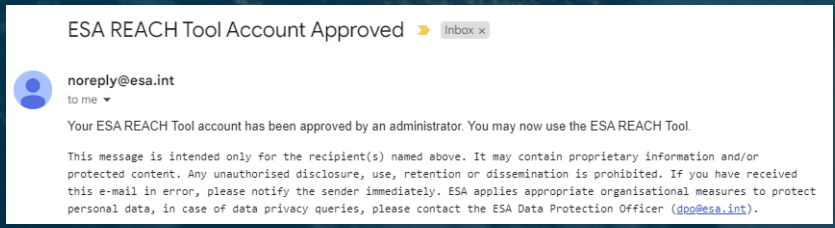


SME Registration

1. Go to: https://reachtool.esa.int/
2. Fill out registration form
   i. First + Last Name
   ii. Work Email Address
   iii. Company (eg. ESA)
   iv. Select ESA Member State
   v. Select Organisation Type
      i. Select SME
      ii. Enter your ESA Entity Code
   vi. State why you would like to access the ESA REACH Tool
3. Confirm your email address
4. Wait for your account to be approved. Please be patient!
5. You will receive an email to let you know that your account has been approved
6. You're ready to use the REACH Tool!







Substances Search

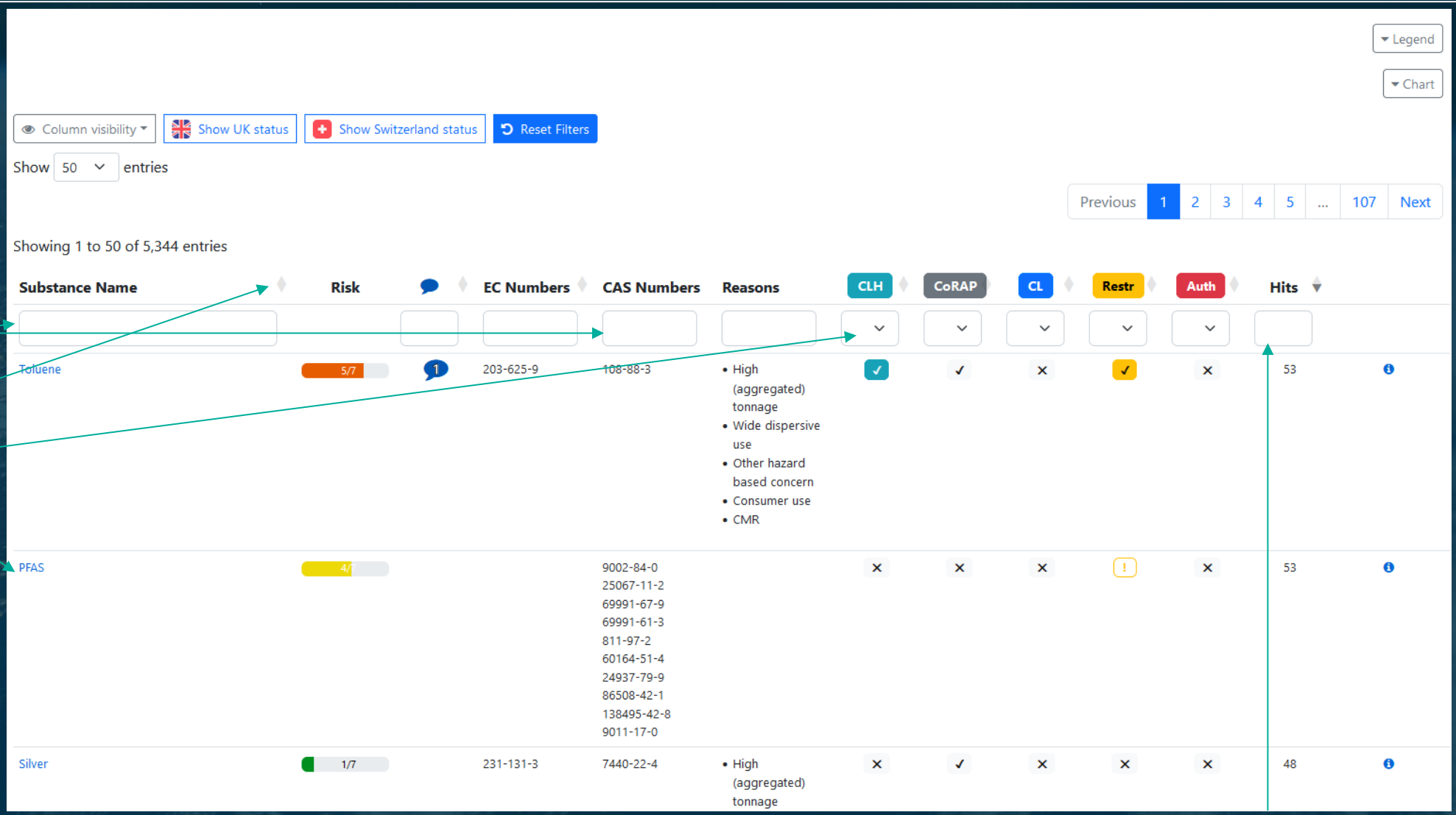
Material Hits
Represents the number of Materials in the REACH Tool that contain this Substance. A larger hit number represents a greater impact on the European Space Industry for that particular substance.

Text Filters

Ascending/Descending Sorting

Dropdown Filters

See further details and impacted materials



Minimum Hits Number Filter

Substances Legend

Entries have been CAS matched against ECHA substances to indicate regulatory obsolence risk

✓	CLH	List of harmonised classification and labelling of hazardous substances
✓ !	CLH	List of harmonised classification and labelling of hazardous substances fulfilling the criteria for Candidate List inclusion
✓	CLH	List of harmonised classification and labelling of hazardous substances fulfilling the criteria of Substances of Concern in ESPR*

*According to Article 2(27), point (b) of the Ecodesign for Sustainable Products Regulation (Regulation (EU) 2024/1781)

✓	Community Rolling Action Plan (CoRAP)	Substance is being assessed by ECHA member states
✓	Community Rolling Action Plan (CoRAP)	Substance assessment has been concluded or withdrawn by ECHA member states

✓	Candidate List (CL) recommended for Authorisation	Substance is on the ECHA Candidate List and has been recommended for Authorisation List inclusion
✓	Candidate List (CL)	Substance is on the ECHA Candidate List for Authorisation
!	Candidate List (CL) intention	Substance has a registered intention to enter the ECHA Candidate List for Authorisation

✓	Restriction List (Annex XVII) - Relevant*	Substance has space-relevant restrictions on its placement on the EU market
✓	Restriction List (Annex XVII) - Irrelevant*	Substance has restrictions on its placement on the EU market
!	Restriction List (Annex XVII) intention	Substance is on the registry of restriction intentions until outcome

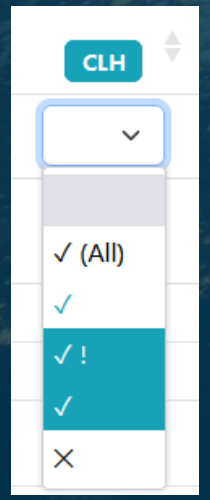
*Based on a restriction text analysis conducted by REACHLaw and ESA

✓	Authorisation List (Annex XIV) - Passed Sunset Date	Substance cannot be used in the EU market and has no Applications for Authorisation
✓	Authorisation List (Annex XIV) - Passed Sunset Date	Substance cannot be used in the EU market without authorisation
✓	Authorisation List (Annex XIV) - Sunset Date upcoming	Substance can shortly not be used in the EU market without authorisation

Substances Search – Dropdown Filters

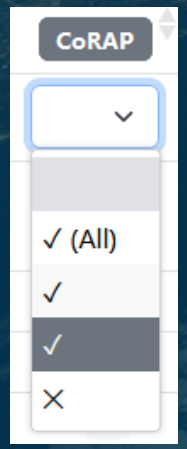
Substance Name	Risk		EC Numbers	CAS Numbers	Reasons	CLH	CoRAP	CL	Restr	Auth	Hits
Toluene	5/7	1	203-625-9	108-88-3	• High (aggregated) tonnage • Wide dispersive	✓	✓	✕	✓	✕	53

CLH List



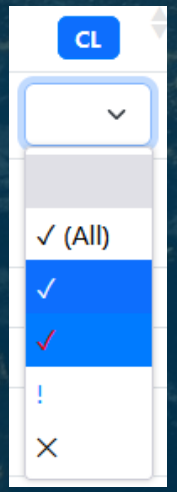
Select All CLH
Not ESPR impacted
Prioritised for SVHC
ESPR impacted
Not in CLH

CoRAP List



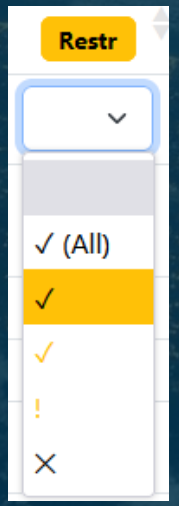
Select All CoRAP
CoRAP concluded
CoRAP ongoing
Not in CoRAP

Candidate List (SVHC)



Select All CL
Not Auth. prioritised
Auth. recommended
CL intention
Not in CL

Restriction List (Annex XVII)



Select All restrictions
Relevant restrictions
Irrelevant restrictions
Restriction intention
Not in Restriction

Authorisation List (Annex XIV)

Select All auths.
Post-sunset date
Pre-sunset date
Not in Auth.

Most Useful

Substances Evaluate

CLH Hazard Classes for this Substance

CoRAP status

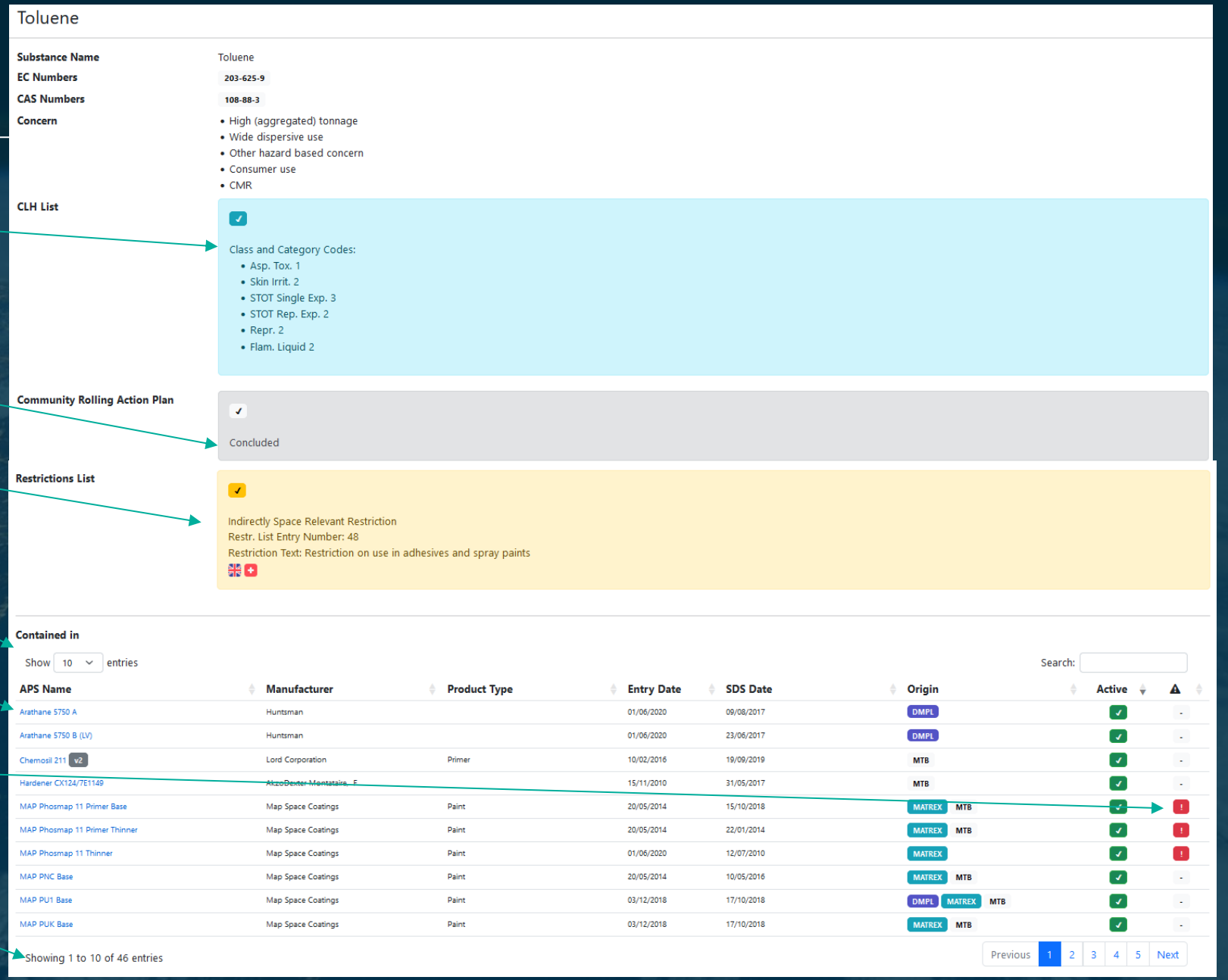
Restriction relevancy, entry list number and brief summary of restriction text. Restriction replicated in UK REACH and Swiss Chemical Regulations

Materials containing selected Substance (eg Toluene)

View details about the Material

Material might already be obsolete or with high obsolescence risk

Total Materials containing this Substance



Toluene

Substance Name Toluene

EC Numbers 203-625-9

CAS Numbers 108-88-3

Concern
- High (aggregated) tonnage
- Wide dispersive use
- Other hazard based concern
- Consumer use
- CMR

CLH List

Class and Category Codes:
- Asp. Tox. 1
- Skin Irrit. 2
- STOT Single Exp. 3
- STOT Rep. Exp. 2
- Repr. 2
- Flam. Liquid 2

Community Rolling Action Plan

Concluded

Restrictions List

Indirectly Space Relevant Restriction
Restr. List Entry Number: 48
Restriction Text: Restriction on use in adhesives and spray paints

Contained in

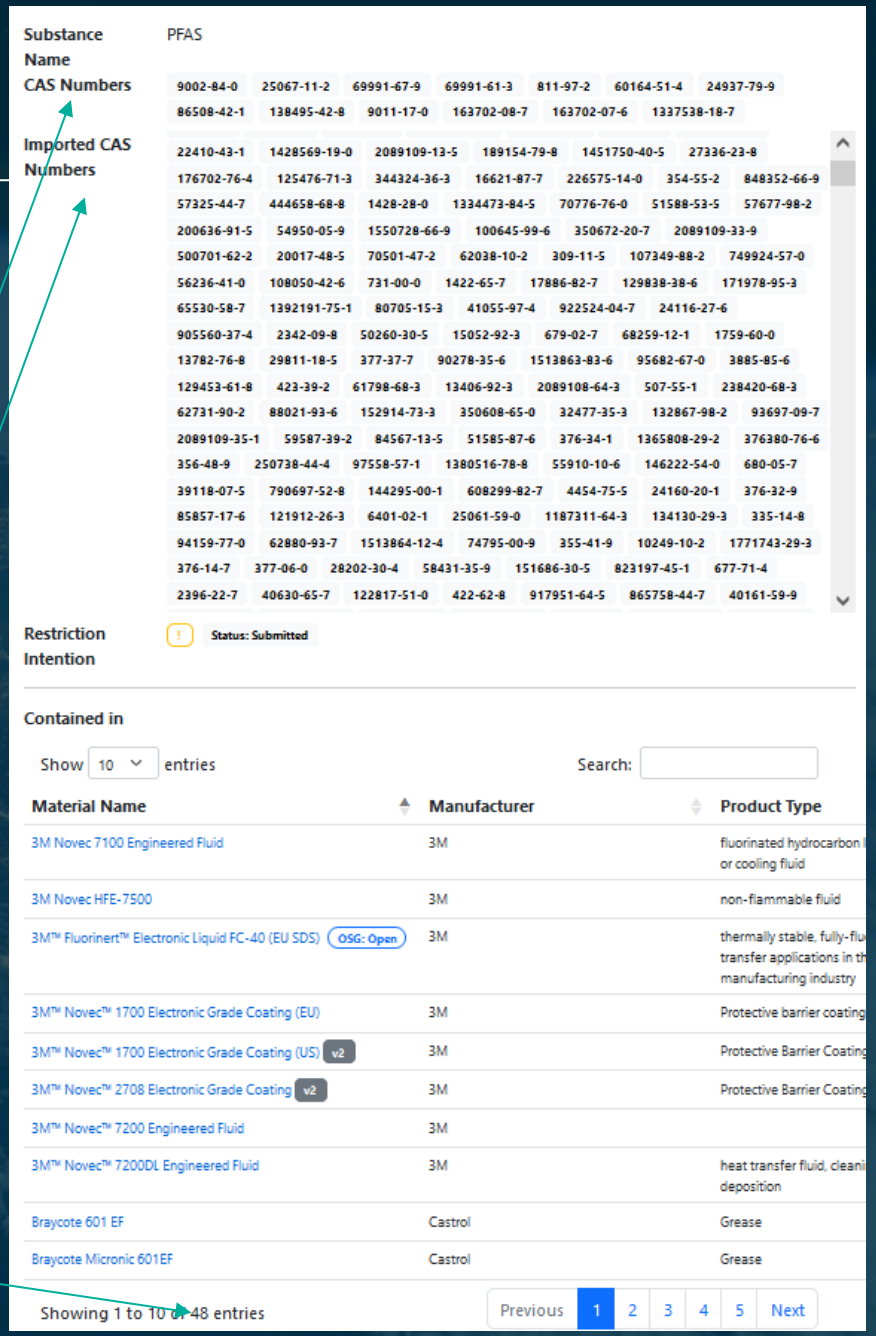
Show 10 entries Search:

APS Name	Manufacturer	Product Type	Entry Date	SDS Date	Origin	Active	⚠
Arathane 5750 A	Huntsman		01/06/2020	09/08/2017	DMPL	✓	-
Arathane 5750 B (LV)	Huntsman		01/06/2020	23/06/2017	DMPL	✓	-
Chemosil 211 v2	Lord Corporation	Primer	10/02/2016	19/09/2019	MTB	✓	-
Hardener CX124/7E1149	AkzoDexter Montataire, F		15/11/2010	31/05/2017	MTB	✓	-
MAP Phosmap 11 Primer Base	Map Space Coatings	Paint	20/05/2014	15/10/2018	MATREX MTB	✓	!
MAP Phosmap 11 Primer Thinner	Map Space Coatings	Paint	20/05/2014	22/01/2014	MATREX MTB	✓	!
MAP Phosmap 11 Thinner	Map Space Coatings	Paint	01/06/2020	12/07/2010	MATREX	✓	!
MAP PNC Base	Map Space Coatings	Paint	20/05/2014	10/05/2016	MATREX MTB	✓	-
MAP PU1 Base	Map Space Coatings	Paint	03/12/2018	17/10/2018	DMPL MATREX MTB	✓	-
MAP PUK Base	Map Space Coatings	Paint	03/12/2018	17/10/2018	MATREX MTB	✓	-

Showing 1 to 10 of 46 entries Previous 1 2 3 4 5 Next

Substances Evaluate PFAS

- PFAS is treated differently within the REACH Tool
- ESA/REACHLaw have pre-screened all 9000+ CAS numbers, and identified 13 CAS numbers that impact Space
- These 13 CAS numbers are cross-referenced throughout the tool, but the other 9000 are analysed only in this page



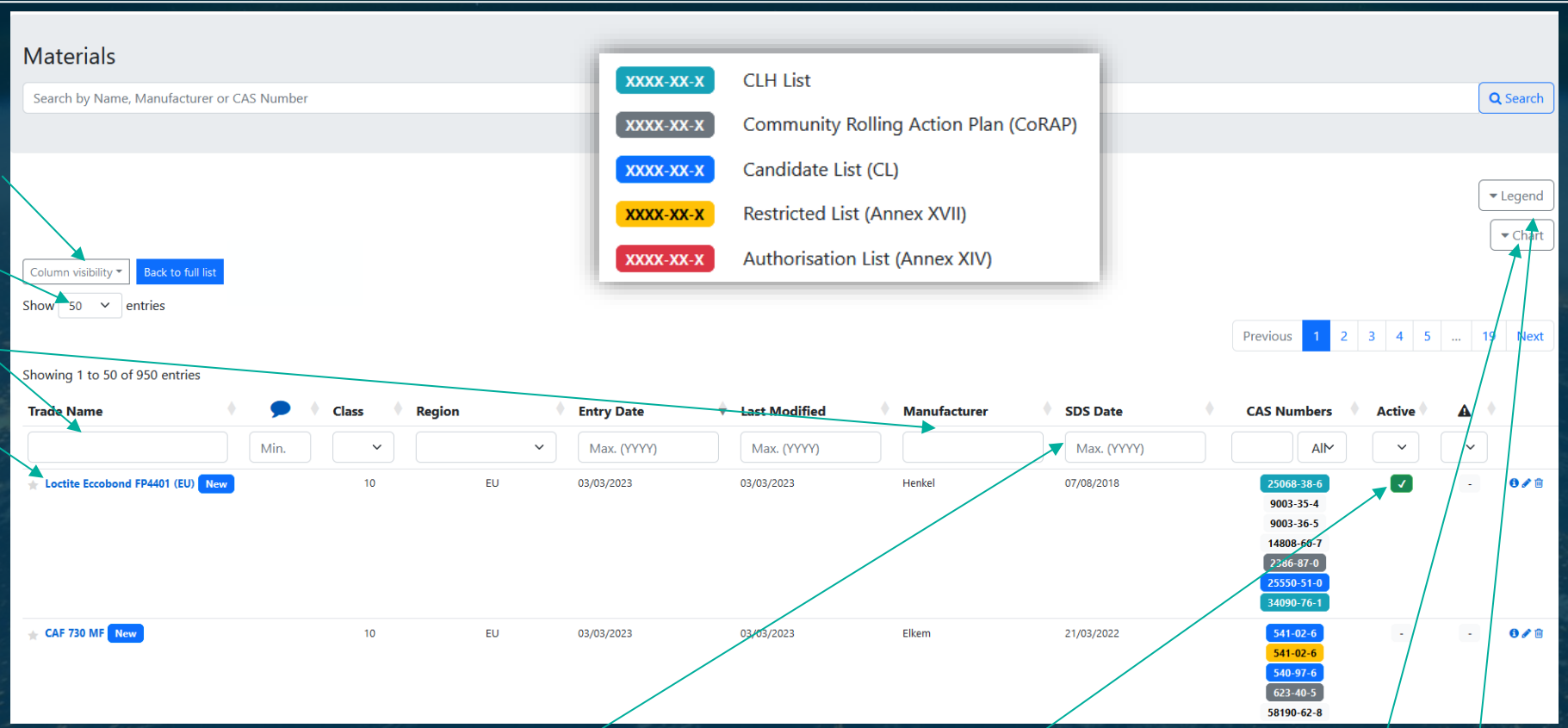
Nominal [Impacting] CAS Numbers
(Cross-referenced throughout the Tool)

Imported CAS Numbers
(Only cross-referenced on this page)

Total Materials containing PFAS

Material Hits
They may be differences between the Material Hits and Total Materials on this page

Materials Search



Toggle columns shown or hidden

Select number of entries to show

Text Filters

See further details and contained Substances

Filter for maximum SDS age to display

Material is in active use by OSG members

Show/hide manufacturer count chart

Show/hide legend

CAS Numbers
The colours of the CAS numbers displayed on this page act as a quick guide to any REACH impact, using the legend above

New symbol and **bold** name

New = Material added in the last month
Bold = Material has been modified in the last month

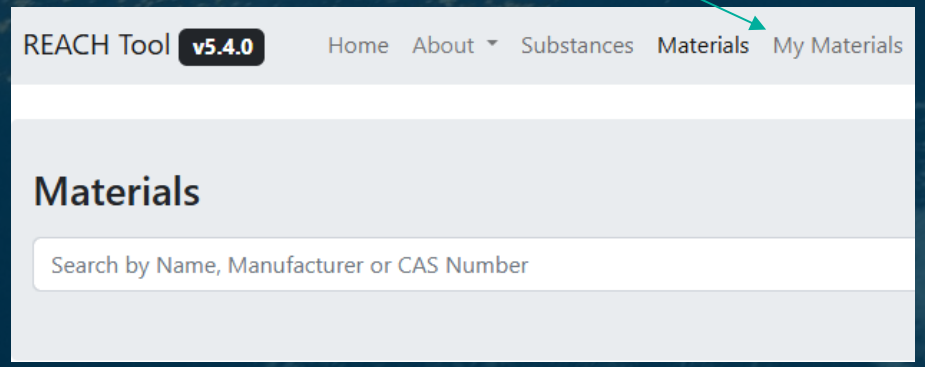
Materials Favourite Material

Click on star to favourite Material

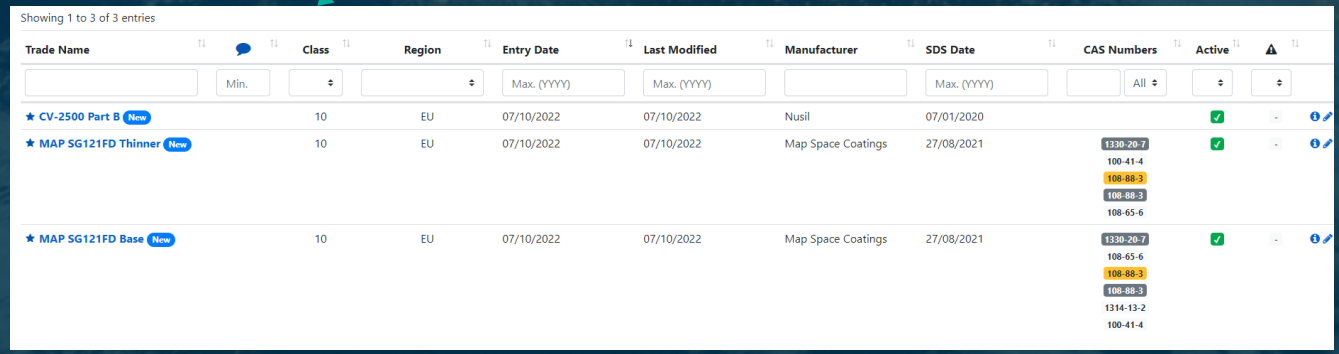
Material has been favourited

☆ ARADUR HY 905 New	10	EU	07/10/2022	07/10/2022	Huntsman	24/05/2018	85-44-9 85-42-7 85-43-8 2210-79-9	✓	-
☆ CV-2500 Part A New	10	EU	07/10/2022	07/10/2022	Nusil	07/01/2020		✓	-
★ CV-2500 Part B New	10	EU	07/10/2022	07/10/2022	Nusil	07/01/2020		✓	-
☆ PSB New	10	EU	07/10/2022	07/10/2022	Map Space Coatings	26/11/2012	1314-13-2 1312-76-1 111-90-0 90622-57-4 90622-58-5	✓	-
★ MAP SG121FD Thinner New	10	EU	07/10/2022	07/10/2022	Map Space Coatings	27/08/2021	1330-20-7 100-41-4 108-88-3 108-88-3 108-65-6	✓	-

Click to view favourite Materials



My Materials view, showing all your favourited Materials



NOTE: This is **anonymous** and **confidential!**

Materials Evaluate

Marked as Potentially Obsolete

Link to Part A

REACH regulatory information, based on the Substances identified to be in the Material
(based on the CAS numbers input)

Substances contained in selected Material
(e.g., PR 420 Part B)

PR 420 Part B

Last Modified: 07/11/2024

Trade Name	PR 420 Part B !
Regulatory Risk	6/7
Use With	PR 420 Part A
Manufacturer Name	PPG
Class	14
Region	Other
Entry Date	11/01/2010
Product Type	Sealant
Chemical Nature	
SDS Revision Date	24/07/2019
CAS Numbers	7439-92-1 108-94-1 14807-96-6 79-01-6 11113-70-5
DMPL Name	×
Matrex Name	PRC-DeSoto PR 420
MODESA Name	×
Active	-

Contains

Show EMWG

Show 10 entries Search:

Substance Name	CAS Numbers	Reasons	Regulatory Status
Trichloroethylene	79-01-6	• Carcinogenic (Article 57a)	CLH | Carc. 1B, Skin Irrit. 2, STOT Single Exp. 3, Aquatic Chronic 3, Eye Irrit. ! Candidate List | Inclusion Date: 18/6/2010 | Recommended for Auth Authorisation List | Sunset Date: 21/4/2016
Lead and its compounds	7439-92-1 11113-70-5		Restrictions List | Space Irrelevant Restriction
Lead	7439-92-1	• Toxic for reproduction (Article 57c)	Candidate List | Inclusion Date: 27/6/2018 | Recommended for Authorisati
Cyclohexanone	108-94-1	• High (aggregated) tonnage • Wide dispersive use • Suspected Carcinogenic • Exposure of workers • Suspected Mutagenic • Suspected Reprotoxic	CLH | Acute Tox. 4, Flam. Liquid 3 CoRAP | Concluded
lead powder; [particle diameter < 1 mm]	7439-92-1		CLH | Aquatic Acute 1, Aquatic Chronic 1, Effect on sexual function, Repr. 1

Materials Evaluate

Marked as Potentially Obsolete

Candidate List Information

Restriction List Information

Authorisation List Information

What does this mean?

Production of PR 420 Part B may now be **obsolete**

Regulatory Compliance

Candidate List

Based on the known composition, indexed from the SDS with the above revision date, the REACH Tool has identified that PR 420 Part B contains a SVHC included in the REACH Candidate List.

PR 420 Part B contains a substance found in the Candidate List of Substances of Very High Concern for Authorisation*, therefore **action may be required**. If the material (qualifying as article as such or assembly of articles) containing this substance above 0.1 % weight by weight in the article is supplied to another entity in the EEA after the substance's inclusion in the Candidate List, the EEA supplier is required to provide a REACH Article 33 Declaration. Furthermore, as from 5 January 2021 EEA suppliers of such articles/assemblies (including EEA importers) are required to submit a SCIP notification based on Article 9(1)(i) & (2) of the EU Waste Framework Directive 2008/98/EC in association with the applicable national law.

*Note: In a worst-case scenario, the substance may subsequently also enter the Authorization List (REACH Annex XIV) within about 2 years from the Candidate List inclusion date, banning its use within the EEA without authorisation after the specified sunset date.

Restriction List

Based on the known composition, indexed from the SDS with the above revision date, the REACH Tool has identified that PR 420 Part B contains a restricted substance

PR 420 Part B contains a substance found in the Restrictions List (REACH Annex XVII), therefore **action may be required**. Restrictions may be any condition for or prohibition of the manufacture, use or placing on the EEA market. Please consult the ECHA website for further details on the specific entry that covers the substance(s) in question, the latest EU REACH Safety Data Sheet provided by the substance/mixture supplier and – if in doubt – regulatory experts. Please use the restriction space relevancy note (indirectly space relevant vs directly space relevant) purely as a guide, and make sure to make your own assessment before taking any decisions based on this information.

Authorisation List

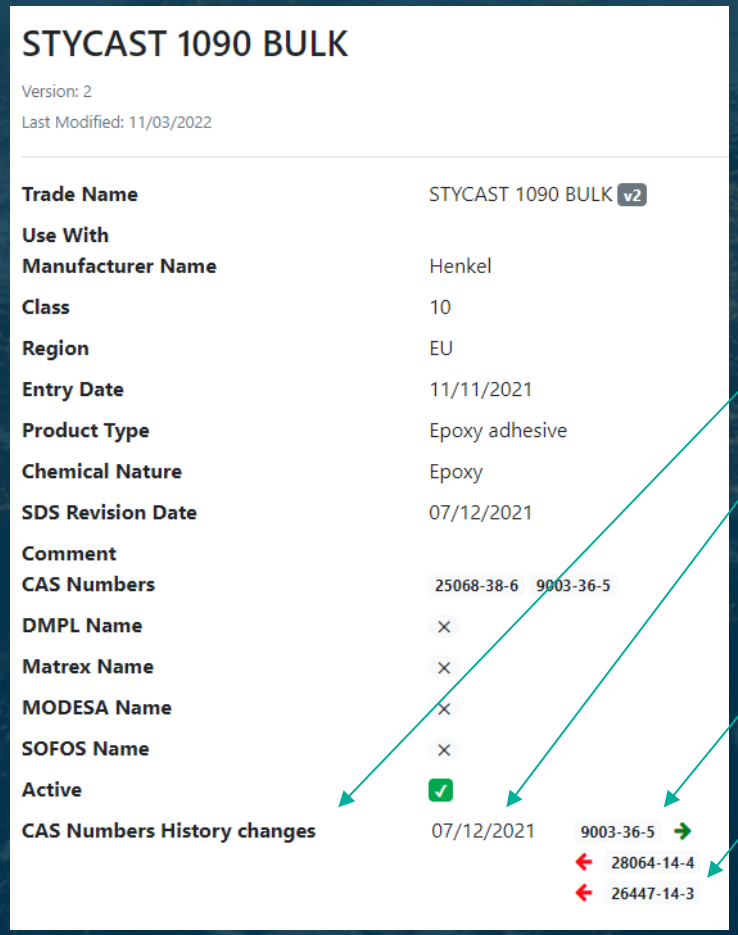
Based on the known composition, indexed from the SDS with the above revision date, the REACH Tool has identified that PR 420 Part B contains a SVHC.

PR 420 Part B contains a substance found in the Authorisation List (REACH Annex XIV), therefore **action is required**. This material (if qualifying as a substance/mixture) cannot be used within the EEA market without authorisation after the sunset date stated above*, unless a REACH exemption clause applies (e.g. based on Scientific R&D). Users relying on an authorisation granted to an upstream supplier have to notify the European Chemicals Agency (ECHA) within 3 months of the first supply of the substance/mixture (REACH Article 66).

*Note: Some chromates (respectively mixtures containing them) are currently still allowed for continued use under the REACH authorisation process, despite their elapsed sunset dates. For details on authorised suppliers, uses, authorisation number, timelines and conditions, as well as pending applications for authorisation, the user should consult the latest EU REACH Safety Data Sheet and CLP label provided by the supplier, the applicable authorisation decision, the chemicals supplier, any customer communications provided and – if in doubt – reach out to regulatory experts.

Materials Versioning

Material where the CAS numbers have changed with SDS date show as versions. V2 is the second version, so an updated SDS has been used to update the Material entry.



When SDS date is updated while editing a Material, the CAS number changes are tracked. The updated SDS date is shown with the changes.

CAS numbers with a **green** arrow have been added in new.

CAS numbers with a **red** arrow have been removed

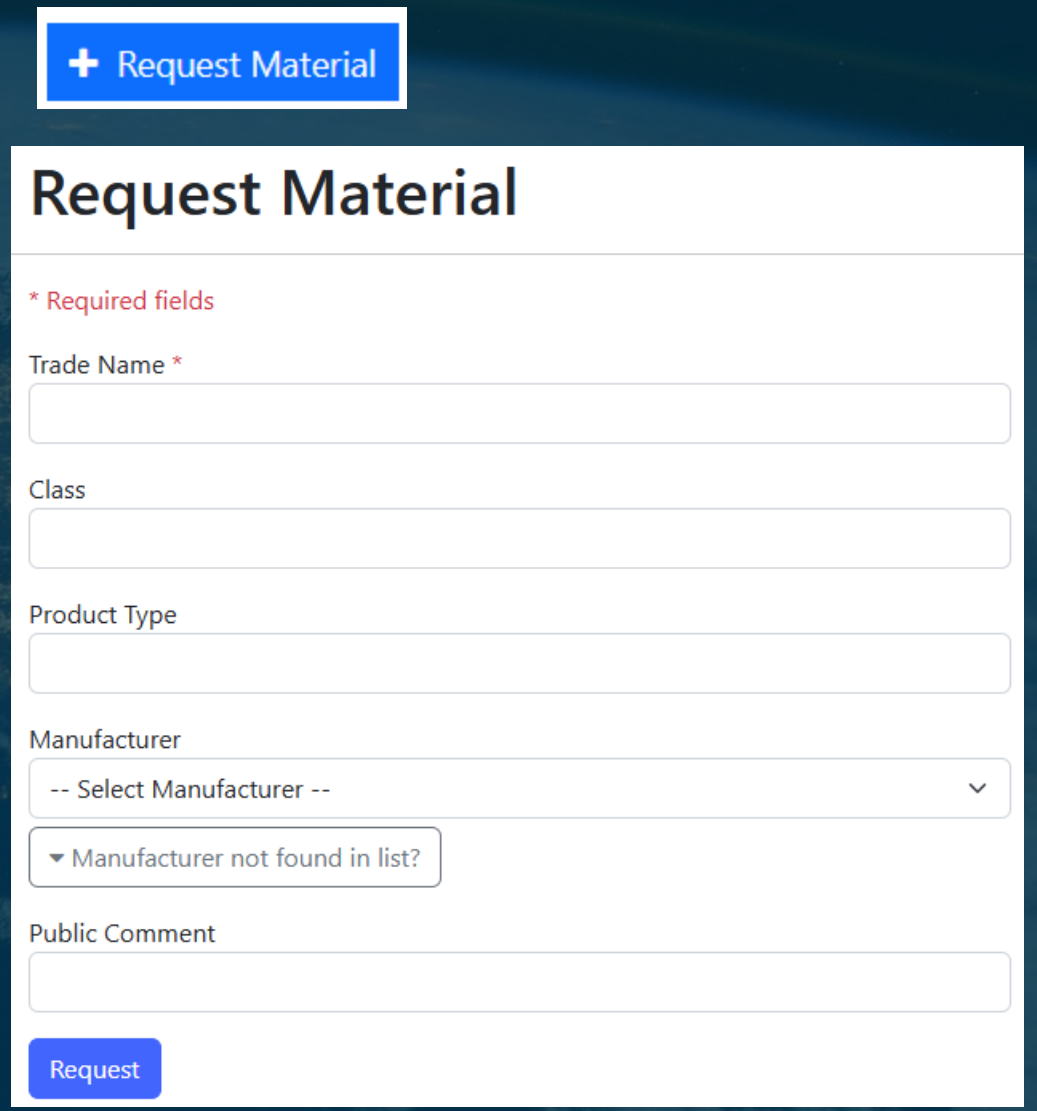
NOTE: Only if Revision Date changes

Materials Request

If you cannot find a material you are looking for, please make a Material Request

1. Navigate to Materials
2. Click on “+ Request Material” (see right)
    a. Opens New Tab
3. Fill in:
    a. Trade Name
    b. ECSS Material Class (optional)
    c. Product Type (optional)
    d. Manufacturer
    e. Leave a comment (optional, please don’t include confidential info)
4. Click on **Request**
5. Your request has been sent to REACH Tool admins!

Note: This process is anonymous by default



ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Outlook Actions

Sign up to the ESA REACH Tool

Favourite the materials your entity uses

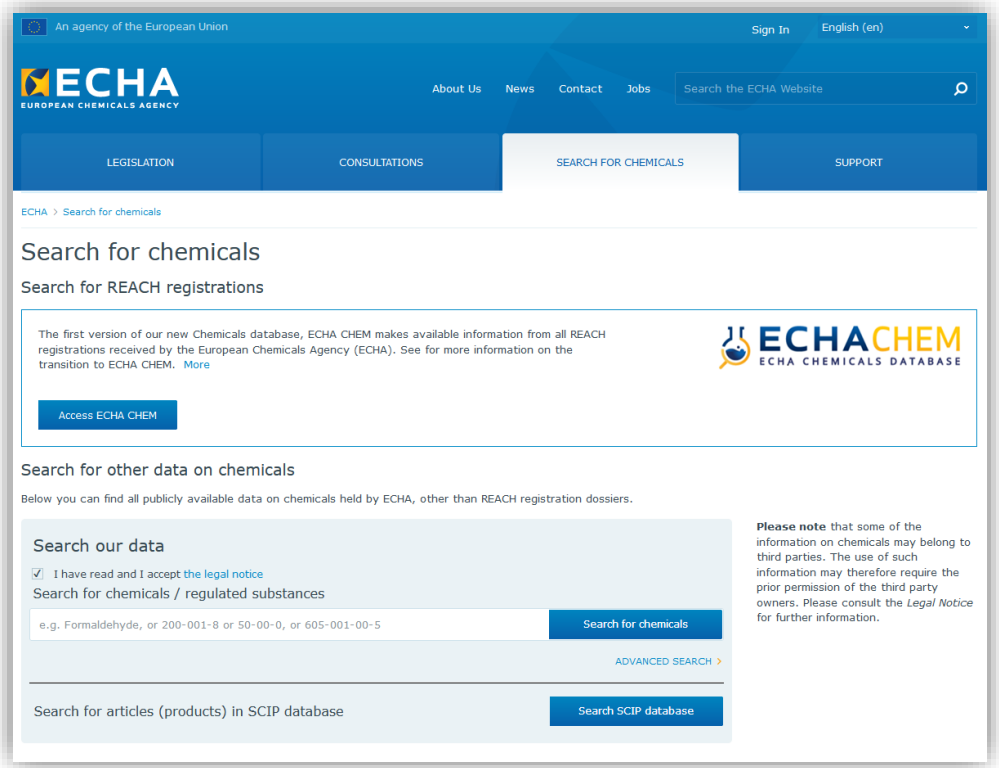
Suggest feedback and create material requests if missing data

Outlook
Limitations

- We cannot guarantee that all regulatory lists will be up to date
  - Always check the ECHA information on chemicals page (for EU REACH) *see right*

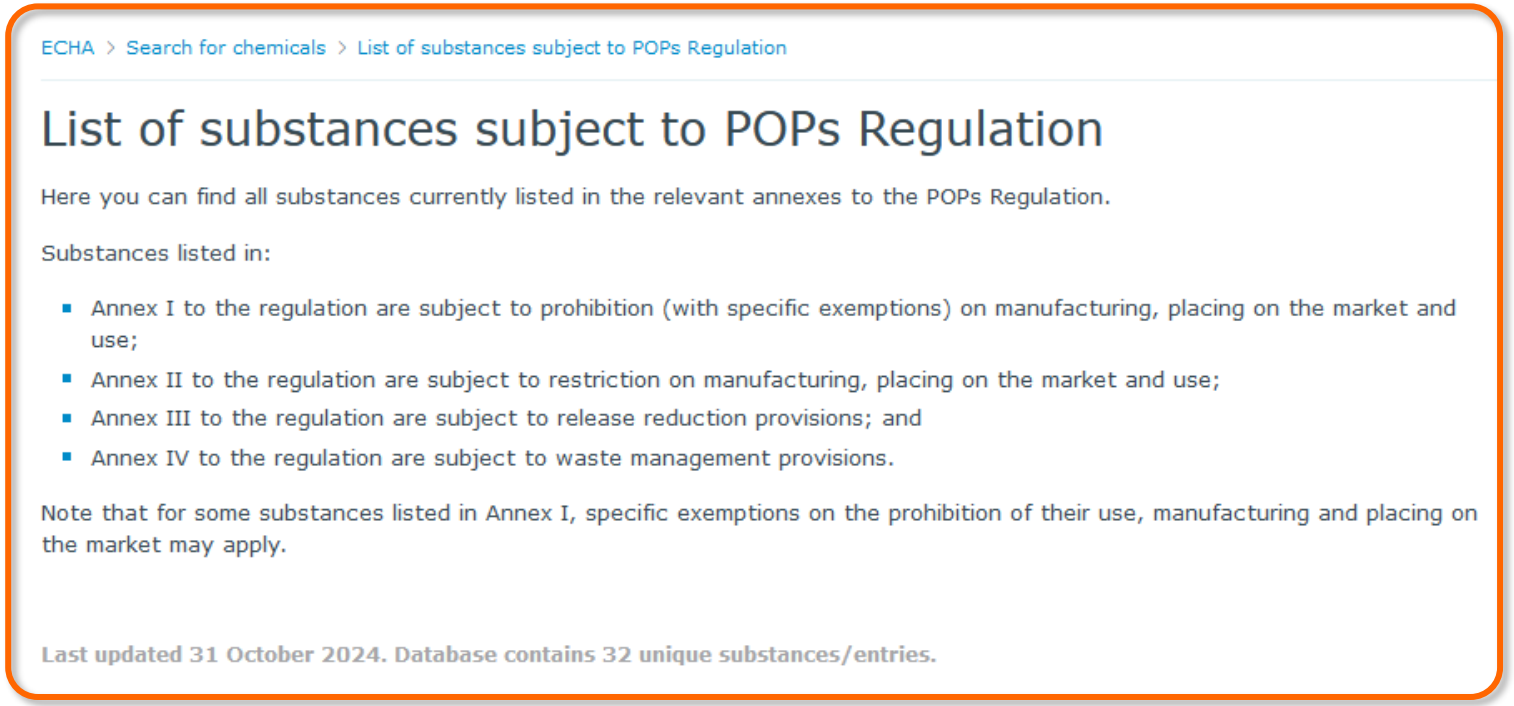
  https://echa.europa.eu/information-on-chemicals

- We cannot guarantee the accuracy of the materials data, it should only be used for guidance



Outlook
Upcoming Features

- EU POPs List Integration
  - Annex I(A), I(B), II, III & IV
  - Likely as a new column on the Substances Page
- EC Number Cross-Referencing
  - Increase the number of PFAS substances checked
- Article, Preparation or Substance indicator
- Formulator View



ECHA > Search for chemicals > List of substances subject to POPs Regulation

List of substances subject to POPs Regulation

Here you can find all substances currently listed in the relevant annexes to the POPs Regulation.

Substances listed in:

- Annex I to the regulation are subject to prohibition (with specific exemptions) on manufacturing, placing on the market and use;
- Annex II to the regulation are subject to restriction on manufacturing, placing on the market and use;
- Annex III to the regulation are subject to release reduction provisions; and
- Annex IV to the regulation are subject to waste management provisions.

Note that for some substances listed in Annex I, specific exemptions on the prohibition of their use, manufacturing and placing on the market may apply.

Last updated 31 October 2024. Database contains 32 unique substances/entries.

Source: https://echa.europa.eu/list-of-substances-subject-to-pops-regulation
https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:02019R1021-20241017&from=EN

Outlook
Outlook

- Focus shifting to broad **group restrictions** like PFAS
- Increasing EU (and Swiss) vs UK regulatory **divergence**
- Further **sustainability** related requirements
  - Substances of Concern reporting obligations
  - Ecodesign/Life Cycle Assessment
- **Awareness** raising
  - 6th ESA REACH Workshop (ESA ESTEC [Noordwijk, NL], 17th June 2025 [TBC])

Outlook Acknowledgements & Further Reading

We would like to thank the following for their continued support on the ESA REACH Tool project:

- ESA TEC-Q IT Support (Terma)
  - Joao Martins Pedro
  - Rahul Rathore
  - Gosse Mol
- Tim Becker (REACHLaw)
- Leo Fournier (ESA)

➢ For more information on automated materials obsolescence management systems, please read my article in Chemical Watch & ISMSE Poster

ESA REACH Tool Webinar

Agenda

1. Recap of REACH
2. Introduction to the ESA REACH Tool
3. How it works
4. Main updates
5. Why use the ESA REACH Tool (INVENT)
6. How to get started (Demo)
7. Outlook
8. Q&A

Thank you for listening!

Any Questions?

REACHLaw
Aleksanterinkatu 19
FI-00100 Helsinki
Finland
www.reachlaw.fi
info@reachlaw.fi
sales@reachlaw.fi

Oliver REIFF-MUSGROVE
Senior Product Manager
oliver.reiff-musgrove@reachlaw.fi

Tim BECKER
Senior Legal Advisor
tim.becker@reachlaw.fi

REACHLAW

We Specialize in Chemical Regulatory Compliance, Advocacy and Sustainability