

Dear Supplier,
Dear Customer,

This letter is to inform you about work that is being done by the petroleum based lubricant and lubricant additive industry to prepare for REACH in relation to mapping lubricant 'uses' in the supply chain.

REACH¹, requires an understanding of how chemical substances are used, specifically, how they are handled throughout their life cycle from manufacture to disposal. For those substances that are hazardous, a risk assessment is required to be performed for each use to demonstrate that it is safe. This is part of the REACH registration process.

For efficiency, the Technical Association of the European Lubricants Industry (ATIEL) and the Technical Committee of Petroleum Additive Manufacturers in Europe (ATC) are working together to identify and collate known information on how these products are used, along with associated operating conditions and risk management measures, and make this available to suppliers and customers of lubricant products via the ATIEL and ATC web sites². They will also be proactively sharing this work with other known Supplier and Downstream User organisations with an interest in the manufacture and use of lubricants. In this way it is hoped to limit the need for unstructured communication up and down the supply chain, in line with the recommended industry model³.

As a first step this group is aiming to have available by the end of May 2009 an initial listing of lubricant applications and associated use descriptor information covering the whole lubricant additives and lubricant life cycle.

We would therefore please ask you not to inform us about uses just yet and not to attempt to develop your own exposure scenarios, etc. but wait for us to share with you the benefits of our work.

Kind regards

¹ REACH, the European Community Regulation on chemicals and their safe use ([EC 1907/2006](#)). It deals with the **Registration, Evaluation, Authorisation and Restriction of Chemical substances**.

² www.atiel.org / www.atc-europe.org

³ As promoted by the European Chemical Industry Council (CEPIC), the Distributors Association (FECC) and the Downstream Users Association (DUCC). For further details of the model and exposure scenario development see CEPIC REACH document 'Guidance on ES development & Supply Chain Communication'.