

Mr. Geert DANCET  
Executive Director  
E C H A  
P.O. Box 400  
F-00121 Helsinki  
Finland

Rüsselsheim, 4 September 2008

**Reference: ECHA reference number INC000000008595**

Dear Mr. Dancet,

We, the Automotive Associations, wish to bring to your attention a matter that we consider is of grave concern.

Over five weeks ago, one of our members addressed a question on REACH to ECHA on behalf of the automotive industry. As we have not received a reply yet, as this one could create an enormous workload and as the end of the pre-registration period is fast approaching, we request your support in bringing this matter to a speedy conclusion.

The question raised and to which we, the industry representatives, require a response from ECHA, concerns the content of the guidance documents on requirements for substances in articles (RIP 3.8) where some of our members have different interpretations. The industry wishes to have a common understanding and hence the request for clarification on the matter.

We kindly request that the agency provides us with an answer to the question as soon as possible. Otherwise, our industry will lose valuable pre-registration time.

For a better understanding, we have also attached a short presentation file to this letter. In case of any question, please feel free to contact me under [tunger@hyundai-europe.com](mailto:tunger@hyundai-europe.com).

Yours sincerely,



Timo Unger on behalf of the automotive industry associations

ACEA/ JAMA/KAMA/CLEPA/VDA/AIAG/BIL Sweden

Attachment



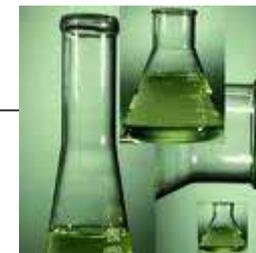
## Shall substances of the windshield washer fluid be preregistered?

RIP 3.8 states:

Important in relation to Article 7(6). At the time of pre-registration, few substances will already have been registered. Therefore, a producer/importer of an article with an intended release of substances should seriously consider pre-registering. If he does not pre-register and if the substance has not (yet) been registered for his use, he has to cease his production/importation until he has made a registration as his substances would be considered a non-phase-in substance, or until someone else registers his use (which may take several years)!

- If OEM makes sure, that their supplier of the windshield washer fluid will register all ingredients, pre-registration is only needed to use the transition period.
- Registration will not follow – pre-registration is made „pro forma“.

## How many substances of the windshield washer fluid must be preregistered?



Exact composition of windshield washer fluid is confidential and has to be requested from the supplier. Main components (5-15) are normally:

- Ethanol or isopropanol
- Monoethylenglycol
- Water
- anionic and/or nonionic tensides
- colorants
- perfume (**consisting of x substances**)

- Each component must be pre-registered when above 1 t/y, which leads to participation in **5 – 15 SIEFs**.
- This has to be done by each legal entity of a company. For example if one OEM has **15 legal entities** in Europe he provides 15 members to each SIEF.
- Extrapolated for the Automotive Industry this leads to more than **200** „pro forma“ members in each SIEF.
- Extrapolated for the whole Industry this leads to an unmanageable number of SIEF participants



## Obligations in a SIEF

Participation in a SIEF is obligatory for each pre-registrant until 2018 even though he doesn't plan to register because his supplier will do it for him.

- An OEM normally can't provide data or information about substances.
- Due to the obligation to answer all requests a lot of workload will occur.
- Administrative costs within the SIEF will be generated which can't be estimated today.

## Conclusion:

**The RIP 3.8. obligation to pre-register all substances of intended release from articles does not contribute to environmental or health protection but only creates unnecessary costs and bureaucracy.**