

REACH 2013

31 May 2012 - Late pre-registration deadline prior to the 2013 registration deadline, for first time manufacturers and importers

31 May 2012 - Downstream users should notify their uses to the suppliers at the latest by this date

31 May 2013 - Deadline for industry to register all phase-in substances manufactured or imported in the EU at and above 100 tonnes a year under REACH.

Background

The REACH Regulation, which entered into force in 2007, foresees three registration phases: the first one ended on 30 November 2010, while the subsequent registration deadlines are in 2013 and 2018.

Companies have the responsibility of collecting information on the properties and the uses of substances that they manufacture or import at or above one tonne per year. They also have to make an assessment of the hazards and potential risks presented by the substance.

This information is communicated to ECHA through a registration dossier containing the hazard information and, where relevant, an assessment of the risks that the use of the substance may pose and how these risks should be controlled.

Registration applies to substances on their own, substances in mixtures and certain cases of substances in articles. Chemical substances that are already regulated by other legislations such as medicines, or radioactive substances are partially or completely exempted from REACH requirements.

Registration is based on the "one substance, one registration" principle. This means that manufacturers and importers of the same substance have the obligation to submit their registration jointly. The analytical and spectral information provided should be consistent and sufficient to confirm the substance identity.

For substance registration a fee is usually charged.

Pre-registration

The pre-registration period, between 1 June and 1 December 2008, allowed potential registrants of the same phase-in substance to get together and submit a registration dossier jointly. Pre-registration was a requisite to benefit from the extended registration deadlines foreseen for these substances.

Potential registrants who, for the first time after 1 December 2008, manufacture or import a phase-in substance in quantities of one tonne per year or more can still submit certain information to ECHA (late pre-registration) and benefit from the extended deadlines. Producers and importers of articles with an intended release of a substance can also submit a late pre-registration.

Late pre-registrations have to be submitted within six months after the manufacturing or importing of the substance that exceeds the one-tonne threshold and no later than twelve months before the relevant registration deadline. Therefore, the late pre-registration period ends on **31 May 2012** for substances to be registered by 31 May 2013, and 31 May 2017 for substances to be registered by 31 May 2018.

Late pre-registration is only obligatory if companies want to benefit from the extended registration deadlines. Companies can also decide to register their phase-in substances immediately, but in this case it is necessary to first submit an inquiry.

After pre-registration and subsequent discussions on the sameness of the substance, the company becomes a member of a Substance Information Exchange Forum (SIEF).

Substance Information Exchange Fora

Companies that intend to register the same phase-in substance will join a Substance Information Exchange Forum (SIEF) to share data on the intrinsic properties of the substance and to avoid the duplication of studies. In particular, they have the obligation to share all test data on vertebrate animals. The members of the SIEF should also agree, if possible, on the classification and labelling of the substance.

The work of a SIEF leads to one joint submission for each substance, therefore reducing costs and avoiding unnecessary animal testing.

Joining a SIEF is a legal obligation for all registrants of pre-registered phase-in substances. Potential registrants must get active in their SIEFs now if they intend to register by 31 May 2013 or by 31 May 2018.

The Role of a Member Registrant

If you are a Member Registrant of a phase-in substance to be registered for the **first time** in 2013 you should get immediately active in your SIEF:

1. Confirm your substance identity and your intention for the 2013 registration;
2. Contribute to the nomination of the Lead Registrant (LR) and sign SIEF/Data sharing agreements.
3. Confirm your membership in the joint submission and submit your member dossier after the LR, by 31 May 2013.

If on the other hand you are a new Member Registrant of a phase-in substance **already registered** make sure that:

1. The substance registered is the same as the one you want to register by 2013.
2. Get in contact with the existing LR in order to enter into SIEF and data sharing agreement negotiations.
3. Join the joint submission object (JSO) in REACH-IT and submit your member dossier by 31 May 2013.

General tasks

- ☞ Check whether your substance is already registered
- ☞ Take action according to your specific role as a Member or Lead Registrant
- ☞ Collect the uses from your Downstream Users (DUs) before 31 May 2012 in order to include them in your chemical safety report. Inform your DUs of your intention to register
- ☞ If you have not been active in REACH-IT for a long time, update your contact details so that SIEF members can contact you easily

More information on the final deadline of 31st May 2013 can be found on the ECHA website: <http://echa.europa.eu/web/guest/reach-2013>