

## 2018 REACH REGISTRATION AWARENESS RAISING

### 2018 REACH REGISTRATION DEADLINE

Under the REACH Regulation, the registration deadline for phase-in substances manufactured or imported in quantities between 1 and 100 tonnes per legal entity per year is **31 May 2018**. Companies using such substances need to ensure that these are registered before this deadline (unless exempted), and that their use is covered in the registration dossier, so that they can continue to use these substances as of 1 June 2018.

### THE RISK:

Why we should seriously prepare for the 2018 registration deadline?

- Small tonnages of substances are more “vulnerable” than higher tonnages, as some suppliers, especially SMEs, might not be in a position to register.
- More substances are expected to be registered, more specialty chemicals and most probably lower number of registrants per substance.
- Fewer substances will be covered by consortia.
- More difficult SIEFs management: less members, less resources and knowledge, smaller companies, more SIEFs run by just a non-experienced Lead Registrant (LR).
- Less data available. More Annex IX test proposals. Limited laboratory capacity to run specific tests. Scientific support for alternative test methods required.
- The risk is to see the supply of these substances discontinued as of 1 June 2018.

### WHAT DOES FECC DO?

Fecc is also in dialogue with different industry sector associations and ECHA to join forces to identify potential registrants and provide support in the registration process.

Fecc starts now an awareness-raising campaign aimed to its members.

Fecc would like to collect from member companies, **in full respect of confidentiality**, directly and via National Associations, the information on the substances to be registered in 2018 by the different actors in the supply chain and those at risk of not being registered.

### WHAT CAN YOU DO?

As a **National Association**, you should raise awareness within your membership, by reminding it of its potential obligations under REACH, and by informing it of the potential risk. You should also convey this survey and collect the input from your member companies and forward it to Fecc.

As a Company, you should know your portfolio, identify the substances that may be affected by this registration deadline and take action before it is too late.

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### HOW TO COMPLETE THE SURVEY STEP BY STEP FOR COMPANIES

#### Step 1: Identification of substances

- Draw up the list of the substances, either on its own or in a mixture that you use.
- Identify correctly the substances with IUPAC name, EC number and CAS number.

#### Step 2: Identification of your role in the supply chain

- Draw up the list of your suppliers for each substance.
- Identify whether it is an EU or a non EU supplier.
- For the non EU suppliers identify whether there is an Only Representative (OR) or not.
- Identify the use you make of the substance.
- Identify your role in the supply chain.

Depending on the substance and the supplier the company can be either:

- **Importer:** Company in the EU that imports a substance, either on its own or in a mixture, from outside EU. In this case the company has registration obligations; continuity of supply is in your hands.
- **Downstream user:** Company in the EU, other than the manufacturer or the importer, who uses a substance, either on its own or in a mixture.

**Use:** any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilization.

In this case, the company does not have registration obligations; continuity of supply is in your supplier's hands.

- **Distributor:** Company in the EU, including a retailer, who only stores and places on the market a substance, on its own or in a mixture, for third parties. A distributor is not a downstream user. In this case, the company does not have registration obligations; continuity of supply is in your supplier's hands.

#### Step 3: For the substances the company is an importer

- Check if the company pre-registered the substances.
- Check if the company registered the substance in 2010.
- Check if the company registered the substance in 2013.
- List the imported and pre-registered substances to be registered in 2018.
- For those substances in your list consider:
  - To continue as an importer and register in 2018.

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- To look for a registered supplier and become a distributor/DU.
- To stop the marketing.

### **Step 4: For the substances the company is a distributor or DU**

- Check if the EU supplier/ OR of non EU supplier registered the substance in 2010.
- Check if the EU supplier/ OR of non EU supplier registered the substance in 2013.
- List the substances to be registered in 2018 by EU supplier/ OR.
- Contact the suppliers of the substances on the list and assess their intentions with regard to the registration of those substances on the list which they supply.
- Will your use be covered in your supplier's registration?
- For those substances in your list with no intention to be registered by your supplier consider:
  - To become an importer and register in 2018.
  - To look for another registered supplier.
  - To stop the marketing.