

## **Tips for REACH compliance: What can you do if your suppliers don't complete REACH registration?**

March 28, 2010 by CIRS LTD

Hello,

Have you ever considered the possibility that your suppliers may not complete REACH registration for the substances that you import? Do you know how to avoid business interruption and what steps to take if your suppliers choose not to register the substances you import? Please find below, a few tips to guide you and help you achieve REACH compliance:

### **1. Ascertain whether your products will be registered by your suppliers:**

CIRS acts as the Only Representative for many suppliers. You may have been told by your suppliers that they intend to register the substances which they supply to you. However, if they do not register these substances, the responsibility to comply with the REACH regulation lies with the importer of these substances. Thus, you should ensure that the substances you imported have been registered in accordance with the REACH regulation. CIRS cannot decide which substances to register and when to register them, without receiving instructions to do so from your suppliers. While some suppliers may carry out registration, they are not obliged to do so and thus your supplier may not have registered the substances that you import.

To receive confirmation that your products will be registered, you are recommended to contact us and enquire as to whether your products will be registered by your suppliers or not. Please send your inquiries to [info@cirs-reach.com](mailto:info@cirs-reach.com) and we will get back to you ASAP detailing the true registration intentions of your suppliers.

Substances with a tonnage of above 1000 ton per year, CMR substances above 1 ton per year and R50/53 substances above 100 ton per year need to be registered before 2010. If the volume of your annual import is above 1000 ton or if you import any CMR substances or R50/53 substances, you are strongly recommended to contact us. (To check the classification of your substances, please go to: <http://ecb.jrc.ec.europa.eu/esis/index.php?PGM=dat>)

## **2. If necessary, you can do your own registration:**

If your suppliers choose not to complete registration, it is possible for you to register your products by yourself. The registration fee imposed by ECHA is tonnage and company-size specific and as such, SME's are charged lower fees to engage in the registration process for their substances. As the 2010 registration deadline approaches, more prices for letters of access are published and the registration costs of many substances have become very clear. It might not be as expensive as you think to complete the registration process for your substances. CIRS can provide you with an estimate of the total cost of registering your substances. For more information about the REACH registration process and REACH registration costs, please go to: <http://www.cirs-reach.com/reg.html> or contact us directly at [info@cirs-reach.com](mailto:info@cirs-reach.com)

## **3. Source REACH registered chemicals and suppliers:**

CIRS has pre-registered over 10,000 substances on behalf of over 2,400 non-EU chemical manufacturers and is expected to acquire 200 registration numbers in 2010. So if you wish to identify REACH compliant suppliers and source REACH registered chemicals, contact us and we can help you with this.

## **More information: Update on the New Chemical Notification in China**

On 19 Jan 2010, the State Environmental Protection Administration (SEPA) of China formally released the revised version (the Order No. 7) of the Measures on Environmental Administration of New Chemical Substances.

From now on, Chinese manufacturers or importers of new chemicals are required to submit new chemical notification to the Chemical Registration Centre (CRC) of the Ministry of Environmental Protection Agency (MEP) of China and obtain a registration certificate from the CRC prior to manufacturing or importing new substances. Companies outside China must assign a local Chinese agent to submit their new chemical notifications on their behalf.

If you are a company which exports new chemicals into China or if you are simply interested in how to do new chemical registration in China, please go to: <http://www.cirs-reach.com/chinareach.html> for more information or contact CIRS via email at [info@cirs-reach.com](mailto:info@cirs-reach.com)