REACH Registration

‘REACH requires all companies manufacturing or placing a substance on the EU market in quantities greater than 1t/year to register that substance with the European Chemicals Agency (ECHA).’

The Scope of REACH Registration

- Substances manufactured imported above 1t/y on its own or in preparations; (Note: some substances are exempted.)
- Substances in articles if present above 1 t/y and intended for release (for example, ink in a pen);
- Monomer substances if present at a concentration above 2% in a polymer (for polymers, monomers shall be registered);
- Intermediates - reduced requirements and lower costs;
- Substances subject to Product and Process Oriented Research and Development (PPORD) exempted from registration for 5 (+ 5) years; However, PPORD notification needs to be submitted.

What are the registration deadlines?

Article 23 of the REACH Regulation provides for a scheme with staggered registration deadlines for so-called ‘phase-in substances’, depending on the tonnage band and hazards of the substance. The respective deadlines to submit the registration dossier to ECHA are as follows:

- 30 November 2010 for CMR1 ≥ 1 t/y, R 50-53 ≥ 100 t/y and other substances ≥ 1000 t/y; or
- 31 May 2013 for other substances ≥ 100 t/y; or
- 31 May 2018 for other substances ≥ 1 t/y;

REACH Registration: What is involved and what information is required for a complete submission?

1. Technical Dossier (> 1 ton per year)
   - Identity of manufacturer/importer;
   - Identity, volume and identified uses of substance;
   - Classification and labelling;
   - Study report and robust study summaries according to Annex VII to X (physiochemical, toxicological, eco-toxicological properties, etc);
   - Testing proposal;
   - Statement whether tests have been carried out on vertebrate animals;

2. Chemical Safety Report (> 10 ton per year)
   - Human hazard assessment, physicochemical properties assessment, environmental hazard assessment and PBT/vPvB assessment;
   - Exposure Scenario is required if classified as dangerous or PBT/vPvB;
   - operational conditions and risk management measures for each use;
   - exposure estimation;

Steps to save money on REACH Registration

- Evaluate if you qualify for late pre-registration
- Verify if you qualify for intermediate registration
- Decide whether to participate in Joint Submission or opt out
- Check whether your company is eligible for SME discounts on ECHA fees
- Choose a cost efficient and experienced service provider

Contact us

Focusing on chemical compliance and having completed over 180 registrations since 2007, CIRS provides one-stop REACH solutions to global companies that manufacture, trade or use chemicals so that they can focus their attention on their core business.

For more information on REACH please contact morgan@cir-reach.com