

Preparing for REACH Tips: Ask for REACH tonnage coverage certificate

Feb 28, 2010 CIRS Newsletter Volume One

Hello,

Did you know that in addition to asking for pre-registration certificate or confirming with the Only Representative of your suppliers that they have (pre-)registered, you also need a **REACH tonnage coverage certificate**?

With REACH tonnage coverage certificate, you can show the enforcement authorities of your states that your substances and volumes are covered by the (pre-)registrations of the Only Representative. You shall ask for this certificate every time before you import your products to the EU market.

Why is REACH tonnage coverage certificate important to you?

1. ECHA Guidance on Registration 1.5.3.4 clearly states "In cases where an importer is also importing quantities of the same substance directly, then both the only representative and the importer must be able to clearly document to enforcement authorities which imports are covered by the registration of the only representative (OR); and which are covered by the importer; otherwise, the importer remains responsible for all his imports."
2. According to CEFIC guidance document, the Only Representative (OR) must have an available and up-to-date record of those importers that are covered by his registration and therefore become Downstream Users (DU). In addition, all the importers covered by an OR must be aware that such OR exists and that he covers his substance and volume in his registration.

REACH enforcement cases

Last year, CIRS issued hundreds of tonnage coverage certificates upon importers and REACH enforcement authorities' requests. Most of those certificates are used for custom clearance, especially in Greece. They regarded the pre-registration certificate (almost identical to CIRS's tonnage coverage certificate) as a mandatory document. If the importer can't provide this document, their goods will be detained at customs.

Another example is that an inspector from UK HSE (Health & Safety Executive) sent an email to ask for tonnage coverage certificate for its UK based importer. In his words, the more important thing of REACH supervision is the tonnage coverage inspection, but not just pre-registration confirmation.

Apart from Greece and UK, importers from France and other countries are also

turning to CIRS for help because of enforcement authorities' requests for this type of certificate.

How can I get this certificate?

Both you and your suppliers can request this certificate. You can fill in an application form and send it to info@cirs-reach.com or simply send your supplier's name, the substances you import and the volume of each substance to the above email. You can also ask your suppliers to provide this certificate along with their products.

The application form can be found here:

http://www.cirs-reach.com/REACH_Certificate_Application_Form.doc

The sample certificate can be found here:

http://www.cirs-reach.com/REACH_Volume_Tracking_Tonnage_Coverage_Certificate.pdf