

Frequently Asked Questions about REACH Registration Numbers

What is the difference between pre-registration number and REACH registration number?



ECHA assigns a unique **pre-registration number (05-xxxx-xxx-0000) or late pre-registration number (17-xxx-xxxx) or registration number (01-xxxx-xxxx)** for each substance that has been (pre-) registered by a legal entity after the successful submission of (pre-) registration data. Pre-registration and late pre-registration numbers are only valid temporarily. Pre-registered substances enter into a transitional period and require further registration before relevant deadlines. After a registration number has been acquired, the pre-registration number will become invalid.

How do I use a REACH registration number?

A REACH registration number is used in two ways. Firstly, it is **direct proof of the completion of REACH registration**. Secondly, the registration number can be **communicated down the supply chain** to avoid duplicate registration. Products without a registration number will not be allowed to be sold on the EU market.



When do I have to disclose the (pre-) registration numbers related to my product to my customers?

For a substance or mixture requiring a Safety Data Sheet (SDS), the registration number must be given in the SDS and communicated to your customers when it is available. Similarly, Article 32(1)(a) indicates that when registration numbers have to be communicated to customers according to Article 32 (communication duties for substances and mixtures not requiring an SDS;) the registration number, if available, should be supplied.

Please note that there are detailed provisions in the Regulation (EU) No 453/2010, amending Annex II of the REACH Regulation, concerning when the segment of the registration number which refers to the individual registrant of a joint submission (the **last four digits of the original full registration number**) may **be omitted by a supplier** who is a distributor or a downstream user).

In most cases, you will be asked by your customers/importers/distributors to disclose (pre-) registration number to prove that you have completed

pre-registration or registration. Distributors may go one step further and ask for your permission to use this (pre-) registration number on their certificate.

How can I check the validity of a pre-registration number or registration number?

The (pre-) registration number does not indicate the substance identity or legal entity and ECHA will not publish pre-registration numbers either. **A customer who is informed about (pre-) registration number, does not have the option to check with ECHA whether the number communicated to him is valid or not.** However, it is recommended that buyers request further documents (REACH certificate, submission report, etc) from their suppliers or REACH only representatives to make sure their products have been properly registered.

If I communicate pre-registration or registration number down the supply chain does that mean both my products and my customers are REACH compliant?

The provision of a pre-registration/registration number by a supplier does not guarantee future compliance with REACH or continuity of supply. There are many practical questions associated with documenting compliance at the point of entry of goods into the Customs territory of the European Union (EU), particularly with respect to valid registrations, whether the substances are exempt or not from registration, whether the pre-registration obligation was taken over by the importer, the only representative of the exporter, or the only representative of the exporter's supplier and whether the quantities imported have exceeded the tonnage band registered.

Suppliers and EU importers are recommended to get the imported goods certified by asking for REACH tonnage coverage certificate from CIRS, which is free. The certificate clearly documents registration status, customers sold to and quantities imported.

If other companies use our registration numbers without our consent, is there any risk?

Your company will not be put at risk. Companies that steal your registration number or use fake registration number will be subject to legal penalties. Buyers can check the validity of a registration number with their suppliers or REACH only representatives.

It is recommended that the owners of registration numbers document the names of customers, allocate annual tonnage and issue a certificate(s) to each of them. The

certificate can be communicated down the supply chain. If any companies use your registration number(s) without your consent, that will be considered illegal. CIRS will not issue REACH certificates to those companies and will inform you of the possible misuse of your registration number.

We are happy to serve as your only representative. If you have any trouble with REACH, please don't hesitate to contact us.

Chemical Inspection and Regulation Service Limited

■Address: Singleton House, Laurence Street, Drogheda Republic of Ireland

■Contact: Ms Louise Halpin ■ Tel: +353 41 9806 916 ■ Fax:+353 41 9806 999

■Email: info@cirs-reach.com ■ <http://www.cirs-reach.com>