



# *REACH – what it is and where you fit in*

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# Outline

- General overview
- Key elements
- Identifying your role
- Registration
- Downstream users
- Communication in the supply chain
- Guidance



# What is REACH?

- European Regulation for the **R**egistration, **E**valuation, **A**uthorisation and Restriction of **C**hemicals
- One coherent system for all chemicals in the EU
- Places greater responsibility on industry to manage the risks that chemicals may pose to human health and the environment
- In principle, REACH applies to all chemical substances



# Key Elements

- **Registration** of all substances  $\geq 1$  tonne/yr
- **Evaluation** of some substances
- **Authorisation** only for some substances of very high concern
- **Restrictions** - the safety net (Community wide action)
- **Information in the Supply Chain**- applies to all



# Scope of REACH

- **Substances** on their own
- **Substances** in preparations
- **Substances** in articles
- Manufacture
- Import
- Use



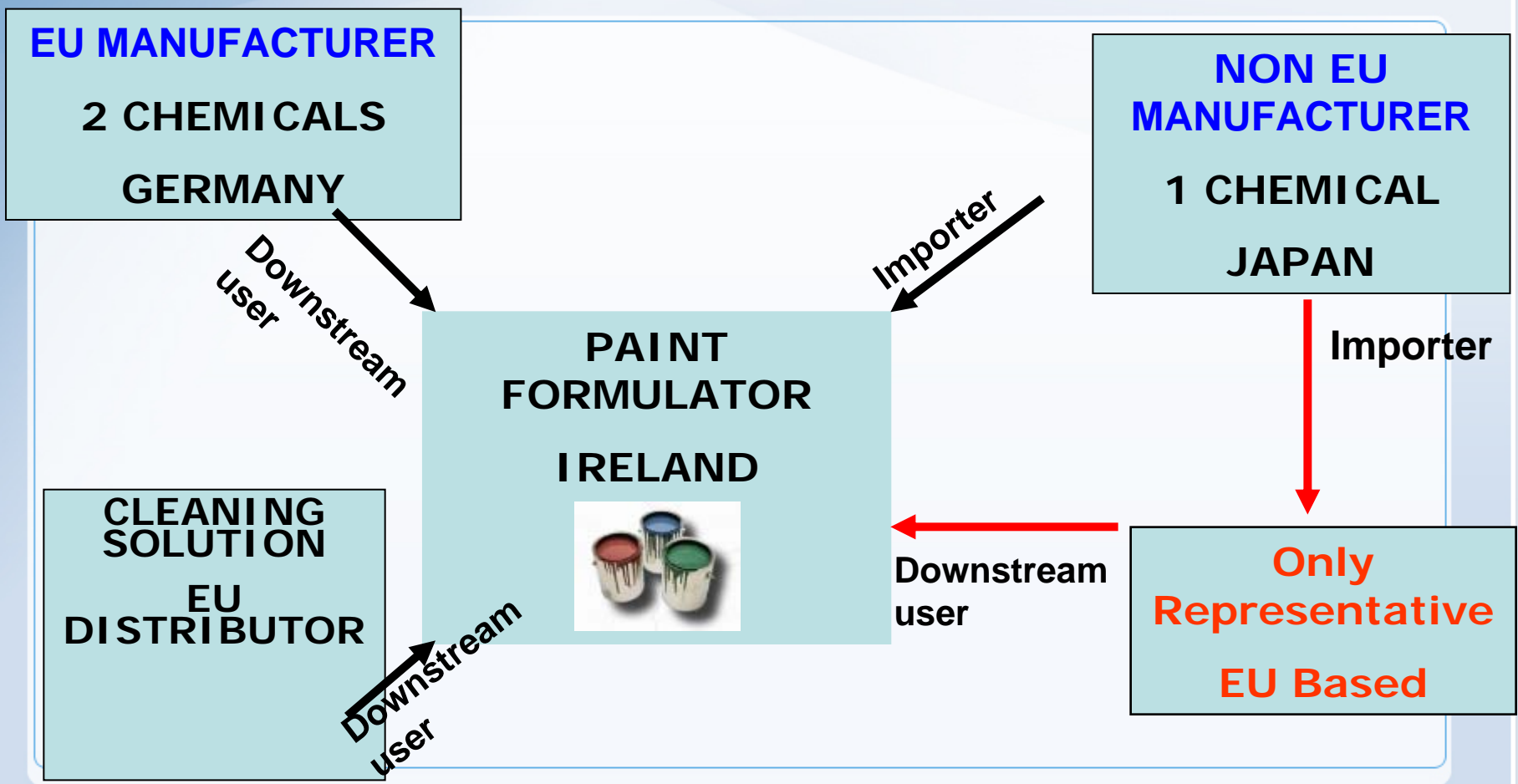
## Identifying your role

- **Manufacturer** - EU manufacturer of substance(s)
- **Importer** – Imports substance(s) from outside EU
- **Downstream User** - Professional users
- **Distributor** - Stores and places on market
- **EU Only Representative** - role of Importer

**You may have more than one role!**



# Identifying your role





# Registration

- Responsibility for management of risks with manufacturer/importer (M/I)
- Registration requires M/I to:
  - Generate data on substances
  - Use data to assess risks
  - Develop risk management measures



# Scope of Registration

Generally, substance on its own or in a preparation, or incorporated into an article, manufactured in, or imported into, the EU, at quantities greater than 1 tonne per annum, must be registered



# Registration of Substances

- General obligation on M/I to register substance at  $> 1$  t/yr
- Submit dossier to ECHA via REACH-IT
- Info requirements increase with tonnage
- No data no market rule of registration
- Framework to demonstrate adequate control



# Substances in Preparations

- Substances in preparations ( $M/I > 1$  tonne per yr) are subject to registration
- Need to know % content of each substance in preparation
- Calculate overall tonnage



# Substances in Articles

## Article

an object, which during production, is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition



# Substances in Articles

- **Registration (Article 7.1)**
  - Present in article  $> 1$  t/yr and
  - Intended to be released
  
- **Notification (Article 7.2)**
  - Substance of very high concern  $> 1$  t/yr and
  - $> 0.1\%$  w/w



# Who has to register?

- Only a legal person established in EU can be a registrant
- Registration applies to:
  - **EU manufacturers and importers of substances**, on their own/in preparations
  - **EU producers/importers of articles**
  - EU-based '**only representatives**'

Within these groups, each legal entity must register



# Downstream Users

- A natural or legal person established in the Community who uses a substance, on its own or in a preparation, in the course of his industrial or professional activities
- Two main roles: final users of substances and formulators of preparations
- A distributor or consumer is not a downstream user



# Aspects of REACH relevant to Downstream Users

- Title V (articles 37-39) of REACH
- Receive an SDS from supplier
- Exposure scenario(s) (ESs) attached
- Check if current use covered
- Options if working outside exposure scenario
- Communication in supply chain

# Downstream Users and Registration

- Not required to register
- REACH will apply to most substances you use today
- Will only be able to continue to use substances if M/I registers them
- Many M/I have begun this process
- Start communicating with suppliers now
- Aware of any potential problems with future supply



# What are the benefits of preparing early?

- Know if supplier plans to register substance, if CSR required, if your use will be covered
- Ensure his registration takes proper account of your use and conditions
- Plan for any changes you may need to make regarding your use of a substance



# What if substance is registered, but my use not covered in ES?

## Options:

- Make use known to supplier
- Change conditions of use
- Source another supplier whose ES covers use
- Prepare own CSR
- Source an alternative substance



# What happens if a substance is not registered?

- Substance can't be manufactured/imported/supplied in EU
- DU can't continue to use it
- 1 Jan 2009: ECHA to publish list of pre-registered substances
- If substance you use not on list, contact ECHA



## What information do I need?

- REACH gives DUs a right to make use known in writing to supplier
- M/I may seek information from you to help prepare their registrations and develop ESs
- Supply information on conditions of use and risk management measures
- Can choose not to make use known; prepare own CSR



# Formulators

- Provide SDS to customers
- Include information in SDS and ES received from supplier
- Forward info to customers on exposures and conditions of use
- Your customers will have right to make use known
- Communicate with customers early; ensure their use is covered and maintain market for your products



# Safety Data Sheets

- Main tool for downstream communication
- Slight change in format
- ES should be attached for substances & preparations at  $> 10$  t/a and classified as dangerous
- Now required for PBTs/vPvBs and substances of 'equivalent concern'



# Start communicating now!

- Identify the substances you use
- Prepare an inventory
- Determine your role
- Prioritise those that are most important or likely to be impacted by REACH
- Contact your suppliers and customers



# Guidance and support available

- Technical Guidance Documents  
[www.echa.europa.eu](http://www.echa.europa.eu)
- Navigator Tool
- Helpdesks
  - [www.reachright.ie](http://www.reachright.ie)
  - 1890 289 389
  - reachright@hsa.ie



Thank you.  
Any questions?

