

REACH registration 2018 and downstream users

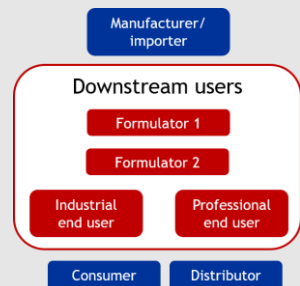
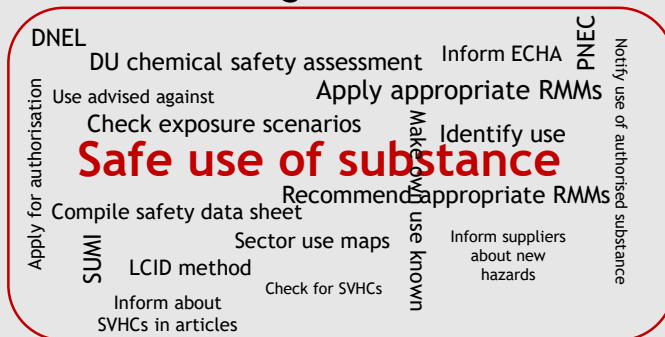
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REACH 2018 SME workshop - road to successful registration
March 9, 2017; Vienna

REACH & down stream users

*„downstream user: means any natural or legal person established within the Community, other than the manufacturer or the importer, who **uses a substance**, either on its own or in a mixture, in the course of his industrial or professional activities. ...” - REACH Art. 3 (13)*

❖ Down stream user obligations



...no market"

- ❖ Manufacturer/importer/Only representative:
x0.000 companies
/legal entities



- ❖ Down stream users:
App. 26.000.000 enterprises
in Europe (public sector
and farmers not included)

...no use"



- ❖ Will all the substances that are vital for the business still be available?

- ❖ Will all the chemical performance still be available after May 2018?

Downstream users

Formulator 1

Formulator 2

Industrial end user

Professional end user

REACH 2018 & down stream users



1. Identify substances critical to your business
2. Check if the substances are already registered
3. Check if the substances should be registered
4. For any substances not registered, find out if your suppliers plan to register them
5. Check that your uses will be covered in the registration
6. Look for alternative suppliers if necessary
7. If no supplier intends to register a substance, consider importing it directly

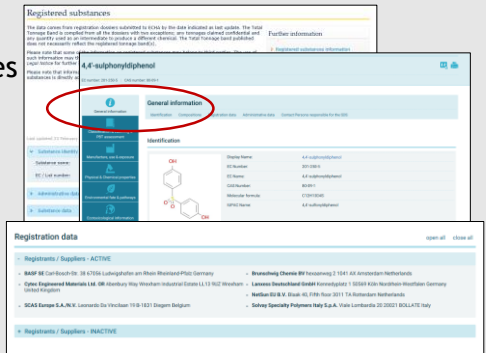
Establish clear responsibilities and dedicated resources

REACH 2018 & DU: Identify substances

- ❖ Establish a REACH compatible chemical inventory in your company (and keep it up to date)
 - “Pure” substances: purchased raw material and auxiliary substances (e.g. chemical substances, metals, minerals, natural substances, ...)
 - Mixtures (e.g. paints, cleaning products, cosmetics, ...): include the chemical composition
 - Produced or purchased articles: including chemical composition
- ❖ Make sure that you are not already in the “registration role”
- ❖ Prioritise substances according to
 - Importance for your business
 - Registration status

❖ Check, which “priority substances” in your inventory are already registered

- Registration number in received safety data sheet (SDS)
 - » Section 1 for substances
 - » Section 3 for hazardous substances in mixtures
- If no SDS is available: check ECHA Website: <https://echa.europa.eu/information-on-chemicals/registered-substances>
 - » Search by CAS No. or substance name
 - » Companies, which registered that substance, usually are available in the disseminated registration information



❖ Check, which “priority substances” need to be registered of if exemptions are applicable

- Substance (mixture) is used below 1tonne/year
- Substance is exempted from registration:
 - » REACH Annex IV or V
- Use of substance is exempted from registration
 - » in food or feeding stuff
 - » in medical products for human or veterinary use
- Regarded as being registered
 - » Active substances for biocidal products or plant protection products

Waste is not regarded as substance or mixture; exemptions for recovered substances possible

Cosmetic ingredients need to be registered

❖ For remaining “priority substances”, which have not been registered yet and no exemption applies, check the plans of your supplier

- Try to get a positive response about his intention to register
- However: bear in mind that a indication of registration intent or a “pre-registration of the substance” is no guarantee
- In any case: cross-check the response with [ECHA list of lead registrants](#)

Creation Date	Substance*	EC Number	CAS Number	Registration Type	Lead Dossier Submitted	Lead Dossier Registered**	Lead Name***
02/02/2017	4-(p-chlorophenyl)pyridin-4-ol	254-479-6	3952-49-7	Intermediate	No	No	OLON Spa
02/02/2017	(dihydro-3,3-diphenyl-2H-furan-2-ylidene)dimethylammonium bromide	253-649-9	37743-18-3	Intermediate	No	No	OLON Spa
02/02/2017	Melastomine	628-127-2	3275-80-9	Intermediate	No	No	OLON Spa

❖ If you get a positive response from your supplier, make sure that your use will be covered in the registration

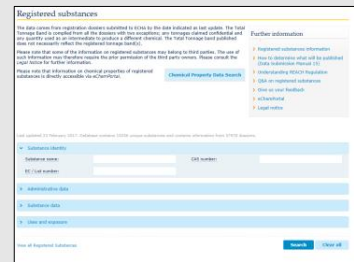
- By informing the registrant about your use, this identified use has to be taken into account
 - » Only for health/safety or environmental concerns: use advised against
- Refer to [sector use maps](#), if available, when reporting the use:
 - » Soaps, Detergents and Maintenance products
 - » Cosmetics and personal care products
 - » Construction Chemicals
 - » Adhesive and sealant industry
 - » Imaging and printing products
 - » ... more to come

Identifying the use helps in dealing with exposure scenarios

If you want to keep your use secret, get acquainted with DU CSA/CSR requirements

❖ If you get no response or a negative response, look for alternative suppliers

- For already registered substances: ECHA Website
- For not registered substances: again check the [ECHA list of lead registrants](#)



Creation Date	Substance*	EC Number	CAS Number	Registration Type	Lead Registrant Substantiated	Lead Registrant Registered**	Lead Status**
02/02/2017	4-[2-(chlorophenyl)phenyl]-4-ol	234-479-8	30512-49-7	Intermediate	No	No	CLRH Data
02/02/2017	1,1-Dichloro-2,2-bis[4-(4-chlorophenyl)phenyl]ethane	235-648-9	37191-28-3	Intermediate	No	No	CLRH Data
02/02/2017	1,1-Dichloro-2,2-bis[4-(4-chlorophenyl)phenyl]ethane	235-648-9	37191-28-3	Intermediate	No	No	CLRH Data

If you don't find a European supplier, extend your search globally

- Look into other sources of chemical suppliers

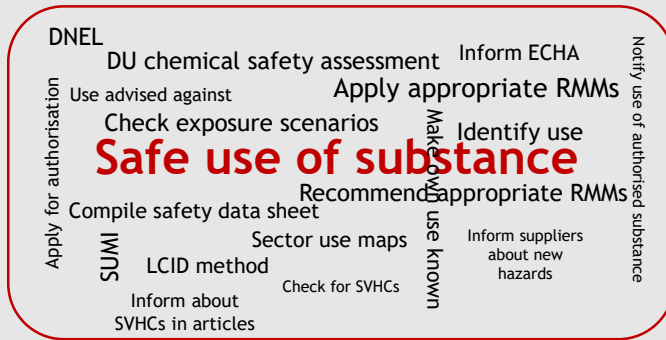
❖ Consider importing from non-EU supplier, if you couldn't find a reliable source for your "priority substance"

- Ask the identified non-EU manufacturer, whether an Only Representative is an option
- If not:
 - » look for alternative substances as soon as possible or
 - » start preparing to become/becoming an importer (necessary preparation already explained today)
 - ❖ if you import for the first time, late pre-registration still possible until May 31, 2017
 - ❖ existing stock of pre-registered substances may be used beyond May 31, 2018

Don't forget: after May 31, 2017 a registration needs to be made BEFORE the import above 1 tonne/year

REACH 2018 & DU: Don't forget ...

- ❖ ... your current obligations, while preparing for REACH 2018:



Be aware: the number of exposure scenarios you will receive after May, 2018 will increase, and with them your workload

- Get acquainted with the [CSA/CSR roadmap](#) and [ENES](#) activities

Thank you ...

for your attention!

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