

REACH-Registration 2018

International Chemical Policy from
a European Perspective

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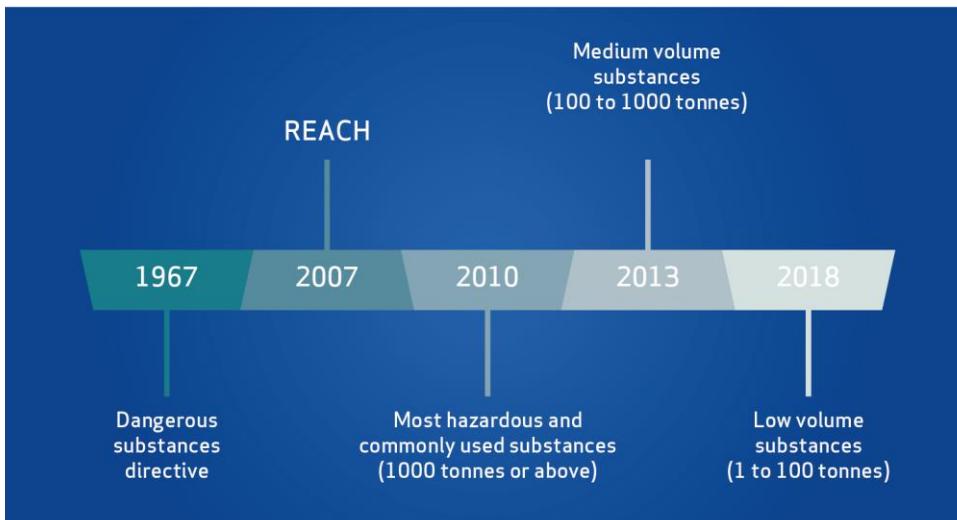
2018 deadline: what happened?



Registration: at the core of REACH

- Registration process is vital
- Dossiers show that industry knows the substance and can demonstrate safe use
- Basis for all other processes:
 - Informed decisions by authorities
 - Safety instructions in the supply chain
 - Information available to the general public

The journey



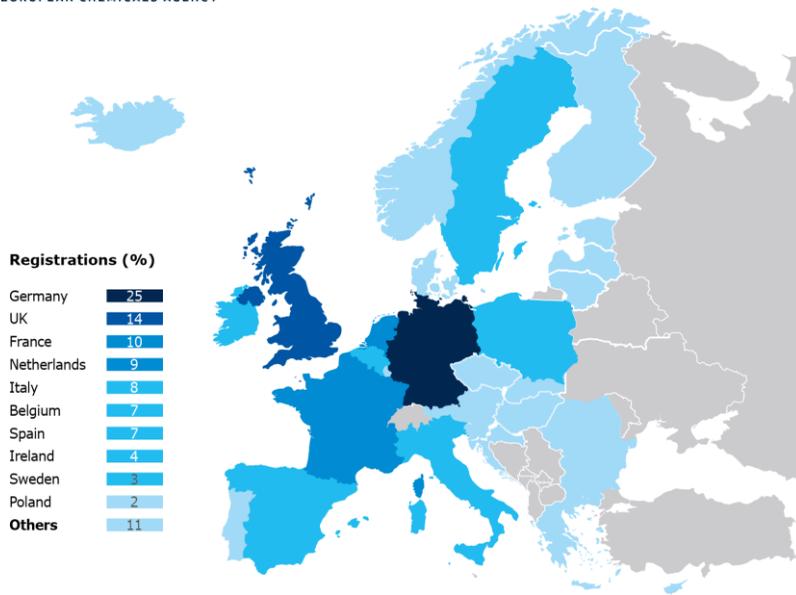
Main outcome

	All	2018 deadline
Registrations	88 319	33 363
Substances	21 551	11 114

- All registrations processed by ECHA
- 18% of registrations from SMEs
- Registrations from outside of EU: 43% from importers and 29% from OR

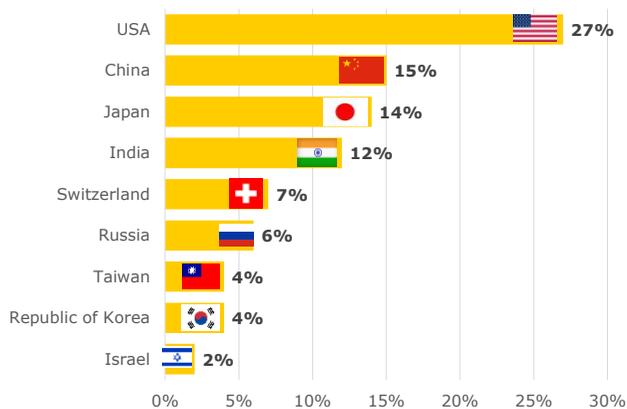
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EU/EEA countries (all)



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Top 10 non-EU countries



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Was the outcome as expected?

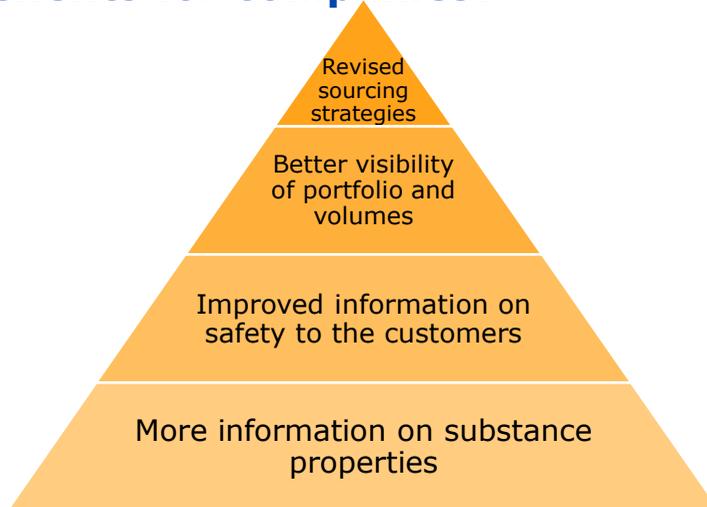
- **Fewer** registrations and substances than forecasted for the 2018 deadline
- Overall, **closer** to the forecast for all tonnages
- Registrations **still** coming in
- **Number of substances similar** to the US market



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Benefits for companies?



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Summary

- 21 550 chemicals registered - we know more than ever about the chemicals used in the EU
- Companies have done their part - information flows in the supply chain improving workers' safety and resulting in safer products
- EU has established clear and harmonised rules for all companies
- Registration is only the start

Life after the deadline



Current situation (1/2)

- All dossiers submitted by the deadline have been processed
- 32 515 registration numbers granted out of the 33 363 dossiers submitted by the deadline.
- Update pending for 457 dossiers (out of 2 039 for which more information has been requested).
 - 557 registrations benefitted from DCG solutions for exceptional circumstances with an extended deadline to submit the information (mostly because of late availability of laboratory results)
- ECHA expects to conclude all pending cases by May 2019.

Current situation (2/2)

- 194 dossiers also pending due to ongoing data-sharing disputes
- 99.7% of all completed registrations already published on ECHA's website.

- Additional **2 000** deadline-relevant registrations

Other activities following on deadline submissions

- Verification of company size for all dossiers submitted by SMEs
- Legal entity changes
- Assessment of confidentiality claims (may lead to request for information)

Late comers / new players for existing substances

- No manufacturing or importing in EU over 1 tonne without registration
- Bring yourself to compliance asap
- Submit an inquiry (or use pre-registration until the cut-off date is clarified by the Commission)
- Document all efforts for enforcement activities
- Contact ECHA if you need help



Retrospective checks

Old dossiers may be checked retrospectively for completeness and fulfilling OSOR

- Enhanced completeness check introduced in 2016
- Dossiers not updated are targeted for retrospective checks to ensure level playing field
- First campaigns showed that registrants were able to fulfil information requirements, e.g. provide a missing study
- Some registration decisions were revoked

- One substance, one registration (OSOR): Implementing Regulation from 2016 tasked ECHA to ensure joint submission

Enforcement by national authorities

- Project in **2019** (reporting in 2020)
- All EU countries foreseen to participate
- Scope:
 - Registration obligations in cooperation with customs authorities
 - This includes verification of strictly controlled conditions applicable to substances registered as intermediates



Thank you

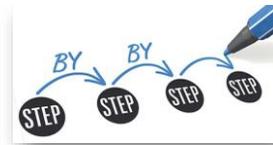
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Keep dossiers up-to-date!



- The reality:
 - 45% of dossiers that are 4 years and older have not been updated
 - Lead dossiers updated more frequently than member dossiers
 - Registrants survey: 85% of the companies are familiar with the update process, but only 55% have already discussed how to handle future updates
- Updating is a legal obligation
- Registrants need to ensure that advice on safe use is based on up-to-date and reliable data
- Registrants should include dossier-updating in their internal quality processes