

## REACH in the Composites Industry

Monthly update

March 2008

### ***Preregistration.***

Preregistration is the first important step in the implementation of the REACH regulation. Through pre-registration manufacturers and importers of chemical substances are showing their intention to the *European Chemical Agency* (ECHA) in Helsinki, which substances they produce and import, they are going to register.

The purpose of the preregistration is to make use of transition periods for the actual registration process. If a substance is not preregistered, it may not be marketed anymore without having available a full Chemical Safety Report according to the rules of REACH.

### **Legal entity**

The preregistration has to be done by every *legal entity* that manufactures or imports a substance in quantities more than 1 ton per year. If a chemical company produces a substances in more than one site in Europe and these sites are separate legal entities, each site has to do its own preregistration.

### **Phase-in substances**

In the preregistration process, so called *phase-in substances* have to be listed. Phase-in substances are existing substances that are listed in the *EINECS* (European Inventory of Existing Commercial Substances) inventory. This inventory contains all chemical substances that have been produced or imported in the European Union between 1<sup>st</sup> January 1971 and 18<sup>th</sup> September 1981. In total the EINECS inventory contains slightly more than 100.000 substances.

A second category of phase-in substances are substances, present on the "*No Longer Polymer List*". These "NLP's" were originally listed as polymers in the EINECS inventory. In 1981 the definition of a polymer was rewritten. As a result a number of substances were no longer regarded as polymers. They received a separate status as "No-Longer-Polymer".

### **Exceptions**

Not all 100.000 substances have to be preregistered.

The following categories of substances do not fall under the REACH regulation:

- Radioactive substances
- Substances under customs supervision
- Non isolated intermediates
- Pharmaceutical substances
- Food- and feedstuff additives

The REACH regulation contains two annexes (Annex IV and Annex V) in which substances are described that are also exempted from registration. These are (in general) substances of natural origin, such as vegetable oils, fatty acids, mineral oil, ores, gases and substances that are formed as a result of a chemical reaction during storage or under the influence of light, humidity, reaction with micro-organisms or with air. Annex IV and Annex V are at the moment under revision.

It is expected that in total approx. 30.000 substances will be preregistered.

### **Information in the preregistration**

The following information has to be provided in the preregistration process:

- Identity of the registrant (company name, contact person, telephone numbers, email addresses, etc).
- Identity of the substance (this can be done by providing a chemical name, CAS-number, EINECS number, a molecular formula or anything else sufficient to identify the substance).
- The tonnage band. There is an indication of the yearly quantity that is produced or imported by the registrant. The choice is between: 1 - 10 ton/a; 10 – 100 ton/a; 100 – 1000 ton/a or > 1000 ton/a.
- The planned registration period. An indication must be given when the registration of the substance will be done. Of course the transition periods in the regulation have to be kept in mind:
  - Substances > 1000 ton/a, CMR 1&2, PBT, vPvB substances and endocrine disruptors have to be registered ultimately 1<sup>st</sup> December 2010
  - Substances > 100 ton/a have to be registered ultimately 1<sup>st</sup> June 2013
  - All other substances have to be registered ultimately 1<sup>st</sup> June 2018.
- A list of substances that can be used for "read across" purposes. For many substances not all necessary toxicological data are available. If similar substances are known which may have a comparable toxicological profile, these substances can be mentioned for "read across" purpose.

#### **Time frame and costs**

The time for preregistration is very short. The preregistration period starts on 1 June 2008 and ends 1<sup>st</sup> December 2008. Although preregistration is not mandatory, companies that do not preregister, cannot use the transition periods described above for the actual registration.

The preregistration of a substance is *free of charge*.

After the preregistration the ECHA will publish a list of all registrants for a particular substance. These registrants have to organise the registration of the substance as much as possible together. This has to be done in a *Substance Information Exchange Forum* (SIEF).

In another REACH update we will go more in detail about the formation of a SIEF and the organisation in a SIEF.

#### **Relevance for Downstream Users**

Although the preregistration process seems of importance only for the manufacturers and importers of substances, it is important for downstream users to follow the process closely.

Downstream users should *contact their suppliers* before the preregistration period in order to make sure that the substance they buy, is preregistered for their use.

As soon as the preregistration period is ended, the ECHA will publish in the beginning of 2009 the survey of preregistered substances. Downstream users must check this survey to see if all their substances are listed. If this is not the case, they have to notify the ECHA that their substance is missing.