



REACH UPDATE

REACH Pre-Registration – what is it, why do it and when?

Pre-Registration of chemicals under REACH runs from 1 June until 30 November 2008. This is the first key action for manufacturers or importers of chemicals in Europe. This edition of our REACH update provides a summary of exactly what Pre-Registration is, and why companies should make sure that their chemicals go through this process.

What is Pre-Registration?

The purpose of the Pre-Registration phase is to draw up a comprehensive list of:

- i) the chemicals made or imported into Europe
- ii) companies who are making or importing each chemical

It is a relatively simple step, but one which provides important initial information to the European Chemicals Agency.

Why should I pre-register substances?

Companies that pre-register their substances can then take advantage of the staggered timeline for full REACH Registration. This is shown below. Companies that don't pre-register their chemicals will have two options:

- i) stop importing or making the chemical
- ii) carry out a full registration of the chemical straight away

The size of the full Registration process should not be underestimated – in short, WSP strongly advise companies to pre-register substances.

REACH timetable

June 1 st 2007	REACH enters into force
June 1 st 2008	Pre-Registration begins
Nov. 30 th 2008	Pre-Registration finishes
December 2008	List of pre-registered substances published
Nov. 30 th 2010	Registration deadline for: <ul style="list-style-type: none">■ >1000t/annum substances■ 'Substances of very high concern'
May 31 st 2013	Registration deadline for: <ul style="list-style-type: none">■ >100t/annum substances
May 31 st 2018	Registration deadline for: <ul style="list-style-type: none">■ >1t/annum substances

Who should pre-register substances?

Pre-Registration is open to the following groups:

- **EU manufacturers and importers of substances and substances in preparations** above 1 tonne per year. Remember that preparations will consist of several substances which will all require separate pre-registrations.
- **Only Representatives of non-EU substance manufacturers.** The appointment of an Only Representative enables non-European manufacturers to continue to export to Europe and removes the importers' registration obligation. This is discharged to the Only Representative.
- **Manufacturers or importers of 'articles'** (essentially finished products) that are deliberately designed to release substances - where the substances have not already been registered for that use. Note that this should not apply to European manufacturers of articles as they should only be able to buy substances that have already been registered under REACH.
- **Manufacturers or importers of polymers.** These companies need to ensure that monomers and other polymer additives have been pre-registered.
- **Owners of toxicology data** on substances may also wish to pre-register since such data will be valuable in subsequent collaborative discussions with others who have pre-registered the same substance.



What information is required for Pre-Registration?

The requirements of Pre-Registration are set out in Article 28 of the REACH legislation. The following information is needed:

- The substance name - including its EINECS (European Inventory of Existing Commercial chemical Substances Information System) and CAS (Chemical Abstracts Service) numbers.
- The name and address of the manufacturer or importer or person representing them.
- The envisaged deadline for the Registration, taking into account the tonnage band (see REACH timetable).
- Any toxicology information from computer predictions (QSARs*) or from comparison to substances with a similar chemical structure ('the read-across approach').
(*Quantitative Structure-Activity Relationship models)

How do I pre-register?

Pre-Registration will take place on-line via the European Chemical Agency's REACH IT system. The REACH IT system can be found using the following link: www.echa.europa.eu

How can WSP help you with Pre-Registration?

WSP Environment & Energy has a team of highly qualified and experienced REACH experts and is one of the market leaders in providing REACH services.

Our comprehensive Pre-Registration services include:

- Working with you to develop and implement a REACH compliance strategy across your business
- Determining the substances either individually in a preparation or as a part of an article which create a REACH obligation for your organisation
- Working with your suppliers to identify additives in your preparations that may generate Registration responsibilities for your business
- Collating and validating substance identification information
- Helping you understand toxicity data and QSARs
- Providing you with full REACH helpdesk support
- Compiling all the necessary information required for Pre-Registration
- Submitting your substances for Pre-Registration to the European Chemicals Agency
- Acting as an Only Representative for non-European companies

Contact Us

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