

News Alert:

ECHA/PR/08/32

Helsinki, 06 October 2008

ECHA RE-EMPHASISES ITS APPROACH ON PRE-REGISTRATIONS

ECHA explained to representatives of the Competent Authorities of the Member States, the European Commission services and stakeholder observers at their meeting of 26 September its approach to advise companies to reflect on their pre-registration strategy before pre-registering their substance(s). In particular, companies were recommended to abstain from pre-registering all substances on EINECS or similar lists unless they then intend to register them. The meeting generally supported the line ECHA had taken.

On 19 September, ECHA published a News Alert on its website to discourage, inter alia, the practice of pre-registering the entire EC inventories. As a practical measure, ECHA started to limit the number of pre-registrations to 10,000 after which a company needs to contact ECHA before being able to continue its pre-registrations. ECHA advised such companies to reflect upon their pre-registration strategy, referring in particular to their obligations following pre-registration under Article 29.3 of REACH, to communicate with the other members of the Substance Information Exchange Fora (SIEFs) of which they will be part. ECHA also reminded companies of the possibility of submitting late pre-registrations under Article 28.6. The aim of these measures was to ensure that companies had a full understanding of the pre-registration mechanism.

At the 5th Meeting of the REACH Competent Authorities on 26 September 2008 in Brussels ECHA explained the line it has taken to the Competent Authorities of the Member States, the European Commission services and stakeholder observers, including major industry associations. ECHA recommended companies to abstain from pre-registering all substances on EINECS or similar lists unless the companies intended to register all of them. The meeting noted and generally supported the line ECHA had taken. The Competent Authorities indicated that they may contact such companies to provide clarification and advice.

This advice should not be seen as a change of policy but a reminder of the objectives of pre-registration, one of which is to facilitate data sharing in advance of registration, and to ensure the workability of the system for industry. Pre-registration of the entire inventory will limit the usefulness of the list of pre-registered substances since downstream users will no longer be able to identify whether their substance is actually pre-registered. Further, the setting up and functioning of the SIEFs will be complicated. For a company pre-registering the entire

inventory participation in the SIEFs may become unmanageable because of the amount of resulting communication. For example, a workload comparable to one man-year would be required when these companies are contacted once for each pre-registered substance, if each communication required one minute of work. To avoid having to pre-register excessive number of substances, companies are advised to co-ordinate with their suppliers on who in the supply chain is supposed to pre-register. Companies importing substances from outside the EU and concerned as to whether they should pre-register them should consult with their non-EU suppliers to determine which substances need to be pre-registered in order to help avoid unnecessary pre-registration.

Nevertheless, ECHA recommends, following discussion with the European Commission services, that for certain types of substance, such as re-imported substances (Article 2.7c), recovered substances (Article 2.7d), monomers in polymers (Article 6.3), and substances intended to be released from articles (Article 7.6) companies should pre-register if they are not sure that the substance(s) concerned will be registered by 1st December 2008, the end of the pre-registration period.

Links:

Data submission web section and **REACH-IT Portal** can be accessed by clicking REACH-IT in the main menu of the ECHA website or by typing following address to Internet address line:

http://echa.europa.eu/reachit_en.asp

Companies wishing to pre-register more than 10,000 substances need to contact the **ECHA Helpdesk**. The request should be made using the REACH-IT ECHA **web form** (http://echa.europa.eu/about/form_reachit/form_reachit_en.asp).

Companies wishing to delete some of their pre-registrations are asked to follow the instructions in News Alert ECHA/PR/08/27 at:

http://echa.europa.eu/doc/press/pr_08_27_pre-registration_20080919.pdf

ECHA Press contact: press@echa.europa.eu