The REACH Regulation (EC) 1907/2006 includes a registration requirement that can have a significant impact on users of chemicals. This sheet describes what downstream users can do to protect their business.

WHAT IS REACH REGISTRATION?

REACH requires manufacturers or importers of substances to assess the hazards and potential risks presented by the substance, define conditions of safe use, and document the results in a registration dossier sent to ECHA. The requirement applies to most substances (and substances in mixtures) manufactured or imported above one tonne per year but some exemptions apply. Exemptions include substances regulated by other legislations, such as medicines and biocides, and naturally occurring substances.

Registration of existing chemicals has been phased-in since 2010 and the most hazardous and highest volume substances are already registered. The next and last registration deadline is on 31 May 2018 and applies to substances manufactured or imported in quantities of 1-100 tonnes per year. Registration is a significant undertaking, particularly above 10 tonnes per year, and registrants should take action now for REACH 2018.

WHAT DOES THIS MEAN FOR A COMPANY THAT USES CHEMICALS?

If a company in your supply chain is obliged to register a substance, they can only continue to supply the substance or mixture after May 2018 if they have registered the substance. Take the necessary steps now to protect your business.

1. Identify substances critical to your business
   • Look at substances in your ingredient and process materials that are critical to your business. This includes substances on their own, in mixtures and incorporated in articles that you use.

2. Check if the substances are already registered in your supply chain
   • For hazardous chemicals, the registration number should be on the safety data sheet. Otherwise, contact your supplier.

3. For substances not yet registered in your supply chain, ask your suppliers about their intentions
   • You can also check ECHA's databases. The registration database shows substances that have been registered.

4. If your supplier intends to register a substance, check if your use will be covered in the registration
   • Contact your sector organisation as they may coordinate this activity for their members and communicate about typical uses with suppliers on a sector-wide basis.

5. If a substance will not be registered by your supplier, look for alternative suppliers
   • You can find the companies that have already registered the substance on ECHA's website, unless they have asked to remain anonymous.
6. If a substance might not be registered by any supplier, consider importing it directly
   • You need to register a substance if you import more than one tonne per year. Registration requirements are less demanding for volumes below 10 tonnes per year.
   • Ask your non-EU supplier if they intend to appoint an “only representative” company to take care of the registration. In that case, you retain your downstream user status even though you are in fact the importer of the substance.

7. Help raise awareness of REACH registration and other obligations among your suppliers and business partners
   • Support our REACH2018 campaign on LinkedIn and Twitter.

WHERE CAN I GET MORE INFORMATION ...about REACH registration and downstream users?

• For information on the REACH 2018 campaign, see: https://echa.europa.eu/reach-2018
• For databases on registered substances, see: https://echa.europa.eu/information-on-chemicals
• For advice on REACH and CLP issues relating to users of chemicals, see: https://echa.europa.eu/regulations/reach/downstream-users