

Directors' Contact Group

DCG3/Recommendation/1/2017
27 November 2017

[DCG Recommendation on notifying registration intentions](#)

The Directors' Contact Group (DCG) strongly recommends that companies, acting in all roles within current supply chains, openly communicate their registration intentions for 2018, including their intention not to register, in order to allow their customers to find an alternative supplier in due time, to remain compliant with their obligations under the REACH Regulation. The DCG also prompts companies to take the Lead Registrant role and make this visible in REACH-IT as well as to agree that ECHA publishes their contact details on its website.

The third REACH registration deadline of 31 May 2018 for phase-in substances placed on the European market in tonnage bands between one and 100 tons p.a. is drawing closer by the day!

The DCG assumes that, by now, awareness among large European manufacturers and importers of chemicals has reached a robust level due to the joint efforts of EU and Member State authorities as well as their membership in the industry associations. This awareness is less certain for SMEs (small and medium-sized enterprises) that are not part of any association.

Therefore, companies within certain supply chains cannot be sure whether all respective substances used within the EU/EEA above one ton per year, directly or indirectly, will actually be registered.

The DCG recommends that all companies, be they manufacturers, importers or only representatives, communicate their 2018 registration intentions of substances on their own or in mixtures openly and as soon as possible to their business partners and, in the 10 to 100 t.p.a. band, wherever available, identify the uses to be covered by their registration.

ECHA provides a regularly updated list of substances for which the Agency knows of a Lead Registrant, by publishing either the company name or mentioning that respective information is available to pre-registrants in REACH-IT. This list additionally contains information on the registration type (full or intermediate) and whether a lead dossier (possibly for a higher tonnage band) has been submitted. The Directors' Contact Group (DCG) appreciates this service.

As a matter of equal urgency, the DCG further recommends that companies decide on picking up the responsibility of Lead Registrant for those substances for which none has yet been nominated and make this transparent by creating a joint submission in REACH-IT. The DCG also encourages such companies to accept that ECHA publishes their details on its website to enable new registrants to contact them directly.

Useful links

- Lead Registrant list (https://echa.europa.eu/documents/10162/5039569/registration_statistics_lr_js_en.pdf/)
- ECHA's REACH 2018 web pages (<https://echa.europa.eu/reach-2018>)