

What REACH means for Manufacturers

This leaflet explains your responsibilities under REACH if you manufacture chemicals and is aimed at manufacturers who have little or no knowledge of REACH.

What is REACH?

REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) is the system for controlling chemicals in Europe. It became law in the UK on 1st June 2007. You need to understand the ways it might affect you as a chemical manufacturer.

What chemicals are covered by REACH?

If you make chemicals either to use yourself or to supply to other people (even if it's for export or under contract, e.g. as a toll manufacturer) then it's likely that you will have some important responsibilities under REACH.

Since 1 December 2008, chemical substances manufactured in Europe in amounts of 1 tonne or more per year have needed to be registered with the European Chemicals Agency (ECHA), based in Helsinki.

It is only chemicals on their own that are registered, not deliberate mixtures of chemicals (formulations/preparations). Where a chemical is supplied or used as part of a deliberate mixture, for example, it is produced and used in a solvent or as part of a product, (e.g., paint or glues, etc.), it is the individual ingredients that are registered. In some cases, substances in [articles](#) need to be registered.

There are a few exceptions, including radioactive substances, those in customs warehouses intended for re-export outside the EU/EEA, substances in transit and waste (as defined in EU Directives). Only selected parts of REACH apply to some chemicals, e.g. human and veterinary medicines, food and food additives. For others, e.g. intermediates, there are reduced requirements under certain circumstances, and some substances are treated as if they are already registered.

More information on the different exemptions can be found in [UK REACH CA Information Leaflet Number 8 - Exemptions](#)

What is meant by manufacturer?

A manufacturer is somebody based in the EU/EEA that produces or extracts a substance. This could be by chemical synthesis (i.e., by reacting chemicals together), by smelting (e.g., production of metals from ores) or by extracting them from another source (e.g. from crude oil or plant material). Companies that simply blend substances together (formulators) are not generally manufacturers; however, they should check this, especially when mixing acids and bases.

What am I expected to do under REACH?

If you want to continue to manufacture chemicals covered by REACH you will need to register them with the European Chemicals Agency (ECHA) in Helsinki. Registration means providing a package of technical information on the chemical and its hazards. Registration is phased over a period of years based on tonnage levels and in some cases the hazards of the chemical. However, to take advantage of the phase in time chemicals need to be pre-registered.

Companies who manufactured their substance(s) before December 2008 were required to pre-register them with ECHA between 1st June and 1st December 2008 in order to continue to market and use them legally. If you missed this pre-registration window, are based in the UK, and have not submitted the required registration, you should contact the UK REACH Compliance team: E-mail: CRDCompliance@hse.gov.uk;

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Companies who manufacture their substance for the first time since REACH has been UK law and after 1st December 2008 can, in some cases, complete a 'late pre-registration'.

The final remaining deadline for late pre-registration is 31st May 2017 for substances in the 1-100 tonnes per annum band.

Pre-registration is free and fairly simple. For each chemical you will need to supply the following information to the ECHA:

- Name of the substance, including an identifying number (e.g. CAS or EINECS number);
- Your Company's name and address and a contact name;
- Envisaged deadline for registration and tonnage band; and
- (If applicable) identifier information of any structurally similar chemical which you may wish to rely on to provide useful evidence on hazards as part of your registration package.

A pre-registration can only be submitted via ECHA's REACH-IT portal.

ECHA provides step by step guidance on how to prepare and submit your pre-registration. Further information can be found in [UK REACH CA Information Leaflet Number 7 - Pre-registration](#).

Another benefit of pre-registering a chemical is that you will become part of a group of companies who have also pre-registered the same chemical. This group, called a Substance Information Exchange Forum (SIEF) will share information on properties so that only one set of technical information has to be submitted to ECHA. The SIEF can also work collectively on other aspects of the registration package. Membership of a SIEF will also help to share expertise and spread costs, with members paying reduced registration fees for a Joint Submission.

Other duties for chemical manufacturers

You should also be aware of other duties you may have as a manufacturer of chemicals.

If the chemicals you manufacture are classified as dangerous, you will have to inform (electronically) ECHA of the classification and labelling of these chemicals. This should have been done by 1st December 2010 for chemicals that you were already placing on the market or within 1 month of you placing them on the market for the first time after 1st December 2010. This is a duty placed on manufacturers by the new European Regulation on Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation). More information on CLP can be found on the ECHA website.

If you supply safety data sheets with your chemicals or products, you will have to update these with additional information. See [UK REACH CA Information Leaflet Number 13 - Safety Data Sheets](#) for more details. Users of the chemicals that you import may request that you support their uses of the chemicals in your registration.

Further information

For advice on the application of REACH, you can contact the UK REACH Competent Authority's national helpdesk or visit the website:

E-mail: UKREACHCA@hse.gov.uk

Website: www.hse.gov.uk/reach

