

# REACH – Pre-registration

This Leaflet is relevant to anyone who, after REACH came into force, manufactures or imports (into the EU) a phase-in substance, at one tonne or more per annum, for the first time after 1 December 2008.

## What is REACH?

REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) is the system for controlling chemicals in the EU. It became law in the UK on 1 June 2007.

REACH states that manufacturers or importers (into the EU) of a substance on its own, in a mixture, or where it is intended to be released from articles (finished manufactured goods), at or above 1 tonne per annum may have to register it.

## Who does pre-registration apply to?

If you manufacture or import (into the EU) a **phase-in** substance (see definition below) at one tonne or more per annum **for the first time** after 1 December 2008, you will be entitled to submit a pre-registration for that substance to the European Chemicals Agency (ECHA). This pre-registration will need to be submitted within six months of breaching the one tonne per annum threshold and at least twelve months before the relevant deadline for registration (e.g., for a 1 tonne per annum substance, the latest you could pre-register would be 30 May 2017). The facility to pre-register after 1<sup>st</sup> December 2008 is sometimes referred to a '*late pre-registration*'

If you fail to meet the criteria for *late pre-registration* you will need to proceed straight to registration.

## What if I supplied a substance at one tonne or more prior to 1 Dec 2008?

If a phase-in substance was manufactured or imported at one tonne or more per annum or more, before 1 December 2008, then there was the potential to pre-register that substance during the initial pre-registration period (1 June 2008 – 1 December 2008). **This pre-registration window has now ended.**

If you should have pre-registered, but missed the pre-registration window, you should contact the compliance team of the member state in which the manufacture/import is occurring. More information on the enforcement of REACH in the UK including a section on pre-registration is available at <http://www.hse.gov.uk/reach/enforcement.htm>.

## Why pre-register?

Pre-registration allows manufacturers and/or importers (into the EU) of phase-in substances, who manufacture or import one tonne or more per annum *for the first time* after the 1 December 2008, to defer their registration until as late as 1<sup>st</sup> June 2018. More information on the various registration deadlines is given in [UK REACH CA Information Leaflet Number 6 – REACH - Timelines](#), but the key registration deadlines are in the table below. Basically, chemicals manufactured or imported in large volumes and certain 'substances of very high concern' (i.e. with particular hazardous properties) will need to be registered earlier than those manufactured or imported in smaller volumes.

1 Dec 2010	Registration of: substances supplied: <ul style="list-style-type: none"><li>• at ≥1000 tonnes per annum;</li><li>• at ≥ 100 tonnes per annum that are classified under CHIP<sup>1</sup> as Very Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment (R50/53);</li><li>• at ≥1 tonnes per annum that are classified under CHIP as Category 1 or 2 CMR<sup>2</sup></li></ul>
1 June 2013	Registration of substances supplied at ≥100 tonnes per annum
1 June 2018	Registration of substances supplied at ≥1 tonne per annum

1 – CHIP - Chemical (Hazard Information and Packaging for Supply) Regulations

2 – CMR - Substances that are, Carcinogenic, Mutagenic or Toxic to Reproduction

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## What substances can be pre-registered?

Only Phase-in substances can be pre-registered. These are:

- i. Substances listed on [EINECS](#).
- ii. Substances manufactured in the EU (including the newer member states) at least once in the 15 years before REACH became law, but were not placed on the market by the manufacturer (provided the manufacturer has documentary evidence of this).
- iii. Substances that are so called 'No Longer Polymers'

The second type of phase-in substances (ii above) are those that have been manufactured in the EU but were only ever used within the company or were exclusively for export to outside of the EU. Further information on the final type of class of phase-in substances, the NLPs, is given in the [ECHA registration guidance document](#).

If a substance does not fall under any of these criteria then it will be considered a **non-phase-in** substance and will need to be registered **immediately** if it is manufactured/ imported (into the EU) at one tonne or more per annum.

**Additionally, according to advice from the ECHA/European Commission, certain substances, which may eventually be exempt from registration, will require pre-registration if they are manufactured or imported (into the EU) at one tonne or more after 1 December 2008. These are:**

- **Re-imported substances** – applies to **phase-in** substances manufactured in the EU, exported out of the EU (usually for formulation) and then re-imported back into the EU.
- **Recovered substances** – applies to **phase-in** substances recovered from waste.
- **Monomers in polymers** – applies to EU based manufacturers of polymers, using monomers (that may have already been pre-registered by the monomer supplier).
- **Substances in articles** – applies to **phase-in** substances that are intended to be released.

## What information is required for pre-registration?

The information that you will need to submit for a **pre-registration** is:

- Name of the chemical, 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;
- Date of first supply, and
- 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 electronically via ECHA's [REACH-IT portal](#).

## What happens after pre-registration?

Those companies that pre-registered their substance between 1 June 2008 and 1 December 2008 were entered into a group comprising all the companies that pre-registered a particular substance and intend to register it. The group is called a Substance Information Exchange Forum (SIEF), and it is intended to facilitate the sharing of information on the properties of the chemical, such that only one set of technical information is submitted to the Agency. The SIEF can also work collectively on other aspects of the registration package (for example, agreeing on the classification and labelling for the

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chemical). Membership of a SIEF will help to share expertise and spread the costs. Manufacturers and importers (into the EU) who are able to *'late pre-register'* a substance will automatically be entered into the relevant SIEF.

## Further information

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

Email: [UKREACHCA@hse.gsi.gov.uk](mailto:UKREACHCA@hse.gsi.gov.uk)

Website: [www.hse.gov.uk/reach](http://www.hse.gov.uk/reach)

