

# 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, then provided the conditions below are met, 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 31 May 2017, see table below). 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 substances can be pre-registered?

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

- i. Substances listed on [EINECS](#).
- ii. Substances you manufactured at least once in the 15 years before REACH became law, but were not placed on the EU market (provided you have 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 you manufactured in the EU but were only ever used within your company (e.g., as intermediates) 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.

## 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 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 effectively defer their registration until as late as 31<sup>st</sup> May 2018. More information on the various

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registration deadlines is given in [UK REACH CA Information Leaflet Number 6 – REACH - Timelines](#), but the key deadlines are in the table below. Chemicals manufactured or imported in large volumes and certain substances with particularly hazardous properties should have been registered earlier than those manufactured or imported in smaller volumes.

30 Nov 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>
31 May 2013	Registration of substances supplied at ≥100 tonnes per annum
31 May 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

**Two of the deadlines have already passed, so any phase-in substances now meeting those criteria will not be eligible for pre-registration.**

## 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, if available, 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 reply 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?

Manufacturers and importers (into the EU) who are able to '*late pre-register*' a substance will automatically be entered into the relevant Substance Information Exchange Forum (SIEF). The SIEF will also contain those companies that pre-registered their substance between 1 June 2008 and 1 December 2008. The group 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 chemical). Membership of a SIEF will help to share expertise and spread the costs.

## Further information

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

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

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

