

What REACH Means for Users of Chemicals

What is REACH?

REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) is the current 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.

Do you use chemicals in your business?

Most businesses use chemicals and many rely on them without realising it. For example, you may use them in the manufacture of finished goods or simply to keep your machinery operating and your premises clean. Examples include paints, metals, glues, solvents and cleaning materials.

What will happen to chemicals under REACH?

From 1st December 2008, chemicals that are manufactured or imported into the EU have to be registered with the European Chemical Agency (ECHA), based in Helsinki. Not all chemicals will be registered straight away. If a manufacturer or importer pre-registered a chemical, they may not have to submit a registration for several years; ECHA advise that you contact relevant members of the supply chain to ensure they will be REACH compliant by **31st May 2018**. Your supplier should be able to tell you if the chemicals you use have been pre-registered or registered and the pre-registration or registration number as appropriate. If a manufacturer or importer has not pre-registered or registered a chemical then in many cases it is now illegal for the manufacturer or importer to continue to supply that chemical.

REACH aims to reduce the use of (and risks from) hazardous chemicals. Certain substances will be identified as substances of very high concern (SVHC), and may become subject to 'authorisation'. Substances that are subject to authorisation may not be used in the EU unless a company (and their identified users) have been authorised to do so. This will mean that such substances are eventually phased out of all non-essential uses. Other substances are subject to a 'restriction'. Restrictions limit or ban the manufacture, placing on the market or use of substances that pose an unacceptable risk to human health and the environment.

As a user, REACH may make things better for you as it is designed to provide more information on chemicals and increase confidence in their safe use. In particular, better information on the hazards of chemicals and how to use them safely will be passed down the supply chain by chemical manufacturers and importers through improved Safety Data Sheets. Unless you make or import chemicals yourself, as a user it is highly unlikely that you will need to register chemicals. If you do make or import chemicals then you should read information [UK REACH CA Information Leaflet Number 2 – What REACH Means for Manufacturers](#) or [UK REACH CA Information Leaflet Number 3 – What REACH Means for Importers](#) for more information on what you might need to do under REACH.

What do I need to do?

Ask yourself what you do in your business and where chemicals might be used? For example, if you make anything from formulations (e.g. paints, coatings) through to objects for sale then the chances are you use chemicals in some form. Generally, if you are using chemicals or mixtures of them (e.g. paint, lubricants, cleaning agents, etc) in the way that is expected then REACH probably won't mean significant changes for you. You might consider drawing up an inventory of all the chemicals you use in your premises (see [UK REACH CA Information Leaflet Number 11- How to Build an Inventory](#))

If your business relies on using chemicals that aren't very common you may need to make sure that these chemicals are still available for your uses. You should consider contacting your supplier to find out if the chemical(s) in question have been pre-registered or registered by whoever makes or imports it and that your uses that have or will be covered by the registration. It is possible that some companies, for example for business reasons, may decide not to register some chemicals. If so, then you may need to find an alternative manufacturer/importer of the substance or even re-think your processes.

If you use a chemical in a novel way that is perhaps not expected, then you will need to consider letting your supplier know. This use will need to be considered for registration by the supplier. If you don't want to let your supplier know about this use (for example because of commercial concerns) then you don't have to, but it will mean that you will have to let ECHA know about this use and possibly have to submit

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your own risk assessment. Once the chemical has been registered and you have been provided with a safety data sheet listing the registration number you have a maximum of 6 months to provide information about your use to ECHA if it is not included in the registration. Your supplier should be able to tell you which uses are covered by the registration.

If you use hazardous substances, you should check whether any of the substances you use are subject to a 'restriction'. This information should be communicated to you in the safety data sheet or other communication given to you by your supplier. If you use restricted substances, you will need to ensure your use of the substance meets the conditions of the restriction. You should also be aware that you are able to contribute to the public consultations whenever a new restriction is proposed, or an existing restriction is amended. For further information, see [UK REACH CA Information Leaflet Number 20 – Restrictions](#).

If you use hazardous substances, you should check whether any of the substances are subject to authorisation, or are likely to become subject to authorisation in the future. If a substance is subject to authorisation, you will only be able to use the substance if you or someone else further up your supply chain has been granted an authorisation for that use. Information about whether a substance is subject to authorisation, and whether an authorisation has been granted or refused, should be communicated to you in the safety data sheet or other communication given to you by your supplier.

Authorisation is a complex process which can have different impacts on your business. As with the restriction process, you can contribute to the public consultation processes involved when a substance is considered for authorisation. If a company within your supply chain applies for authorisation, you may be asked to help them to prepare the application, for example by providing information on how you use the substance. For further information, see [UK REACH CA Information Leaflet Number 19– Authorisation](#).

If you use chemical substances to manufacture articles (finished objects) which you then place on the market, then certain duties may apply to you (see [UK REACH CA Information Leaflet Number 9 – Articles](#)).

Safety data sheets under REACH

You may notice some changes to the safety data sheets that your supplier provides. Once chemicals are registered, safety data sheets will list registration numbers. Safety data sheets may also include **exposure scenarios**. An exposure scenario describes the operating conditions and risk management measures that have been identified by the supplier as necessary to use the chemical safely in your process. REACH requires you to follow the advice on risk management measures given in the exposure scenario attached to the safety data sheet. If you use different risk management measures to those described in the exposure scenario, then you should be able to justify why your measures offer an equivalent (or better) level of protection for human health and the environment to those described in the exposure scenario. If you need to change the risk management measures used at your workplace in order to comply with the exposure scenario then you have a maximum of 12 months (after you have received a safety data sheet listing a registration number for a chemical) to do this.

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

Website: www.hse.gov.uk/reach

