



European Commission  
Enterprise and Industry Directorate-General

# **European Commission workshop on RIP 3 - Development of REACH Guidance for Industry**

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## **Brief outline of timelines and obligations of industry under REACH**

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# Will we reach REACH?

- REACH is a considerable challenge
- It covers a very wide range of issues and substances
- How can guidance help companies?
  - Companies will look for simple guidance
  - Companies will ask us to cover their specific issues in sufficient detail

# How can we reach REACH?

## ○ Simple guidance needs to be available

○ for those with limited experience and capacities  
(normally also those with limited obligations under REACH)

○ to give an overview for more experienced users

## ○ In addition, detailed guidance need to be provided

○ for those who have more substantial obligations

○ for those who need specific information

# HOW can you reach REACH?

## Key steps:

- § *Start today with analysing your portfolio of chemicals!*
- § **Check the scope of obligations**
- § **Identify your role and tasks under REACH**
- § **By when do tasks have to be fulfilled?**

# Scope of obligations

○ *REACH applies to the manufacturing, import, placing on the market and use of substances*

§ However, there are exemptions for certain:

§ Substances

§ Uses of substances

§ Reduced obligations for research, product and process related research and development (PPORD) and intermediates

# Downstream users: Obligations

- *Downstream users are users of chemical substances that are neither produced nor imported by the company*
- *Be careful not to overlook that you also may be an importer!*

## u **Key question: Do you receive Safety Data Sheets?**

○ **If no:**

only very limited obligations under REACH

○ **If yes:**

apply the risk management measures identified in the SDS

# Downstream users: Rights

- u **DUs have the right:**
  - √ To make their uses known to manufacturers/importers
  - √ To carry out their own CSA (e.g. for confidentiality reasons)
  - √ To contribute to SIEFs

# Manufacturers/Importers: Registration

§ **Registration for all substances >1 t**

§ **Chemical Safety Report (CSR) for all substances >10 t**

○ *In the absence of available information, tests may have to be conducted*

○ *Data sharing (in particular for vertebrate tests)*

○ *Substance Information Exchange Fora (SIEFs)*



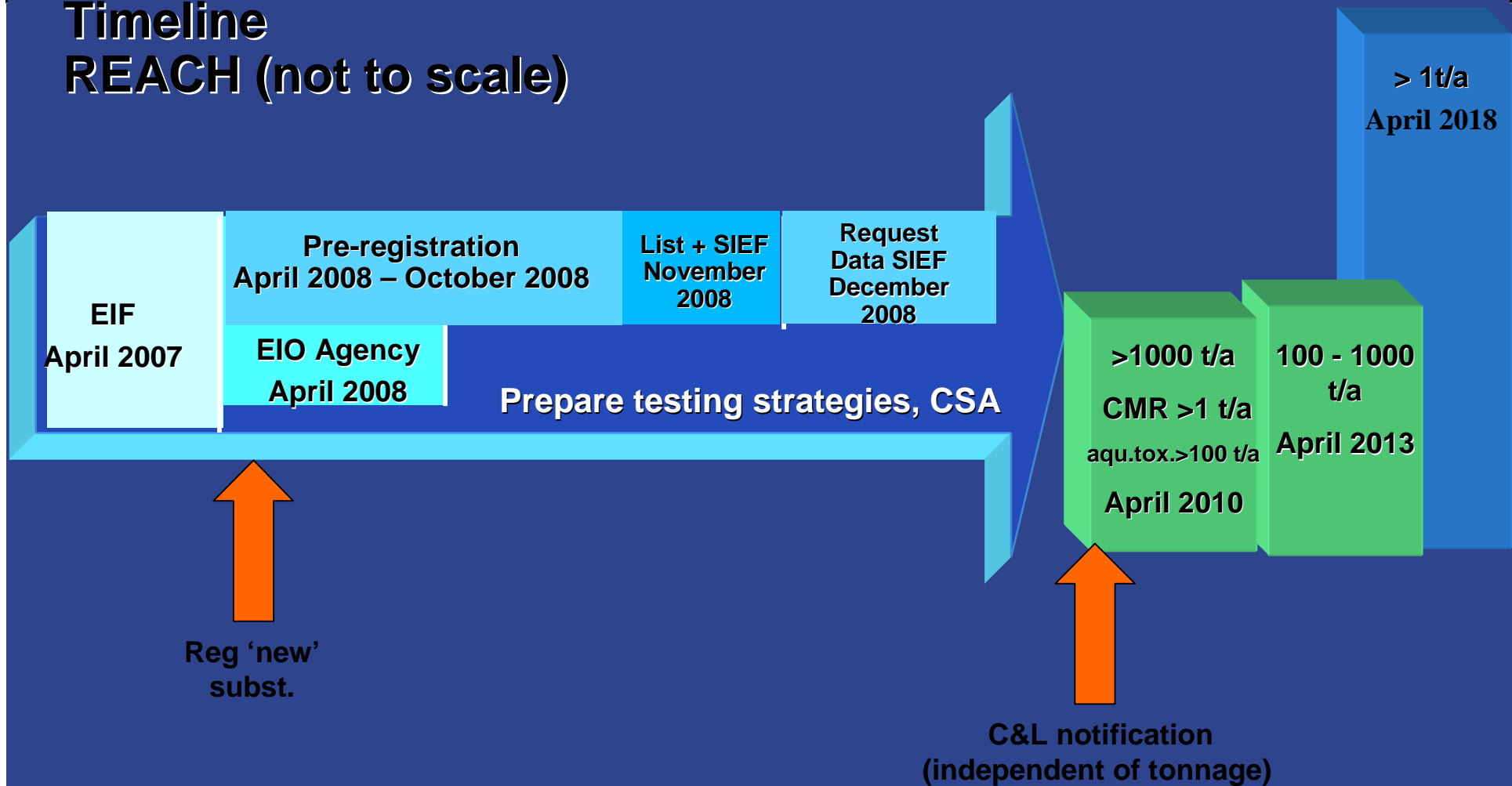
# Manufacturers/Importers : Registration

## § Timetable:

- ✓ **Non phase-in substances** (neither in EINECS nor already registered): before a substance can be marketed
- ✓ **Phase in substances: benefit from transition periods if pre-registered**
  - w **Pre-registration: 12 to 18 months after entry into force (except where newly produced/imported)**
    - s Identify substance, manufacturer, tonnage band/deadline
    - s Agency will publish list
  - w **Registration: Transition period depending on the tonnage band**

# (Pre)Registration

## Timeline REACH (not to scale)



# Substances in articles

## § **Registration** required if:

- § Substance is intended to be released, and
- § Substance is present in quantities >1 t

## § **Notification** required if:

- § Substance is on candidate list for authorisation
- § Substance is present in quantities >1 t
- § Substance is present in concentration >0.1% by weight  
(except where there is no exposure; at the earliest 42 months after entry into force, or 6 months of identification of substance on candidate list)



# Evaluation

- § **Dossier evaluation: checking completeness and compliance of registration dossiers**
- § **Substance evaluation: checking whether further information is needed on a substance**

# Authorisation/Restriction

## § **Authorisation:** for substances of very high concern

- § Identification of SVHC

- § “Sunset date” by which manufacturing and use is only allowed if it is covered by an authorisation

## § **Restriction:** only minor changes compared to existing system

- § Also manufacturing covered

- § Wider range of possible measures

# Will we reach REACH?

§ **Most downstream users and SMEs will have limited obligations**

○ *Simple guidance will be available*

○ *More information will come from manufacturers/importers*

§ **However, manufacturers/importers will have more significant obligations, depending on:**

§ **Hazards and risks of substances**

§ **Production volume**

○ *Careful check needed to identify tasks and obligations*

○ *Guidance will assist and can be used to look up details*



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 **Thank you!**