

REACH for cleaners – the 2018 deadline

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Overview

- REACH, and the registration deadline in 2018
- Borderline between biocide regulation and REACH
- Exemptions from REACH



REACH - Overview

Registration, Evaluation, Authorization and Restriction of Chemicals

- **REGISTRATION**
 - Chemicals M/I in quantities > 1 ton/ year must be registered with ECHA
 - ‘No data, no market’
- **EVALUATION**
 - Registration dossiers are evaluated by ECHA
- **AUTHORIZATION**
 - SVHC (substances of very high concern) on Annex XIV are banned unless authorized for specific uses
- **RESTRICTION**
 - Annex XVII: list of restricted substances

REACH 2018 deadline for registration

The REACH deadline for registration of substances already on the market, concerns:

- Registrations of >1-100 tpa must be registered by 1 June 2018
- Substance that have been pre-registered (in 2008)
- Late pre-registrations of first time import 12 months before the deadline

REACH applies to:

- Substances
- Substances in mixtures
- Substances in articles

REACH 2018 deadline for registration

Substances = chemical elements and their compounds



Preparations = mixtures of substances



Articles = finished products



REACH 2018 deadline for registration

- Import or manufacture of a substance
 - Tonnage of same substance summarised over all imported mixtures, *per legal entity*.
 - Same substance as defined under REACH, e.g. EC No. ; CAS No.
 - Tonnages: average of three preceding calendar years
- Data requirements are tonnage dependent
 - 1 – 10 tpa REACH Annex VII
 - 10 – 100 tpa + information in Annex VIII
 - 100 – 1000 tpa + information in Annex IX
 - > 1000 tpa + information in Annex X

How to register under REACH

- The substance has already been registered
 1. Contact the SIEF
 2. Verify substance identity is the same
 3. Agree on price for Letter of Access
 4. Prepare and submit your own Company Specific Dossier
 5. Pay registration fee

- The substance has not been registered
 1. Identify co-registrants (via pre-registration forum; pre-SIEF)
 2. Agree on who is Lead Registrant
 3. Agree on data and cost sharing
 4. Prepare registration: Lead and co-registrations.
 5. Pay registration fee

Exemptions from duty to register under REACH

- Substances manufactured or imported < 1 tpa
- Substances exempted:
 - *Radioactive substances*
 - *Substances under customs supervision*
 - *Non-isolated intermediates*
 - *Waste*
 - *Recovered substances that are already registered*

Exemptions from REACH

Category	Exemption
Medicinal products	Registration Evaluation Authorisation
Food and feed	Registration Evaluation Authorisation
Polymers	Registration DU obligations Evaluation
Substances in Cosmetics	(Authorisation)
Medical devices	(Authorisation)
Annex IV and V	Registration Evaluation
Active substances in biocides and pesticides	Registration (Authorisation)

Borderline: REACH - Biocidal Products Regulation (BPR)

Substance	REACH	BPR
Raw materials for AS	X	
Intermediates for AS	X	
Co-formulants in BP	X	
Active substance in BP		X

Exemptions from registration under REACH – Annex IV and V

- Annex IV: sufficient information is known about these substances that they are considered to cause minimum risk because of their intrinsic properties;

Among others:

- Glucose and other sugar substance
- Ideal gasses and CO₂, N₂
- Fatty acids
- Starch
- Glycerides

Exemptions from registration under REACH – Annex IV and V

- Annex V: lists thirteen broad categories of substances for which registration is deemed inappropriate or unnecessary;

Among others:

- *Substances which occur in natureif they are not chemically modified unless they meet the criteria for classification ...*
- *By-products, unless they are imported or placed on the market themselves.*
- *Vegetable fats, vegetable oils, vegetable waxes; animal fats, animal oils, animal waxes; fatty acids from C6 to C24 and their potassium, sodium, calcium and magnesium salts; glycerol - if they are not chemically modified or classified*

Conclusions

- REACH 2018 deadline is close
 - Clarify roles: importer, downstream user, manufacturer
 - Map imports and identify substance and volumes
 - Prepare registrations in good time before deadline
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- REACH – BPR borderlines: only AS is exempted from REACH

Thank You!

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