

ECHA-19-B-13-EN

The REACH Regulation (EC) 1907/2006 includes a registration requirement that can have a significant impact on users of chemicals. This document describes what downstream users can do to protect their business.

WHAT IS REACH REGISTRATION?

REACH requires manufacturers or importers of substances to assess the hazards and potential risks presented by the substance, define conditions of safe use, and document the results in a registration dossier sent to ECHA. The requirement applies to most substances (and substances in mixtures) manufactured or imported above one tonne per year but some exemptions apply. Exemptions include substances regulated by other legislations, such as medicines and biocides, and naturally occurring substances.

Registration of existing chemicals was phased-in between 2010 and 2018. Companies have now registered the substances they manufacture or import over 1 tonne per year. If any company want to start manufacturing or importing a substance over 1 tonne per year they have to submit a registration dossier before starting the operation.

WHAT DOES THIS MEAN FOR A COMPANY THAT USES CHEMICALS?

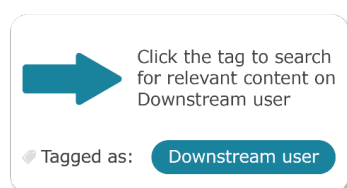
Manufacturers and importers can only supply a chemical substance (or a mixture containing it) if they have registered the substance.

As a downstream user of substances or mixtures, the necessary steps to protect your business are:

1. Identify substances critical to your business
 - Look at substances in your ingredient and process materials that are critical to your business. This includes substances on their own, in mixtures and incorporated in articles that you use.
2. Ensure that these substances are registered in your supply chain
 - For hazardous chemicals, the registration number should be on the safety data sheet. Otherwise, contact your supplier.
3. For registered substances, check if your uses are covered in the registration
 - Section 1 of the safety data sheet lists the uses the chemical is intended for. If the safety data sheet contains information from exposure scenarios, check that the use conditions described match your own situation.
4. If your uses are not covered ask the registrant in your supply chain to cover the uses or look for alternative suppliers
 - Contact your sector organisation as they may coordinate this activity for their members and communicate about typical uses with suppliers on a sector-wide basis.
5. If a substance will not be registered by your supplier, look for alternative suppliers
 - You can find the companies that have registered the substance on ECHA's website, unless they have asked to remain anonymous.

6. If a substance is not registered by any supplier, consider importing it directly
- You need to register a substance if you import more than 1 tonne per year. Registration requirements are less demanding for volumes below 10 tonnes per year.
 - Ask your non-EU supplier if they intend to appoint an “only representative” company to take care of the registration. In that case, you retain your downstream user status even though you are in fact the importer of the substance.

WHERE CAN I GET MORE INFORMATION ...about REACH registration and downstream users?



- For general information on registration, see <https://echa.europa.eu/regulations/reach/registration>
- For databases on substances, see: <https://echa.europa.eu/information-on-chemicals>
- For advice on REACH and CLP issues relating to users of chemicals, see: <https://echa.europa.eu/regulations/reach/downstream-users>

Pages containing information specifically aimed at Downstream users have been tagged accordingly. Click the tag to retrieve the list of relevant content.