

REACH 2018 Registration

How to prepare and mitigate Supply Chain Disruption





REGISTRATION under REACH provides data on a chemical substance relating to properties, hazards and uses. Without this data, the substance is not allowed to be used. The 2018 Registration deadline is a risk to material supply.

If you make a product, you use chemical substances. Aluminium is a substance; so is acetone; as is argon. Paints are complex mixtures of many substances. All substances made or imported in quantities more than 1t / year have to be registered to permit their use by industry. You have to register substances you import.





The 2018 Registration Deadline is for registration of substances manufactured or imported in the 1T – 100T per year volume range.

If you import substances or mixtures (possibly within articles) from outside the EU in this quantity range, you will have a registration obligation. If you don't register, you will have to stop importing those materials. Also, unless you have 'Late Pre-Registered' by 31st May 2017, you will also have to stop importing materials until full registration is completed.

Late Pre-Registration is quick and easy on the ECHA REACH IT website.



What happens if a substance is not registered?

The substance will not be available for you to use, either on its own, or in mixtures such as paints. There can be other knock-on effects on processes if the material is critical to use. Obsolescence issues can affect critical materials and processes.



What can you do to mitigate risk?
Mitigation depends on your role.

Manufacturer / Importer. If you make products, you are unlikely to be a manufacturer, but could be an importer.

- Pre-register the substances you make or import in the 1T – 100T volume
- 2. Assess the importance of the substance to the supply chain.
- 3. Decide whether or not you are going to register the substance
- 4. If not, inform your supply chain so that they can prepare an alternative

Downstream User - Formulator

- 1. Check if your suppliers are going to register the substances you use.
- 2. Inform your customers if non-registration is going to affect your product.

<u>Downstream User – Producer of Articles</u>

- 1. Ask your suppliers about REACH 2018
- 2. Assess the consequences of nonregistration of substances in 2018
- 3. Work with the supply chain to identify alternatives if necessary.

Communicate! Communicate! Communicate!

For further information on REACH 2018 Registration see the links below.

ADS Hazmat WG UK Chemical Stakeholder Forum The material and views expressed in this briefing are not necessarily those of ADS or individual organisations, and do not constitute legal advice. In this respect, you should always satisfy yourself that the actions you take are covered by taking appropriate professional legal advice.