



# A new chemicals policy for the EU...



... and for your business

[www.reachright.ie](http://www.reachright.ie)

## WHAT IS REACH?

REACH is a single regulation replacing many existing pieces of chemical legislation and is an acronym for the Registration, Evaluation and Authorisation of Chemicals.

REACH will apply to a broad scope of businesses, from chemical intensive industries to small businesses that use, import, distribute and supply chemicals and articles.

## HOW WILL THE REACH REGULATION BENEFIT YOU?

- A high level of protection for human health and the environment because more information will become available on chemicals, and this information will be more publicly available.
- A sustainable, innovative and competitive EU chemicals industry.
- Greater access to chemical health and environmental information enabling your business, your employees and your customers to handle and use chemicals in a safer manner.



If you manufacture, import, distribute or use chemicals, you could now be responsible for their control and safety.



## WHAT ARE THE KEY ELEMENTS OF REACH THAT I SHOULD KNOW ABOUT?

REACH will switch responsibility for the control and safety of chemicals from authorities, to those that manufacture, import and use chemicals.

This change is reflected in the key elements of the regulation:

- Registration
- Evaluation
- Authorisation

### REGISTRATION

If you manufacture or import one tonne or more of a substance you must submit a registration file, or a 'dossier', to the European Chemicals Agency (ECA) for each substance. Failure to register means that the substance cannot be manufactured or imported.

Once REACH is in place, if your business is placing a **NEW** substance on the market for the first time, then your business needs to register that substance before it can actually be placed on the EU market.

If a substance you manufacture or import is **already on the EU market**, then you will be able to avail of phased registration deadlines, as long as you pre-register the substance during a certain time period. Pre-registration can only take place from 1st June 2008 – 30th November 2008 and will be done through the European Chemicals Agency (ECA). Pre-registration will facilitate data sharing and reduce animal testing.

Companies that do not pre-register a substance, cannot later avail of the phase-in deadlines. The phase-in deadlines are based on:

- the hazard of the chemical, and
- the yearly tonnage at which it is placed on the EU market.

### EVALUATION

All dossiers which have been registered may be subject to evaluation by the European Chemicals Agency (ECA) for compliance with the requirements of registration.

Additionally, some substances will be evaluated to clarify suspicion of risk to human health or the environment.

### AUTHORISATION

As with evaluation, not all substances will require authorisation by the European Chemicals Agency (ECA). Authorisation will be required to use and place substances of very high concern on the market (e.g. a cancer causing chemical or one that persists in the environment). Once a substance is placed on a list of substances subject to authorisation, those using it will need to apply for an authorisation for each use of that substance.

### RESTRICTIONS

This process is intended to provide a safety net to manage risks which have not been addressed by other elements of REACH. This allows for the restriction or banning of either the use, or placement of certain chemicals on the EU market.

Early preparation is key to ensuring your business has the information required to be ready for REACH. Your business needs to start preparing now!

## WILL I BE AFFECTED BY REACH?

REACH does not only apply to chemical intensive industries. The scope is extensive, encompassing manufacturers, importers, distributors and downstream users – from dry cleaners and retailers to printers and metal fabricators – from large chemical manufacturers to crash repair shops. All may now have obligations under REACH.

If any of the points below describe your business, then you will need to comply. Your role and responsibilities will vary depending on the role your business plays in the supply chain.

- If you are a manufacturer/importer and you manufacture and/or import substances in quantities greater than 1 tonne, you may have to register those substances.
- If you are a downstream user, you will need to supply information up the supply chain to your manufacturer/importer on how you use a substance supplied by them. You are a downstream user if you use a substance either on its own or in a preparation in the course of your industrial or professional activities.
- If you are a producer or importer of an article, you may have to submit a registration for any substance above 1 tonne that is intentionally released from the article. Additionally, you may need to notify the European Chemicals Agency (ECA) and possibly register if there is a substance of very high concern present in the article.

## YOU SHOULD START PREPARING FOR REACH NOW!

- Make sure you are fully informed and are monitoring any emerging guidelines. This will enable you to do the essential advance planning.
- Develop an inventory of all your substances, whether they are on their own or in a preparation.

- Determine the current and future tonnage levels of each substance per year.
- Establish CAS\*, EINECS\*\* and ELINICS\*\*\* numbers (if appropriate).
- Identify the hazard classification and any related hazard data you may have on each substance.
- Determine your status for each substance on the inventory – are you the manufacturer, the importer, the downstream user, the distributor, etc?
- Identify and list your suppliers and/or customers, as well as their locations.
- Do you need to pre-register any of your substances?
- Examine how you use chemicals supplied by a manufacturer or importer.
- Identify an appropriate contact person for REACH in your organisation and make them responsible for communications with suppliers and customers.
- Communicate with your suppliers/distributors and your downstream users as required under REACH regulation.



Early preparation is key,  
your business needs to  
start preparing now!

\* CAS number is the Chemicals Abstracts Service number for a chemical

\*\* EINECS is the European Inventory of Existing Commercial Chemical Substances and is a list of all chemical substances on the EU market up to 1981

\*\*\* ELINICS is the European List of Notified Chemical Substances and is a list of substances which have been notified in the EU in accordance with Directive 67/548/EEC



For general queries on REACH, contact the HEALTH AND SAFETY AUTHORITY on Locall 1890 289 389, by email to [reachright@hsa.ie](mailto:reachright@hsa.ie), or log onto [www.reachright.ie](http://www.reachright.ie)

## KEY REACH MILESTONES

- January 2007 – Preparation by Irish businesses begins
- 1 June 2007 – REACH enters into force
- 1 June 2008 – European Chemicals Agency (ECA) in operation and main titles of REACH apply
- 1 June 2008 – “New” substance registration
- 1 June 2008 – November 2008 – Pre-registration for phase-in of existing substances
- November 2010 – 1st phase-in substance deadline\*
- June 2013 – 2nd phase-in substance deadline\*
- June 2018 – 3rd phase-in substance deadline\*

\* If substances have been pre-registered

## WHAT ROLE DOES THE HEALTH AND SAFETY AUTHORITY HAVE?

The HEALTH AND SAFETY AUTHORITY was appointed the interim competent authority for REACH in June 2005. The authority has set up a REACH helpdesk that industries can contact to receive help and answers in relation to their legal obligations under REACH.

Throughout 2007 the HEALTH AND SAFETY AUTHORITY will be raising awareness through national media, nationwide briefings and seminars. Details of seminars will be posted on the website [www.reachright.ie](http://www.reachright.ie).

## WHERE CAN I GET FURTHER INFORMATION?

- For general queries on REACH, contact the HEALTH AND SAFETY AUTHORITY on Locall 1890 289 389, by email to [reachright@hsa.ie](mailto:reachright@hsa.ie), or log onto [www.reachright.ie](http://www.reachright.ie)
- HSA FAQs
- Your local trade or industry association
- The European Chemicals Bureau website <http://ecb.jrc.it/REACH>
- EU Commission:  
<http://europa.eu.int/comm/enterprise/reach>  
<http://europa.eu.int/comm/environment/chemicals/reach>  
<http://ec.europa.eu/environment/chemicals/pdf/qa.pdf>

