UK CHEMICALS STAKEHOLDER FORUM EXPLANATORY NOTE

UKCSF guidance for SMEs and downstream users on REACH 2018 Registration deadline

The UK Chemicals Stakeholder Forum (UKCSF) has today published new SME-friendly advice on another key element of the EU's REACH Regulation, namely the 2018 Registration deadline. At its sixty-second meeting on 3 November the Forum signed off this guidance which is now being published, and signposted to a wide business audience by Forum members and others, including the UK REACH Competent Authority.

This guidance is a further response to a recommendation made, in October 2013, by the Prime Minister's Business EU Red Tape Task Force that the European Commission and the European Chemicals Agency (ECHA) should provide more understandable guidance for smaller businesses. The UKCSF took up this challenge and produced business-friendly guidance on REACH Authorisation in April 2014 (which was updated in November 2015). Now the Forum has followed this up with another guidance document – this time on the third REACH Registration deadline which falls in May 2018 (after corresponding deadlines in 2010 and 2013). The 2018 deadline applies to substances which are manufactured or imported into Europe annually in volumes between 1 and 100 tonnes.

The purpose of this guidance is to raise awareness of the deadline and to help companies to consider what they have to do, in particular to prepare and submit dossiers to ECHA. It is also aimed at downstream users who need to assess the potential for disruption of their supply chains if substances which they depend on are not registered.

ECHA estimates that the likely number of registration dossiers for the 2018 deadline will be greater than the combined number of dossiers submitted for the corresponding 2010 and 2013 registration deadlines for higher tonnage substances. Moreover, ECHA is also expecting a significantly higher number of small and medium-sized companies to be involved in the process, compared with the previous deadlines.

The UKCSF guidance explains what REACH registration is and sets out the key steps for companies to determine if they have a registration obligation; and then what needs to be done if they do. It answers a number of likely questions about the process. The different information requirements for the two tonnage bands of 1-10 tonnes and 10-100 tonnes are noted. The guidance also touches on the issue of the costs of registration and how these will be shared. There is advice about alternatives to animal tests and what happens if the registration deadline is missed, and if companies depend on others to register substances. Various aspects of communication in the supply chain are considered from the perspective of downstream users. The guidance closes with links to a number of other sources of relevant information, including in particular the ECHA website.

Notes:

1. The UK Chemicals Stakeholder Forum was set up in September 2000. Its terms of reference and membership can be found on the Forum website at https://www.gov.uk/government/policy-advisory-groups/uk-chemicals-stakeholder-forum#

2. Defra provides the secretariat for the Forum, which also works closely with the UK REACH Competent Authority. UKCSF quarterly meetings are open to the public and the specialist chemical press. Forum papers and minutes are available on the Forum website.

3. This guidance was drafted by a sub-Group of the UK Chemicals Stakeholder Forum comprising: Susanne Baker (EEF, the Manufacturers' Organisation) (Chair), Jo Lloyd (formerly Chemical Industries Association), David Santillo (Greenpeace), Silvia Segna (Chemical Industries Association) and Glenis Wedzicha (National Federation of Women's Institutes). Non-Forum members - Keith Bailey (Defra), Patrice Mongelard (Defra) and Jane Kirk (HSE) - also contributed to this work.

4. Both sets of guidance are available as publications on the UKCSF website.

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