

COMPANIES MUST REACH DEADLINE BY 31 MAY 2018

Irish chemical companies have until 31 May 2018 to meet the deadline date of the EU's final REACH registration, which addresses the production and use of chemical substances, and their potential impacts on both human health and the environment.

Irish chemical companies who have pre-registered substances that they manufacture or import from outside the EU above one tonne, but not greater than 100 tonnes per year, and who have not yet registered them, are being strongly urged by the Health and Safety Authority (HSA) to roll out their preparations for registration now.

A registration dossier must be submitted to the European Chemicals Agency (ECHA). REACH requires that all companies registering the same substance must work together as a group (the so-called SIEF), and to be part of a joint submission for the registered substance.

In the SIEF, a lead registrant is appointed on behalf of all the members. The lead registrant submits the lead registration dossier, which contains certain information which must be submitted jointly by all the registrants.

Following that, each member registrant can then submit his own member dossier, which will contain information which is relevant for him that he must submit separately. It is important to remember that completely separate registrations outside of the joint submissions are not allowed – registrants must be all part of the same joint submission.

THE VOICE OF AUTHORITY

As data sharing negotiations within the SIEF can take some time, the Health and Safety Authority is advising companies to begin this work as soon as possible to ensure they have their registration in place by May 2018.

Registration involves contacting other companies registering the same substance, appointing a lead registrant, agreeing data and cost sharing, evaluating the available data, risk assessing uses and preparing and submitting dossiers through the ECHA IT submission tools.

ECHA has documented the various steps involved in registration with a view to simplifying the process for small



to medium enterprises (SMEs), who may be registering in 2018 for the first time. Information, guidance and an accompanying webinar are available for each step on ECHA's REACH 2018 webpages.

Companies that have just started manufacturing or importing a substance from outside the EU over one tonne, but not more than 100 tonnes per year, are advised that they may have a last chance to pre-register up until the end of May 2017.

Companies who have pre-registered may continue their activities whilst working towards registration in 2018, and those who have not pre-registered must have a valid registration in place before they can manufacture or import over one tonne per year.

For further information and support, email the HSA's chemicals helpdesk chemicals@hsa.ie.



REACH is a European Regulation whose overall aims are to provide a high level of protection of human health and the environment from the use of chemicals, and to allow free movement of substances on the EU market.