

REACH in Europe after 31 May 2018 Over and Out?



17 and 18 May 2018, Yokohama | Dr. Thomas Berbner

What is going on in Europe?

**REACH ends after
31 May 2018?**

REACH

Registration

Substances
Phase-in, new substances, NONS

Evaluation

Dossiers
Completeness check, testing proposals, CoRAP

Authorisation

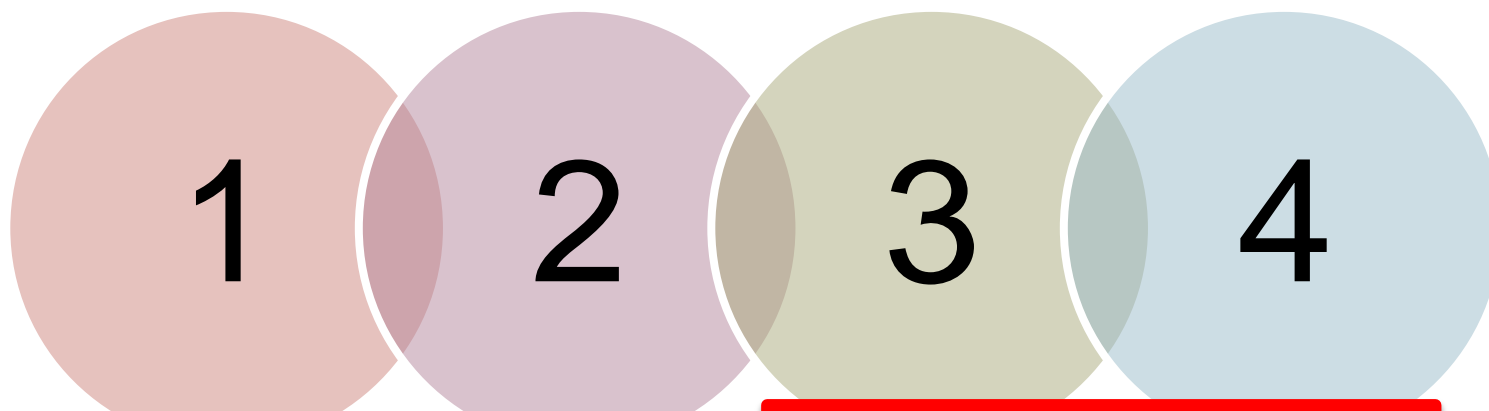
Substances of very high concern
Business critical uses

CHemicals

Purpose

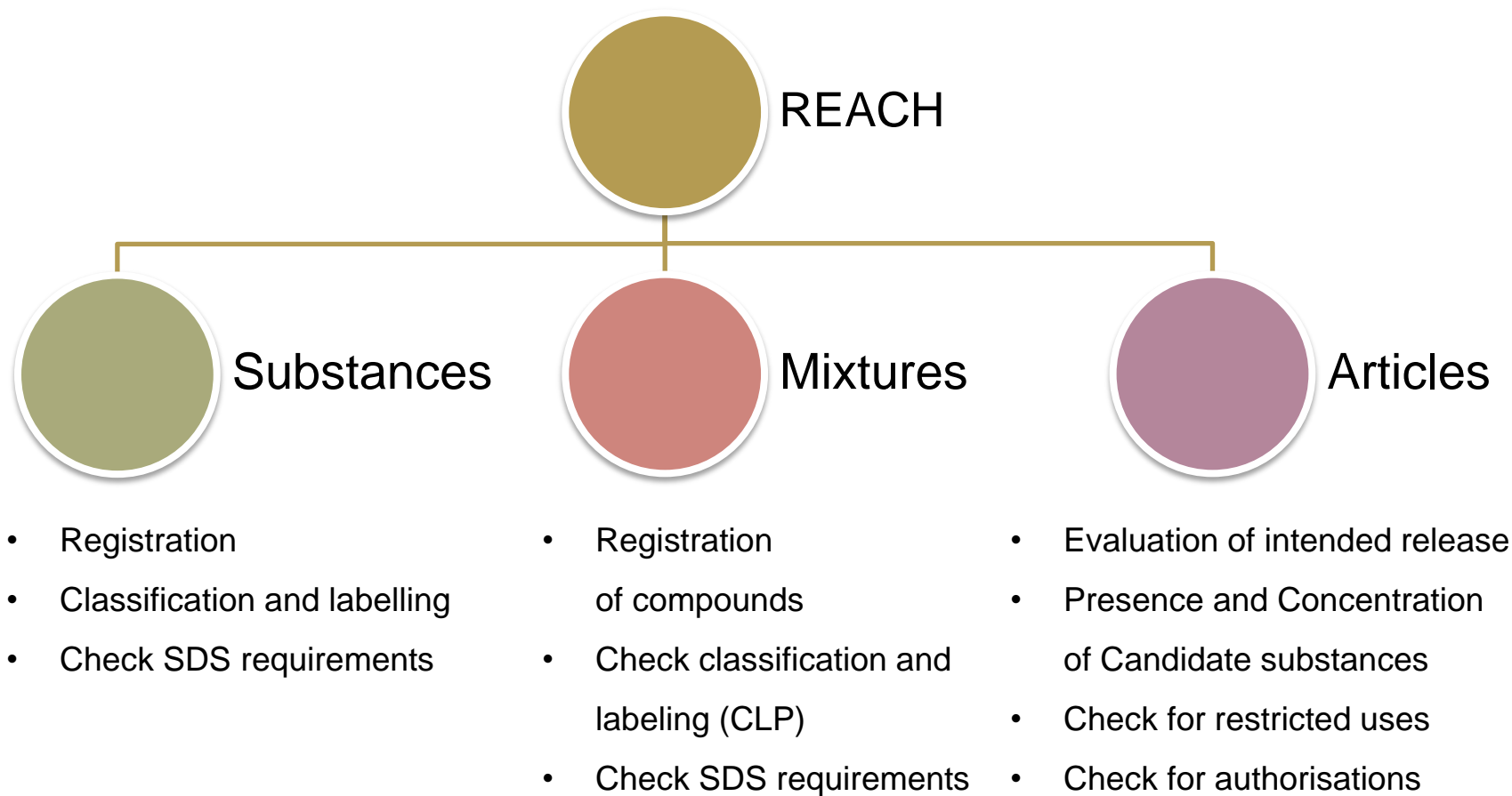


Tiered approach for registrations (article 23)



Tons per year	> 1000		100 – 1000		10 – 100		1 – 10
Deadline	Nov. 30 2010		May 31 2013		May 31 2018		May 31 2018
CSR	Yes		Yes		Yes		No

Direct obligations



So, what's coming to an end?

Registration of Phase-In substances

Achievements?

Europe has one of the biggest data collections about hazards and risks of chemical substances

Disseminated content

Basis for a comprehensive evaluation and identification of substances of concern



Article 1 of REACH: „...to ensure a high level of protection of human health and the environment”

Top tasks

Identify critical substances

- Large volumes
- Wide disperse use
- hazardous

Maintain and increase data quality

Substitute risky substances

Increase public awareness (right to know)

Broader focus on the use of substances

Increase enforcement

2018 – the end?



After May 2018

Check SIEF and Consortia agreements

Keep dossiers up-to-date

New substances, new uses?

Change in product composition?

Exceeding tonnage bands?

Supply chains intact?

Restrictions, authorisations, candidate list

Alternative chemicals to hazardous ones?

After May 2018

Check SIEF and Consortia
agreements

Contracts remain valid?

What is the process for new
registrants?

After May 2018

Keep dossiers up-to-date

Changes to report?

Tonnages accurate?

Are all uses covered and correct?

After May 2018

New substances and uses

Registered substance?

Letter of Access

Type of registration
(Intermediate/full)

Identification of lead registrant

After May 2018

Changes in product
composition

Provided information accurate and
plausible?

Composition of raw materials
disclosed?

Information flow down the supply
chain

After May 2018

Exceeding tonnage band

Dossier update

Reason for crossing the threshold
values

New clients? – New uses?

All required data available?

After May 2018

Supply chains intact?

SDS up-to-date?

Compliance statements accurate?

Compositions unchanged?

After May 2018

Restrictions, Authorisations,
Candidate list

Keep an eye on changes!

Get in contact with your suppliers

Plan a strategy

After May 2018



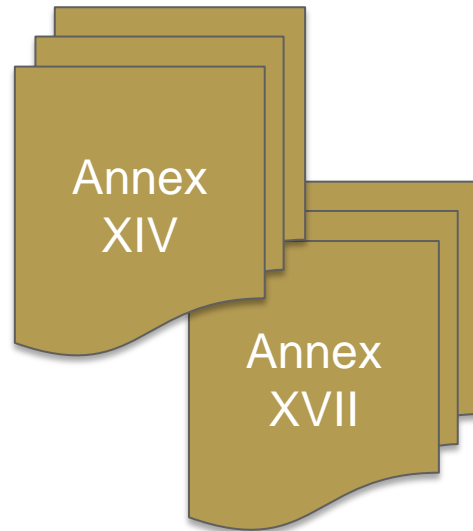
Alternative chemicals to
hazardous ones

Develop a substitution plan

Provide budget for either
authorisation or substitution

Consider long-term strategies

Market drivers



Legal

Economy



So, what's next from authorities?

The head of ECHA expressed: “After this year’s registration deadline, REACH moves from a setting-up stage to total operation.”

Thank you!

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