

## **REACH Pre-registration – have you done it yet?**

The article in volume 19 issue 4 of the BOHS newsletter outlined the new EU chemicals legislation known as REACH, and that it will impact on most UK business sectors. It and subsequent articles and information on the BOHS REACH web pages have stressed the importance of checking whether and how this might be the case for your businesses or businesses you are involved with, and the action that might need to be taken to comply with the Regulation and ensure business continuity.

In particular, your attention is drawn to the pre-registration period that began on 1 June, and runs to 1 December this year. It is also worth noting that for all non-exempt substances that are not pre-registered or fully registered by 1 December the supplier(s) and downstream customer(s) are technically liable for penalties backdated to 1 June.

The relevant pre-registration software systems such as IUCLID5 and REACH IT require some administrative set-up and training and so it would be advisable to start this process earlier rather than later and in any case to take care not to leave it until the end of the pre-registration period.

We are now about half-way through the pre-registration period, which means that if you have not yet done so, time is running out fast for you to check whether REACH could affect you, and whether you should pre-register any substances. If you manufacture or import substances, or “preparations” (i.e. mixtures of substances – paints, or adhesives would be examples), or “articles” (i.e. finished goods – or scented coat-hangers or candles would be examples) containing substances that are intended for release during their use, then you will have registration obligations under REACH, and would benefit from pre-registering.

Pre-registration does not commit you to registration later, if it turns out that you do not need to register. However, it does entitle you to take advantage of the staggered registration deadlines available under REACH that could mean you don't have to finally register until June 2018, if the annual quantities of substances you deal with are between 1 and 100 tonnes. **If in doubt, pre-register – it may save you a lot of time and money later on!**

Pre-registration is free, and is a simple procedure involving electronic submission of some basic information about your company and the substances that you are involved with to the European Chemicals Agency in Helsinki. The relevant pre-registration software systems such as IUCLID5 and REACH IT require some administrative set-up and training

### **Help and Advice**

The UK Government has established a Competent Authority (CA), hosted by the Health and Safety Executive, who can help and advise on complying with REACH. You can contact them through the CA website at [www.hse.gov.uk/reach](http://www.hse.gov.uk/reach) or by phoning the national Helpdesk on 0845 408 9575.

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