

# Pre-Registration in REACH

## When to Pre-register

The window for pre-registering substances under REACH lasts from June 1st 2008 to December 1st 2008. A month after Registration closes, the European Chemicals Agency will publish the list of substances that have been pre-registered.

## Why Pre-register

Failure to pre-register means that any means that manufacturers or importers can not rely on the transitional arrangements whereby pre-registered substances will not have to be fully registered until the deadline applicable to their tonnage or properties arrives, which is any time from two to ten years after pre-registration.

## Who pre-registers substances

Pre-registration is generally open to the following groups:

- EU manufacturers of substances above 1 tonne per year
- EU importers of substances and substances in preparations above 1 tonne per year (it is important to remember that preparations will consist of several substances which will all require separate pre-registrations).
- Only representatives of non-EU substance manufacturers.
- Manufacturers of on-site isolated intermediates and transported isolated intermediates.
- Manufacturers or importers of 'articles' that are deliberately designed to release substances where the substances have not already been registered for that use. (Note that this should not apply EU manufacturers of articles as they should only be able to purchase substances that have already been registered under REACH).
- Manufacturers or importers of polymers. These companies need to consider the need to pre-register monomers and other substances bound to the backbone of the polymer chain (Note that this should probably not apply EU manufacturers of polymers as the monomers and other chemicals used as starting materials should only be able to have been purchased if they have already been registered under REACH).
- Owners of information such as toxicology study reports, that may be of use to those companies or individuals that will register the substance in question at some future date.

## What information is required in Pre-Registration?

The requirements of pre-registration are set out in Article 28 of the REACH legislation and ask for the following information to be submitted:

- The name of the substance plus its EINECS and CAS numbers
- The name and address of the manufacturer or importer or person representing them.
- The envisaged deadline for the registration and the tonnage band;

- Any information that already exists regarding computer predictions of the toxicity of that substance (QSARs) or toxicological properties that are predicted by comparing the substance to ones with a similar chemical structure (read-across).

### **How to Pre-register**

Pre-registration will take place on-line using the IUCLID5 software due to be issued by the Commission in the Summer of 2007.

### **What happens after Pre-registration**

After pre-registration, manufacturers and importers will form Substance Information Exchange Fora (SIEFs) for each substance to enable existing testing information to be pooled thereby removing the need for registrants to repeat any animal tests that have already been performed. The costs of any new tests that have to be performed will be shared between SIEF members.

It is understood that the European Chemicals Agency will only make public the substances that have been pre-registered, not the names of the companies or individuals that have pre-registered substances. Such information will only be available to other people who have pre-registered the same substance i.e. potential SIEF members.

Taking part in the pre-registration procedure is therefore a way of finding out who your competitors are. Some companies may therefore try to disguise the fact that they are manufacturing or importing a substance by asking a representative to pre-register on their behalf.