



# REACH

**Registration, Evaluation & Authorisation of Chemicals**

**IMnI's 34th Annual Conference, New Delhi, September 2008**

Dr Keven Harlow, REACH Mn Consortium Manager, IMnI, Paris  
email: [reach@manganese.org](mailto:reach@manganese.org)



# Outline

- What is REACH?
- EU Manufacturer/Importer.
- Non-EU Manufacturer.
- Necessary steps for you to take.
- REACH Mn Consortium.
- Summary.



# What is REACH?

- EU regulation; effective from 1 June 2007
- Driven by ‘substances’ including all metals.
- Registration of each substance that is manufactured in or imported into the EU/EFTA
- Responsibility for REACH shall be with a legal entity in the EU.
- Deadlines: >1,000 tpa, >100 tpa, >1tpa
- “no data, no market” - a permit to trade!



# Exemptions

- Ores and minerals – if not chemically modified
- Coke, crude oil, natural gas, LPG, polymers
- Finished articles (conditions attached)
- Waste for disposal
- Radioactive substances
- Food, medical, cosmetic or defence applications
- Process and product orientated R&D (PPORD)
- Material in Customs control (bonded warehouse)

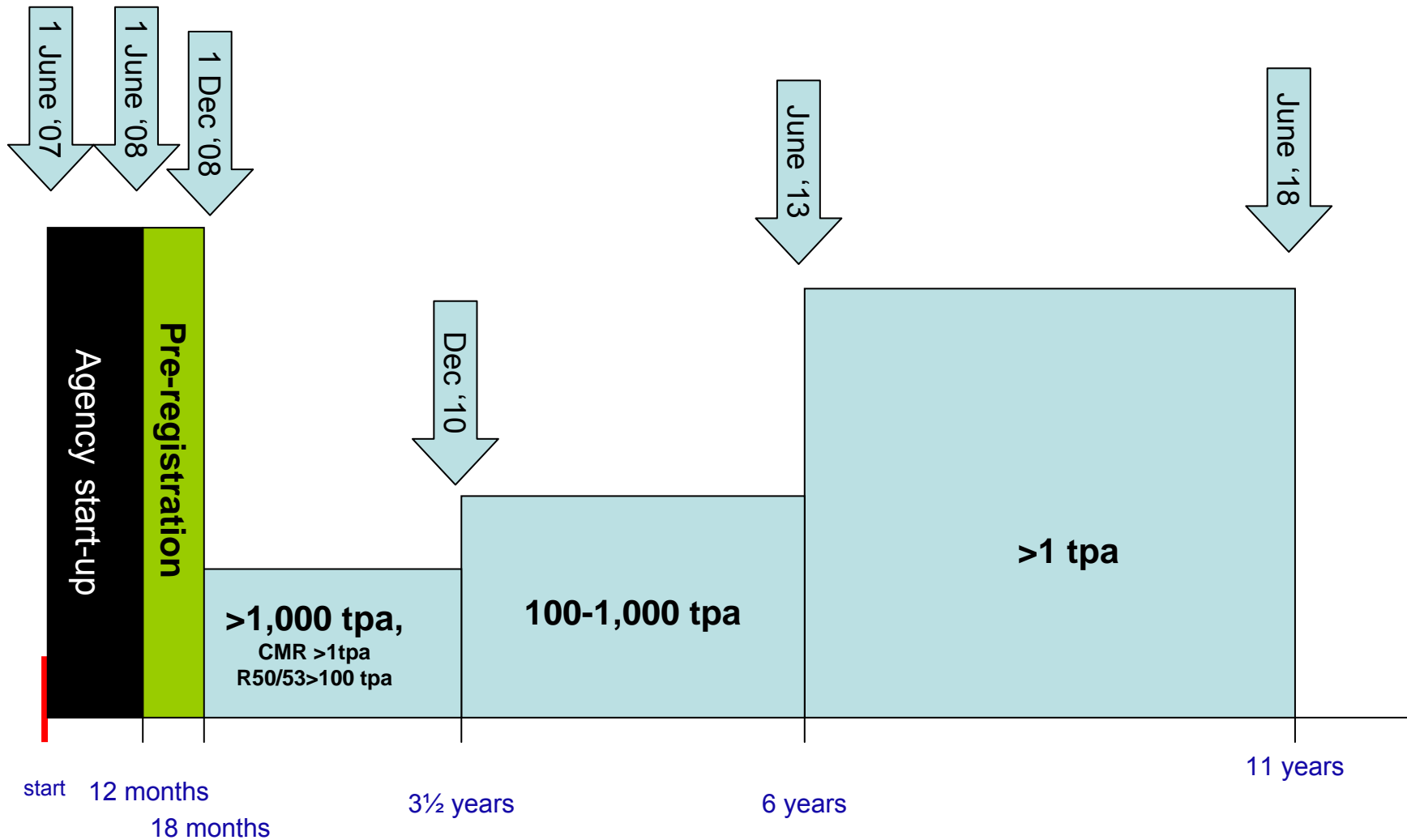


## REACH - main elements:

- REACH applies to all substances...
  - on their own (e.g. Mn)
  - in mixtures and preparations (alloys, like FeMn, SiMn)
- Each substance  $\geq 1$ tpa per EU legal entity must be registered by that EU legal entity.
- Data sharing + joint submission per substance.
- New agency (ECHA) to manage the process.
- Payment of a fee to ECHA for each registration.



# Registration: Overview





## Pre-registration: the first step

- To use the phase-in period, pre-registration is essential.
- Pre-registration is 1 June to 1 Dec this year
- Pre-registration allows time to organise the collection of data and testing for new data.
- Pre-registrants work towards a joint registration
- Remember: pre-registration keeps you in the EU market from the end of this year.



# What you must do!

EU-based manufacturers and importers:

- Each substance that you handle at  $\geq 1$  tpa should be pre-registered and registered.
- You must communicate with your supply chain.
- You will need (extensive) data for registration in Dec 2010.



# What you must do!

## Non-EU manufacturers:

- You have no obligations under REACH
- But, ensure that your EU importers have a plan to pre-register and register on time.
- If your importers do not pre-register, you will eventually lose the EU as a market
- You can appoint a *REACH Only Representative* to register on behalf of your EU importers.



## REACH data from where?

- Do you own data?
- Can your importers obtain data from you?
- Public domain (internet, tech publications etc)?
- Generate all data yourself (cost, resources)?
- Join a Consortium (cost effective, clear, structured)

Don't forget, the registrant is fully accountable and liable for the data used in its registration.



# Consortium advantages

Your supply chain must have data - how will you provide it?

- Reduced burden and lower cost through sharing
- Mn consortium has already started data collection
- Well structured with a clear plan for compliance
- Data controlled and confidentiality maintained
- Legal certainty through consortium Agreement
- Clearly defined cost sharing and voting rights
- Transparent approach suits antitrust requirements



# REACH Mn Consortium

- Launched in January 2008, now 36 members.
- Structure:
  - Assembly (all Regular Members)
  - Steering Committee (elected)
  - Technical Working Group (task specific)
  - Trustee/Secretariat: IMnI
- Agreement includes Mn, Mn alloys, oxides + salts
- Cost sharing depend on member's EU turnover:  
higher turnover, higher cost, higher voting rights
- Contracts in place with 2 GLP-rated test facilities



# Summary

- REACH is effectively a licence to trade in the EU
- Understand how your EU supply chain plans to comply with REACH.
- Pre-registration before December this year is essential: buys time to keep in the EU market.
- REACH is very complex and you or your supply chain will need expert help and support.
- Accept that REACH will effect all parts of your business
- Look to join necessary consortia for your substances.
- You are welcome to join the Mn Consortium



Thank You.

REACH

Registration, Evaluation & Authorisation of Chemicals

[reach@manganese.org](mailto:reach@manganese.org)

[www.mn-consortium.org](http://www.mn-consortium.org)