

UK CHEMICALS STAKEHOLDER FORUM EXPLANATORY NOTE

Updated and expanded UKCSF guidance for SMEs and downstream users on 2018 REACH Registration deadline

The UK Chemicals Stakeholder Forum (UKCSF) has updated its 2015 SMEs and downstream user-friendly guidance on the 2018 REACH Registration deadline. At its sixty-eighth meeting on 27 April, the Forum signed off this guidance. This is now being published, along with additional materials to help industry stakeholders. The new package will be signposted to a wide business audience by Forum members and others, including the UK REACH Competent Authority.

The 31 May 2018 deadline applies across the EU and in the UK to substances which are manufactured or imported into Europe annually in volumes between 1 and 100 tonnes. The European Chemicals Agency (ECHA) has estimated that the likely number of registration dossiers for the 2018 deadline will be greater than the combined number of dossiers submitted for the corresponding 2010 and 2013 registration deadlines for higher tonnage substances. Moreover, ECHA is also expecting a significantly higher number of small and medium-sized companies to be involved in the process, compared with the previous deadlines.

The purpose of this updated guidance remains to raise awareness of the deadline and to help companies to consider what they have to do, in particular to prepare and submit dossiers to ECHA. It is also aimed at downstream users who need to assess the potential for disruption of their supply chains if substances which they depend on are not registered. To this end the guidance comprises three elements:

(i) A 13-page generic note covering what SMEs need to know about the REACH Registration deadline including flow charts to illustrate and explain the relevant processes. This sets out what REACH registration is, how companies can determine if they need to register a substance and what needs to be done if they have registration obligations. It explains how Substance Information Exchange Forums (SIEFs) work, and the different information requirements for the two tonnage bands of 1-10 tonnes and 10-100 tonnes. The guidance also covers the issue of the costs of registration and how these are shared. There is advice about alternatives to animal tests and what happens if the registration deadline is missed, and if companies depend on others to register a substance. Various aspects of communication in the supply chain are considered from the perspective of downstream users. There are links to a number of other useful guidance documents and materials, in particular from ECHA.

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(ii) A 14-page self-assessment guide for SMEs which are downstream users of low volume chemical substances (as formulators or end users) or distributors, designed by a skilled practitioner. It helps companies to understand and create their product “portfolio” for registration purposes. There is advice on how to use the ECHA Registration database, how to engage with suppliers (including a template letter), and what to do if a substance is not going to be registered. The guide includes a number of flow charts as well as top tips and information on useful web links.

(iii) A 3-page self-assessment questionnaire for SMEs who manufacture or import articles, to help companies understand their registration, and other, obligations. A range of other useful information from official sources, and in particular, from sector-specific bodies, is also signposted.

This work by the Forum sits very well alongside the comprehensive efforts made by the UK REACH Competent Authority under its own RR2018 project over the past twelve to fifteen months, which benefitted from extra funding from Defra, to enhance pre-registrant understanding and awareness so as to counter the risk of supply chain disruption, reduce late registrations for UK businesses and minimise animal testing.

Forum Chairman Professor David Phillips commented:

“I am very pleased with the way in which the Forum members, the UK REACH Competent Authority, Defra and others came together to work so well, quickly and very competently on this material.”

Steve Elliott, the Chief Executive of the Chemical Industries Association said: *“Feedback received through the UKCSF sub-group’s activities indicate there is still need to continue to raise awareness on REACH 2018 and its implications for UK businesses, including downstream users. We hope this guidance information package will help first time registrants to consider what needs to be done to meet the deadline as well as encourage users of chemicals to assess the impact on their products”. He added: “Our contribution to the Forum’s activities is part of our continued efforts to ensure registrants and their respective supply chains, SMEs in particular, are supported on this major regulatory challenge”.*

Notes:

1. The UK Chemicals Stakeholder Forum was set up in September 2000. Its terms of reference and membership can be found on the [Forum website](#).

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2. Defra provides the secretariat for the Forum, which also works closely with the UK REACH Competent Authority. UKCSF quarterly meetings are open to the public and the specialist chemical press. Forum papers and minutes are available on the [Forum website](#).
3. This guidance was drafted by a sub-Group of the Forum consisting of the following representatives of Forum members - Silvia Segna (Chemical Industries Association) (Chair), Susanne Baker (Tech UK), Michael Cooper (Chemical Business Association), Finella Elliott (EEF, the Manufacturers' Organisation), David Sidgwick (ADS), Wayne Smith (British Coatings Federation) and Katy Taylor (Cruelty Free International). In addition there were two co-opted members - Mamta Patel (Chemical Watch) and Steve Quinn (West & Senior). Defra and the UK REACH Competent Authority also contributed to this work.
4. This guidance updates, and expands, the previous Forum guidance on the 2018 Reach Registration deadline which was published in November 2015.
5. The Forum has also published guidance on REACH Authorisation, in April 2014, and in November 2015. All of the guidance published by the Forum is available on its website.

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