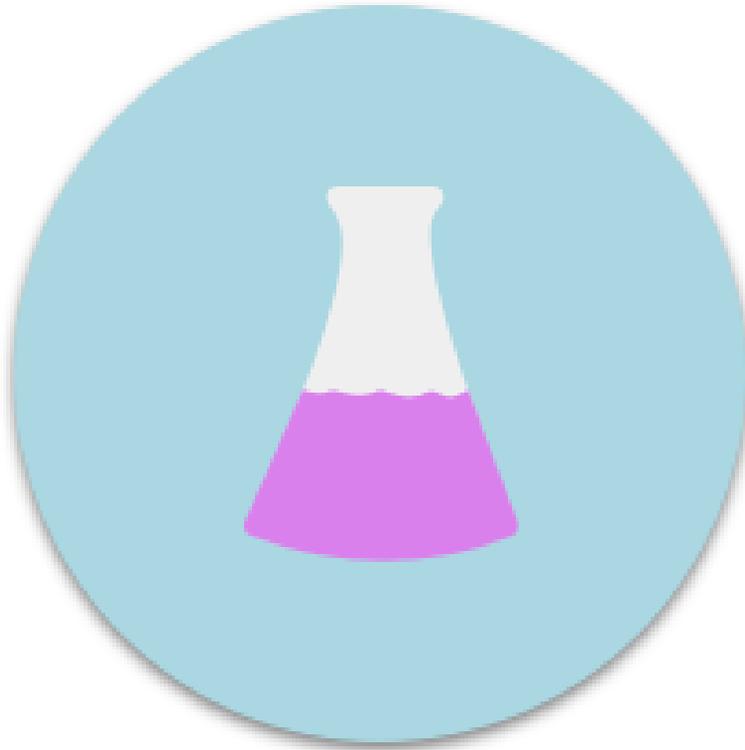




CROWBERRY CONSULTING
Environment, Ethics and Corporate Responsibility Management

REACH FAQ's



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What Is It?

The **Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)** addresses the production and use of chemical substances, and their potential impacts on both human health and the environment.

REACH requires all companies manufacturing or importing chemical substances into the European Union, in quantities of one tonne or more per year, to register these substances with the **European Chemicals Agency (ECHA)**.

It has created a single system for 'existing' and 'new' substances:

- a) non-phase-in substances (those not produced or marketed prior to the entry into force of REACH).
- b) phase-in substances (those manufactured but not placed on the Community market in the last 15 years).

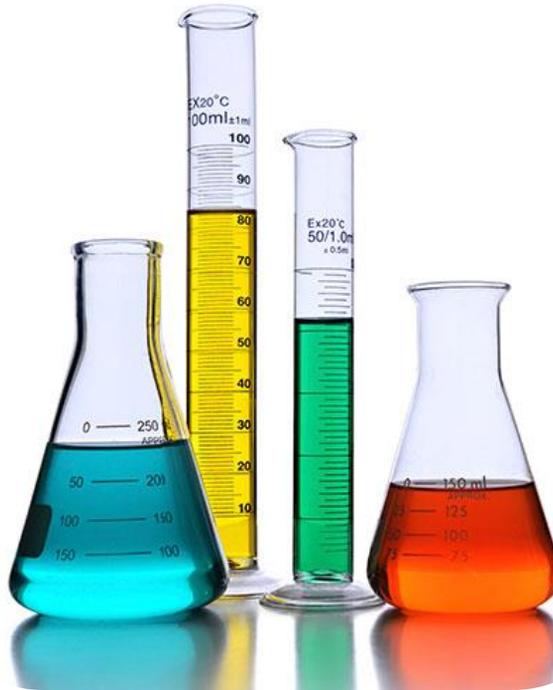


Image from GBC.



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How Does It Work?

The [European Chemicals Agency](#) has set three major deadlines for registration of chemicals (see figure 1.1 below):

- 1000 tonnes were required to be registered by 1 December 2010.
- 100 tonnes by 1 June 2013.
- 1 tonne by 1 June 2018.

The fees payable for registration have now subsequently been amended to transpose it via [REACH \(Amendment etc.\) \(EU Exit\) Regulations 2019](#).

In addition, chemicals of higher concern or toxicity will also have had to have met the 2010 deadline.

Some of the basic elements of REACH are as follows:

- All substances are covered by REACH unless they are explicitly exempted from its scope (open-scope principle)
- Registration requires manufacturers and importers of chemicals to obtain relevant information on their substances and to use that data to manage them safely.
- Better information on hazards and risks and how to manage them safely will be passed up and down the supply chain.
- Downstream users are brought into the system.
- Evaluation is undertaken by the Agency for testing proposals made by industry or to check compliance with the registration requirements.
- Substances with properties of very high concern will be made subject to authorisation.

What Are The Benefits Of REACH?

Positive occupational impact and public health impact of REACH is expected as chemicals are linked to respiratory and bladder cancers, skin disorders, respiratory diseases, eye disorders, asthma and so on.

Increased information on hazards and controls will help better implementation of existing legislation.

Authorisation of substances of very high concern and speedier restrictions will also assist positive occupational and public health and positive environmental impact of REACH.



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Do I Need To Register Substances?

In general, under REACH you may have one of these roles:

- **Manufacturer:**
 - If you make chemicals, either to use yourself or to supply to other people (even if it is for export), then you will probably have some important responsibilities under REACH.
- **Importer:**
 - If you buy anything from outside the EU, you are likely to have some responsibilities under REACH. It may be individual chemicals, mixtures for onwards sale or finished products, like clothes, furniture or plastic goods.
- **Downstream Users:**
 - Most companies use chemicals, sometimes even without realising it, therefore you need to check your obligations if you handle any chemicals in your industrial or professional activity. Examples of downstream users are formulators, end-users, re-fillers, re-importers and so on, so it is vital to check if you fall into this category.

REACH covers most chemical substances including:

- Substances on their own.
- Substances in a 'preparation' (a mixture, for example, ink or paint).
- Substances that make up an 'article' (basically, an object that is produced with a special shape, surface or design).

[ECHA have guidance on identifying substances under REACH.](#)

All substances which exceed 1 tonne require registration, unless explicitly exempted.



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The 'B' Word

- The UK is strongly committed to the effective and safe management of chemicals, and this will not change after Exit Day.
- The government, through hse.gov.uk have stated that their priorities are to ensure the continued effectiveness and safe management of chemicals to safeguard human health and the environment
- Respond to emerging risks and allow trade with the EU that is as frictionless as possible.
- The UK still intends to allow these rules to be governed by the European Chemical Agency.

What about No Deal?

If there is No Deal, the EU REACH Regulation will be brought under UK law by the [Withdrawal Act](#), and related legislation (see above) will be retained under UK law. The government have stated that they will retain the key features of REACH, including the fundamental principle of 'no data, no market' and its provisions for Only Representatives. The UK and EU agencies would operate independently from each other. IF companies are mixing substances from both UK and the EU, they will need to ensure the different substances are registered with BOTH agencies.

- The UK market will implement a phased approach designed to minimise disruption and ensure continuity, and HSE.gov have released further guidance on how to best prepare your business (relevant to your specific sector) in a no deal scenario, you can find it [here](#).



Image from [JCB Solicitors](#)



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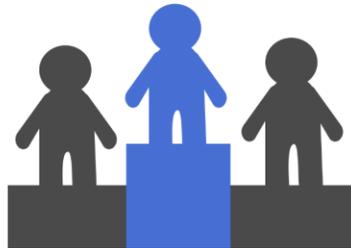
How Can Crowberry Consulting Help You?

- Help and guidance with the administrative process and submitting tonnage information to the ECHA.
- Provide a supply chain dialogue to assist your understanding of your company's REACH compliance, for example, by establishing the raw materials and tonnage used by manufacturers and suppliers and whether they are registered under REACH or not.
- We can also support your company in implementing the Environmental ISO140001 and can conduct internal environmental audits to help you achieve the certification

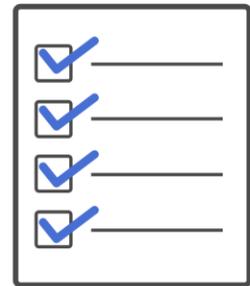
WE CAN HELP YOU IMPLEMENT ISO 14001 - ENVIRONMENTAL:



Clause 4 - Context of the organisation



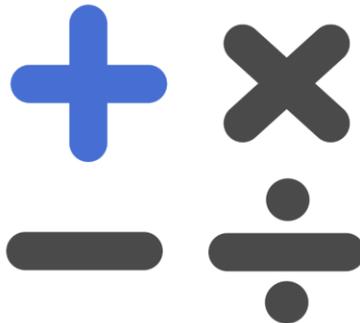
Clause 5 - Leadership



Clause 6 - Environmental Planning



Clause 7 - Support



Clause 8 - Operations for Environment



Clause 9 - Performance Evaluation



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