

## CLIENT ALERT

### The ECHA Expects Up to 70,000 Registrations of Little Known Chemicals by 2018

May 2015

REACH is the Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals. It entered into force on June 1, 2007 and established a system for generating, documenting and disseminating information for chemicals sold on the European market.

REACH places the burden on the individual companies who manufacture or import chemicals in the EU to demonstrate that these substances can be used safely. Companies must collect information on a chemical's properties and its uses, and assess their impact when workers, consumers and the environment are exposed to them.

To help companies and authorities manage the burdens imposed by the registration requirements, REACH implemented a stepwise system. It required the most hazardous substances and those manufactured or imported in the largest quantities to be registered first, in 2010. Chemicals manufactured or imported in the next largest quantities were registered second, by 2013. Finally, chemicals that are only manufactured or imported between 1-100 tons per year per company are to be registered third, in 2018.

The European Chemicals Agency (ECHA) expect this last registration deadline, which arrives on May 31, 2018, to be quite different from the two previous ones, both in terms of the number of registrations and the type of registrants. It expects that up to 70,000 registrations will be prepared for 2018, which is three times more than for either of the previous deadlines. Also, there will be more small- and medium-sized enterprises (SMEs) filing registration this time than for the previous registration deadlines. Many of these registrants are likely to be inexperienced and operating outside the chemicals sector.

In light of these increases, ECHA expects high demand for support services from registrants scrambling to meet the 2018 registration deadline, including for advice on how and when to use suitable alternative approaches. ECHA has indicated that it wishes to assist companies and that it will provide updated advice and tools to assist registrants. These actions are described in the [roadmap](#) published by ECHA in January 2015. The roadmap will be updated annually.

Despite these efforts, it is expected that the challenge to produce REACH registration dossiers for often little known substances will be significant. Companies would thus be well advised to make the inventory of substances that must be registered before May 31, 2018 as soon as possible.

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