

# SOLUTIONS REGARDING REACH ISSUES

- competence in consulting - intermediate products - toll manufacturing -

## What iSL-Chemie can do for you:

### Our Strength - Your Advantage

No **R**egistration, **E**valuation or **A**uthorization of **C**hemicals means automatically no market for your products within the EU Community.

We can assist you in REACH issues, e.g. as only representative or distributor for your goods. Take the advantage of our expertise in REACH, gained through our experiences in the promotion of our products.

- Grow your business in the EU-Market without disruption which may arise from REACH
- We are a professional company for dispersions, mixtures, paints and colored preparations for different applications.
- Production of intermediate products and toll manufacturing.
- We are versatile and flexible and our globally well equipped technicians and representatives are globally active at our customers' all over the world.
- Analytical competence and innovation are the core of our R&D.
- Responsible care for human and environment are the main focus of our company. Systematical work is essential for our effectiveness and product stewardship.

The success is documented by the following certificates:



Contact: [REACH@isl-chemie.com](mailto:REACH@isl-chemie.com)

## REACH in summary:

REACH, the new EU chemicals regulation, requires that chemical **substances** on their own, in preparations and those which are intentionally released from articles have to be registered to the European Chemicals Agency (ECHA). The regulation applies to substances manufactured in, or imported to the EU in annual quantities of 1 ton or more per company, unless the regulation indicates otherwise.

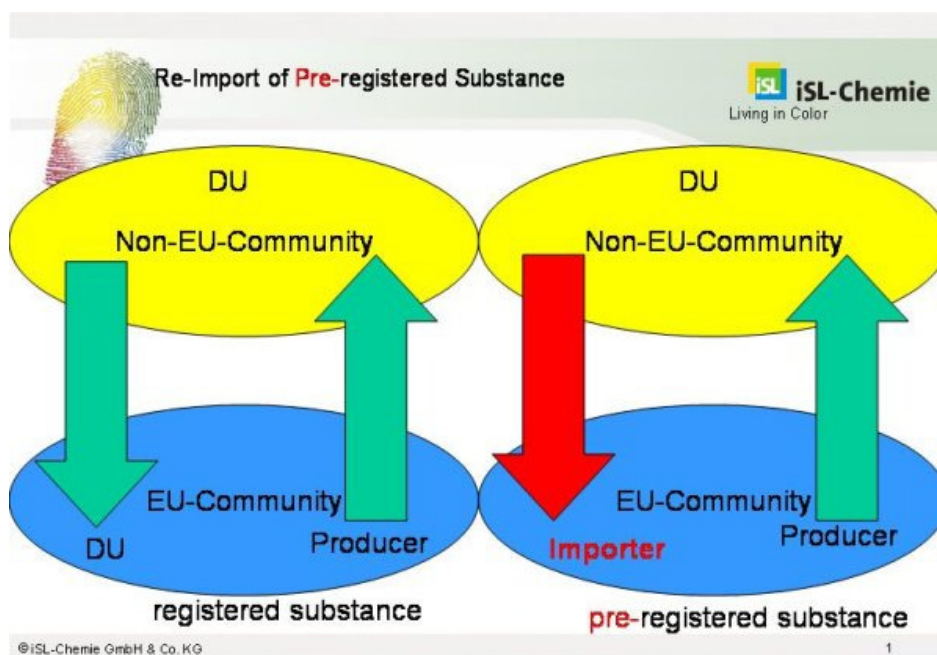
The obligation to register applies from 1 June 2008. The chemicals currently on the EU market which meet the definition of **phase-in substances** should be pre-registered between 1 June and 1 December 2008. Companies who pre-register their substances can benefit from extended registration deadlines. The deadline depends on the tonnage band and the hazardous properties of the substance. The staggered deadlines are:

- 30 November 2010,
- 31 May 2013 or
- 31 May 2018

Pre-registration requires only limited data and there is no fee associated to it. A pre-registration file for a substance consists of:

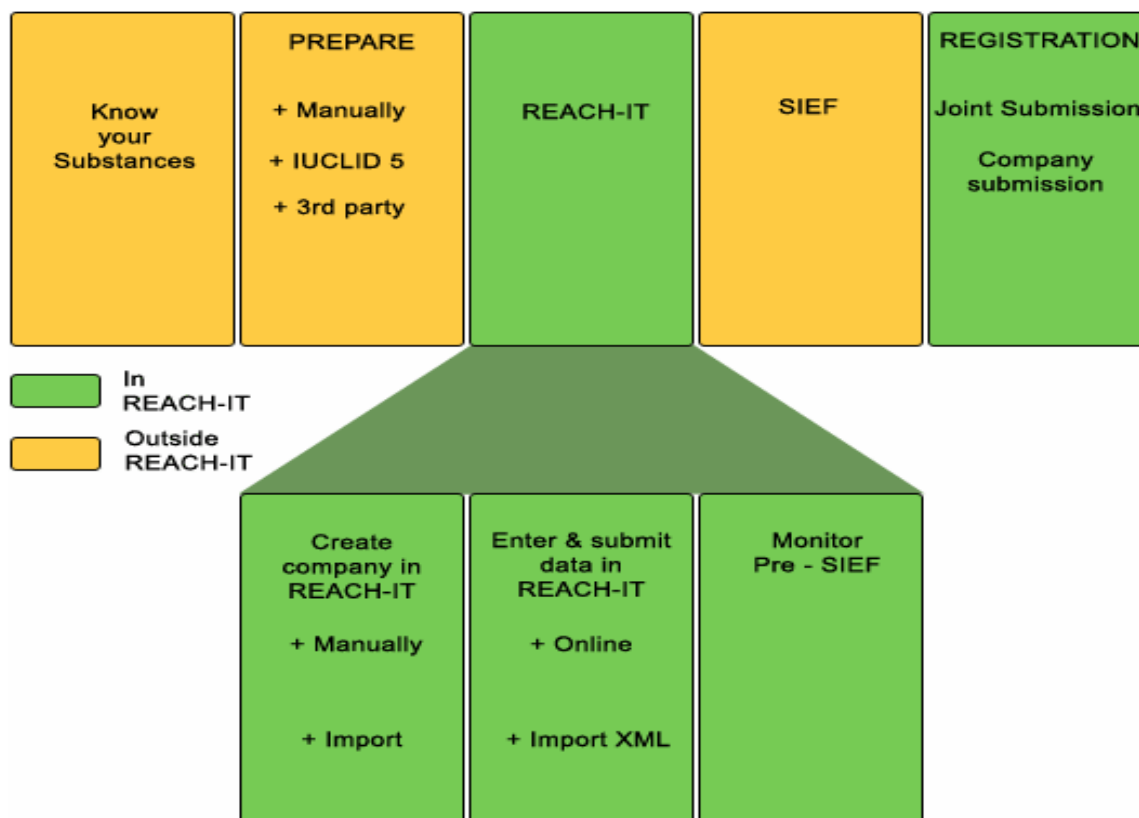
- **Substance Identity:** EINECS number, CAS numbers and names of the substance
- envisaged **deadline** and tonnage band for the registration
- name and contact information of a **Contact person** or **Third party Representative** who will act as the contact point in data sharing

Re-import of substances also requires pre-registration.



A pre-registrant should also provide when applicable **substance identification of any relevant substances** which may facilitate the risk assessment and data sharing of the substance

The process from knowing your REACH roles and substances to registration has several steps. The roles are explained in the **Actors** section of the **About REACH** web page on the **Guidance website**. The seven steps are presented in the graph below. Each of the steps has its own web page, detailed with explanations.



## What is your role under REACH?

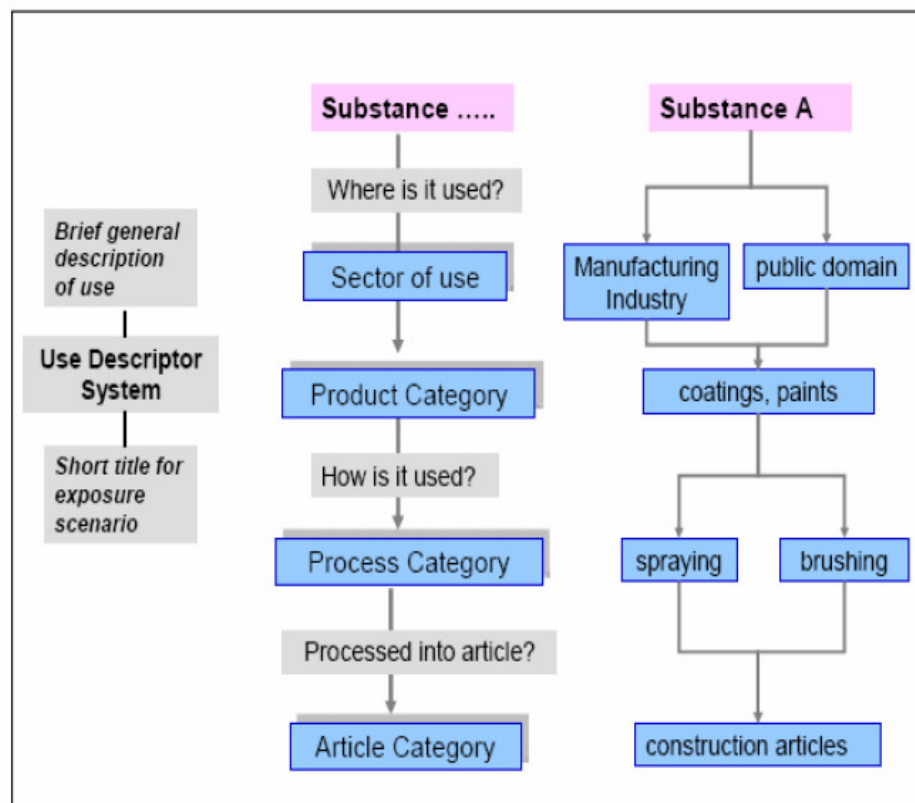
Question	Role	Supporting information, examples
Do you manufacture substances by synthesis, refining or extraction? This includes new substances created while making preparations	<b>Manufacturer</b> of substances, either on its own or in one or more preparation(s).	The formation of 'new substances' during the normal use of a substance or preparation is, in principle, exempted from the registration requirement e.g. a substance resulting from a chemical reaction occurring upon use of other substances.
Do you import substances or preparations from outside the EU?	<b>Importer</b> of substances as such or in preparations	Substances as such or substances contained in preparations are imported if you purchase them from a manufacturer or distributor who is located outside the EU. Countries belonging to the EEA will implement REACH in their national legislation; once they have done so, substances purchased from those countries will not be regarded as imports under REACH. If you import a polymer, you will need to check whether you have to register monomers or other substances in the polymer.
Do you import articles?	<b>Importer of substances in articles</b>	REACH defines an article as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition does". If the substance is present in quantities over 1 ton per year in the articles you import and is intended to be released, you will need to register the substance. If the substance is not intended to be released, but it is a substance of very high concern, you may have an obligation to notify the Agency. For more detailed guidance see the guidance document on requirements for substances in articles

## Situation of Non-EU manufacturers

Non-EU manufacturers can appoint an only representative **inside** the EU, who is responsible for registration of and communication on the substances, as such or in preparations.

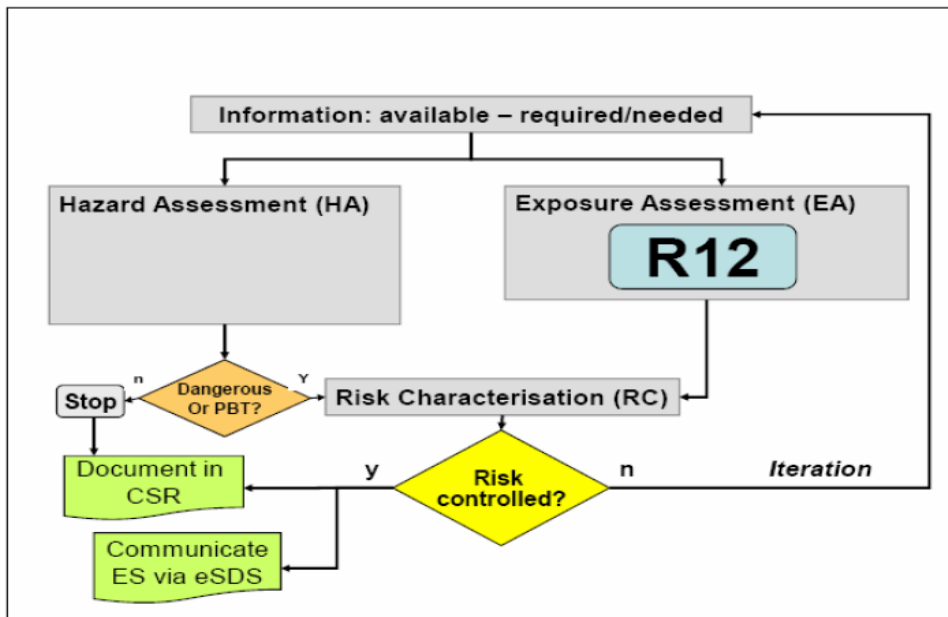
### The consequences of failing to prepare for REACH

Failing to prepare for REACH could mean that the substances you use, on their own or in preparations, are not registered or that your use



**Figure R.12-1: Descriptor system for short titles and a brief general description of use**

is not covered in the supplier's registration dossier or exposure scenario.



### What happens if a substance is not registered?

If a substance is not registered under REACH, it cannot be manufactured, imported or supplied to the EU market at or above 1 ton per year.

#### No Data - No Market

You cannot continue to use the substance, unless it is specifically exempted from registration. If you find that a substance you use is not on the list of pre-registered substances, you can express your interest in the substance to the Chemicals Agency. The Agency will then publish on its website the name of the substance. On request from a potential registrant, the Chemicals Agency will provide him with your contact details.

It is important to know that only legal entities within the EU are able to pre- and register substances under REACH.