### Registration in the REACH regulation

Companies are responsible for collecting information on the properties and uses of the substances they manufacture or import. They also have to assess the hazards and potential risks presented by the substance. This information is communicated to ECHA through a registration dossier containing the hazard information and, where relevant, an assessment of the risks that the use of the substance may pose and how these risks should be controlled.

#### Deadline

<table>
<thead>
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<th>Manufactured or imported substances</th>
<th>Deadline</th>
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<tr>
<td></td>
<td>30 November 2010</td>
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<td>Above 1,000 t/year</td>
<td>R50/53 substances above &gt; 100 t/year</td>
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<tr>
<td>CMR 1 &amp; CMR 2 substances above 1 t/year</td>
<td>31 May 2013</td>
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<tr>
<td>Above 100 t/year</td>
<td>31 May 2018</td>
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<tr>
<td>Above 1 t/year</td>
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**R50/53**: substances dangerous to aquatic organisms or the environment

**CMR**: carcinogenic, mutagenic or toxic to reproduction

15,000 substances have been registered between 2008 and beginning of 2017. The last deadline will be very different from the two previous ones (2010, 2013), in terms of both the number of registrations and the type of registrants (many SMEs).

### How to avoid the supply chain disruption

**ISSUE:** AVOID THE SUPPLY CHAIN DISRUPTION

- Real risks of supply disruption for our sector
  - Because of ignorance of REACH
    - Many small and very small companies are concerned for this last registration step.
  - For economic reasons
    - The registration cost makes the substance unprofitable.

The non-registration of a substance will lead to its disappearance from the European market. Consequently, mixtures in which the substance is incorporated have to be reformulated or will vanish from the market. In case of reformulation, substitution can be transparent (without technical and economic consequences) but very often it may require expensive validation/certification in the aerospace and defence industry at all levels of the supply chain.

It is necessary to clearly identify these cases in order to take the right decision (registration or substitution) without forgetting to assess the sustainability of the alternative substance. The late identification of these cases may generate significant additional costs or irrelevant choices.

**Effective communication at all stages in the supply chain is absolutely necessary.**

As often as possible, the decision on whether or not to register a substance should be a shared decision between the customer and its supplier.

**For more information**

Your national helpdesk point of contact: [https://echa.europa.eu/support/helpdesks](https://echa.europa.eu/support/helpdesks)


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**French Aerospace Industry Association**

8 rue Galilée 75116 PARIS

[www.gifas.asso.fr](http://www.gifas.asso.fr)
All industrial sectors are affected by the REACH regulation and not only the chemical industry. This regulation must be applied in Europe by all companies that manufacture, import or use substances, mixtures and articles in their business, irrespective of the size and position of the company in the supply chain. This applies not only to substances as such but also in mixtures (adhesive, paint, resin, …) or contained in an article (component, semi-finished or finished product). As downstream users of substances or mixtures, aerospace and defence companies are rarely involved in the registration phase of substances, but care must be taken to ensure that these substances are registered within the regulatory deadlines by the upstream manufacturers/importers. Information is not easily available. A Substance/Mixture Importer/Manufacturer in the EU (registrant):
• I assess the substance importance for my customer and ask his advice.
• I take my registration decision based on technical and economic impacts and my customer’s opinion. I inform him of my decision.
• I share my risk assessment conclusion with my customer.
• I take my registration decision whether I will register my substance or not.
• The cost/benefit of the registration (security of supply).
• The cost/benefit of a new formulation (substitution, validation, qualification…). In this case, make sure that the substitute is sustainable. A supplier raising a risk should not be stigmatized. This risk conclusion my supplier shares with me. A supplier could also exist for other suppliers.
• I ask my suppliers about REACH 2018: “How do you manage the risk?”. Did you ask your own suppliers?”. In ALL CASES: if a risk is identified, I assess the options with my customer/supplier:
• The cost/benefit of a new formulation (substitution, validation, qualification…). In this case, make sure that the substitute is sustainable. The customer relationship could be more affected if the topic is mentioned too late, could it?
• The cost/benefit of the registration (security of the supply). Registration is the job of the upstream suppliers. 2018 registration deadline: “I do not want to discuss it with my customer because I’m afraid to lose the business”.
“REACH: we have been dealing with it and speaking about it since 2007. It’s all under control, isn’t it? False: REACH is a step by step and continuous process. Many obligations are implemented on a rolling basis. This last registration deadline concerns substances that manufacture or import substances in low volumes (between 1-100 tonnes a year) and very small and medium size enterprises (SMEs) are directly affected.
• I am a mixture downstream user or I assemble or make articles or I am a distributor:
• I pay close attention to the risk assessment conclusions my supplier shares with me. A supplier raising a risk should not be stigmatized. This risk could also exist for other suppliers.
• I ask my suppliers about REACH 2018: “How do you manage the risk?”. Did you ask your own suppliers?”. In ALL CASES: if a risk is identified, I assess the options with my customer/supplier:
• The cost/benefit of a new formulation (substitution, validation, qualification…). In this case, make sure that the substitute is sustainable. The cost/benefit of the registration (security of the supply). Registration is the job of the upstream suppliers.
Each company, other than manufacturers or importers, who use chemical substances as such or included in a mixture, could be:
• A formulator who produces mixtures.
• A producer of articles who assembles or makes articles.
Most companies use chemicals, sometimes even without realising it, therefore you need to check your obligations if you handle any chemicals in your industrial activity. You might have some responsibilities under REACH.