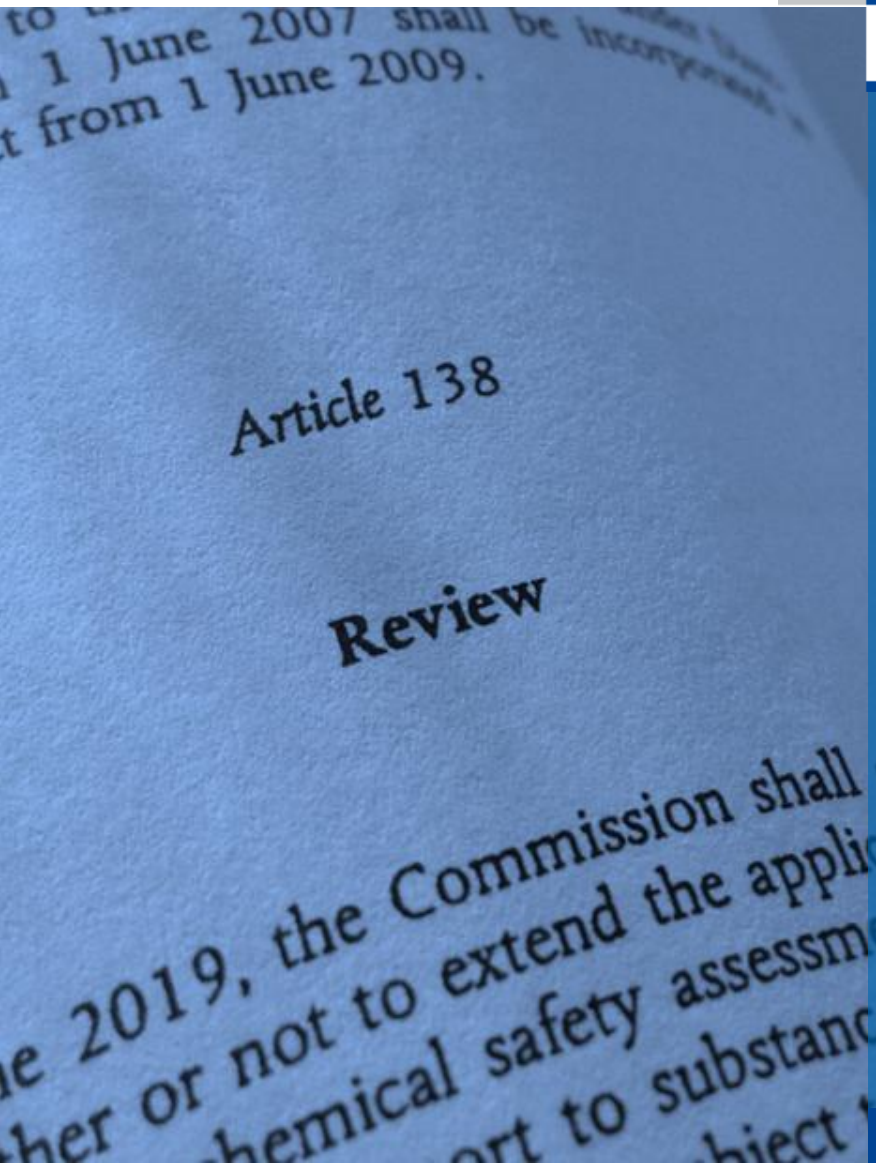

European Commission

Registrations of SMEs under REACH

State of play and perspectives

12th ECRN Congress
Ùstì nad Labem, 22 October 2014

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Unit F.1 : REACH

Objectives of REACH

- ☑ protection of human health and the environment
- ☑ promotion of alternatives to animal testing
- ☑ free circulation of substances
- ☑ enhance competitiveness and innovation

Legal obligation to register substances

- **Registration:** one of the major elements of REACH, together with **evaluation**, **restrictions** and **authorisations**.
- High number of substances have to be registered (~35.000). To date more than 12,000 have been registered.
- Phase-in period with three deadlines:
  - 1 December 2010 (over 1,000 tpa),
  - 1 June 2013 (100 to 1,000 tpa),
  - 1 June 2018 (1 to 100 tpa).

What has happened so far

- Registration deadlines of **2010** and **2013** successfully completed, but limited experience with SMEs since concerned high tonnage bands.

- To date around **3,000 SMEs have registered**.

- COM has published in February 2013 a **comprehensive** review on the implementation of REACH, including on the first lessons learnt from the REACH implementation With **special attention** to:
  - attainment of its aims on human health and the environment,
  - the costs and administrative burden,
  - other impacts on innovation.

REACH review: conclusions

REACH **functions well** and delivers on all objectives that at present can be assessed.

- Too early to quantify benefits in terms of **Health and Environment** but positive initial trend.
- Less **Animal Testing.**
- **Innovation:** increased moves towards substitution of Substance of Very High Concern.
- **Internal Market & Competiveness:** increased harmonisation but need to reduce impact on SMEs.

REACH review: conclusions

- Balanced against legislative stability and predictability, no changes to the enacting terms of REACH.
- At the same time, REACH was considered as No 1 in the TOP10 Most Burdensome EU Legislations for SMEs.

REACH review: recommendations

- The 2013 review recommends a set of actions to be taken in order to address the concerns identified. This list includes inter alia:
  - More specific guidance for SMEs,
  - Reduced fees for SMEs,
  - Improved transparency on fair cost sharing in SIEFs.

What has been achieved

- **March 2013:** further reduction of SME registration fees.
- **April 2013:** appointment of an SME Ambassador at ECHA.
  Andreas Herdina

- **December 2013:** SME workshop to identify priorities for actions.
- **April 2014:** Workshop on registration of natural essential oils.

What has been achieved (continued)

- **2014**: The Director Contacts Group, informal platform formed by Commission, ECHA and 9 associations has issued 4 important guidance documents:
  - Fair, transparent, and non-discriminatory cost sharing in SIEFs,
  - Recommandations on sound SIEF management,
  - Considerations to be made when joining an existing SIEF,
  - Checklist on how to hire a good consultant.

Priority for action in the field of registrations

- **Increasing transparency in Substance and Information Exchange Forums**
  - Perceived lack of transparency on administrative costs and cost sharing model
  - Commission is considering an implementing act to increase transparency in SIEFs
- **Development by ECHA of the 2018 Registration roadmap**
  - **http://echa.europa.eu/reach-2018**
- **Reinforcement of communication actions**

Other initiatives

- The Authorisation procedure is also a matter of concern for SMEs and downstream users.
- SVHC Roadmap: Risk Management Options
- REFIT Communication in June 2014:
  - Reduction of frequency at which substances are added on the list of substances subject to authorisation,
  - Simplified procedure for authorisation,
  - Socio-economic aspects to be taken into account at an early stage in the autorisation process.

Tips for the 2018 registration deadline

Check who else is in your SIEF:

- your substance may be already registered,

  → join existing joint submission, identify a LR.

- your substance is not yet registered,

  → discuss in SIEF, appoint a LR.

- Share data with others,
- LR submits the joint part of the dossier,
- Don't forget to submit your individual dossier.

Tips for 2018 registration deadline

- „In time“ means start now!
- Not only „classical“ chemical sectors are affected.
- REACH registration requires technical expertise.
- Preparing a dossier takes much time (up to 1.5 years).
- Applying data- and cost sharing reduces costs!
- SMEs have a registration fee reduction of up to 95%.
- Consider also further possible obligations (e.g. safety data sheet, obligations on articles).

Tips for the 2018 registration deadline

Where to find REACH assistance?

- ECHA website: REACH guidance, navigator tool, FAQs...
- National REACH/CLP helpdesks ,
  → help for SMEs!
- Industry associations,
- EEN/chambers of commerce.

Thank you

For further information please visit:

- ec.europa.eu/enterprise/reach
- ec.europa.eu/environment/chemicals/reach
- echa.europa.eu

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This presentation does not necessarily reflect the official opinion of the Commission.