REACH 2018: How to Prepare for Registration Following ECHA's Roadmap

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Presenter Biography

Michael studied Biology at the Aachen University of Technology (RWTH) and holds a PhD in ecotoxicology. After several post-doc years in research and teaching at the RWTH, he joined Dr. Knoell Consult in 2004, working on environmental risk assessments for agrochemicals, biocides and chemicals. In 2006 he developed the REACH working group, and in 2010 he became the head of the business unit for REACH & global regulatory affairs, being responsible for the registration of chemicals in Europe, North America and also Asia-Pacific.

Since 2013, Michael is the Managing Director for Knoell's global industrial chemicals & biocide business.

Abstract of presentation:

The final REACH registration deadline still seems quite far away but companies would be ill-advised to think that "sit and wait" is an option.

There is no doubt that involved parties have gathered valuable experience in the practical handling of the REACH registration requirements during the two registration deadlines in 2010 and 2013. Now it is known, for example, approximately how much time and money it takes to prepare a proper registration, what kind of scientific expertise and human resources are needed and also what kind of communication and information flows need to be established.

On the other hand, it is quite obvious that the registration deadline of 31 May 2018 will differ in various aspects from the two previous ones, particularly in terms of both the number and type of registrations. According to ECHA, it is expected that up to 70,000 registrations (for up to 25,000 substances) will be prepared for 2018. This is much more than has previously been prepared for past deadlines. Many of the registrants are expected to be rather inexperienced. They may also be located outside the chemical sector. There will be more small and medium-sized enterprises (SMEs), presumably even in the role as lead registrant, than for the previous registration deadlines.

The majority of the 2018 substance information exchange forums (SIEF) will be small or even consist of only a single company.

At the same time, there will be less information available on the substances to be registered, because all of the "big" substances where data have been generated already in the pre-REACH era – for example under the ICCA-HPV schedule - are already registered.

Despite the reduced data requirements for registrations below 100 tonnes per year (t/a), registrants might be in the need to generate data to fill gaps, if they don't have the expertise to discuss how and when to use suitable alternative approaches to avoid animal testing.

In October 2014, ECHA launched a set of new web pages related to REACH 2018. These outline the phases leading to a successful registration. The pages help companies to begin their preparations and give them easy access to the current information on the agency's website. Specifically, ECHA proposes a "six step plan" for a successful registration which be outlined together with my own comments and recommendations.