

SAFEGUARDS

SGS CONSUMER TESTING SERVICES

HARDLINES, SOFTLINES, ELECTRICAL & ELECTRONIC

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Keep Track of the Proposed REACH¹-Registration Exemption List and Take Advantage of the Pre-registration Option

Substances Exempted from Registration are under Review! For the validation of minimal risk substances, the European Commission has reviewed the existing Annexes IV and V of REACH Regulation (EC) No 1907/2006. The proposed amendment is available at "http://echa.europa.eu/doc/reach/regulation_annexes_iv_v_en.pdf".

In this proposal, the number of substances in Annex IV is reduced from 68 to 40 while the coverage in Annex V is expanded, from 9 to 13 substance types. After the final decision by the European Parliament and the Council, these Annexes will be adopted accordingly in September or October 2008.

Substances included in Annex IV or covered by Annex V are exempted from the registration, evaluation and downstream user provisions of REACH. Annex IV identifies substances on the basis that sufficient information is known about these substances so that they are considered to cause minimum risk because of their intrinsic properties [Article 2(7)(a)]. Annex V defined substances on the basis that registration is deemed inappropriate or unnecessary for these substances and their exemption from the provisions does not prejudice the objectives of the regulation [Article 2(7)(b)].

Pre-registration: A Wise Move to Ensure your Business Continuity until the Formal Registration Deadline

Concerning this proposed revision, ECHA² advised the relevant companies to carefully check the website during these months and, if appropriate, to pre-register their substances by 1 December 2008. In case of doubt, it is recommended rather to pre-register the substance than to potentially face the consequence of having to register the substance before manufacturing or importing can continue. Pre-registration does not trigger any registration obligations and is free of charge.

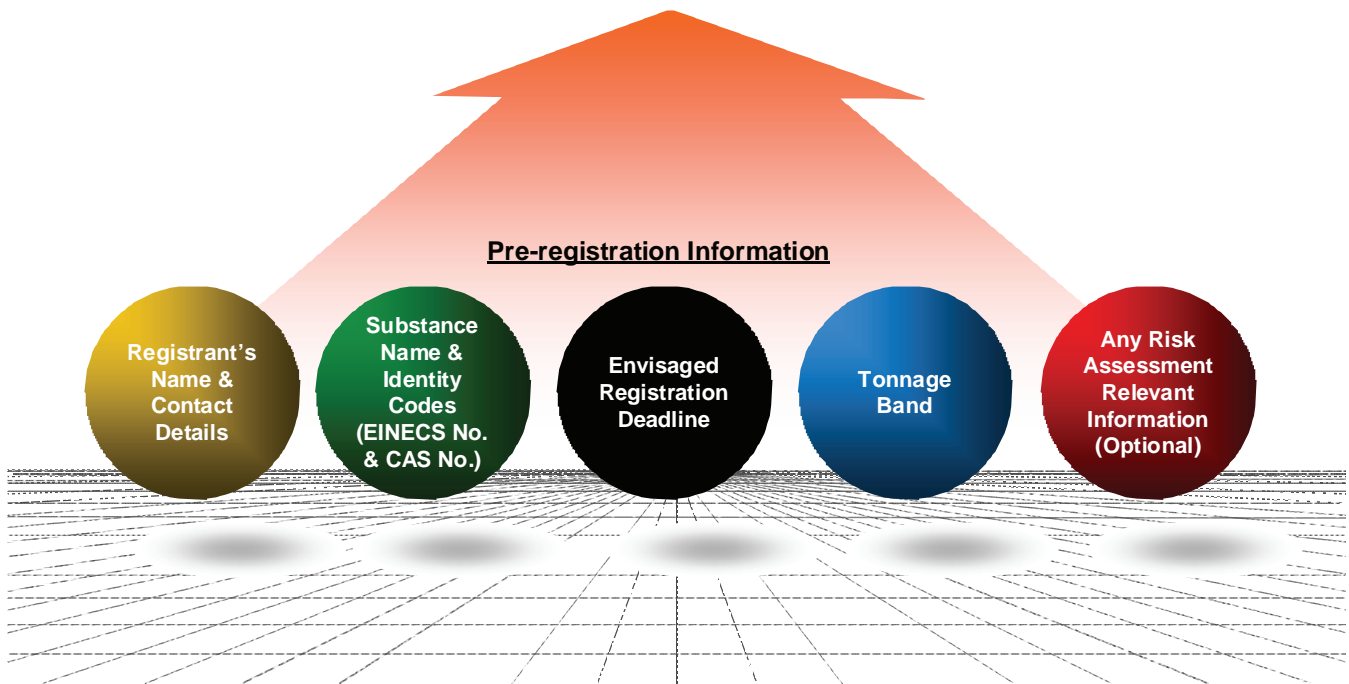
Article 28 of REACH regulation states that potential registrant (i.e. EU³-manufacturer, EU-importer or Only Representative) for phase-in substances should pre-register at ECHA between June and November 2008 and will consequentially be granted an extended registration period of 2-10 years depending on substance volume and risk. Pre-registration allows potential registrants of a substance to meet in a SIEF⁴ for data sharing and cost assessment during technical dossier and chemical safety report preparation.



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Three Ways to Submitting your Pre-registration

1. **Online REACH-IT:** Entering required information directly into the REACH-IT system
2. **IUCLID 5:** Using the pre-registration functionality of IUCLID 5 to generate an xml file
3. **Third Party Tool:** Using registrant's company IT tools to generate an xml file



What if a Phase-in Substance is not Pre-registered by 1 December 2008?

- **First-time Manufacturer or Importer**
Only if the company is a so called first-time manufacturer or importer of that substance in quantities of 1 tonne or more per year after the pre-registration deadline has passed. Manufacture or import for the first time, refers to the first time after the entry into force of REACH (1 June 2007). First-time manufacturers or importers must pre-register within 6 months after the first manufacture or import reaches the one tonne threshold, and not later than 12 months before the relevant deadline for registration. The same applies for imported articles that contain a phase-in substance for which registration is required.
- **Current Manufacturer or Importer**
A company that fails to pre-register a phase-in substance by the pre-registration deadline may neither import nor manufacture it after that date until it has fully registered the substance with the ECHA.

Non Phase-in Substances Are Not Entitled to Pre-registration

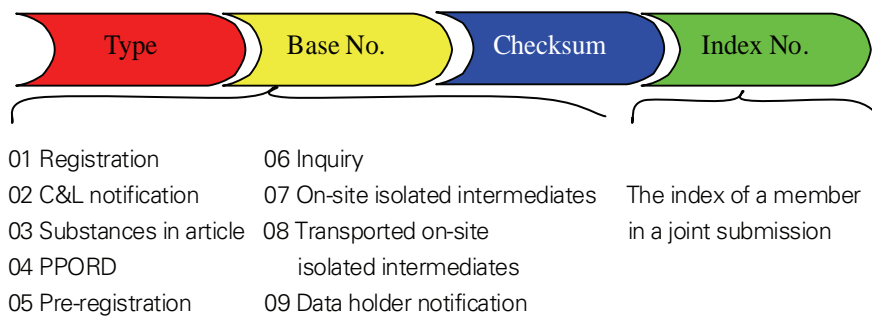
Non Phase-in Substances should not be placed on the EU market unless full registration has been done. If a potential registrant for phase-in substances missed the pre-registration period, he/she has to register right away before placing the substances on the EU market.

How to Prepare Pre-registration?

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|---------------------------------|---|
| 1. Role Assessment | - Identify your role in the supply chain (i.e. EU-manufacturer, EU-importer, EU-downstream user, EU-distributor or non-EU supplier) |
| 2. Supply Chain Analysis | - Communicate your EU-suppliers for their REACH registration
- Collect chemical composition data from your non-EU suppliers |
| 3. Product Overview | - Identify those registration product types (i.e. substance, preparation, intentional substance released article, intermediate, monomer, polymer additives) |
| 4. Substance Inventory | - Review chemical composition data from your suppliers
- Calculate the annual tonnage of substance per legal entity |
| 5. Data Evaluation | - Assess the accuracy and completeness of data collected from your suppliers
- Confirm the substance identity for pre-registration and registration |
| 6. Pre-registration | - Select your best way for pre-registration
- Submit pre-registration file to ECHA |

What will you obtain when pre-registration is completed?

You will get a reference number comprising 4 segments as shown below:



SGS - The Professional Service Provider Understanding your Business Needs

Armed with strong expertise and remarkable technical support, SGS is able to offer simple inventory review and assist data submission for pre-registration process. Other comprehensive solutions include portfolio analysis, tailor-made questionnaires for data collection, supplier training, product composition evaluation, substance identification, and impact analysis.

Abbreviation

- CAS:** Chemical Abstracts Service
³**EU:** European Union
²**ECHA:** European Chemical Agency
¹**REACH:** Registration, Evaluation, Authorisation and Restriction of Chemicals
EINECS: European Inventory of Existing Chemical Substances
⁴**SIEF:** Substance Information Exchange Forum

To learn more about how SGS can help you with pre-registration or later during the REACH process, contact REACH@SGS.COM or visit WWW.SGS.COM/REACH.

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