



# REACH Information sheet: (pre)-registration.

December 2008

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The REACH legislation has been in force since 1<sup>st</sup> June 2007. The REACH Regulation is complex and will have significant impacts on all manufacturers, importers and downstream users in the European Union and require their joint collaboration across all supply chains.

UKLA MWF PSG members have been working closely with their suppliers and customers to ensure full compliance with this extremely complicated piece of legislation.

In essence REACH requires that all substances, and substances in articles that are intended for release to the environment (eg items such as ink jets cartridges that release a substance into the environment), used in Europe should be pre-registered and subsequently registered at the appropriate time. Substances in volumes over one ton per year must be neither manufactured nor imported in the EU unless they are pre-registered or registered.

Transitional periods are granted under the REACH Regulation in order to perform the comprehensive registration tasks. Depending on substance volumes and certain health and environmental classifications, these transitional periods range from 3.5 to 11 years (Article 23). To be able to benefit from these transitional periods, manufacturers/importers must pre-register a substance.

It is essential for users of substances to know if their suppliers (Manufacturer/Importer) will pre-register the substances they require; to confirm that these substances will be available in the future, and their specific uses will be covered by a registration. It is also essential for manufacturers/importers to be informed about downstream applications as well so as to have use and exposure information for the respective substances in order to be able to generate the required chemical safety report and extended safety data sheets covering the identified uses.

UKLA MWF PSG members are largely formulators, that is they take substances from suppliers and blend them together to make products for their customers. On this basis they are in contact with their suppliers to ensure that their raw materials will be pre-registered. Some of our members are however substance manufacturers or importers in their own right and hence they are involved in pre-registration directly.

Substances which are contained in the formulated product(s) and which require registration, are pre-registered by our member companies or by our upstream suppliers. Several substances, however, are exempt from registration. These include, but not limited, to: polymers and substances on Annex IV and V, biocides fulfilling the BPD.

The list of pre-registered substances will only be published after 1 January 2009, following closure of the pre-registration period on 1 December 2008 (Article 28(4) of the REACH Regulation). The ECHA will not publish pre-registration numbers so there is no way to check whether pre-registration by a specific legal entity actually took place. For this reason UKLA MWF PSG members will not publish pre-registration numbers for substances contained in its products.

It should be noted that the fact a substance is pre-registered does not automatically guarantee that it will be later registered by a given supplier. However, raw materials used in the metalworking fluid industry are supplied by manufacturers of long standing and whilst the risk of some raw material not being registered is tangible, it is considered to be low. Naturally, as competent manufacturers of lubricants we will keep in close touch with our raw material suppliers so as to be able to react quickly and appropriately to any substance withdrawal.

Therefore, although at this stage we expect that the substances which are contained in the product(s) will be registered appropriately, this is not a guarantee of registration. This is because – besides REACH – further commercial factors might exert an influence (e.g. unforeseeable future market situations) in the 11 year timeline.



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December 2008, continued

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Some of the Guidance Documents developed from the 'RIP's' are not yet completed. Nevertheless the UKLA MWF PSG is working closely with related industry associations to develop appropriate Exposure Scenarios for the safe use and handling of our fluids. Discussions relating to product use will be held with our customers and suppliers in the near future.

Further background information on the REACH Regulation and the terminology/ definitions is available in national and industry-specific supporting materials, and from national helpdesks, see also: [www.ukla.org.uk](http://www.ukla.org.uk); [www.ueil.org](http://www.ueil.org); [www.vsi-schmierstoffe.de](http://www.vsi-schmierstoffe.de) and the European Chemicals Agency website: <http://echa.europa.eu/>

We thank you for your interest and as the REACH legislation becomes clearer, further communication will take place with our own suppliers and customers to gather the information that we will need to ensure compliance in a timely manner.

\*REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

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### **The Metalworking Fluid Product Stewardship Group**

*The above information is an industry view produced by the UKLA Metalworking Fluid Product Stewardship Group that is believed to be correct at the time of publication. It is provided in good faith for information only. No guarantees are made or implied within the text of this article. The reader is advised not to act upon this article, but to seek further information. More information on this and other health, safety and environment issues is available from your UKLA Metalworking Fluid Product Stewardship Group member company supplier.*

*The Metalworking Fluid Product Stewardship Group exists to promote the industry's commitment to the development, manufacture and marketing of safe and effective metalworking fluid products. It will assist in the education of users, enhance the health and safety provision to both the members and their customers' employees, protect the environment and provide qualified, reviewed information to industry, trade unions, Government and the general public.*

*Member companies have each subscribed to the principles of product stewardship in respect of their metalworking fluids businesses and have signed a commitment to a common code of ethics.*

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