

# REACH

## REGISTRATION

### 2018

WHAT TO KNOW ABOUT  
THE COMPLIANCE DEADLINE



REACH is the European Union (EU) law that ensures safe use of chemicals. It applies to products manufactured in or imported to the European Economic Area (EEA). If you are producing or importing chemicals, act now to register your chemicals under the EU's chemicals legislation.



**REGISTRATION COMPLIANCE DEADLINE**

**31 MAY 2018**

**REGISTRATION  
OVERVIEW**

**KNOW  
YOUR ROLE**

**TRUE OR  
FALSE?**

**WHAT TO  
DO NEXT**

**RESOURCES  
AND TOOLS**

**ABOUT  
IAEG**

**LEGAL DISCLAIMER**

# WHAT MUST BE REGISTERED?

If you manufacture or import substances at or above one tonne a year in the EU/EEA market, you must register them.

If you manufacture or import mixtures, you may need to register the substances they contain.



## SUBSTANCE

A chemical element and its compounds in the natural state or the result of a manufacturing process.  
*Examples: aluminium, acetone, xylene*



## MIXTURE

Composed of several substances.  
*Examples: paints, liquid coolants, lubricants, sealants, coatings*

## NOTE

Hazardous substances must be listed in **ECHA's Classification and Labelling Inventory**. Placing your substance on the market may be restricted or its use in the EU may require an authorisation.





# WHY REGISTER?

If you need to register a substance and do not do it by **31 May 2018**, you will no longer be allowed to manufacture, import or supply it in the EU/EEA.

Some chemicals are hazardous for human health and/or the environment, and it's important to know about their hazards and uses to be able to take responsible action. By registering your chemicals, you demonstrate that you have considered the possible risks and can give advice on how to use them safely.

**By doing so, you are playing your part in protecting human health and the environment in Europe.**



## Business Continuity Risk to the Aerospace & Defence Value Chain

The Aerospace and Defence industry recognises that the REACH Registration 2018 obligations could lead to reassessment of business cases for the European market for specific chemical products, possibly leading to their discontinuation or reformulation.



## Chemical Substance and Mixture Manufacturers

Decisions to not register substances may result in reformulation, obsolescence or removal of chemical products from the EEA market. This needs to be an informed decision with a healthy dialogue among Aerospace & Defence value chain members to ensure business continuity.



## Importers

Importers of chemical substances and mixtures will need substance information beyond safety data sheets to track import volumes at the substance level and determine when registration is needed. Chemical mixture formulators need to partner with importers to leverage the Only Representative registration option or provide full substance level transparency to importers.



# KNOW YOUR ROLE

Your responsibilities in the registration process will depend on your role in the supply chain. However, choosing to not register a substance, or reformulating using unregistered substances, will have global consequences on the supply chain. Dialogue between the customer and suppliers is key to maintaining good relationships when making these important business decisions.



## I AM A

Substance/Mixture Distributor with import responsibilities in Europe or Substance Manufacturer



### Ask Yourself

- Do I intend to register my substance? I need to communicate with my customer as soon as possible about my intentions.
- Do I know the importance of the substance for my customer? This is a point I need to account for in my decision.
- Does my registration decision take into account technical and economic impacts and my customer's feedback? I need to inform my customer of my decision.

## I AM A

Substance/Mixture Formulator



### Ask Yourself

- Am I importing any substances/ mixtures directly into Europe? If so, I will go through the bullet points in the previous section addressing import responsibilities.
- Are the substances I use registered? Are my uses covered? I may need to contact my suppliers to confirm status.
- Am I concerned one of the key substances in my mixture is not going to be registered by my supplier and I am considering a reformulation? Have I considered the technical challenge for my customer to use my new formulation? I need to share my concerns and risk assessment with my customer as soon as possible.

## I AM A

Substance/Mixture Downstream User



### Ask Yourself

- Am I paying attention to obsolescence and reformulation notices I receive from my suppliers? The REACH 2018 registration deadline seems to play a role in the business continuity risk raised by my supplier.
- Am I keeping an open and honest dialogue with my supplier? Explaining my situation to my supplier may weigh into their decision.

## FOR ALL ROLES

If a risk is identified, I need to assess the options with my customer/my supplier



### Consider and Discuss

- The cost/benefit of a new formulation (substitution, validation, approval...). In this case, make sure that the substitute is sustainable.
- The cost/benefit of the registration (security of the supply).



*"I do not sell to Europe directly, therefore REACH 2018 registration does not affect me."*



## TRUE

**HOWEVER**, the Aerospace and Defence supply chain and/or customers who import your product into Europe need your help with substance information to complete their registration requirements.

*"The Aerospace and Defence industry uses specialized chemical substances and mixtures in limited volume, thus, there is a high business continuity risk due to the REACH 2018 registration compliance deadline."*



## TRUE

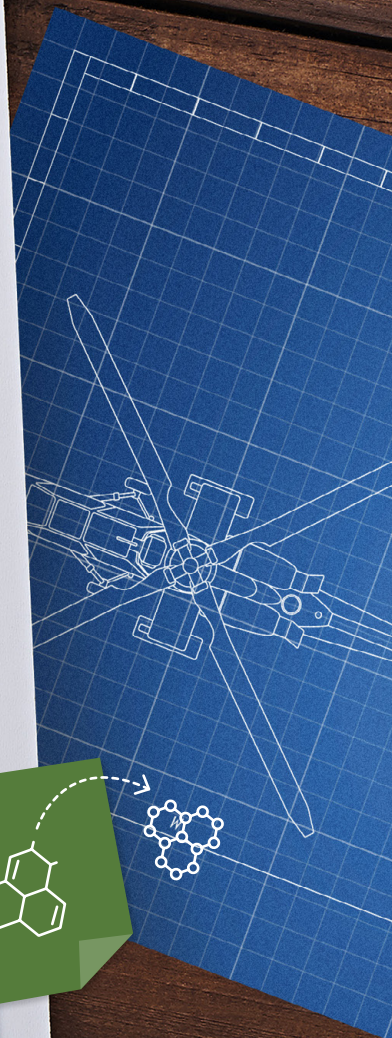
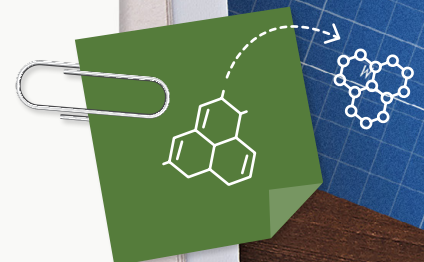
Substances have likely **NOT** been registered in prior registration deadlines.

*"I do not need to register as I have an alternate substance that is already, or will be, registered."*



## FALSE

The Aerospace and Defence industry has lengthy and rigorous testing protocols before alternate substances or mixtures can be used. Therefore, an alternate substance **MAY NOT BE READY** to use for Aerospace and Defence applications before the May 2018 registration deadline.



# WHAT TO DO NEXT



If you need to register, start preparing as soon as possible. It takes time to get organised with other registrants and to prepare your registration dossier so it is completed by the 31 May 2018 deadline.



Assess your supply chain business continuity risk. IAEG developed a voluntary interview script to identify chemical product risk sources.

[You can access the interview script here.](#) 



Be aware of product reformulation or product obsolescence.



Communicate up and down the supply chain, using this as an opportunity to strengthen your supply chain relationships.





# RESOURCES AND TOOLS FOR YOU

## RELATED ECHA LINKS

- [Guidance in a Nutshell on Registration](#)
- [ECHA's REACH 2018 Roadmap](#)
- [REACH 2018 Leaflet - Stay on the Market - Register Your Chemicals](#)
- [Leaflet: Do You Export to the European Union?](#)
- [Know the Substances in Your Portfolio](#)

## IT TOOLS

The three tools below are used to complete the registration process. Go to ECHA's website to prepare and submit your registration:

- IUCLID to organise the data.
- REACH-IT to submit the information and keep it up-to-date.
- CHEMical Safety Assessment and Reporting tool (CHESAR) to prepare a chemical safety report.



## FOR MORE INFORMATION AND SUPPORT

- REACH 2018 web pages (available in 23 EU languages):  
<http://echa.europa.eu/reach-2018>
- Getting started with EU chemicals legislation:  
<http://echa.europa.eu/support/getting-started>
- Self-help material: <http://echa.europa.eu/support>
- Your national REACH helpdesk and ECHA's Helpdesk:  
<http://echa.europa.eu/contact>
- The Enterprise Europe Network (EEN):  
<http://een.ec.europa.eu/about/branches>





**IAEG** was founded in 2011 with a vision to advance innovative environmental solutions for the aerospace and defence industry.

Starting with 11 Founding members, now at 43 members, this collaboration forum is designed to address pertinent environmental issues that all member companies face. As we have grown, we have found tremendous value and synergy in working these non-proprietary issues together, for the betterment of the industry at large.

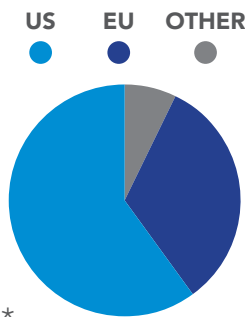
*Sally Gestautas*  
**Sally Gestautas**  
 Board Chair



**REVENUE FOOTPRINT**

**\$400 BILLION**

OUT OF AN APPROXIMATE \$700 BILLION INDUSTRIAL BASE\*



**EMPLOYMENT FOOTPRINT**

SLIGHTLY OVER **1 MILLION**



OUT OF A ROUGHLY **2 MILLION** INDUSTRIAL BASE\*

\*Deloitte, 2014 Global aerospace and defense sector financial report

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