



January 2008

Univar Europe SHE  
RC Product Stewardship

## REACH Bulletin – Customer Update 4.2



### Implementation of the REACH Regulations – Pre-registration



Dear Customer,

The REACH Regulations came into force on 1st June 2007. **“Pre-registration”** of chemical substances will take place **between June 2008 and November 2008**. Chemical suppliers and manufacturers are however already preparing for pre-registration. Pre-registration is a very important step in ensuring that chemicals can still be sold in the European Union after November 2008. After this date any product not “Pre-registered” will need to be fully registered and/or authorised to be sold in the market.

**Univar therefore intends to pre-register all substances it manufactures or imports. We are also encouraging all our EU suppliers to pre-register their substances.** Where we have concerns that a supplier/manufacturer may not pre-register in time, Univar intends to pre-empt this by helping with the registration of the substance. If and when we become aware of a substance that is not going to be registered, we will let our customers for that substance know as soon as possible.

Univar is working with trade associations (FECC – the European Association of Chemical Distributors and country chemical trade associations) as well as participating fully in European REACH committees to help create a workable system for collecting data required for the registration of products under REACH.

Univar has supported the production of a **common questionnaire** for customers to use in completing REACH information needed by their suppliers. The final version of this questionnaire **will not be available until early 2008**. Once available we will work with our customers to ensure that they are able to submit information to Univar using this standard questionnaire.

Please note: uses/applications are not required for pre-registration, only for full registration.

Below is some information on actions you may wish to take in preparing for the REACH registration process.

1. Make an inventory of all the chemicals you buy and handle by name and annual volumes (chemicals include: detergents, oils and lubricants, coatings materials, glues etc., not just "simple" chemicals i.e. acetic acid or soda ash).

2. List the supplier(s) for each product.

Pay special attention to products that you buy directly from outside the EU (Switzerland, Africa, India, Asia, America...) - these create additional burdens, as you will be the importer under REACH, and may be therefore classed as the manufacturer.

3. Identify the human health and environmental exposures related to each product and its use - at your own facility and at your customers (if applicable):

- Oral, Dermal, Inhalation, Waste Water etc.
- Accidental, Occasional, Frequent.

Rest assured that we shall be contacting customers and suppliers at the appropriate time to ensure registration of substances and applications. Customers with specific concerns can contact the Univar REACH centre using the email address [reachenquiry@univareurope.com](mailto:reachenquiry@univareurope.com) for advice.

**Univar REACH Team**

**Univar Europe**