



REACH ONLY REPRESENTATIVE

REACH 'Only Representative' services from WSP Environment & Energy - a leading global supplier of REACH services

REACH is one of the most challenging issues facing the international business community today. The new European Chemicals regulation could impact the majority of businesses exporting products to the European Union.

It requires all companies exporting products containing chemical substances to have them pre-registered with the European Chemicals Agency by 30th November 2008. Failure to register by this deadline will require companies to submit a full registration dossier or stop exporting to the EU. The most effective way for a non-EU supplier to pre-register their products is to appoint an Only Representative to act on their behalf. WSP can help you meet that deadline.

> Definition of the role of 'Only Representative'

As defined by the ECHA Registration guidance document: "Registration of substances imported into the EU on their own, in preparations or, in certain cases, in articles will have to be submitted by the EU importers. This implies that each individual importer needs to register the substance(s). Natural or legal persons that manufacture substances, formulate preparations or produce articles outside the EU cannot by themselves register a substance(s). However, although not responsible for any action under REACH, they can nominate an only representative established within the EU to carry out the required registration of the substance that is imported into the EU. This will relieve the EU importers within the same supply chain from their registration obligations, as they will be regarded as downstream users of the only representative."

> Is REACH a risk for my business?

Missing the November pre-registration deadline will have a serious impact on your business.

> What is REACH?

REACH, the **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals, is the new European Union (EU) Chemicals Regulation. It introduces major changes to the way chemicals are managed throughout Member States, and aims to provide greater protection to human health and the environment where chemicals are being produced or used.

> Will my company be affected by REACH?

Companies often believe that REACH affects only chemical manufacturers. In fact, any company based outside the EU that supplies products to the EU market could be affected. The scope of REACH covers:

- Chemical substances
- Preparations i.e. mixtures of substances – such as toiletries, paints, cleaning products
- Articles that are designed to deliberately release substances – such as aerosols, ink cartridges, denim jeans designed to fade and scented candles.

If your company exports any of these types of products to the EU then you need to take action today.

Non EU based manufacturers must ensure registration is carried out (for a substance or substances in preparations or articles) either by their importer or by an Only Representative acting for the company. A non EU based manufacturer cannot themselves register.

> Is an Only Representative the best option for a non EU based manufacturer?

Using an Only Representative means that you can:

- remove the REACH Registration burden from your EU customers
- continue to supply the EU after 30 November 2008

Furthermore, using an Only Representative enables you to:

- protect the confidentiality of your product information
- retain ownership of the Registration of your products
- control your costs

2 REACH Only Representative

> How much time does my company have to complete the registration process?

The REACH Legislation was formally published at the end of 2006 and came into force on 1 June 2007. The first key phase for businesses of all sizes runs from 1 June until 30 November 2008 – the **pre-registration phase**.

It is vitally important that all manufacturers with registration obligations, as outlined above, take advantage of the extended registration period by pre-registering before the 30 November 2008 deadline.

Failure to pre-register by the 30th November deadline will mean that manufacturers and importers will, from 1st December 2008, be required to fully register the substance with the ECHA before it can be supplied to the EU market or else stop importing. Therefore, from a practical perspective the work to pre-register needs to start now in order to complete before the window closes.



Missing the November pre registration deadline will have a serious impact on your business. We can help you meet that deadline, if you contact us now.

Contact Us

For more details of how WSP Environment & Energy will help you fulfil your REACH obligations, please contact:

Trevor Kilner
T: +44(0)20 3206 4930
E: reach@wspgroup.com



Alternatively, visit our website dedicated to REACH: www.reach-answers.com

www.reach-answers.com

www.wspenvironmental.com



REACH ONLY REPRESENTATIVE



> Why choose WSP to provide your Only Representative Service?

WSP has 9,000 staff globally and has a global team of highly qualified and experienced REACH experts. We are one of the market leaders in providing REACH services and we are here to help to ensure that your business risks, as a result of the new REACH regulation, are effectively addressed and managed to enable ongoing business in Europe.

Amongst our many REACH Services is our Only Representative Service.

We provide a dedicated and confidential Only Representative service to register your substances. We tailor our service to your exact needs and can work with you on some or all of the following:

- identify substances you require to register
- execute all aspects of the pre-registration process
- safeguard your interests by participating in the relevant Substance Information Exchange Forums and Consortia
- classify substances according to Globally Harmonized System for classification and labeling
- communicate with downstream users to identify uses and develop exposure scenarios where necessary
- submit registration dossiers
- distribute safety data sheets and subsequent updates to downstream users
- track volumes of your substances imported into the EU