

# Preparation for preregistration under REACH

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Estonia



**SILMET**

Rare Earth Metals  
Rare Metals



*2nd follow up seminar*

*Train the trainer on REACH and RIPs*

*05-06 March 2008*

*Krakow*

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# Preregistration – why?

- To get phase-in status for your substance
  - To take advantage of that transitional period
    - ✓ To decide on a business strategy for your substance
    - ✓ To prolong the period for deciding about which chemicals should be registered
    - ✓ To distribute the costs for registration and testing within the transitional period
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# Preregistration – why? (2)

## Business strategy:

– Gradually cease operation by the end of the transitional period, if the registration and testing costs are considered too high

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preregistration will not bring about the obligation to register

- Early registration to get commercial advantage over your competitors

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# Preregistration – what is required?

## 1. Training

### 1.1 General training on REACH - workshops

- Estonian Association of Chemical Industry & CEFIC
- European Chemical Regions Network (ECRN) – Ida-Viru country is a member
- Consulting companies – few in Estonia

### 1.2 Training on use of the IT-tools

- March 12-13, 2008, training on IUCLID 5 arranged by Estonian Association of Chemical Industry
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# Pre- registration – what is required? (2)

## 2. Funds

- no preregistration fee and testing costs
- mostly personnel and training costs
- participation in CEFIC workshops financed by TAIEX

**Preregistration is not especially financially burdening**

- **But realize that you will be linked to a SIEF, with administrative burden**
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# Preregistration – what is required? (3)

## 3. Information

- Inventory of substances you produce or import (including substances in preparations)
  - Tonnage band / deadline for registration
  - Intermediate, PPORD substance, polymer, mono- or multi-constituent substance?
  - Options for grouping or read across
  - Company's role in supply chain – manufacturer, importer, downstream user?
  - Decide on Third Party Representative
  - Decide on import status of OR
  - What the suppliers and customers plan to do?
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# Pre-registration – what is required? (4)

- 4) What to pre-register?
  - All substances you produce
  - All on site isolated and transported intermediates
  - Non-registered monomers of polymers if > 2%
  - Substances you import (also in preparations)
  - Substances in articles you import if intended to release, dangerous and > 1t/a

**Note: it is advised to pre-register substances in Annex IV and V, as this will be revised and we don't know yet the outcome**

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# Special features for Estonia

- Large share of suppliers from non-EU countries (Russia, other CIS countries)
    - Special attention for Importer or OR !
  - Large-scale oil shale processing – unique for Europe
  - Rare earth (lanthanide) and rare metal (Nb and Ta) processing – only few companies in Europe
  - Most of companies are SME-s
  - 16 companies gives ca 80% of Estonian chemical industry's turnover
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# Issues arising

- Lot of companies in Russia (CIS) have not yet made decision about pre-registering and registering their products in EU under REACH by their appointed Only Representatives

What to do?

- ✓ Switch over to EU suppliers, if possible
  - ✓ Preregister (and possibly register) the used substances by yourself
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## Issues arising (2)



### ■ Oil shale chemistry

- ✓ Oil shale and crude shale ole should be included in Annex V by clear analogy – joint effort of companies and Ministry of Social Affairs is needed
  - ✓ List of substances (including intermediates) for preregistration to be specified
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## Issues arising (3)

- ✓ Waste is excluded from REACH – but what if waste material will be used as raw material for new products?
  - ✓ Production of resins (phenol-formaldehyde or urea-formaldehyde resins) – should the pre-polymers be considered as polymers or as monomers?
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## Issues arising (4)

### ■ **Production of lanthanide compounds**

- ✓ Quite a large number of individual substances (60 substances planned for registration by the future consortium)
  - ✓ Lot of substances with very similar toxicological properties – grouping and read across clearly applicable
  - ✓ Problems with multi-constituent substance approach under REACH (see case study)
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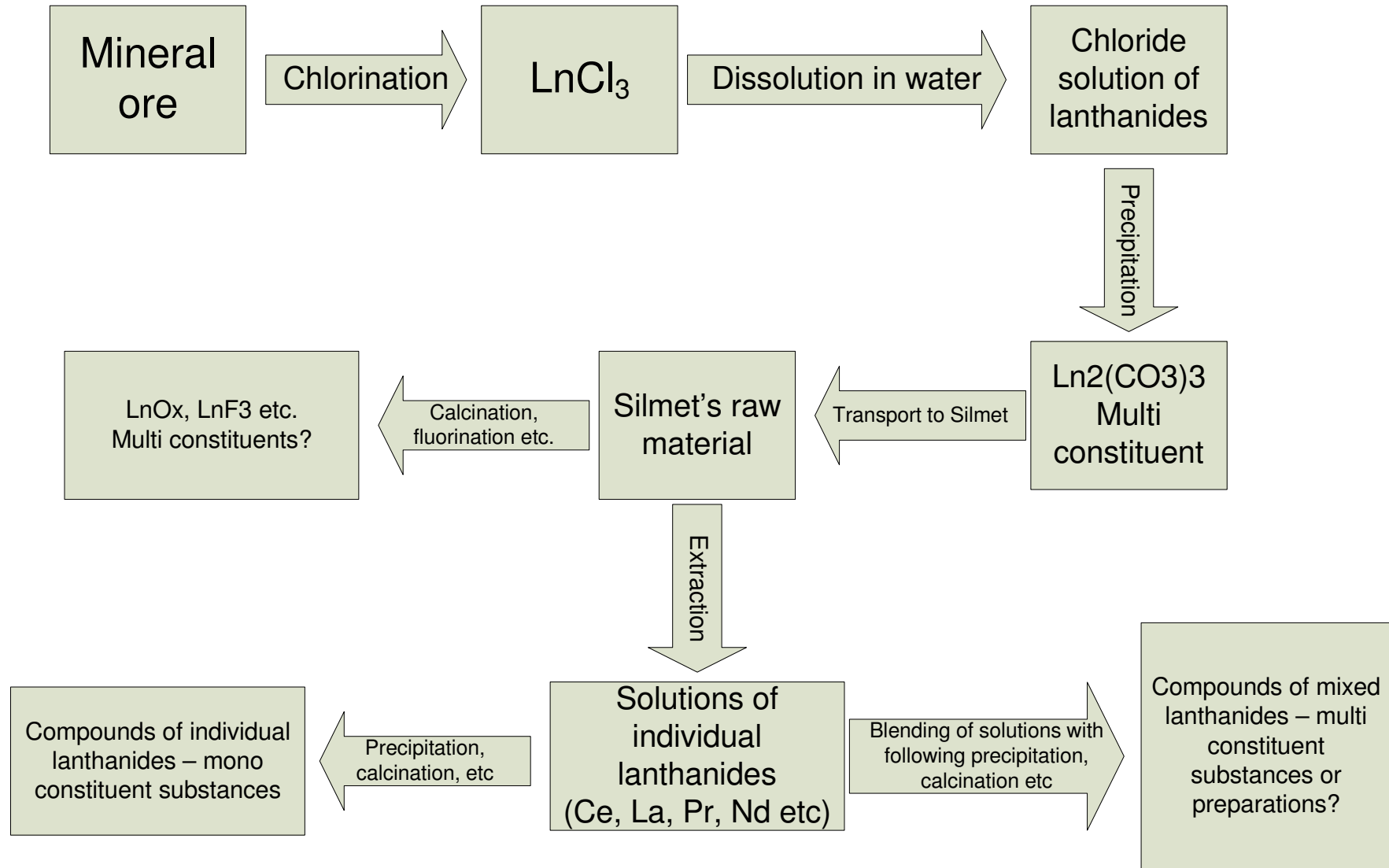
# Case study

Lanthanides are widely used in many branches of industry both as individual compounds and as compounds of nonseparated or mixed lanthanides.

AS Silmet in Estonia also produces the compounds of individual lanthanides, as well as mixed lanthanide compounds.

- Compounds of individual lanthanides (e.g. 99% Praseodymium Oxide) are clearly monoconstituent substances
  - There can be problems with classification of mixed lanthanide compounds
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# Case study (2)



An aerial photograph of an industrial complex, likely a steel mill, situated near a large body of water. The facility features numerous buildings, several tall smokestacks emitting white plumes, and various storage tanks. A prominent feature in the foreground is a large, irregularly shaped body of water with a sandy or silty shoreline. The surrounding area includes green fields and some infrastructure like roads and parking lots. The text "Thank you for your attention!" is overlaid in the center of the image.

Thank you for your attention!