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European REACH Regulation

Registration, Evaluation, Authorisation and Restriction of Chemicals

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Introduction

The purpose of this application note is to provide a formal response to the many different customer requests for information on REACH with respect to Syfer Technology Ltd.

This application note provides:

- A brief summary of REACH regulation.
- How REACH is being addressed by Syfer.
- Frequently Asked Questions.

This application note is not intended as a guide to REACH. REACH is a complex regulation that has different impacts on different organisations depending on the location of the organisation and product being produced.

The central coordination and implementation role for REACH is being conducted by the European Chemicals Agency (ECHA) based in Helsinki, Finland. For further information on REACH regulation, guidance documents and a glossary of terms used refer to the ECHA at <http://ec.europa.eu/echa/>.

REACH Summary

REACH (**R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals) is a European Union regulation that requires compulsory registration of substances manufactured or imported into the EU in quantities of 1 tonne or more per year. The regulation applies to substances on their own, in preparations or in articles (providing certain article threshold limits apply).

The main purpose of REACH is:

- To provide a high level of protection of human health and the environment from the use of chemicals.
- To ensure that organisations placing chemicals onto the market (manufactures and importers) understand and manage the risks associated with the use of the chemical
- To allow the free movement of substances on the EU market.
- To enhance innovation in and the competitiveness of the EU chemicals industry.

Registration is required if:

- Substance quantity > 1 tonne per year either manufactured or imported (note that tonnage thresholds are per manufacturer or importer not per preparation).
- Articles:
 - If the substance is intended to be released and in quantities > 1 tonne per year.
 - If the substance is not intended to be released, but it is classified as a Substance of Very High Concern (SVHC) such as CMR (Carcinogenic, Mutagenic or Toxic to Reproduction) then if >1 tonne per year and concentration is >0.1% (w/w).

If a substance is not registered under REACH, it cannot be manufactured, imported or supplied to the EU market at or above 1 tonne per year unless exemptions apply.



Exemptions are listed in REACH annex IV and annex V such as radioactive substances, waste, recycled substances (providing same substance as previously registered) food, substances used in the interests of defence, medicinal products, low risk substances such as oxygen and water, naturally occurring substances such as minerals and ores – providing that they are not chemically modified.

Key REACH Dates

- 1 June 2007: REACH came into force.
- 1 June 2008: European Chemicals Agency becomes operational.
- 1 June 2008 to 30 November 2008: Pre-registration period.
- 1 December 2008: Registration for existing substances (that have not been pre-registered) starts.
- 1 January 2009: List of pre-registered substances published and SIEFs (Substance Information Exchange Forum) formed
- 1 June 2009: First recommendation of priority substances to be considered for authorisation published by ECHA.
- 1 December 2010 **PHASE 1**. By this date the following pre-registered ‘phase-in’ substances should have been registered when supplied at:
 - ≥ 1000 tonnes per annum or;
 - ≥ 100 tonnes per annum and classified under CHIP (Chemical Hazard Information and Packaging for Supply regulations) as very toxic to aquatic organisms or;
 - ≥ 1 tonne per annum and classified under CHIP as Cat 1 or 2 carcinogens, mutagens or reproductive toxicants
- 1 June 2013 **PHASE 2**. Deadline for registration of substances supplied at ≥ 100 tonnes per annum.
- 1 June 2018 **PHASE 3**. Deadline for registration of substances supplied at ≥ 1 tonnes per annum.

Syfer REACH Activities

Syfer maintains both ISO14001 (Environmental Management System) and OHSAS 18001 (Health & Safety Management System) approvals. Part of the criteria to be approved to these management systems includes formal processes to ensure that Syfer is compliant with existing relevant legislation and that Syfer evaluates and implements corresponding actions with respect to new relevant legislation.

REACH is one of the regulations that is relevant to Syfer and actions/ processes have been implemented to:

- Evaluate the supply chain to ensure that there is no risk to the continued supply of product to Syfer and to Syfer’s customers. Where products/ substances are within REACH registration threshold criteria then confirmation has been obtained from suppliers that registration requirements will be met.
- Review new Safety Data Sheets issued by suppliers to confirm that Syfer exposure scenarios have been included. If not included then corresponding action will be taken.



- Evaluate REACH requirements with respect to any new supplier and/ or new products.
- Periodically monitor Syfer substance usage to identify potential registration requirements for substances currently not requiring registration. For example, if a substance currently used < 1 tonne is started to be used >1 tonne.
- Monitor changes to REACH legislation such as updates to the candidate list of SVHC (Substance of Very High Concern) and implement actions where required.

Frequently Asked Questions

The purpose of this section is to provide answers to the frequently asked questions submitted by customers regarding Syfer and REACH requirements.

Frequently Asked Questions	Syfer Response
Where is the Syfer manufacturing facility?	Syfer’s factory is located in the United Kingdom within the EU.
Is Syfer aware of REACH requirements?	Yes
How is Syfer classified with respect to REACH?	Syfer is a downstream user producing/ supplying articles
Has Syfer evaluated REACH implications with respect to suppliers?	Yes
Has Syfer contacted suppliers to confirm registration requirements?	Yes
Will there be any disruption of supply from Syfer to customers?	No
Will there be any products manufactured by Syfer which will be withdrawn as a result of REACH?	No
Are substances (SVHC) within components (articles) supplied by Syfer listed on the Candidate List?	No
Will Syfer monitor changes to REACH such as Candidate List updates and implement actions?	Yes
Do articles supplied by Syfer contain substances intended to be released in quantities > 1 tonne per year.	No