



European
Automobile
Manufacturers
Association



C L E P A
European Association of
Automotive Suppliers

Brussels, 28th June 2016

To all suppliers

Subject: REACH Registration - 2018 Deadline

The Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (EC) 1907/2006 requires that manufacturers and importers of substances at over 1 tonne per year register those substances by deadlines that depend on the annual volumes. The final REACH registration deadline of 31 May 2018 for substances manufactured in or imported into the EU at 1 to 100 tonnes per year will see the highest number of registrations to date.

REACH registrations require a large internal company effort as well as high costs (e.g. for external consultants, certified laboratory testing, letters of access and registration fees). This could lead some companies, especially small and medium-sized enterprises (SMEs), to decide not to proceed with REACH registration, and instead to remove the affected substances from the market. This in turn could lead to production interruptions in the supply chain which relies on those substances, unless changes to alternate materials or suppliers are managed effectively.

In cases where companies choose to proceed to register their substances, the very large numbers of substances requiring registration by the 31 May 2018 deadline may lead to consultants and test laboratories being fully booked well in advance of the deadline.

The European Automotive Manufacturers Association (ACEA) and the European Association of Automotive Suppliers (CLEPA) have therefore issued the following recommendations to the automotive supply chain in order to minimise any potential disruption resulting from the registration deadline:

- Start now! Determine if you have any REACH registration obligations for the 31 May 2018 deadline, and decide whether you will proceed to register or not.
- If you are not a substance manufacturer or importer, contact your suppliers directly to confirm their registration plans for any substances on which your business relies; send this or a similar letter to your own suppliers to pass this consistent message along the supply chain.



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- If you plan to be a registrant, plan your registration actions, ideally through the relevant substance information exchange forums (SIEFs); include timing and budgets for external consultants, certified laboratory testing, letters of access and registration fees.
- If you plan not to register a substance that you manufacture or import, contact your customers as soon as possible in order to plan and implement the necessary actions to substitute the substance without business interruptions.
- If you are informed by ECHA or otherwise that no lead registrant has been announced yet for a substance on which you rely, inform your customer immediately to start discussions on actions.
- For more information, see the attached overview of REACH 2018 issues, which has been prepared by the French automotive industry, and refer to the Automotive Industry Guideline for REACH for guidance (available for free download at www.acea.be/reach).
- If you have a general question to vehicle manufacturers about these recommendations, please send an email to reach@acea.be.