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To Whom It May Concern

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REACH Statement Registration Numbers_VCI.doc

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REACH

**Should pre-registration numbers be given or respectively be demanded in the supply chain?
What significance does a pre-registration number have?**

Dear Customer,

The REACH regulation does not provide for a pre-registration number, but only for a registration number.

The ECHA assigns an own pre-registration number (structure: 05-xxxxxxxx-xx-0000) for each substance that has been pre-registered by a company (legal person) after the successful submission of the pre-registration data. This number is generated separately for each combination of a substance and a legal person. Thus, the same substance is assigned different pre-registration numbers, if it is pre-registered by different producers / importers.

As especially downstream users want a simple document as evidence that they only buy pre-registered or registered substances in addition, it was discussed whether pre-registration numbers could be used for this purpose.

In practice, one and the same substance for use in a specific formulation is often purchased from different producers depending on the availability, the current price, etc. If then, the pre-registration numbers are always passed on to the customers, new combinations of pre-registration numbers for the purchased components would have to be documented every time, they would have to be assigned to specific deliveries and communicated to the customers. As the pre-registration numbers are not substance-specific, new customers cannot attribute new numbers to certain substances, so that in case of changes, they could erroneously assume a reformulation (for the substitution of one or more pre-registration numbers as well as for the adding of additional pre-registration numbers for the same substance from different sources).

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The communication of pre-registration numbers to customers would require a significant administrative effort throughout the entire supply chain – not only for the producer / importer, but also for the downstream users and dealers, who would have to document the numbers and assign them to specific batches and freights and pass them on to their customers. As batches of a substance or a formulation that were bought in addition rarely go one-to-one into a single batch of an own formulation of a formulator and supply chains can be very complex, this would quickly result in a situation that is not manageable anymore.

A customer, who is informed about pre-registration numbers has no possibility to check with ECHA, whether a pre-registration has been carried out for a pre-registration number that has been communicated to him. The ECHA will only publish the names of the pre-registered substances in early 2009.

With regard to the promise of a producer / importer that a certain substance or the substances subject to registration contained in a formulation (or a product) were pre-registered, no additional certainty about any completed pre-registrations can be obtained by means of the transmission or query of pre-registration numbers.

The members of the VCI committees that are responsible for the subject matter of the REACH implementation therefore prefer the assurance of the pre-registration over the transmission of pre-registration numbers.

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