

Häufig gestellte Fragen - FAQ

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Should pre-registration numbers be communicated or demanded in the supply chain? What is the informative value of a pre-registration number?

The REACH Regulation does not provide for any pre-registration numbers; the text of the Regulation mentions exclusively a registration number.

Following the submission of pre-registration data, the European Chemicals Agency (ECHA) assigns an own pre-registration number (structure: 05-xxxxxxxxxx-0000) to each individual substance, which was pre-registered by a company (legal entity). The number is generated separately for each combination of substance and legal entity. Thus the same substance – where pre-registered by different manufacturers/importers – is given different pre-registration numbers.

It was discussed whether pre-registration numbers can serve – especially for downstream users – as straightforward proof of having purchased only pre-registered or registered substances.

In practice, one and the same substance for use in a specific preparation is often obtained from different manufacturers, depending on availability, current price etc. If pre-registration numbers were always communicated to customers, ever new combinations of pre-registration numbers for the respective constituents would need to be documented, allocated to specific deliveries and communicated to customers. As pre-registration numbers are not substance-specific, customers themselves cannot match new numbers with certain substances. Consequently, in the event of changes they might erroneously assume a change in formulation (both when exchanging one or several pre-registration numbers and when adding further pre-registration numbers for the same substance from different sources).

Communicating pre-registration numbers to customers would cause a considerable amount of administration along the entire supply chain – not only for manufacturers/importers but, in particular, also for downstream users and distributors, who would have to document the numbers, match them with specific batches and deliveries, and pass them on to their recipients. As a purchased batch of one substance or formulation is rarely fully used in just one single batch of an own preparation of the formulator and as supply chains can be highly complex, this would soon lead to an unmanageable situation.

A customer, who is informed about pre-registration numbers, has no possibility to find out from ECHA whether a pre-registration was made for the pre-registration number communicated to him. In early 2009 ECHA will publish exclusively the names of pre-registered substances.

Consequently, communicating or demanding pre-registration numbers cannot provide any extra certainty about pre-registrations made – additionally to a confirmation by the manufacturer/importer that a certain substance or substances in a preparation (or an article) which require registration were pre-registered.

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