EFEO INFORMATION
REACH Registration deadline: 31st May 2018 is coming closer

ACT NOW:
NO REGISTRATION - NO MARKET!

Status: 29th July 2016

The last registration deadline under REACH will expire in less than 2 years from now:

- After 31st May 2018, each Essential Oil/natural complex substance (NCS) > 1 ton p.a. used i.a. as ingredients in fragrance and/or oral care application may only be further produced or imported if registered with the ECHA (European Chemical Agency).

- Otherwise, production and import will have to be suspended and can only be resumed after the submission of the dossier.

The following recommendations are particularly addressed to importers/producers who have pre-registered and thus are part of a pre-SIEF in a “dormant” position but have not made any further efforts towards registration mainly because they have not yet conclusively decided whether or not to finally submit a dossier.

I. Start now - check your portfolio and decide!

EFEO recommends to urgently identify those pre-registered Essential Oils/NCSs you wish to further produce in the EU or import into the EU as from 1st June 2018, for purposes not exempted from REACH registration and above 1 ton/per year. Quantities for use in food, feed, and pharma do not count, but you should make sure that evidence for such exempted applications can be provided.

Your partners in the supply chain (downstream users) expect clarity about your continued supply after May 2018. Please also be aware that all obligations under REACH will apply as provided for in REACH Regulation (EC) 1907/2006, so do not expect any exemptions or further transition periods to be granted by legislation, neither in general nor with a view to your specific NCS!

In consequence, for each substance under REACH in your portfolio, you should now urgently decide to register or not.

II. Join the guided NCS EFEO REACH consortia!

In order to register in time, EFEO urgently recommends to join one or more of the respective EFEO guided REACH registration consortia, such as e.g. Citrus Oils or Mint Oils, and/or the several consortia grouped by the main constituents of important NCSs like Cineol or Citral covering a broad range of Essential Oils/NCSs traded in commercial practice. Access to the EFEO Consortia: See section III below.
By the way: Of course, you do not need to be a member of EFEO if you wish to join an EFEO guided consortium. But please consider that only EFEO members benefit from additional information and support offered by our association. For more information, see EFEO website, REACH section.

III. How you should proceed now: Contact EFEO!

EFEO provides “first aid” for those who decide to start their registration efforts now, and will serve as a central contact point:

| EFEO contact: efeo@wga-hh.de; phone +49 40 236016 - 0; fax +49 40 236016-10 |

The EFEO Secretariat will support you with general information and advice on REACH-related general matters, such as the registration obligation under REACH. More technically related matters will be forwarded to EFEO’s Technical Committee and/or EFEO’s REACH consultants, as the case may be.

EFEO will particularly assist you to identify and access the relevant EFEO guided consortia or advise you in cases where your essential oil/NCS is not covered by an existing EFEO guided consortium.

- When contacting the Secretariat (preferably by e-mail to efeo@wga-hh.de) please do not forget to provide us with some minimum information: Your role in the supply chain (Importer? EU producer? Non-EU Company? Only Representative?); precise denomination/description of your essential oil(s)/NCS(s) i.e. trade name, botanical name, CAS/EINECS number; preferably intended volume band for REACH registration. EFEO will not share any confidential information!!

- EFEO will respond directly to your inquiry, or forward your message to the relevant consortium contact (Lead registrant/Coordinator) or EFEO consultant, as the case may be.

If a particular essential oil/NCS should not be covered by one of the existing EFEO consortia as mentioned above, your product might fit in a specific branch related consortium not accompanied by EFEO. If the substance you would like to register is a chemically defined fragrance material, IFRA might be the competent organization to address.

IV. Make use of all information sources available!

With a view to the specific problems of Essential Oils/NCSs, EFEO has elaborated a variety of information documents in order to support and guide their members which are also open to non-EFEO members, see our website, REACH section.

Further there is general information and guidance as well as specific information relating to NCS/Essential Oils available on the ECHA webpage.

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E.F.E.O.

European Federation of Essential Oils