



Is there an obligation to register coatings/primers applied to castings?

No. There is no specific obligation to register coatings/primers applied to castings.

Under REACH, the application of a coating constitutes 'light processing', meaning that it is regarded as part of the production process of a casting classified as an article. Once a primer/coating has been applied to a casting it is no longer regarded as a 'separate' substance but as part and parcel of the article, so that registration is not mandatory.

But the situation is different whenever a **customer requests the application of a paint that is exclusively manufactured and distributed outside the EU**. In these cases, foundries are obligated to register such paints because they have to be imported into the EU. To circumvent the obligation to pre-register or register, a foundry may either stop applying this particular paint and propose to its customer that another paint be used which is already registered or pre-registered in the EU. Alternatively, it may refer its customer to the option of appointing a so-called 'only representative'. However, such an only representative, who must be resident in the EU, should be nominated by the manufacturer of the special paint in question. As the representative would assume any and all obligations to register and/or pre-register, the foundry would merely appear as a downstream user of the paint who is not under any obligation to register. As this option is bound to appear relatively impractical to the paint manufacturer because of the effort involved, it is best to begin looking for alternatives to the paint currently used as early as possible.