

Information session on changes in REACH Registration process: meeting report

Summary

This session was jointly organised by ECHA and some industry associations to provide stakeholders with an overview of the upcoming changes in tools and processes involved in the registration of substances under REACH.

The session covered both the drivers behind the revision as well as some detailed explanations of the upcoming changes. Although no major issues were raised, many questions were clarified during the discussions. More detailed support to registrants will follow in terms of training and material.

Meeting report

ECHA and some industry associations representing registrants (Cefic, Eurometaux, Concawe and FECC) organised this information session on the 4th of November 2015. The event was attended by 200 participants ranging from companies, consultancies, NGOs and Member States.

The purpose of the session was to inform stakeholders on the upcoming changes including the update of the completeness check process, changes in the IT tools and the implementation of the One Substance One Registration principle.

The event was introduced by Mike Rasenberg from ECHA. He mentioned that after 7 years of activities around registration, ECHA has decided to revise the tools and processes to meet a number of issues ahead of the next registration deadline.

A number of presentations followed to explain the drivers behind these changes:

Adolf Eisenträger from the German authorities UBA presented a study carried out by his organisation which has led to a number of observations on the quality of the existing registration dossiers. He also had some recommendations based on these observations.

Geert Boeije, from the International Antimony Association, explained the problems faced by the consortium in this sector, due to the registrations submitted by a company outside of the joint submission. He welcomed the reinforcement of the joint registration obligation.

Barbara Dallinger, from UEAPME, brought the issues of the SMEs in the context of SIEF discussions. Transparency and fairness of cost sharing are the most important concerns for the next registration deadline in 2018.

Finally, Vito Buonsante, from ClientEarth, supported the need for enhanced dissemination of information to the general public.

Jos Mossink from ECHA, explained that the upcoming Implementing Regulation on data sharing from the Commission has given the task to ECHA to strengthen the implementation of the OSOR principle (One Substance One Registration). He explained how ECHA will implement this task which covers two areas: the REACH-IT system will ensure that there are no submissions

Internal/Restricted/Highly restricted

outside of joint registrations, and a substance identify profile (SIP) in the registration dossier will allow members of the joint registration to make sure that the substance properties covered by the registration dossier cover their substance and ECHA to understand the boundaries of the joint registration. There were some discussions on how to deal with the existing registrations that were submitted until now outside of joint registrations. ECHA will reflect on how to tackle this best, but mentioned that it is a complex issue.

Javier Sanchez from ECHA explained the upcoming changes to the completeness check: a revision of the automated rules to circumvent shortcomings of the previous rules and the introduction of a manual verification step aimed at blocking dossiers with manifestly irrelevant data provided instead of required information. During the questions that followed, he clarified that the deadlines set for the completeness check by ECHA in the legal text have not changed so even if the manual verification step is included, the deadlines will be respected.

Mike Rasenberg presented the next versions of the IT tools to be released by mid-2016: REACH-IT and IUCLID 6 including some new features to simplify the submissions particularly for SMEs. He also explained how the new IUCLID fields may allow companies to 'make their case' better in order to prevent an irrelevant selection of substance for further scrutiny for regulatory action after registration. He mentioned the currently envisaged dates for publication of test and final versions.

Violaine Verougstraete from Eurometaux explained the new concept of Assessment entity introduced in IUCLID to facilitate the reporting of the assessment of complex substances for which different sets of properties are relevant to assess the uses.

Francisco del Castillo from Concawe presented the recent efforts of his sector to improve the information on uses in the registration dossiers. He highlighted that the efforts have led to a clearer overview of actual uses of petroleum substances and the tonnages involved, resulting in a significant reduction of the number of Substances in scope of the SVHC Roadmap.

The next version of the Chemical Safety Assessment and Reporting tool Chesar developed by ECHA was introduced by Hélène Magaud from ECHA. She provided an overview of improvements in the next versions of Chesar including the version 3 to be released at the same time as IUCLID6 in mid-2016.

Leo van der Bissen from Royal Haskoning, listed the benefits that he has found using Chesar and encouraged others to use it.

The last part of the day was devoted to the dissemination of non-confidential information from registration dossiers on the ECHA website. Christel Musset from ECHA, explained the enhancements that will be put in place in the coming months in order to facilitate the search and use of the published information. Erwin Annys from Cefic, added that industry is working on a project which intends to use this disseminated information to enhance its usability. Both speakers supported the need to explore the availability of information in a downloadable format.

Mike Rasenberg concluded the event with a summary of the discussions. He emphasized that ECHA plans to continue to raise awareness on these changes to ensure a smooth registration deadline. His main message was that industry needs to prepare and get familiar with the registration tools and processes for their next new registrations and updates. ECHA is committed to continue to support companies.

In conclusion, the event provided the participants with a lot of information and an overview of the upcoming changes. All the information including the presentations are available here: <a href="http://echa.europa.eu/news-and-events/