

18 April 2018

## Tips of the week for REACH 2018 registration

**18 April:**

### Avoid the most common business rules failures

Have a look at the most common business rules failures that happen during dossier submission in REACH-IT, why they happen and what you can do to avoid them. As these particular failures cannot be detected by the Validation assistant in IUCLID, it is important that you pay attention to them.



To avoid some of the most common mistakes make sure that you indicate:

- the same substance identity in the IUCLID dossier as the one indicated in the joint submission;
- the correct inquiry number in section 1.3 of IUCLID, if you have submitted an inquiry;
- the correct reason for updating the dossier header and the correct last submission number, in case of an update.

Always remember to run the Validation assistant on your dossier before submitting it to avoid failing any other business rules.

[Q&As on business rules](#) | [From submission to decision](#)

### Are you a downstream user? Check if your substance is being registered

If your supplier manufactures or imports a substance in amounts of more than one tonne per year, it is likely that it should be registered. Check if the substance you rely on for your operations in the EU has already been registered by checking the registered substance database. If your supplier has registered the chemical for your uses, you are covered.

If your chemical has not yet been registered, you can check in the lead registrant list if there is a company that is still planning to register it. We expect this list to grow in the coming weeks so keep an eye on it!

If no supplier intends to register your substance, consider importing it yourself and register.

[Registered substances](#) | [Lead registrant list](#) [xls] | [REACH registration and downstream users](#)

**11 April:**

### Submit your inquiry successfully

Before submitting your inquiry dossier to ECHA, make sure that all the relevant information has been included. In addition to checking your dossier with the Validation Assistant in IUCLID,

make sure that the identity of your substance and its composition (reported in sections 1.1 and 1.2 of IUCLID) are consistent and supported by the analytical data (attached in section 1.4. of IUCLID). This is key to successfully receiving your inquiry number.

For UVCB substances, you need to report the description of the manufacturing process. Use the free text template for the field 'Description' in section 1.2 of IUCLID to guide you on how to fill in this information. More help is available on page 22 of the manual 'How to prepare an inquiry dossier'.

[Manual](#)

#### 4 April:

##### **Are you in the correct SIEF?**

If you realise that the substance you pre-registered is clearly different from that of the other pre-registrants, you may want to join another substance information exchange forum (SIEF). This may also be the case if you find out that your substance is different during discussions on substances sameness.

It is important to remember that whether you find a more suitable SIEF or not, you must register your substance using the correct identifiers, which have to be consistent with the analytical data on your substance, even if they are different from the ones used in your pre-registration.

The lists of pre-registered and registered substances are useful tools for looking for a more suitable SIEF. Take a look at our Q&A for more advice.

[Information on chemicals \(includes the lists\)](#) | [Q&A](#)

#### 28 March:

##### **Short of time? Make your life easier by using IUCLID Cloud**

IUCLID Cloud offers SMEs and their consultants a simple and easy collaboration platform for preparing lead and member REACH 2018 dossiers. With the cloud service, you will get:

- access from anywhere, at any time to ECHA's own private, secure cloud;
- the latest version of the IUCLID application;
- regular and automated data backups by ECHA;
- easy and transparent online collaboration – you can cut down on the number of local copies and improve data security;
- responsive, 24/7 online support.

[ECHA Cloud Services](#) | [Animation](#)

## 21 March:

Tip of the week: Report your uses and prepare your chemical safety assessment with the help of use maps

When preparing a registration, you need to include information on the uses of your substance, including those of your customers. Use maps can help you to describe the uses in a standardised way based on the information from certain downstream user sectors.

The use maps will also give you information on the conditions of use, which can help you carry out the chemical safety assessment and to prepare a chemical safety report (CSR) that you need to include in your dossier if you register a substance for above 10 tonnes per year.

[Use maps](#) | [Phase 4 of REACH 2018](#)

## 14 March 2018:

### **Are your REACH tests going to be late for the registration deadline? Contact us!**

If the tests results for your substance will not be available before the 31 May registration deadline, contact us as soon as possible and before submitting your dossier.

You can benefit from solution 10.3 of the Directors' Contact Group (DCG) – a situation where data is not available by the registration deadline - provided that you have ordered the tests related to data required in annexes VII and VIII to REACH by 31 March. If this is your situation, contact us and you will receive instructions from us on what to do next.

If you are experiencing the above or any other exceptional difficulty in completing your registration in time, check if the solutions developed by the DCG would be of help! Keep in mind that you need to apply for a DCG solution as soon as possible to register before the registration deadline on 31 May.

[DCG solutions](#)

## 7 March 2018:

### **Keep your contact details up to date in REACH-IT**

Whether you are a lead registrant or a member of a joint submission, remember to keep your contact details up to date in REACH-IT. By doing this, you ensure that the other members of the joint submission can easily contact you when necessary. If you are not sure how to do it, check out our new video for practical advice.

[Video](#)

### **Find your lead registrant**

The easiest way to find the lead registrant of your substance is to look for it in REACH-IT. Our new video shows you how to do it. You can also consult our Q&A on the topic.

If there is no lead registrant yet, consider taking up the role yourself. After you have the consent of your co-registrants, create a joint submission in REACH-IT to allow the other potential registrants to find you. If you agree, your name will then also be published in the

lead registrant list on ECHA's website. Downstream users can also check this list to know if their substance of interest is going to be registered.

Additionally, if you think that you are not part of the correct pre-SIEF and the identity of your substance is different to the one you pre-registered, you can find your lead in the lead registrant list or contact ECHA for help.

[Video](#) | [Q&A](#) | [Lead registrant list](#) | [Contact ECHA](#)

## **28 February 2018:**

### **Communicate clearly within your SIEF**

Companies registering the same substance (co-registrants) have to make every effort to reach an agreement on sharing data, submitting together and sharing costs in a fair, transparent and non-discriminatory way.

If a company that has the role of lead registrant does not reply to your emails, try contacting them by other means of communication, e.g. registered letter, telephone, identifying other people in the company, and keep record of your efforts. If you still do not get a reply, contact ECHA.

[Practical advice](#)

## **21 February 2018:**

### **Avoid unnecessary testing on animals**

Under REACH, testing on vertebrate animals can only be used as a last resort to fulfil information requirements for registration. There are multiple ways for you to avoid testing on animals when preparing your REACH 2018 dossier. Have a look at the advice on our website.

[How to avoid unnecessary testing on animals](#) | [Practical guide](#)