

REACH 2018

webinars

Last minute advice for registrants
Before submitting your dossier

8 March 2018

11.00 – 12.00 Helsinki time

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Before submitting

- Joint submission obligations
- Correct set of IT tools
- Exceptional situations
- Admin checks

Joint submission obligations



Joint submission: lead registrant

- Make sure you have support from your SIEF
- Create joint submission in advance
 - Potential co-registrants can find you
 - Allow publication on list of joint submissions
 - Members can start signing up

Joint submission: lead registrant

- If joint submission created by “unsupported lead”, contact us for Lead role verification
- If substance identity changed since pre-registration, create joint submission with correct substance identity, but include pre-registration number in the dossier

Joint submission: members

- Find your joint submission
 - Available in REACH-IT (if substance pre-registered or registered)
 - Our website: list of joint submissions (if lead has agreed on publishing company name)
 - Dissemination pages: list of companies who have registered the substance (unless company name claimed confidential)

Joint submission issues

- Unresponsive lead
 - Contact us
 - If lead doesn't respond or exist => new lead required
- Lead not supported anymore
 - Contact us
 - Lead role verification
- Technical issues with joint submission (jointly submitted documents, type, tonnage band, etc.)
 - Contact us

Lead role verification

- Lead acting unilaterally, doesn't have support of SIEF, etc.
- Contact us describing the situation and request for lead role verification
- We send a letter to all (pre-)registrants of the substance for information on lead
- Clearly indicate supported lead
- We implement the request of the majority

Correct set of IT tools





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IT tools designed for you

Large companies with
at least one lead
dossier

SMEs

Member registrants
with one composition
(online dossier)





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Supporting tools

- Use them in IUCLID 6
 - Validation assistant
 - Fee calculator
 - Dissemination preview
- Free to use, included in IUCLID 6
- Advance information on your dossier

Exceptional situations



Directors' Contact Group (DCG)

- Informal group, founded in January 2010
- ECHA Directors, European Commission and nine industry associations
- Solutions for companies in exceptional situations

DCG solutions

- Mixture importer does not obtain substance identification information from non-EU supplier
- Delays in obtaining Annex VII and VIII test results
- Legal entity change – one company without pre-registration
- Lead registrant disappears, no complete submission
- SIEF without EU manufacturer/importer: Downstream user decides to start importing

Applying for the solutions

- Contact us before submitting your dossier
- Start with the [DCG webpage](#)
- Read **Notice on the use of the DCG solutions** to understand what supporting documents are needed and the expected consequences
 - We give further instructions after you contact us
- Note
 - Delay in obtaining results of Annex VII/VIII tests: tests have to be ordered by **31 March 2018** at the latest
 - You have to apply for a DCG solution by **24 May 2018**

Admin checks



Are your details up-to-date?

- Check contact details
 - General company contact details
 - Contact details of the person assigned to registrations / joint submission
- Verify your company size
 - Company size based on EU criteria
 - Upload supporting documents in REACH-IT
 - SME verification on all companies declared as SME

Take home messages



Take home messages

- Sort out joint submission related issues early =>
If needed, we can support you
- Choose the correct set of IT tools
- Under exceptional circumstances, contact us

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