

# REACH 2018

## webinars

**Last minute advice for registrants**  
Protect your confidential data

8 March 2018

11.00 – 12.00 Helsinki time

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# Planning to claim your data confidential?

- What does it mean?
- How to do it?
- Things to consider

# Claiming confidentiality

- Remember
  - Claim information confidential to exclude it from publication on our website
  - Confidentiality claims are subject to fees to cover the costs of assessment – payment is non-refundable
  - Article 119 of REACH: specifies information that will be published, whether claimed confidential or not
  - Claims may be rejected but you will have a chance to clarify
    - Information is already public
    - Insufficient justification

# Considerations (1/4)

- Information not already public
  - Search the internet
    - Substance name - EC/CAS number in search engines and our website
    - Use or hazardous impurities - safety data sheets

## Considerations (2/4)

- Is claiming confidentiality useful for you?
  - Does the claim cover the information you want to protect?
  - Know what information is published if there is no confidentiality claim



## Considerations (3/4)

For claims on...	be aware that...
Tonnage band	<ul style="list-style-type: none"> <li>• Aggregated tonnage band of all registrants together</li> </ul>
Substance name	<ul style="list-style-type: none"> <li>• Substances listed in EINECS inventory or pre-registered substances are published by default</li> <li>• Claim application (use) and/or your company name</li> </ul>
Company name	<ul style="list-style-type: none"> <li>• Available to co-registrants in REACH-IT unless a third party representative is appointed</li> </ul>
Study summaries	<ul style="list-style-type: none"> <li>• Experimental details, details on examinations</li> <li>• Study results always published</li> </ul>
Chemical safety assessment	<ul style="list-style-type: none"> <li>• Chemical safety assessment performed (yes/no)</li> <li>• Chemical safety reports are not published</li> </ul>

## Considerations (4/4)

- You have a reasoned and valid justification
  - Commercial interest of the information
  - Potential harm caused by publication
- Specific to the information claimed confidential
  - Valid justification for a use/company name is not valid for the outcome of the PBT assessment of the substance
- Examples of unacceptable justification
  - Intellectual property that you do not want your competitors to know
  - Others will use the studies for registration elsewhere
- Examples of acceptable justifications available in the manual: [Dissemination and confidentiality under the REACH Regulation](#)



# 5 steps to claim confidentiality

1. Confidentiality claim in your IUCLID dataset or in your online member dossier in REACH-IT before you create your dossier
2. Add a justification for each claim
3. Create your dossier and use our plug-ins
  - Dissemination preview: know what will be published beforehand
  - Fee calculator: know how much your claims will cost
4. Submit your dossier and pay the fees
5. Check REACH-IT message box for our decision



# Take home messages

## Make sure

- Information you are claiming confidential is not already public
- Information you want to protect is covered by the claim
- Your justification is reasoned and valid

# Further information on

- Confidentiality requests
- Dissemination



# Thank you

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