~~Confidential~~

Helsinki, 04 September 2023

Addressee
Registrant Name: [redacted]
Registration number: [redacted]

Date of submission of the dossier subject to this decision
23 November 2020

Registered substance subject to this decision ("the Substance")
Substance name: Hydrocarbons, C7-C8, cyclics
EC/List number: 927-033-1

Decision number: Please refer to the REACH-IT message which delivered this communication (in format CCH-D-XXXXXXXXXX-XX-XX/F)

DECISION ON A COMPLIANCE CHECK

Under Article 41 of Regulation (EC) No 1907/2006 (REACH), you must submit the information listed below by ***11 December 2023***.

1. **Description of the analytical methods or the appropriate bibliographical references that are necessary for the identification of the substance (Annex VI, Section 2.3.7.);**

2. **Composition of the substance (Annex VI, Section 2.3.);**

3. **Name and any other identifier of the substance (Annex VI, Section 2.1.);**

The reasons for the request(s) are explained in Appendix 1. The procedural history is described in Appendix 2.

How to comply with your information requirements

To comply with your information requirements you must submit the information requested by this decision in an updated registration dossier by the deadline indicated above. You must also **update the chemical safety report**, where relevant, including any changes to classification and labelling, based on the newly generated information.

Appeal

This decision, when adopted under Article 51 of REACH, may be appealed to the Board of Appeal of ECHA within three months of its notification to you. Please refer to http://echa.europa.eu/regulations/appeals for further information.

Failure to comply

If you do not comply with the information required by this decision by the deadline indicated above, ECHA will notify the enforcement authorities of your Member State.

Authorised[1] under the authority of Mike Rasenberg, Director of Hazard Assessment

[1] As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Appendix 1: Reasons related to the information under Annex VI to REACH

The Substance must be identified as specified in Annex VI, section 2 to REACH. Under this provision, the information provided has to be sufficient to enable the identification of the Substance.

1. **Description of the analytical methods or the appropriate bibliographical references that are necessary for the identification of the substance (Annex VI, Section 2.3.7.);**

   The description of the analytical methods or the appropriate bibliographical references that are necessary for the identification of a substance (including the identification and quantification of its constituents and, where appropriate, its impurities and additives) is an information requirement of Annex VI, Section 2.3.7 to REACH. The description shall consist of the experimental protocols followed and the relevant interpretation of the results reported under points 2.3.1 to 2.3.6 of Annex VI. This information shall be sufficient to allow the methods to be reproduced.

   In this respect, provision of all necessary quantitative analytical data specific for the identification of a substance, such as chromatographic, titrimetric, elemental analysis or diffraction data, is an information requirement of Annex VI, Section 2.3.6 to REACH.

   For quantitative analytical data such as gas chromatography, according to Appendix II of the Guidance for identification and naming of substances under REACH and CLP (Version: 2.1, May 2017), referred to as "the Guidance" hereinafter, the following information must be indicated in the chromatogram itself or in annexes:

   - The identity of the substance;
   - Column properties, such as diameter, packing, length;
   - Temperature, also temperature range if used;
   - Injection temperature;
   - Carrier gas and pressure of carrier gas;
   - Concentration range of substance;
   - Visualisation method, e.g. MS;
   - Peak identification;
   - Results (indicate the main peaks important for substance identification).

   In practice, for chromatography, relevant interpretation of the results normally includes a peak table that includes the list of peaks with their corresponding retention times, peak identification, and area percentages.

1. *The information submitted*

   In your registration dossier, you have provided a picture of a gas chromatogram under a title "*GCGC - Spectroscopy is used for identification and quantification of the hydrocarbon classes present in 'Hydrocarbons, C7-C8, cyclics'*" on p. 5 of the attachment "[redacted].pdf" included in IUCLID section 1.4. The provided chromatogram shows a large group of peaks at approximately 8-9 minutes and a few other peaks that are relatively significantly smaller than the large group of peaks.

   The chromatogram is accompanied by the following information:
   - "*Analyse GC – SOLANE METHYLCYCLOHEXANE (SCIRIUS 19-11778)*"
   - "*Figure. Chromatogram GCxGC Solane Methylcyclohexane*"
   - "*Method: The sample has been analysed by GC GC.*"

- *"Results: No peak neither of aromatic nor of paraffin has been detected. The sample analysed by the [redacted] laboratory of [redacted] is made of [redacted]% of Methylcyclohexan."*

No other information has been provided that would correspond to the description of the experimental protocols followed and the relevant interpretation of the results.

A peak table that would include the list of peaks with their corresponding retention times, peak identification, and area percentages has not been provided.

2. *Assessment of the information submitted*

The description of the gas chromatographic method lacks the description of the experimental protocols followed and a complete relevant interpretation of the reported results. In particular, the following information listed in Appendix II of the Guidance is missing:

- Column properties, such as diameter, packing, length;
- Temperature, also temperature range if used;
- Injection temperature;
- Carrier gas and pressure of carrier gas;
- Concentration range of substance;
- Visualisation method, e.g. MS.

Furthermore, in the absence of a comprehensive peak table, the following information listed in Appendix II of the Guidance is missing:

- Peak identification;
- Results (indicate the main peaks important for substance identification).

In the absence of a peak table, it is unclear whether the large signals in the chromatogram at approximately 8-9 minutes should be interpreted to correspond to a single peak or multiple adjacent partially resolved peaks. Although the statement "*Results: No peak neither of aromatic nor of paraffin has been detected. The sample analysed by the [redacted] laboratory of [redacted] is made of [redacted]% of Methylcyclohexan.*" suggests that these signals might correspond to a single peak that could be identified as methylcyclohexane, in the absence of a peak table, such interpretation is subject to uncertainty.

Therefore, the provided description of the analytical method is not sufficient for the identification of the Substance including the identification and quantification of its constituents and, where appropriate, its impurities and additives.

3. *Resolution of the incompliance*

You must provide a complete description of the experimental protocols followed and a complete relevant interpretation of the reported results for the method that you use to fulfil the information requirement of Annex VI, Section 2.3.6 on quantitative analytical data (such as gas chromatography).

The description of the experimental protocols must include the following information:

- Column properties, such as diameter, packing, length;
- Temperature, also temperature range if used;
- Injection temperature;
- Carrier gas and pressure of carrier gas;
- Concentration range of substance;

- Visualisation method, e.g. MS.

The relevant interpretation of the reported results must provide the following information:

- Peak identification;
- Results (indicate the main peaks important for substance identification).

For chromatography, the relevant interpretation can be provided in the form of a peak table that includes the list of peaks with their corresponding retention times, peak identification, and area percentages.

As an alternative to complementing your current gas chromatographic analysis with a complete description of the experimental protocols followed and a complete relevant interpretation of the reported results, you can provide completely new quantitative analytical data using a method of your choice. However, your dossier must include all necessary quantitative analytical data specific for the identification of the Substance in line with Annex VI, Section 2.3.6 and a description of the analytical methods or the appropriate bibliographical references that are necessary for the identification of the Substance in line with Annex VI, Section 2.3.7 including the identification and quantification of its constituents and, where appropriate, its impurities and additives. The description shall consist of the experimental protocols followed and the relevant interpretation of the results reported. This information shall be sufficient to allow the methods to be reproduced.

The quantitative analytical data and the description of the analytical methods must be provided in IUCLID section 1.4.

2. Composition of the substance (Annex VI, Section 2.3.);

Annex VI, Section 2.3 of REACH requires that each registration dossier contains sufficient information for establishing the composition of a substance and therefore its identity.

According to Chapter 4.2 of the Guidance, a mono-constituent substance is a substance in which one constituent is present at a concentration of at least 80% (w/w) and which contains up to 20% (w/w) of impurities. A multi-constituent substance is a substance consisting of several main constituents present at concentrations generally ≥ 10% and < 80% (w/w). For mono- and multi-constituent substances, the following applies:

- Each main constituent (i.e. the constituent present at ≥80% for mono-constituent substance or each constituent present at ≥10% and <80% for multi-constituent substance) shall be identified and reported individually;
- Each impurity present at ≥1% or relevant for the classification and/or PBT assessment shall be identified and reported individually;
- As a general rule, the aim should be to cover the composition up to 100%.

Annex VI, Section 2.3.2 of REACH requires that names of constituents and impurities are provided, and that for "Unknown or Variable composition, Complex reaction products or Biological materials" (UVCB) substances, the following is provided:

- Names of constituents present at a concentration of ≥ 10 %;
- Names of known constituents present at a concentration of < 10 %;
- For constituents that cannot be identified individually, description of groups of constituents based on chemical nature;
- Description of the origin or source and the manufacturing process.

Annex VI, Section 2.3.3 of REACH requires that the following is provided for all substances:

- Typical concentration and concentration range (in percentage) of constituents, groups of constituents that cannot be identified individually and impurities as specified in point 2.3.2.

According to Appendix II of the Guidance, the given values for the typical concentrations must normally add up to 100%.

In case of a UVCB substance all constituents are to be listed under "constituents" in the composition in IUCLID Section 1.2 because the terms "main constituents" and "impurities" must not be regarded as relevant for UVCB substances according to Chapter 4.3.1 of the Guidance.

1. *The information submitted*

You have chosen "UVCB" as the "Type of substance" in IUCLID section 1.1. You have provided a name "Hydrocarbons, C7-C8, cyclics" in the "IUPAC name" field and a List number 927-033-1 (which is associated with List name "Hydrocarbons, C7-C8, cyclics" in REACH-IT EC inventory) in the "Inventory number" field.

You have reported a legal entity composition in IUCLID Section 1.2 consisting of the following (groups of) constituents:

- "Hydrocarbons, C7-C8, cyclics" (List number 927-033-1) with typical concentration [redacted]% (w/w) and concentration range [redacted] (w/w).

- "methylcyclohexane" (EC number 203-642-3) with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).

- "<=C6 saturated hydrocarbons" with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).

- ">=C9 saturated hydrocarbons" with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).

You have provided a description of the manufacturing process in the Description-field of IUCLID section 1.2. In the description of the manufacturing process, you note that "[redacted]".

2. *Assessment of the information submitted*

The IUPAC name and List number that you have provided in IUCLID Section 1.1 refer to a UVCB substance "Hydrocarbons, C7-C8, cyclics" in line with the Substance type ("UVCB") that you have selected IUCLID Section 1.1. Furthermore, the description of the manufacturing process that you have provided in IUCLID Section 1.2 describes the result of the manufacturing process as "Hydrocarbons, C7-C8, cyclics".

However, the legal entity composition that you have reported in IUCLID Section 1.2

does not coherently refer to a single substance. The given values of the typical concentrations of the (groups of) constituents that you have reported in the legal entity composition in IUCLID Section 1.2 add up to 200.2%. Because the typical concentrations do not add up to 100%, it is unclear what the composition of the Substance consists of. For example, you have reported both "Hydrocarbons, C7-C8, cyclics" and "methylcyclohexane" with a typical concentration [redacted]%. However, two (groups of) constituents cannot be present at the same time with a typical concentration [redacted]% in the composition of a substance, because the sum of typical concentrations must add up to 100%. Therefore, it is unclear whether the legal entity composition of the Substance should be interpreted to consist of e.g. typically [redacted]% "Hydrocarbons, C7-C8, cyclics" or typically [redacted]% "methylcyclohexane".

On one hand, if the legal entity composition consisted of typically 100% methylcyclohexane (i.e. a specific cyclic hydrocarbon constituent with carbon number C7), the composition would be inconsistent with the IUPAC name "Hydrocarbons, C7-C8, cyclics" (that describes a UVCB substance consisting of cyclic hydrocarbon constituents with carbon numbers C7-C8), List number reported in IUCLID Section 1.1, and the description of the manufacturing process reported in IUCLID Section 1.2 of your dossier (that describes the result of the manufacturing process as "Hydrocarbons, C7-C8, cyclics").

On the other hand, if the Substance consisted of typically 100% of (groups of) constituents that could be described as "Hydrocarbons, C7-C8, cyclics", the reported composition would not meet the expectations for reporting of composition of UVCB substances outlined in Section 2.3.2 and 2.3.3 of Annex VI of REACH because the composition would not have been reported to the expected level of detail: for UVCB substance "Hydrocarbons, C7-C8, cyclics", reporting of all constituents present at concentration ≥ 10 %, all known constituents present at a concentration of < 10 %, and all individually unidentifiable constituents described as groups of constituents based on their chemical nature would be expected.

3. *Resolution of the incompliance*

You are requested to revise and correct the legal entity composition reported in section 1.2.

If the Substance is a well-defined substance (such as mono-constituent substance "methylcyclohexane"), each main constituent (i.e. the constituent present at ≥80% for mono-constituent substance or each constituent present at ≥10% and 80% for multi-constituent substance) and each impurity present at ≥1% or relevant for the classification and/or PBT assessment must be identified and reported individually in the legal entity composition in IUCLID Section 1.2.

If the Substance is a UVCB substance (such as "Hydrocarbons, C7-C8, cyclics"), all constituents present in the Substance with a concentration of ≥ 10 % and all known constituents must be named and reported individually, and constituents that cannot be identified individually must be described as groups of constituents based on their chemical nature (e.g. "C7 cyclics" and "C8 cyclics") in the legal entity composition in IUCLID Section 1.2.

Irrespective of whether the Substance is a well-defined or UVCB substance, the typical concentration and concentration range (in percentage) of constituents, groups of constituents that cannot be identified individually, and impurities must be reported in the appropriate fields in IUCLID. The sum of the typical concentrations of the

constituents, groups of constituents that cannot be identified individually, and impurities reported in the legal entity composition in IUCLID Section 1.2 must be 100%. Therefore, you must revise the legal entity composition so that the sum of typical concentrations of the constituents, groups of constituents that cannot be identified individually and impurities is 100%.

The reported legal entity composition must be consistent with the information provided in IUCLID Section 1.1 and verifiable by the analytical information provided in IUCLID Section 1.4.

You are also requested to ensure that the description of the manufacturing process provided in the Description-field in IUCLID section 1.2 is consistent with the IUPAC name and substance type reported in IUCLID Section 1.1, the legal entity composition reported in IUCLID Section 1.2, and the analytical information provided in IUCLID Section 1.4.

Further information on how to report the information in IUCLID6 can be found in the manual "How to prepare registration and PPORD dossiers" available on ECHA website at the following link:

https://echa.europa.eu/documents/10162/1804633/manual_regis_and_ppord_en.pdf

3. Name and any other identifier of the substance (Annex VI, Section 2.1.);

Name and any other identifier of each substance is an information requirement under Annex VI Section 2.1 of REACH. The name and any other identifiers are used to identify a substance in an unambiguous manner and are therefore fundamental for substance identification. Adequate information needs to be present in the registration dossier to meet this information requirement.

The information requirements listed in Annex VI, Section 2.1. include: "Name(s) in the IUPAC nomenclature. If unavailable, other international chemical name(s)" (Section 2.1.1.), "EC number, i.e. EINECS, ELINCS or NLP number, or the number assigned by the Agency (if available and appropriate)" (Section 2.1.3), and "CAS name and CAS number (if available)" (Section 2.1.4).

According to Chapter 4.2 of the Guidance, mono-constituent substance is a substance in which one constituent is present at a concentration of at least 80% (w/w) and which contains up to 20% (w/w) of impurities. A multi-constituent substance is a substance consisting of several main constituents present at concentrations generally ≥ 10% and < 80% (w/w). A mono-constituent substance is named after the main constituent. A multi-constituent substance is named as a reaction mass of two or more main constituents. Only main constituents typically ≥ 10% contribute to the name of a multi-constituent substance.

Chapter 4.3 of the Guidance provides guidance on identification and naming of UVCB substances. Chapter 4.3.2.1 of the Guidance outlines that for substances with variation in the carbon-chain lengths, a specific naming convention can be used that includes an alkyl descriptor. When it comes to the alkyl descriptor which describes the number of carbon atoms in the carbon-chain length(s) of the alkyl group(s), the Guidance outlines that a narrow alkyl chain lengths distribution does not cover a broader one and vice versa (e.g. C10-14 does not correspond to C8-18). The Guidance outlines

that this naming convention is not suitable for well-defined substances, which can be identified by a defined chemical structure.

According to Chapter 4.5 of the Guidance, a UVCB substance with a narrow distribution of constituents is not regarded as equal to a UVCB substance with a broader composition and vice versa.

1. *Information submitted*

You have chosen to report "UVCB" as the "Type of substance" in IUCLID section 1.1. You have provided the name "Hydrocarbons, C7-C8, cyclics" in the "IUPAC name" field and a List number 927-033-1 (which is associated with List name "Hydrocarbons, C7-C8, cyclics" in REACH-IT EC inventory) in the "Inventory number" field. You have stated that "*The List number 927-033-1 currently assigned does not specifically correspond to the registered substance. This identifier cannot be modified or deleted at this stage in the present registration update for technical reasons*." in the "No inventory information available – Justification" field in IUCLID Section 1.1.

You have reported a legal entity composition in IUCLID Section 1.2 consisting of the following (groups of) constituents:

- "Hydrocarbons, C7-C8, cyclics" (List number 927-033-1) with typical concentration [redacted]% (w/w) and concentration range [redacted] (w/w).
- "methylcyclohexane" (EC number 203-642-3) with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).
- "<=C6 saturated hydrocarbons" with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).
- ">=C9 saturated hydrocarbons" with typical concentration ca. [redacted]% (w/w) and concentration range [redacted] (w/w).

You have provided a description of the manufacturing process in the Description field of IUCLID section 1.2. In the description of the manufacturing process, you note that "[redacted]".

You have provided a picture of a gas chromatogram under a title "*GCGC - Spectroscopy is used for identification and quantification of the hydrocarbon classes present in 'Hydrocarbons, C7-C8, cyclics'*" on p. 5 of the attachment "[redacted].pdf" included in IUCLID section 1.4. The chromatogram is [redacted] by a statement "*The sample analysed by the [redacted] laboratory of Total is made of [redacted]% of Methylcyclohexan.*"

2. *Assessment of the information submitted*

Based on the statement that you have provided in the "No inventory information available – Justification" in IUCLID Section 1.1, you consider that the List number 927-033-1 currently assigned does not specifically correspond to the Substance but that this identifier cannot be modified or deleted at this stage in the present registration update for technical reasons.

As outlined in the "Reasons related to the information under Annex VI to REACH request" for the request "Composition of the Substance (Annex VI, Section 2.3.)" in Appendix 1 of this decision, the legal entity composition that you have reported in IUCLID Section 1.2 does not coherently refer to a single substance and it is unclear what the composition of the Substance consists of. Therefore, in order to comply with request "Composition of the substance (Annex VI, Section 2.3.)", it is necessary for you to revise and correct the legal entity composition reported in IUCLID Section 1.2.

3. *Resolution of the incompliance*

In order to ensure that the information provided in IUCLID Section 1.1 is consistent with the revised and corrected legal entity composition in IUCLID Section 1.2, you may also have to revise the information provided in IUCLID Section 1.1.

A few possible scenarios resulting from the revision and correction of the legal entity composition are described below. However, these scenarios are not exhaustive, because it is not possible to anticipate all possible ways how the legal entity composition could be revised and corrected.

On one hand, the statement "*The sample analysed by the* [redacted] *laboratory of* [redacted] *is made of* [redacted]*% of Methylcyclohexan.*" that you have provided in IUCLID Section 1.4 suggests that the analysed sample contained [redacted]% methylcyclohexane, which you have also reported with a typical concentration [redacted]% in the legal entity composition in IUCLID Section 1.2. ECHA observes that according to the Guidance, a substance containing [redacted]% "methylcyclohexane" (i.e. a specific cyclic hydrocarbon constituent with carbon number C7) would be regarded as a mono-constituent substance consisting of methylcyclohexane as the only main constituent. If the revised and corrected legal entity composition could, after complying with the request "Composition of the substance (Annex VI, Section 2.3.)", be described as mono-constituent substance "methylcyclohexane" by correct application of the Guidance, the legal entity composition would be inconsistent with the IUPAC name "Hydrocarbons, C7-C8, cyclics" (that describes a UVCB substance consisting of cyclic hydrocarbons with carbon numbers C7-C8) reported in IUCLID Section 1.1 and the description of the manufacturing process reported in IUCLID Section 1.2 (that refers to the result of the manufacturing process as "Hydrocarbons, C7-C8, cyclics"). Furthermore, the statement that you have provided in the "No inventory information available – Justification" field would be accurate: the List number 927-033-1 currently assigned would not specifically correspond to the Substance, because List number 927-033-1 (which is associated with List name "Hydrocarbons, C7-C8, cyclics" in REACH-IT EC inventory) would not be appropriate for mono-constituent substance "methylcyclohexane". For well-defined mono-constituent substance methylcyclohexane, an available and appropriate EC number would be 203-624-3 which is associated with name "methylcyclohexane" in EINECS[2].

On the other hand, the current IUPAC name "Hydrocarbons, C7-C8, cyclics" and substance type "UVCB" that you have selected in IUCLID Section 1.1 and the current description of the manufacturing process that you have provided in the Description-field in IUCLID Section 1.2 are consistent with the List number 927-033-1 that you

[2] EINECS (European INventory of Existing Commercial chemical Substances) as published in O.J. C 146A, 15.6.1990 is an inventory of substances that were deemed to be on the European Community market between 1 January 1971 and 18 September 1981. EINECS was drawn up by the European Commission in the application of Article 13 of Directive 67/548/EEC, as amended by Directive 79/831/EEC, and in accordance with the detailed provisions of Commission Decision 81/437/EEC. For more information, please see ECHA webpage "EC Inventory" at https://echa.europa.eu/information-on-chemicals/ec-inventory.

have provided in the "Inventory number" field. If the revised and corrected legal entity composition could, after complying with the request "Composition of the substance (Annex VI, Section 2.3.)", be described as UVCB substance "Hydrocarbons, C7-C8, cyclics" by correct application of the Guidance, the legal entity composition would be consistent with the List number 927-033-1. Overall, if all information provided in IUCLID Sections 1.1, 1.2 and 1.4 were consistent with the List number 927-033-1, the statement that you have provided in the "No inventory information available – Justification" field would be unnecessary.

Therefore, in order to provide consistent information on the identity of the Substance, you must revise the information provided in IUCLID Section 1.1 so that it is consistent with the information provided in IUCLID Section 1.2. In particular you must:

- ensure that the chemical name provided in the "IUPAC name" field is consistent with the information you have provided in IUCLID Section 1.2 and follows the instructions for naming of substances outlined in the Guidance. For example, if the chemical name "Hydrocarbons, C7-C8, cyclics" that you have provided in the "IUPAC name" in IUCLID Section 1.1 is not consistent with the legal entity composition of the Substance, you must provide a new chemical name. For example, if the composition of the Substance consisted typically 100% of only a single constituent methylcyclohexane, according to the Guidance, the consistent chemical name would be "methylcyclohexane".

- select the "type of substance" that corresponds to the Substance in the "type of substance"-field in IUCLID Section 1.1. For example, if the composition of the Substance consisted typically 100% of only a single constituent methylcyclohexane, the corresponding substance type would be "mono-constituent substance".

The information provided in IUCLID section 1.1 must be consistent with the legal entity composition and the description of manufacturing process reported in IUCLID Section 1.2 and the analytical information provided in IUCLID Section 1.4.

If the List number 927-033-1 currently assigned does <u>not</u> specifically correspond to the Substance (e.g. if the Substance is a well-defined substance consisting of only one main constituent "methylcyclohexane"), you are requested to update the registration dossier as follows:

- Do not remove or modify the current List number provided in the "Inventory number" field in IUCLID Section 1.1 (as this registration is linked to the current List number in REACH-IT and it cannot be removed at this stage for technical reasons).

- Keep the statement "*The List number 927-033-1 currently assigned does not specifically correspond to the registered substance. This identifier cannot be modified or deleted at this stage in the present registration update for technical reasons.*" in the "No inventory information available – Justification" field of the reference substance in IUCLID section 1.1.

- Specify, in the "Remarks" field or "No inventory information available – Justification" field, any available and appropriate EC/List number for the Substance. For example, if the Substance is a well-defined substance consisting of only one main constituent "methylcyclohexane", an available and appropriate EC number for the Substance would be 203-624-3.

- Specify, in the "Remarks" field or "No inventory information available – Justification" field, whether you intend to make use of the ECHA process (outlined below) to adapt the EC/List number of your registration:

    i. If you intend to make use of the ECHA process to adapt the EC/List number of your registration, include the statement "I intend to make use of the ECHA process to adapt the EC/List number of my registration".
    ii. If you do not intend to make use of the ECHA process to adapt the EC/List number of your registration, include the statement "I do not intend to make use of the ECHA process to adapt the EC/List number of my registration".

ECHA has established a process, subject to certain conditions, enabling registrants to adapt the EC/List number of an existing registration, while maintaining the regulatory rights already conferred to the substance concerned.

Pending the resolution of the non-compliances addressed in the present decision, any possible adaptation of the identifier can only become effective once ECHA is in a position to establish unambiguously the identity of the Substance intended to be covered by you with this registration.

Should the information submitted by you enable ECHA to identify the substance unambiguously and result in a need to modify the identifier of the Substance, and should you indicate your intention to make use of the ECHA process to adapt the EC/List number of your registration, ECHA will inform you in due time as to when and how the identifier adaptation process must be initiated.

In any case, you should note that the application of the process of adapting the identifier does not affect your obligation to fulfil the requirements specified in this decision.

As a result of a successful process of adapting the EC/List number of your registration, you would be able to submit a dossier update using a new EC number (or List number assigned by the Agency) in "Inventory number" field in IUCLID Section 1.1. You would need to make sure that the EC number (or List number assigned by the Agency) that you use is available and appropriate for the Substance.

Alternatively, you may consider that the List number 927-033-1 currently assigned does not specifically correspond to the Substance and that you do not need this registration anymore. In this case, instead of adapting the EC/List number of your registration, you also have the option of notifying to ECHA the ceasing of the manufacture of the Substance. Under Article 50(3), your registration will no longer be valid.

If the List number 927-033-1 currently assigned is appropriate for the Substance, you are requested to update the registration dossier as follows:

- Remove the statement "*The List number 927-033-1 currently assigned does not specifically correspond to the registered substance. This identifier cannot be modified or deleted at this stage in the present registration update for technical reasons*." from the "No inventory information available – Justification" field of the reference substance in IUCLID section 1.1.

You can find more information on substance identification the Guidance on Substance Identification and Naming of Substances under REACH and CLP available on ECHA website at the following link:
https://echa.europa.eu/documents/10162/23036412/substance_id_en.pdf

Further information on how to report the information in IUCLID6 can be found in the manual "How to prepare registration and PPORD dossiers" available on ECHA website at the following link:
https://echa.europa.eu/documents/10162/1804633/manual_regis_and_ppord_en.pdf.

Appendix 2: Procedure

The scope of this compliance check decision is limited to the standard information requirements of Annex VI, Section 2 to REACH.

This decision does not prevent ECHA from initiating further compliance checks at a later stage.

ECHA followed the procedure detailed in Articles 50 and 51 of REACH.

The compliance check was initiated on 30 September 2022.

ECHA notified you of the draft decision and invited you to provide comments.

ECHA did not receive any comments within the commenting period.

ECHA notified the draft decision to the competent authorities of the Member States for proposals for amendment.

As no amendments were proposed, ECHA adopted the decision under Article 51(3) of REACH.