Webinar IUCLID 6 – Questions and Answers

IUCLID 6.8.0.1

16/05/2024



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1. INTRODUCTION

This document contains the questions and answers from a Q&A session that was held on 16th of May 2024 during the webinar for the release of IUCLID 6 v8. More information about the release can be found on the IUCLID website <u>here</u>.

Please also have a look at the latest update of the Frequently Asked Questions page on the IUCLID 6 website: https://iuclid6.echa.europa.eu/faq.



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2. CLASSIFICATION AND LABELLING

Q1: Will the new field "reason for classification" be mandatory?

A1: The field is not mandatory but there is a quality warning in the Validation assistant tool recommending providing this information. Should it ever become mandatory then ECHA will inform the users well in advance.

Q2: When a substance meets both PBT and vPvB criteria, can both classifications be entered?

A2: In the picklist there is a possibility to select only one value PBT or vPvB. Guidance on applying the PBT and vPvB criteria under the CLP regulation will be available after the summer.

Q3: What is the legal basis for the "Reason for Classification"? Is this mentioned in the CLP Regulation (EC) No 1272/2008)? Does it relate to the 'Reasons for divergence' in the upcoming CLP revision? Is there any guidance on the applicable picklist values?

A3: "Reason for classification" is indeed a new IUCLID field in the GHS section that allows users to indicate, per hazard class, information that supports the understanding of the classification. Importantly, it makes it possible for users to clearly report, in the same GHS record, classification that is harmonised e.g. under CLP Annex VI as well as self-classification based on available data. When self-classifying, users can also indicate in more detail the driver behind the classification, e.g. if it relates to a specific form of the substance. The field is not directly linked to the CLP revision but is foreseen to also bring clarity on the reasons for different classifications for the same substance. The manuals for preparing dossiers under the REACH and CLP regulations have been updated with generic advice on this field.

Q4: The C&L documentation (format description and validations) published on https://echa.europa.eu/de/system-to-system-submission-service is still points to C&L format version 1.0 (IUCLID 6.6). When will you publish the current version 3.0 (IUCLID 6.8)?

A4: Thank you for highlighting this issue. The C&L notification documentation related to the latest version of IUCLID has now been published on the ECHA website.



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3. CHESAR

Q5: Will you also address the update of Chesar so it is compatible with IUCLID?

A5: IUCLID 6 v8 can be used with Chesar 3.8, however additional improvements have been identified. These improvements are available in a newer version of IUCLID 6, version 8.0.2, available from 16.05.2024 on the IUCLID website. A new version of Chesar is also in preparation. We have addressed this topic in the IUCLID FAQ page, cf. https://iuclid6.echa.europa.eu/faq#q125.

Q6: Dear Team, do you have recent information concerning the future patch to improve the compatibility with Chesar 3.8 [IUCLID v6.8.02]?

A6: As indicated on the IUCLID FAQ page, https://iuclid6.echa.europa.eu/faq#q125, IUCLID 6 v8 can be used with Chesar 3.8. Some improvements have been released today (16.05.2024) in IUCLID 6 v8.0.2 and a new release of Chesar will also bring additional improvements to ensure a better compatibility in the coming weeks.



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4. IUCLID FUNCTIONALITIES, ECHA CLOUD SERVICES

Q7: Regarding your mention to the filtering of EU PPP dossiers, in the new version of IUCLID the filtering of dossier does not work. Will this be addressed and fixed in the upcoming service release?

A7: We are not aware of an issue with the filtering of EU PPP dossiers. Could you please report your findings to the ECHA IUCLID Helpdesk and we will investigate the problem you experienced: https://comments.echa.europa.eu/comments cms/Contact IUCLID6.aspx

Q8: IUCLID software in ECHA cloud services is still IUCLID 6 version 7.12.6. Shouldn't it be automatically updated in April to the new version?

A8: The IUCLID instances in the ECHA Cloud Services are being updated in batches and it takes several days to have all instances upgraded (there are around 27,000 IUCLID instances to be upgraded). We aim to complete the update by the end of May.

Q9: Is there a notice while deleting context (e.g. 100-100 tonnage) for example a warning of deleting the tonnage related information?

A9: When you delete a working context in IUCLID, a warning is displayed before confirming the deletion. When a working context is deleted, the related dossier header is deleted as well. In case you created a dossier for this working context in the past, you can retrieve the information inserted in the dossier header from there if needed.

Q10: Is it still possible to limit the number of IUCLID files that can be exported in one go? e.g. in the system set up settings?

A10: The system settings used in the past referred only to the Classic interface. If you need to configure such a limit in the latest version of IUCLID, create a ticket at the IUCLID Helpdesk explaining the situation.

Q11: Tables and other content is often not visible in a dossier printout "Field content is not in a valid XML format and thus ignored!". Has this issue been fixed?

A11: This issue occurs when a user enters or pastes invalid HTML inside a Rich text field. This issue has been partially addressed in v6.7.12 (released in February this year) and has reduced the frequency of this error appearing. However, we are aware that the issue still re-occurs, and we are continuing to investigate solutions for the next IUCLID service releases.



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5. MIGRATION

Q12: Question about the fix of the data migration - If, after the last IUCLID update, we manually copied the text from the attachments back into the relevant place in IUCLID, will the 'fix' remove this content and replace it with the text from the attachments?

A12: Thank you for your question regarding the endpoint summaries migration fix (cf. https://iuclid6.echa.europa.eu/faq#q116). In case you manually transferred the data from the attachments back to the fields, the fix included in IUCLID 6 v8 will detect this and will not update the content of your documents.

Q13: For Use and exposure information: I have understood that the REACH- and the OECD templates have been merged. What is the master and what is the slave template? Just to understand if there was (much) effort required to clean up the records after merging. To date we have used the REACH template only.

A13: The REACH and OECD versions of the Use and Exposure templates were quite well aligned in the past and the migration done in IUCLID 6 v8 should not require any manual changes. To answer your question more specifically, the REACH templates were the ones kept in IUCLID 6 v8 (i.e. they can be considered the master templates) and become the new OECD templates (the previously available OECD templates are converted to the new one in this version).

Q14: After the migration to the new IUCLID version, I have some issues to export a IUCLID dossier from the desktop (updated) version to the Cloud IUCLID version. I have always the same error message (Legislation null is not supported in this Iuclid6 installation). Is there something I should modify?

A14: The ECHA Cloud Services IUCLID instances are in the process of being migrated to IUCLID 6 v8. Due to the number of instances to migrate, this process takes time and not all instances are updated yet (the process is expected to complete before the end of May). Please check which version of IUCLID is currently available for your ECHA Cloud Services account as, if this is still IUCLID 6 v7, this would explain the error you see when importing a v8 file.

Q15: It's about the migration and fix. If I had to export v8 back to a major version and a text file was created for a new field in v8, then when I upgrade a v7 version back into v8, will the text file be automatically converted to the new field in v8?

A15: The migration process across IUCLID major versions in which data is transferred from a field to an attached text file is not automatically reversible. Such data would have to be re-entered into the field or fields.

Q16: Could a tool (or search) be made available which allows a search for obsolete picklist entries in a dataset? This would help to identify data that were modified during the update/migration.

A16: Thank you for your suggestion. Although obsolete values can remain in existing datasets, it can be useful to review them to check if more relevant picklist entries can be selected instead. We have added this idea to the IUCLID requirements list.



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6. SUBMISSION TO ECHA

Q17: Is REACH-IT fit to receive IUCLID dossiers generated in Version 8? If not, by when will it be fit?

A17: REACH-IT, and other ECHA submission systems, are accepting IUCLID 6 v8 dossiers since the 29th of April.

Q18: How long will ECHA/REACH-IT accept dossiers generated in IUCLID Version 7?

A18: ECHA is not preventing the submission of dossiers made in an older version of IUCLID 6. However, we recommend using the latest version to make sure the content of the dossier complies with the latest information requirements and to be able to use the latest version of the validation assistant to verify this before submission.

Q19: Do changes in format require immediate update of dossiers for REACH? Or can these fields be addressed if an update is done sometime in the future?

A19: The new version of IUCLID does not require by itself REACH dossiers to be updated. The new version supports the latest requirements under several legislations though. For example, it makes it possible to apply the latest hazard classes under the CLP regulation.

Q20: In IUCLID SPC, if we need to translate the SPC to different languages, how can we proceed to indicate the different commercial names in the different languages without changing the original dossier names?

A20: Commercial names in different languages should be indicated in the section "Family, meta SPC, product", in the document "Product", in the field "Trade names of the product". By clicking on "New item", an entry opens in which you need to indicate a trade name and a corresponding country. Several entries can be added to cover all the relevant names.

Q21: Is there any way to create multiple SPCs of a same product in different languages without having to duplicate the existing dataset?

A21: No, you need to prepare a dataset for each linguistic version, you can use the "Clone" functionality to facilitate this task. Please see Part 3 of the exercise (SPC training session for Industry, online event (24/10/2023)) on the IUCLID website: https://iuclid6.echa.europa.eu/training-material.

Q22: For SCIP the "Candidate List Package" on https://echa.europa.eu/de/candidate-list-package is not yet available for IUCLID 6.8. When the update version "IUCLID 6 v.8" will be published?

A22: A new version of the package, which will be in version 8 of IUCLID 6, is due to be released at the end of June 2024. In the meantime, it should be possible to import the current data into the latest version of IUCLID. If you have any further queries about this, you are welcome to contact the IUCLID Helpdesk.

Q23: Does the previous IUCLID format in PCN working context will continue to be accepted for a limited period? If so, which are the deadline for adopting this new IUCLID format?



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A23: The ECHA submission portal can process earlier versions of the IUCLID/PCN format. However, it is recommended to update to the latest IUCLID format within one year of its publication.



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7. VALIDATION ASSISTANT

Q24: Is training regarding the validation report available? it is very difficult to figure out, in some cases, what should be corrected, especially where the "errors" have no hyperlinks.

A24: Thank you for your question. You can find a training video on the Validation assistant on our YouTube channel: https://www.youtube.com/watch?v=-3dRV6_6ckU. For more specific questions on how to fill in the data in the dossier, you can check the dossier preparation manuals: https://echa.europa.eu/manuals. You can also always contact us for help at https://echa.europa.eu/contact.

