

Legal status of substance numbers: EC numbers vs “list numbers” Overview on substance databases and registries

Producers, importers and downstream users: be careful when communicating in the supply chain!



Within [REACH](#) Regulation*, REACH-IT allocates numerical identifiers, so-called „list numbers“, to substances for which no previous EC entry is given by the legal entity submitting the dossier. These numbers do not have any legal status!

Background: legal status of EC numbers

The EC (European Commission) inventory consists of three independent inventories, namely EINECS, ELINCS and NLP which have been established by Directive 67/548/EEC and its amendments.

EINECS (European INventory of Existing Commercial chemical Substances) covers the so-called existing substances which deemed to be on the European Community market between 1 January 1971 and 18 September 1981 and comprises about 100,000 substances.

ELINCS (European List of Notified Chemical Substances) includes all substances notified until 31 May 2008 according to the Directive 67/548/EEC and its amendments. It covers so called new notified substances that were not placed on the Community market by 18 September 1981.

NLP (List of No Longer Polymers) includes substances which were originally considered to be polymers under the reporting rules when EINECS was established but were no longer considered to be polymers under the 7th amendment of Directive 67/548/EEC.

“List numbers”

REACH Regulation does not mention the generation of new EC numbers for substances for which there are no entries in the EC inventory. However the “list numbers” were generated since it was considered beneficial to allocate automatically a number to all incoming valid submissions in order to facilitate the management, processing and identification of the substances in these submissions (pre-registrations, PPORD, inquiries, C&L notifications...).

“List numbers” assigned by REACH-IT during pre-registration are not based on a legal act and have not been checked for correctness and validity. “List numbers” are pure technical identifiers automatically generated for processing a submission. For this reason, it was initially not planned to release list numbers to the public. However, as during pre-registration, approximately 40,000 substances were pre-register without an EC number; their publication became necessary to facilitate, among other, SIEF formation. See also ECHA CHEM [registered substances](#) for further clarification.

IMPORTANT
List Numbers do not have
any legal significance

Number	Legal status	Covers	Status under REACH
EINECS 2xx-xxx-x 3xx-xxx-x	Directive 67/548/EEC as amended by Directive 79/831/EEC Decision 81/437/EEC	Substances deemed to be on the EC market 1 Jan 1971 – 18 Sep 1981 (Phase-in)	Part of EC inventory, official identifier, valid
ELINCS 4xx-xxx-x	Directive 67/548/EEC and its amendments Decision 85/71/EEC	All substances notified under Directive 67/548/EEC and its amendments until 31 May 2008 (“new substances”)	Part of EC inventory, official identifier, valid ECHA has assigned registration number(s) to each notification submitted under Directive 67/548/EEC. The owner of the notification needs to claim a registration number from ECHA. For more information see Art. 24 REACH and Q&A on NONS
NLP 5xx-xxx-x	Directive 92/32/EEC (7 th amendment of Directive 67/548/EEC)	Substances on EU market 18 September 1981 to 31 October 1993 no longer considered to be polymers under the 7th amendment of Directive 67/548/EEC	Part of EC inventory, official identifier, valid
List number 6xx-xxx-x 7xx-xxx-x 9xx-xxx-x	No legal status	Substances registrations and notifications submitted via REACH-IT without clear substance identification in the EC inventory, e.g. no EC number submitted, different name (Phase-In and Non-Phase-In)	Not checked for correctness, validity, several list numbers might be assigned to one substance based on different identifiers and submissions

* Regulation (EC) 1907/2006 for registration, evaluation, authorisation and restriction of chemicals, so called REACH came into force on 1 June 2007.

CONTACT: Arno Biber | Caroline Fedrigo | Virginie Piaton | Ruth Moeller
REACH&CLP Helpdesk | 66, rue de Luxembourg | L-4002 Esch-sur-Alzette
Tel: + 352 42 59 91-600 | Fax: +352 42 59 91-555
E-mail: reach@tudor.lu | clp@tudor.lu

To subscribe / unsubscribe: www.reach.lu/contact or www.clp.lu/contact or by email.

Some problems with list numbers...

List numbers are used by registrants like an official number

→ Confusion within the supply chain when an EC entry also exists

Several numbers might have been assigned to the same substance

→ Challenges in fulfilling data sharing joint submission obligations since several (pre-)SIEFs have been generated for a substance

Use of list number, instead existing EC, entry as identifier when communicated down the supply chain

→ Inappropriate Risk Management Measures due to a wrong identification

Where to find further information...

Information on chemical substances can be obtained via different databases and registries.

Dependent on database, you can search with either the substance name or a numerical identifier like the EC or the CAS number.

Please note that the "list number" allocated under REACH is no official identifier and thus not linked to international databases, nor to ECHA-maintained databases.

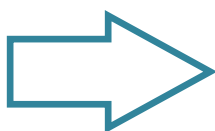
Terminological database

[ECHA-term](#) database contains terminology data from the REACH and CLP Regulations in the 22 languages of the European Union. It was designed as a dynamic database, to ensure regularly updates by experts and linguists

IMPORTANT

DO NOT use "list numbers" for any legal or official documents including Safety Data Sheets and C&L notifications

SCREEN your numerical identifiers used to pre-register and CHECK on [ECHA CHEM](#) portal to identify potential substances identical to your own substance.



Overview on databases and registries of substances on our website

ECHA databases and registries:

The [ECHA CHEM](#) section provides access to public information related to substances linked to the different procedures of the REACH and CLP regulation, including a database on [pre-registered substances](#) and [registered substances](#). The [consolidated version of Annex VI](#) of the CLP regulation lists information on the classification and labelling of substances. The [C&L Inventory](#) is a database established and maintained by ECHA, containing basic classification and labelling information on notified and registered substances.

The [« Registry of intentions »](#) includes the intentions of the Member States to submit proposals in form of Annex XV dossiers for harmonised Classification and Labelling of substance, for SVHC identification and for restrictions.

European databases:

[ESIS](#) is the platform of the former ECB (European Chemicals Bureau) grouping several databases providing information such as the European index number, information on certain legislations (biocides, import/export...), scientific data from international programs...

Further European databases include [eChemPortal](#) providing information on substance properties, the [EU Pesticide database](#), the German [GESTIS](#) database on hazardous substances...

International databases:

Several further databases provide access to comprehensive scientific information especially in the field of toxicology and bioactivity ([Toxnet](#), [U.S. EPA Chemical databases](#), [PubChem](#)) and chemical and occupational safety ([ILO](#), [INCHEM](#)).

Find a summary about existing databases and registries on our website reach.lu/documentation.

This Newsletter is published by the REACH&CLP Helpdesk Luxembourg. This advisory service, however, does not represent any legal interpretation of the existing legislation. The REACH and CLP regulations and related regulations and directives are the only legally binding sources. The information provided in this document is not legally binding and is provided "AS IS", without any warranty or representation of any kind, given or to be implied, as to its sufficiency and accuracy. Therefore, the CRP Henri Tudor takes no legal responsibility and liability for any errors, omissions or misleading statements and the recipient of this email shall be entirely responsible for the use to which it puts such information. © 2012, CRP Henri Tudor.