REACH 2018 registration deadline – Last advice for companies

Conference & Networking Lunch: REACH&CLP: Implementation and future challenges for companies

14 December 2017

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Deadline 2018: who, what, when

Quick recap for the 2018 REACH Registration Deadline

Deadline 2018

- 31 May 2018
- Manufacturers and Importers
- For phase in substances in the 1-10 or 10-100 tpa
- Follow the 7 phases of registration => REACH 2018 webpage

Data and Cost Sharing

Data and Cost Sharing

- Data is needed to assess risks, implement safety measures
- All registrants are obliged to share only the cost of data they need for their registration in a fair, transparent and non-discriminatory way
- Cost have to be broken down, providing detailed information
- Data Sharing Dispute as last resort

Data and Cost Sharing – Cont'd

- Under "One Substance, One Registration", all registrants have to be in the same joint submission => opt-out possibility (admin costs apply to JS)

- "Legacy cases" are being handled => joint responsibility

- "Joint submission dispute" as last resort

Dossier Submission and Joint Submissions

Dossier Submission Pipeline

- Pre-processing & Business Rules => Need to pass to be accepted for processing
- Technical Completeness Check
  - Manual Verification (MV) since June 2016
  - ~30% of all submitted dossiers goes for MV
- Check your R-IT account for invoice!

Joint Submissions - Lead Registrant

- Make sure that you have the support of the SIEF
- Create joint submission still this year
  - Potential co-registrants can find you
  - Members can start signing up
- If joint submission (JS) already created by "unsupported lead", contact ECHA => Lead role verification
- If SID changed since pre-registration, create JS w/ correct SID, but include pre-registration # in the dossier!

Joint Submissions - Members

- Find your joint submission
  - Available in R-IT (if pre-registered or registered the substance)
  - ECHA's website: List of Joint Submissions (if lead has agreed on the publication of their contact details)
  - Dissemination pages: List of companies who have registered the substance (unless company name claimed confidential)

Joint Submission – General issues

- Unresponsive lead:
  - Contact ECHA!
  - If lead doesn't respond or exist anymore => New lead registrant is required
- Lead is not supported anymore:
  - Contact ECHA!
  - Lead role verification
- Technical issues w/ JS (jointly submitted documents, JS type, JS tonnage band, etc.)
  - Contact ECHA!

Lead Role Verification

- “Lead registrant” is acting unilaterally, doesn’t anymore have the support of the SIEF, etc.
- Contact ECHA describing the situation & requesting the “Lead role verification”
- ECHA sends a letter to all pre-registrants and registrants of the substance, requesting information on the lead registrant
- ECHA implements the request of the majority

Lead Role Verification – cont'd

- "Don't want XYZ as lead." is not counted as a reply
- Supported lead registrant has to be indicated clearly
- Lead role is only modified in case there is a majority support for another company amongst respondents

IT tools

ECHA IT Tools

- New generation of IT tools, providing a more intuitive, user friendly experience
- Help is integrated into the IT tools => no need for user manuals
- ECHA has the right IT Tool for your situation!

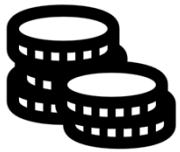
The Right Set of IT Tools for Your Situation

Non SME w/ at least one lead dossier	SME w/ at least one lead dossier	Member registrant (online dossier)
IUCLID 6 REACH-IT	ECHA Cloud Services	REACH-IT

ECHA
EUROPEAN CHEMICALS AGENCY

Supporting Tools

- Use the following tools in IUCLID:
  - Validation assistant (MV not included)
  - Fee calculator
- Free to download and use
- Provides advance information on your dossier



Support from ECHA

Support from ECHA

- ECHA Helpdesk – http://echa.europa.eu/contact
- IT Tools training on demand => material available on IUCLID 6 website
- Stakeholders' day => 1-2-1 sessions, IT Tools Training
- Guidance documents and registration manual on ECHA website

Thank you!

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