

CONFIDENTIAL

Helsinki, 8 April 2014

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Heraeusstr. 12-14  
63450 Hanau  
Germany

Registration number: [REDACTED]

Submission number: [REDACTED]

Submission date: [REDACTED]

**Information letter about the substance identity of your registration dossier in accordance with Regulation (EC) No 1907/2006**

In the context of Regulation (EC) No 1907/2006 (the REACH Regulation), you have registered "perrhenic acid", CAS No 13768-11-1 (EC/List No 237-380-4) [REDACTED]  
[REDACTED]

In an effort to support registrants in proactively improving the quality of their dossiers, ECHA has conducted an IT-based screening of the substance identity information included in the registration dossiers. Based on this screening, there are indications that your dossier might not meet the conditions set out in Article 10(a)(ii) and section 2 of Annex VI of the REACH Regulation.

This information letter aims at assisting you in identifying and, if necessary, addressing potential substance identification shortcomings detected by the screening. ECHA encourages you to improve the quality of your registration dossier on your own initiative, by submitting a spontaneous update of your registration dossier. The list of potential shortcomings of your dossier and instructions on how to address them can be found at the end of this letter and the accompanying Annex.

ECHA will soon organise a webinar to provide further support to registrants in identifying their substances. You will receive an invitation to this webinar to the email addresses you have specified in your legal entity in REACH-IT. Attending the webinar is highly recommended as several of the substance identity shortcomings identified in the screening will be explained and you will have an opportunity to ask questions directly to ECHA's experts.

Please note that ECHA will conduct another IT-based screening after 3 months from the

present letter. If the potential shortcomings are not addressed voluntarily and after confirming the persistence of the issues, ECHA will take constraining measures to ensure compliance of the substance identity information submitted with the information requirements imposed by the REACH Regulation. In that case, the legally binding measures adopted may also address other issues beyond the ones identified in the present letter by the IT-based screening.

ECHA trusts that you will find the above information helpful to ensure compliance with the requirements of the REACH Regulation and for the continuous and voluntary improvement of your registration dossier.

If you have questions about the content of this letter and the information in the Annex, please contact ECHA via the ECHA Helpdesk at <http://echa.europa.eu/contact/helpdesk-contact-form> selecting 'I have a question related to a REACH/CLP submission'. Please indicate in the subject of your question: 'SID2014' in order to facilitate the processing of your question.

Christel Schilliger-Musset  
Director of Registration

Cc: Member State Competent Authorities

Enclosure

The Annex of this letter provides guidance on how to address the identified substance identity shortcomings, information on how to update your registration dossier, and instructions on how to contact ECHA for further help if needed.

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### **List of potential shortcomings**

The IT-based screening identified the following potential shortcomings in the substance identity information of your registration dossier:

#### **Missing concentration ranges**

- The composition with name "Perrhenic acid - Generic" and local UUID "L-341c57db-0dbe-4c1f-93e1-8d145a110c09" contains the additive with reference substance name "water" and IUPAC name "not specified in IUCLID dossier" for which the concentration range has not been provided.

**Additives without stabilising function**

- The composition with name "Perrhenic acid - Generic" and local UUID "L-341c57db-0dbe-4c1f-93e1-8d145a110c09" contains the additive with reference substance name "water" and IUPAC name "not specified in IUCLID dossier" that has a technical function that does not appear to be compatible with stabiliser.