

How to prepare for REACH implementation - checklist of key steps

DRAFT 23 April 2010

PRE-REGISTRATION

- Create your account on REACH-IT and register before 1 Dec 2008

START PREPARING NOW

- Join Consortium or obtain a right to refer to the Lead Registrant's dossier by purchasing a letter of access
 - Read, approve and sign the relevant Agreement
 - Comply with rights and obligations laid down in Agreement
- Install IUCLID 5.2 and Technical Completeness Check (TCC) tool (<http://iuclid.echa.europa.eu/>)
- Perform minimum substance identification tests
 - Solids: ICP-MS or XRF, XRD and IR spectroscopy (as per PMC recommendation)
 - Liquids: ICP-MS or XRF and Raman spectroscopy (as per PMC recommendation)
 - All: Granulometry (as per section R.7.1.14 of endpoint-specific Guidance 7A - http://guidance.echa.europa.eu/docs/guidance_document/information_requirements_r7a_en.pdf?vers=02_02_10)
- Complete company-specific sections; other sections are only required in the LR file (see screen-shots below):
 - *Substances:*
 - Section 1.1 Substance identification
 - Section 1.2 Substance composition
 - Section 1.4 Substance analytical information
 - Section 1.5 Joint submission
 - Section 3.1 Technological processes
 - Section 3.2 Estimated quantities
 - Section 3.3 Production sites
 - Section 3.4 Forms in the supply chain
 - Section 3.5 Identified uses
 - Section 3.6 Uses advised against
 - Section 3.7 Waste from production and waste
 - *Intermediates:*
 - Section 1.1 Substance identification
 - Section 1.2 Substance composition
 - Section 1.5 Joint submission
 - Section 3.1 Technological processes
 - Section 3.3 Production sites
 - Section 3.5 Identified uses

NOT BEFORE AUTUMN 2010

- Screen your company-specific file through the TCC tool
- Obtain joint submission object name and token number from Lead Registrant (through Consortium)
- Register as a joint registrant on REACH IT (use same account details as for pre-registration above). Note: the information provided at the time of pre-registration was indicative and can be adjusted for the purpose of registration
- Await the green light of the Lead Registrant (through Consortium) to submit registration (sections 1 and 3 above including reference to Lead Registrant's submission in section 1.5)
- Submit registration through REACH-IT
- Pass Business Rules and Technical Completeness Check
- Obtain Registration number
- Update all substance (SDS-type of) documents with Registration number
- Make sure you have generated and/or stored all information documenting REACH compliance steps (volumes manufactured and/or imported, customers and suppliers on the supply chain, safety / strict control measures where these apply, etc.) in case you are required to proof your REACH status to REACH Competent Authorities

1.1 Substance identification

Navigation

Query results Section tree

REACH Registration member of a joint

- 0 Related Information
- 1 General Information
 - 1.1 Identification**
 - 1.2 Composition
 - 1.3 Identifiers
 - 1.4 Analytical information
 - 1.5 Joint submission
 - 1.6 Sponsors
 - 1.7 Suppliers
 - 1.8 Recipients
- 2 Classification and Labelling
- 3 Manufacture, use and exposure
- 4 Physical and chemical properties
- 5 Environmental fate and pathways
- 6 Ecotoxicological Information
- 7 Toxicological information
- 8 Analytical methods
- 11 Guidance on safe use
- 12 Literature search
- 13 Assessment Reports

Substance: Test / EPMF1 / Brussels / Belgium

Substance identification

Chemical name

Public name

Legal entity flags

Legal entity

Third party flags

Third party

Role in the supply chain

Role flags

Role: ☐ Manufacturer ☐ Importer ☐ Only representative ☐ Downstream user

Reference substance

Type of substance

Composition

Origin

Trade names

Trade names flag

Name

Contact person

Person flags

Organisation

Department

Title

First name

Last name

Phone

Mobile

Fax

E-mail

Address

Address

Postal code

Town

Region / State

Country

Remarks

Information

1.2 Substance composition

Navigation

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 - 3.9 Biocidal information
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Substance: Test / EPMF1 / Brussels / Belgium

Substance composition

Name

Brief description

Composition ID

Degree of purity

Constituents

Reference substance

Typical concentration

Concentration range

Remarks

Impurities

Reference substance

Typical concentration

Concentration range

Remarks

☐ this impurity is considered relevant for the classification and labelling of the substance

Additives

Reference substance

Function

Typical concentration

Concentration range

Remarks

☐ this additive is considered relevant for the classification and labelling of the substance

1.4 Substance analytical information (not mandatory for intermediates)

Navigation: Query results | Section tree

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Substance: Test / EPMF1 / Brussels / Belgium

Analytical information

Analytical methods and spectral data

Optical activity

Results of analysis

Analysis type

Tested substance

Method used

Remarks

1.5 Joint submission

Navigation: Query results | Section tree

REACH Registration member of a joint

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- 6 Ecotoxicological Information

Substance: Test / EPMF1 / Brussels / Belgium

Joint submission

General information

Joint submission name

Remarks

Regulatory programme

Lead

Members

Add... Delete Go to link target

3.1 Technological process

The screenshot shows the REACH registration software interface. On the left is a 'Navigation' pane with a 'Section tree' containing the following items:

- 0 Related Information
- 1 General Information
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 - 1.8 Recipients
- 2 Classification and Labelling
- 3 Manufacture, use and exposure
 - 3.1 Technological process**
 - 3.2 Estimated quantities
 - 3.3 Sites

The main window title is 'Substance: Test / EPMF1 / Brussels / Belgium'. The section title is 'Technological process'. Below the title is a large text area with the label 'Methods of manufacture'.

3.2 Estimated quantities (not mandatory for intermediates)

The screenshot shows the REACH registration software interface. On the left is a 'Navigation' pane with a 'Section tree' containing the following items:

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 - 3.3 Sites
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The main window title is 'Substance: Test / EPMF1 / Brussels / Belgium'. The section title is 'Estimated quantities'. Below the title is a form with the following fields:

- Year:
- Total tonnage**
 - Manufactured: tonnes/year
 - Imported: tonnes/year
- Details on tonnages**
 - Tonnage for own use: tonnes/year
 - Tonnage imported in article: tonnes/year
 - Tonnage used as intermediate under strictly controlled conditions (transported): tonnes/year
 - Tonnage used as intermediate under strictly controlled conditions (on-site): tonnes/year
 - Tonnage used in the production of articles: tonnes/year
 - Tonnage used for research purposes: tonnes/year
 - Remarks:

3.3 Sites

The screenshot shows the REACH registration interface. On the left is a navigation pane with a tree structure. The main pane on the right is titled 'Substance: Test / EPMF1 / Brussels / Belgium' and contains a section titled 'Sites'. Below the title is a search bar and a list of sites. The first site is 'Site' with a search icon and a pencil icon. Below it are two checkboxes: 'Production site' and 'Use site'.

Navigation: Query results, Section tree
REACH Registration member of a joint

0 Related Information
1 General Information
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Substance: Test / EPMF1 / Brussels / Belgium

Sites

Site

☐ Production site
☐ Use site

3.4 Forms in the supply chain (not mandatory for intermediates)

The screenshot shows the REACH registration interface. On the left is a navigation pane with a tree structure. The main pane on the right is titled 'Substance: Test / EPMF1 / Brussels / Belgium' and contains a section titled 'Form in the supply chain'. Below the title is a search bar and a list of forms. The first form is 'Available as substance' with a search icon and a pencil icon. Below it are two checkboxes: 'Available as substance' (checked) and 'Substance in mixture'. Below these are three input fields: 'Trade name of mixture', 'Type of mixture', and 'Typical concentration'.

Navigation: Query results, Section tree
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3.7 Waste from production and use

Substance: Test / EPMF1 / Brussels / Belgium

Form in the supply chain

Available as substance
☒ Available as substance

Substance in mixture
☐ Substance in mixture

Trade name of mixture
Type of mixture
Typical concentration

Query results Section tree

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Substance in mixture

☐ Substance in mixture

Trade name of mixture

Type of mixture

Typical concentration

Substance in article

☐ Substance in article

Description of article

Amount

Tonnage

Remarks

3.5 Identified uses

Navigation

Query results Section tree

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Substance: Test / EPMF1 / Brussels / Belgium

Identified uses

Information on uses

Uses by workers in industrial settings

Flags	IU number	Identified u...	Process cat...	Environmen...	Substance s...	Market sect...	Sector of en...	Subsequent...	Article d
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Add... Edit... Delete

Uses by professional workers

Flags	IU number	Identified u...	Process cat...	Environmen...	Substance s...	Market sect...	Sector of en...	Subsequent...	Article d
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Add... Edit... Delete

Query results

Section tree

REACH Registration member of a joint

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1 General Information

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Uses by consumers

Flags	IU number	Identified u...	Chemical pr...	Environmen...	Subsequent...	Article cate...	Exposure s...
-------	-----------	-----------------	----------------	---------------	---------------	-----------------	---------------

Add...

Edit...

Delete

Closed system

☐ all identified uses take place in closed system

Justification why no identified uses are reported

Most common technical functions of the substance

Technical function of substance (what it does)

Remarks

Significant routes of exposure

Human exposure

☐ Oral
☐ Dermal
☐ By inhalation

Environmental exposure

☐ Water
☐ Air
☐ Solid waste
☐ Soil

Pattern of exposure

☐ Accidental / infrequent
☐ Occasional
☐ Continuous / frequent

3.6 Uses advised against (not mandatory for intermediates)

The screenshot displays the REACH registration software interface. On the left is a 'Navigation' pane with a 'Section tree' showing a hierarchical list of data sections. Section 3, 'Manufacture, use and exposure', is expanded, and subsection 3.6, 'Uses advised against', is selected. The main area on the right is titled 'Uses advised against' and contains three tables for different user groups: 'Uses by workers in industrial settings advised against', 'Uses by professional workers advised against', and 'Uses by consumers advised against'. Each table has columns for 'Flags', 'IU number', 'Use advised...', and various categories. The tables are currently empty. Below each table are 'Add...', 'Edit...', and 'Delete' buttons. The top of the window shows a breadcrumb trail: 'Substance: Test / EPMF1 / Brussels / Belgium'.

Navigation

Query results Section tree

REACH Registration member of a joint

0 Related Information

1 General Information

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2 Classification and Labelling

3 Manufacture, use and exposure

- 3.1 Technological process
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Substance: Test / EPMF1 / Brussels / Belgium

Uses advised against

Information on uses advised against

Uses by workers in industrial settings advised against

Flags	IU number	Use advised...	Process cat...	Environmen...	Substance s...	Market sect...	Sector of en...	Article cate...	Remarks
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Add... Edit... Delete

Uses by professional workers advised against

Flags	IU number	Use advised...	Process cat...	Environmen...	Substance s...	Market sect...	Sector of en...	Article cate...	Remarks
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Add... Edit... Delete

Uses by consumers advised against

Flags	IU number	Use advised...	Chemical pr...	Environmen...	Article cate...	Remarks
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Add... Edit... Delete

3.7 Waste from production and use (not mandatory for intermediates)

The screenshot displays the ECHA REACH registration portal interface. The top navigation bar shows the breadcrumb path: Substance: Test / EPMF1 / Brussels / Belgium. The left sidebar contains a 'Section tree' with the following structure:

- 0 Related Information
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 - 3.2 Estimated quantities
 - 3.3 Sites
 - 3.4 Form in the supply chain
 - 3.5 Identified use

The main content area is titled 'Waste from production and use'. It contains three input fields, each with a magnifying glass icon for search:

- Estimated quantities
- Composition
- Remarks