

Data Submission Manual

No. 08 - Business Rules validation



Document history

Version	Changes
1.1	<p>November 2009</p> <p>P 15: new automated business rule SUB_GBL_BR180 added (BR Error message: It is not allowed to submit an update dossier “further to a request / decision form regulatory body” related to a 1st TCC failure, while a previous update dossier for the same reason and related to the same request / decisions is still pending in the submission pipeline.)</p> <p>P 24: Automated business rule SUB_REG_UC03_BR100: changed the text related to “What to do to avoid a failure in your (next) submission” from “...Indicate in IUCLID 5 in section 1.5 all information related to the Joint Submission (i.e. the name of the Joint Submission and the Lead of the Joint Submission)” to “...Indicate in IUCLID 5 in section 1.5 the name of the Joint Submission”.</p> <p>P 25: The status of two rules have been updated from manual to automated (rule SUB_GBL_UC02_BR50 and rule SUB_GBL_UC02_BR90).</p> <p>P 31: new manual business rule SUB_REG_UC04_BR50 that applies to update for tonnage band increase of registration dossiers (Error message: ‘The system has detected that you submitted a dossier for a higher tonnage band than the one currently stored in the REACH IT database. If you want to submit an update for a tonnage band increase, you must indicate this as an update reason in your IUCLID 5 dossier header by choosing ‘change of tonnage band’)</p> <p>P 32: new manual business rule added (Error message: the dossier you have submitted is related to an invalid ‘category’ of substances. The category is considered invalid because the substance to be registered is not clearly identified. In order to create a valid category dossier you have to clearly identify the substance you intend to register (using the REACH approach). You can find detail instructions in chapter D.8.2.5 of the IUCLID 5 user manual.</p> <p>P 32: new manual business rule added (Error message: you have indicated in section 1.3 of your dossier a registration number. This registration number relates to a substance previously notified under Directive 67/548/EEC. Please note that when updating a previous notified substance you must also indicate, in section 1.3, both the registration number and the notification number assigned to this substance under the previous legislation (NCD number).</p>
1.0	15/04/2009, first version.

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If you have questions or comments that relate to this document, please send them using the information request form to ECHA helpdesk. Quote the reference and issue date as stated above. The information request form can be accessed via the ECHA website under the section for the REACH helpdesk at the following address:

http://echa.europa.eu/reach/helpdesk/echahelp_en.asp

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1 Introduction

The aim of this document is to help ensure that companies can successfully submit a dossier through REACH-IT, and in particular to explain the initial checks that are made by REACH-IT to determine whether the dossier can be accepted for further processing.


Dossier types currently undergoing these checks include:

- Registrations
- Notifications for PPORD (Product and Process Orientated Research and Development) exemptions
- Inquiry dossiers
- Classification and Labelling Notifications.

This document outlines how and why these checks are carried out. It also explains the 'business rules' which are used in the REACH-IT application to enforce them. Annex 1 and Annex 2 provides a complete list of REACH-IT current business rules, together with advice on how to ensure that a dossier will pass them.

Annex 3 provides further information to help registrants and notifiers to locate the information relevant to a specific submission within REACH-IT. Therefore, these annexes can be used as a reference to identify the reason why a dossier could not be accepted for processing and what amendments are necessary in order to make a successful submission.

One substance, one registration: REACH operates on the principle of one substance, one registration. If you have more than one substance to register then you need to make a series of single registrations. If you have a number of substances with similar structure and/or properties a category approach can be used but it is still necessary to submit a separate registration dossier for each substance being registered. More information on categories is provided in Section D6 and D8.2.5 of the IUCLID 5 end user manual.

 Note that ECHA will develop and apply new business rules when required. Please check the web page regularly for updates.

2 Business rule validation

2.1 What are business rules?

All dossiers submitted to ECHA undergo administrative checks, called “business rules”. The business rules are a set of pre-requisites that must be fulfilled before ECHA can establish that the dossier can be handled properly and that the required regulatory processes can be successfully carried out. The business rules are checked using the REACH-IT software, and exist for three reasons:

- **Format:** In order to be processed correctly, REACH-IT must establish whether the dossier is in the correct IUCLID 5 format. For example, a PPORD notification must not be in the format of a registration dossier.
- **Administrative:** Before accepting a dossier for processing, ECHA must establish that it can be properly handled. This requires that certain (often quite complex) administrative information has to be checked to ensure that it is consistent with the submission type. For example, if the dossier is an update following a regulatory request, but the reference number provided for the previous submission is incorrect, it would be impossible to establish a link with the previous dossier. Under other circumstances, it might be unclear how the dossier should be invoiced.
- **Technical:** After dossier submission, REACH-IT extracts a large amount of technical information directly from the dossier, and this is used by the software to initiate numerous regulatory processes. The business rules ensure that this information can be properly handled within the software. For example, incomplete or contradictory substance identifiers would result in errors in the database if these were not corrected prior to accepting the dossier.

A dossier can be accepted for processing by ECHA only if all of the relevant business rules are satisfied. After that, the submission can proceed to the next steps (e.g. technical completeness check (TCC) and invoicing). If the dossier submission fails at the business rule level, the dossier cannot be accepted for processing, and a new submission is required before any regulatory processes can be initiated.

2.2 Why are there two different types of business rules?

At this time, it has not been possible to fully automate the checking of all the business rules in REACH-IT. Therefore there are currently two types of business rules:

- **Automated business rules:** These are checked by REACH-IT. Annex 1 provides a comprehensive list of the automated business rules, together with advice on the action needed to correct a dossier that cannot be accepted for processing. Annex 3 provides detailed information on how REACH-IT displays the status of a specific submission with respect to this type of rule.
- **Manually checked rules:** These are checked by ECHA staff. Annex 2 provides a comprehensive list of the manually checked business rules, together with advice on the action needed to correct a dossier that cannot be accepted for processing. Annex 3 provides detailed information on how REACH-IT displays the status of a specific submission with respect to this type of rule.

2.3 Where can I find further information on dossier submission?

Further information on how to submit a notification or registration to ECHA is available on ECHA's website http://echa.europa.eu/reachit_en.asp. The information helps you to understand the topics covered and provides access to relevant documents, tools and web pages.

In particular, we would recommend you to consult 'Data Submission Manual 4: How to submit a valid dossier to ECHA and complete the dossier header'.

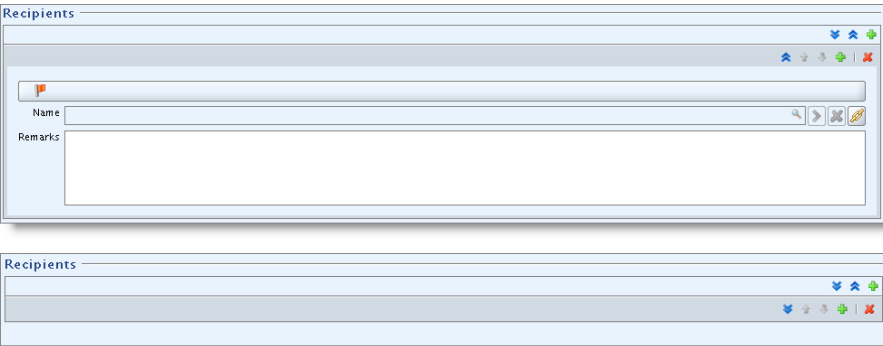
Furthermore Industry User Manual - parts 1 to 10 and Data Submission Manual 1 (PPORD notification), 2 (submit an inquiry dossier), 4 (complete the dossier header) and 5 (technical dossier).

Annex 1 - List of automated business rules

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
ALL SUBMISSIONS	SUB_GBL_UC02_FC030 SUB_GBL_UC02_FC010	There was no Reference substance in section 1.1 of your IUCLID 5 dossier and all constituents of the first composition of section 1.2 were not linked to a Reference substance.		<p>You did not provide a Reference substance neither in IUCLID 5 section 1.1 nor in 1.2.</p> <p>A Reference substance should always be present in IUCLID 5 section 1.1 and in section 1.2. If not, the dossier cannot be linked to a substance and it cannot be processed by ECHA.</p> <p>This Business Rule also fails in case an empty repeatable block for "composition" and / or "constituent" is created in a dossier.</p>	<p>Ensure that at least one Reference substance is linked in section 1.1 and in section 1.2 under Constituents in the dossier that you are submitting in REACH-IT.</p> <p>A Reference substance cannot be defined by completing only the field "name". To be valid, a Reference substance should have at least one of the following identifiers:</p> <p>EC number, or CAS number and name, or IUPAC name, or Description</p> <p>Note that in case the only available information is related to CAS, both the CAS number and name should be given.</p> <p>Ensure you indicate at least one 'valid' identifier in every Reference substances that you use in the dossier. In case you have an unknown impurity, you should write "unknown impurity" in the "IUPAC name" field of the corresponding Impurity Reference substance.</p> <p>Finally, in the subsequent TCC step, the presence of the molecular and structural information in each Reference substance (molecular formula, molecular weight range, and structural formula, or justification for not providing the information) will be checked.</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT rule Code	Business message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_GBL_UC02_FC040	The reference substance in section 1.1 and/or the reference substances indicated in section 1.2 of your IUCLID 5 dossier must be updated. Either EC number or CAS number or IUPAC name or Description must be provided in the corresponding IUCLID 5 fields, for each reference substance. It is not enough to provide the required information only in the reference substance name.		<p>At least one of the Reference substances that you have indicated in your dossier does not contain a valid identifier (EC number, CAS number, IUPAC name or Description).</p> <p>The system cannot accept a reference substance without any of these identifiers.</p>	<p>Each Reference substance that you link to your dossier (either in IUCLID 5 section 1.1 or 1.2) needs to be defined by at least a valid identifier among the following:</p> <ul style="list-style-type: none"> • EC number • CAS number and name • IUPAC name • Description <p>Note that in case the only available information is related to CAS, both the CAS number and name should be given.</p> <p>Be careful to indicate at least one identifier in every Reference substance that you indicate in the dossier. In case you have an unknown impurity, you should write "unknown impurity" in the "IUPAC name" field of the corresponding Impurity Reference substance.</p> <p>In order to avoid any inconsistency related to the identification of a chemical, a Reference substance cannot be defined by completing only the field "name".</p> <p>Finally, in the subsequent TCC step, the presence of the molecular and structural information in each Reference substance (molecular formula, molecular weight range, and structural formula, or justification for not providing the information) will be checked.</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_GBL_UC02_BR10	The dossier type specified during the creation of the submitted dossier is not equal to the dossier type mentioned in REACH-IT.		<p>The dossier type indicated in REACH-IT during the submission step does not match with the one indicated in the IUCLID 5 dossier template submitted.</p> <p>For example you might have indicated in your Dossier template "Registration of on-site isolated intermediate" while, in REACH-IT, during the dossier submission step, you have indicated "REACH Registration 10-100 tonnes". In this case and whenever a mismatch is detected, the submission fails.</p>	<p>You should take care to specify in the REACH-IT submission page the same Dossier type specified in the IUCLID 5 dossier template (during the IUCLID 5 dossier creation step).</p> <p>Please submit a new dossier via REACH-IT.</p>
INITIAL SUBMISSION	SUB_GBL_UC02_BR110	Mixtures are not allowed to be submitted.		<p>In your dossier a Mixture dataset was detected.</p> <p>IUCLID 5 Mixtures datasets are not allowed to be submitted as registration/notification dossiers via REACH-IT.</p>	<p>Please create a new dossier that does not contain any IUCLID 5 Mixtures dataset, and submit it via REACH-IT.</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_REG_UC02_FC010	The Legal entity indicated in IUCLID 5 , section 1.1 for the Third Party Representative should be already registered in REACH IT (i.e. same UUID).		The Legal entity of the Third party representative you have specified in IUCLID 5 section 1.1 was not signed up in REACH-IT as Third Party Representative.	<p>Make sure that the Third Party Representative Legal entity is signed-up in REACH-IT as a Third Party Representative, before proceeding with a submission of a new dossier. For more information see chapter 2.2 of REACH-IT Industry User Manual Part 2:</p> <p>http://echa.europa.eu/doc/reachit/industry_user_manual/reachit_signup_accmngt_en.pdf</p> <p>Please submit a new dossier via REACH-IT.</p>
ALL SUBMISSIONS	SUB_GBL_UC02_FC090	An error was detected in section 1.8 of your IUCLID 5 dossier: contact address of the recipient(s) is/are not complete. A Legal entity must be provided for each recipient. You must provide also the contact address for each recipient (including town and country) in the corresponding IUCLID 5 fields.		If you have created a repeatable block in section 1.8 of your IUCLID 5 dossier, you must have a link to a valid Legal entity (with contact address and country specified). If you do not have any recipient(s) to indicate, please do not create any empty repeatable block. (REACH-IT will fail the dossier if a valid Legal entity link is not properly indicated when a repeatable block is created).	<p>If you have created a repeatable block in section 1.8 of your IUCLID 5 dossier, keep in mind that you have to link to it a valid Legal entity (with at least the contact address and country specified).</p> <p>If you do not have any recipient(s) to indicate, please do not create any empty repeatable block. (REACH-IT will not process the dossier further if a valid Legal entity link is not properly indicated when a repeatable block is created). An empty repeatable block contains information neither in the normal view nor in the compressed one (see screenshots here below):</p>  <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT rule Code	Business Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_GBL_UC02_FC080	An error was detected in section 3.3 of your IUCLID 5 dossier: you must update your site(s) and provide also the contact address for the site(s) (including town and country) in the corresponding IUCLID 5 fields. It is not enough to provide the required information in the name of the site(s).	<p>In section 3.3 of your IUCLID 5 Dossier, you have added a link to a Site in which you have not indicated the complete contact address.</p> <p>Keep in mind that empty repeatable blocks created in section 3.3 are triggering the same error in REACH-IT.</p>	<p>If you need to specify a Site in section 3.3 of your IUCLID Dossier, please make sure that you have added a link to a Site in which you have indicated the complete contact address.</p> <p>Please also note that you should not create any empty repeatable block if you have no intention to indicate a Site (REACH-IT will be unable to accept the dossier if a valid site is not properly indicated when a repeatable block is created).</p> <p>Please make the necessary modification and submit a new dossier.</p>
INITIAL SUBMISSION	SUB_REG_UC03_BR120	The system has identified that you have submitted a dossier where it is indicated in section 1.1 that you are a Manufacturer/Importer AND an Only Representative. Please submit a separate registration for each of your role in the supply chain, i.e. one as a Manufacturer/Importer and one per non-EU Manufacturer you are representing.	<p>You have ticked in IUCLID 5 section 1.1 that you are either Manufacture or Importer, and Only Representative.</p> <p>ECHA cannot accept this dossier for further processing because you cannot have both roles in the same dossier.</p>	<p>You should create a dossier in which your role in the supply chain is either Manufacturer/Importer or Only Representative.</p> <p>If you need to submit a dossier for the same substance with the two roles, you must create two different dossiers:</p> <ul style="list-style-type: none"> one as Manufacturer or Importer, in which your you will tick the checkbox "Manufacturer/Importer" one as Only Representative, in which you will tick the box "Only Representative" <p>Please make the necessary modification and submit (a) new dossier(s).</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_REG_UC03_BR200	The IUCLID 5 dossier template "REACH registration 1-10 tonnes, physicochemical requirements" can be used only for phase-in substances (see REACH Article 12(1)(b)).		<p>You have submitted a registration for a non-phase in substance, and you have defined the template "REACH registration 1-10 tonnes, physicochemical requirements".</p> <p>As this template can only be used to register phase-in substances, ECHA cannot accept the dossier for further processing.</p>	<p>If your substance is a "non phase-in" substance, you are not allowed to create a dossier with the template "REACH registration 1-10 tonnes, physicochemical requirements".</p> <p>Please make sure that your substance is not a "phase-in substance" (see REACH Article 3(2)).</p> <p>If your substance is "non phase-in", please create a new dossier using the template "REACH Registration 1-10 tonnes, standard requirements" including the required information for this tonnage band, and submit it via REACH-IT</p>

	REACH-IT rule Code	Business message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR100	The dossier has already been submitted earlier. Please create a new dossier and submit it.		You have submitted for the second time the same dossier.	<p>If your intention is to submit an update of a previously submitted dossier, please create a new dossier and make sure to correctly indicate the following information in the Dossier header during the IUCLID 5 dossier creation (step 7 of the dossier creation wizard):</p> <ul style="list-style-type: none"> • tick the checkbox “Is the submission an update?” • enter the last valid submission number in the “Last submission number” field (note that the submission number of any dossiers previously not accepted at the business rules stage should not be used; it must be the submission number of the last dossier which was accepted for processing e.g. an initial submission which failed the TCC) • select the checkbox “Spontaneous update”, if you want to spontaneously update your dossier. Then, add a repeatable block in which you should enter the justification of your update. • select the box “Further to a request/decision from regulatory body”, if you have received a formal communication from ECHA. Then add a repeatable block in which you will indicate the related communication number <p>For more information on how to correctly enter data in the dossier header in case of an update, please refer to Data Submission Manual 4: http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT rule Code	Business message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_BR180	It is not allowed to submit an update dossier "further to a request / decision from regulatory body" related to a 1st TCC failure, while a previous update dossier for the same reason and related to the same request / decisions is still pending in the submission pipeline.		If you have already submitted a dossier after the first TCC failure, and if this dossier has passed the step "Business rules check", you are not allowed to submit a new one, until the previous one has completed all steps.	<p>If you have submitted a registration dossier, you cannot update it while it is still in the submission pipeline, neither "further to a request / decision for nor "spontaneously" (see BR SUB_GBL_UC02_BR140).</p> <p>Please note that if you realise you need to update a dossier, you should wait a "reference number" (e.g. registration number) is assigned to it, i.e. until it has been completely processed. Only after having received the reference number, can you only submit a "spontaneous" update dossier (i.e. do not use anymore the reference related to the communication of TCC failure you have received previously).</p> <p>Be aware that under these circumstances you should resubmit a dossier update following a first "Technical Completeness Check communication of failure" sent to you via REACH-IT. In this case, you must resubmit your dossier, and during step 7 of the IUCLID 5 dossier creation wizard, tick the box "Further to a request/decision from a regulatory body". Do not forget to indicate in the field "Number" the communication number given to you by ECHA.</p> <p>Please make the necessary modification and submit again your new dossier via REACH-IT.</p> <p>For more information on how to correctly enter data in the dossier header in case of an update and complete a technical dossier, please refer to Data Submission Manual 4 and 5: http://echa.europa.eu/reachit/supp_docs_en.asp</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR140		No spontaneous update is allowed after a submission which was rejected due to a 1st TCC failure.	You have submitted a "spontaneous update" for a dossier that previously failed the first TCC .	<p>If you have submitted a registration dossier, you cannot "spontaneously" update it before a "reference number" (e.g. registration number) is assigned to it, i.e. until it has been completely processed. Only after having received the reference number, can you submit a "spontaneous" update dossier.</p> <p>Be aware that under these circumstances you should resubmit a dossier update following a first "Technical Completeness Check communication of failure" sent to you via REACH-IT. In this case, you must resubmit your dossier, and during step 7 of the IUCLID 5 dossier creation wizard, tick the box "Further to a request/decision from a regulatory body". Do not forget to indicate in the field "Number" the "communication" number given to you by ECHA.</p> <p>Please make the necessary modification and submit again your new dossier via REACH-IT.</p> <p>For more information on how to correctly enter data in the dossier header in case of an update, please refer to Data Submission Manual 4: http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p>

	REACH-IT rule Code	Business message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR55	The submitted dossier is an update without update reason (Request by authority/Spontaneous) specified.		You have submitted a dossier update but you have not specified the reason why you are updating your dossier. Therefore the dossier cannot be processed by ECHA.	<p>If you want to submit an update (either “Spontaneous” or “Further to a request/decision from a regulatory body” type), you should not forget to specify the reason for the update, in the corresponding repeatable block field.</p> <p>In case of “Spontaneous” update, you should indicate in the field “Justification” one of the pre-defined picklist entries using the field “remarks” to add more information.</p> <p>In case of “Further to a request/decision from a regulatory body” update, you should indicate in the field “Number” the communication / decision number related to the update.</p> <p>Finally, before submitting a new update dossier, make sure to have also completed the following steps:</p> <ul style="list-style-type: none"> • tick the checkbox “Is the submission an update?” • enter the last valid submission number in the “Last submission number” field (note that the submission number of any dossiers previously not accepted at the business rules stage should not be used; it must be the submission number of the last dossier which was accepted for processing e.g. an initial submission which failed the TCC) • select the checkbox “Spontaneous update”, if you want to spontaneously update your dossier. Then, add a repeatable block in which you should enter the justification of your update. <p>select the box “Further to a request/decision from regulatory body”. Then add a repeatable block in which you will indicate the related communication number.</p> <p>Please make the necessary modification and submit again your new dossier update via REACH-IT.</p> <p>For more information on how to correctly enter data in the dossier header in case of update, please refer to Data Submission Manual 4:</p> <p>http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_REG_UC04_BR80		You have submitted an update for a change in tonnage band. However, the previous tonnage band recorded in the database for this substance is identical to the one indicated in your update. Consequently your dossier will not be processed. You should check the correctness of your dossier prior to resubmit'.		<p>You have updated your dossier indicating a change in the tonnage band.</p> <p>However REACH-IT has detected that the tonnage band of the submitted dossier is the same as the one indicated in the previously accepted dossier. Therefore this update submission cannot be processed by ECHA.</p>	<p>If you need to submit an update of a previously registered substance, because your tonnage band has changed, you should make sure to create an update dossier using the correct IUCLID 5 "dossier template" in the IUCLID 5 "dossier creation wizard" - step 1 (for example if you were previously registering your substance using the "REACH Registration 10-100 tonnes", you should submit your update dossier with a different template).</p> <p>To proceed, please complete the following steps during the dossier creation:</p> <ul style="list-style-type: none"> • tick the checkbox "Is the submission an update?" • enter the last valid submission number in the "Last submission number" field related to the last valid submission of your dossier • select the checkbox "Spontaneous update". Add a repeatable block in which you select the "Change of tonnage band" picklist entry in the justification field <p>Please make the necessary modification and submit your new dossier update via REACH-IT.</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR30 SUB_REG_UC03_BR10 SUB_PPD_UC02_BR10		An inconsistency has been detected in the type of dossier submitted. Please verify that you have not sent an update instead of an initial dossier or vice versa. This submission has been aborted. Please make the necessary modification and submit a new dossier.	You have submitted an invalid "update" dossier or you have submitted an invalid "initial" dossier.	<p>As an inconsistency has been detected in the dossier you have submitted, please read carefully the following before submitting a new dossier via REACH-IT</p> <p>If your dossier was an initial one, please make sure that:</p> <ul style="list-style-type: none"> the dossier header has not the checkbox "Is the submission an update?" ticked. the same substance has not been already submitted by your company (i.e. by the same Legal entity signed up in REACH-IT). <p>If your dossier was an update, please make sure that:</p> <ul style="list-style-type: none"> in the dossier header you have ticked the checkbox "Is the submission an update?". in the dossier header you have indicated the right "last submission number" (i.e. the submission number of the latest accepted dossier for the same substance and the same company). In case that you have been requested to submit an update "further to a request of a regulatory body", indicate in the dossier header a valid "<u>communication/decision number</u>". In case of a spontaneous update, specify a "Justification" chosen from the picklist. <p>If you need to submit an update of a NONS (notified substance under Directive 67/548/EEC) for which you have already claimed the registration number in REACH-IT, check that:</p> <ul style="list-style-type: none"> in the dossier header you have ticked the checkbox "Is the submission an update?". in the dossier header you have indicated the right "<u>last submission number</u>" (= to the one you have received with the claim of the registration number of your previous notification) specify that it is a spontaneous update and provide a suitable "Justification". <p>In order to identify whether the dossier should be submitted as an update of a previous dossier or not, as well as the information that you have to report, please refer to pages 6-9 of Data Submission Manual 4: http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p> <p>Please make the necessary modification and re-submit your dossier as a new submission or update of a previous one.</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL OR UPDATE SUBMISSION (not applicable for PPOD)	CLN_UC02_BR10		You have already registered this substance. To update the Classification and Labelling information for this substance you have to submit an update of your registration dossier.	<p>You have already received a registration number for this substance.</p> <p>Therefore you are not allowed to submit a "Classification and Labelling (C&L) notification".</p> <p>If you need to update the Classification and Labelling information you should instead submit an update of the already registered substance.</p>	<p>If you need to update the Classification and Labelling information for this substance, you should submit a dossier update, and you should not create a new "Classification and Labelling" notification.</p> <p>Please note that in this update you should indicate the submission number of the last complete dossier submitted for this substance in the "Last submission number" field. Moreover in section 1.3 of the IUCLID 5 dossier, please add the registration number you have received for this substance.</p> <p>For detailed information please refer to chapter 1.2 of Data Submission Manual 4: http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p> <p>Please make the necessary modification and submit your new dossier update via REACH-IT.</p>
INITIAL OR UPDATE SUBMISSION	CLN_UC02_BR20		No Classification and Labelling notification submission is allowed while a registration dossier for the same substance is still pending in the submission process.	You have submitted a Classification and Labelling notification for a substance for which you have submitted a registration dossier. Moreover this registration has not yet reached the end of the registration process and no registration number has been yet issued for it.	<p>You have submitted a Classification and Labelling notification dossier for a substance that has the status "pending" in a previous registration submission. This means that you have already submitted a registration dossier for this substance, and this dossier has not yet reached the end of the registration process. Be aware of the fact that you are not allowed to submit a new Classification and Labelling notification dossier for the same substance.</p> <p>If you need to update the Classification and Labelling information, you should proceed by updating the previous registration dossier. You will be able to submit a valid updated dossier only after you have received the registration number from ECHA for it (i.e when the submitted dossier has reached the end of the pipeline).</p>

	REACH-IT rule Code	Business message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL OR UPDATE SUBMISSION	CLN_UC02_BR30	You have provided the C&L information in an incorrect format. Please respect the deadlines concerning the submission of C&L information according to DSD and GHS format.		<p>You did not specify in your dossier a valid Classification and Labelling in section 2.2 of your IUCLID 5 dossier.</p> <p>Please note that this failure appears also if you have specified only a Classification and Labelling information in IUCLID 5 Section 2.1 – GHS (used for submitting information on C&L under the CLP Regulation).</p>	<p>To submit a valid dossier to ECHA, you are asked to complete at least the Classification and Labelling according to the DSD/DPD (the Dangerous Substance Directive 67/548/ECC/Dangerous Preparations Directive 1999/45/EC (IUCLID 5 Section 2.2)). Therefore, a Classification and Labelling repeatable block in this section should be created and filled in.</p> <p>Please follow the information you find in Data Submission Manual 5: http://echa.europa.eu/doc/reachit/compl_tech_dossier_manual.pdf to correctly complete the Classification and Labelling information</p> <p>Under the transitional provisions for the European Regulation on Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation), C&L must currently be provided using at least the DSD/DSP format. However, after the first transitional deadline and until 1 June 2015 section 2.1 must contain at least the CLP (GHS) Classification and Labelling. Therefore, ECHA advises completing the C&L information in both formats whenever possible.</p> <p>Please make the necessary modification and submit your new dossier via REACH-IT.</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL SUBMISSION	SUB_REG_UC03_BR160		<p>According to the information present in IUCLID Section 1.1. 'Role in the supply chain' and Section 3.4 'Form in the supply chain', it would appear that the registration dossier is invalid. In Section 1.1, only the box for 'Downstream User' was ticked. The only circumstances where a Downstream User can register is as a producer of articles meeting the criteria presented in the Article 7(1) of the REACH Regulation. However, Section 3.4 did not indicate 'Substance in article' under 'Form in the supply chain'. Please re-submit a registration dossier, either indicating that you are a Manufacturer, Importer or Only Representative in Section 1.1, and/or updating Section 3.4 'Form in the supply chain', as appropriate.</p>	<p>A Downstream User can register a substance only if he/she is a producer of articles, meeting the criteria presented in Article 7(1) of the REACH Regulation.</p> <p>In your dossier you have not indicated in IUCLID 5 Section 3.4, 'Substance in article' under 'Form in the supply chain'.</p>	<p>If you are a "Downstream User", you should tick the checkbox "Downstream User" in IUCLID 5 Section 1.1.</p> <p>Be informed that the only circumstances where a Downstream User can register a substance is as a producer of articles meeting the criteria presented in Article 7(1) of the REACH Regulation.</p> <p>Therefore, if you are a Downstream User, you should provide the correct information in IUCLID 5 section 3.4 where under the 'Form in the supply chain' header, you should select the 'Substance in article' checkbox.</p> <p>Please make the necessary modification and submit your new dossier via REACH-IT</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INQUIRY SUBMISSION	SUB_INQ_UC03_BR20	Your inquiry dossier does not contain your information requirements in IUCLID 5 section 13. Please make the necessary modification and submit a new dossier."		In your inquiry dossier, you did not attach your information requirements as a report in IUCLID 5 Section 13.	In Section 13 of your IUCLID 5 inquiry dossier, you need to attach your information requirements as a report. All information related to the Inquiry submission process can be found in ECHA web page http://echa.europa.eu/reachit/inquiry_en.asp Please make the necessary modification and submit your new inquiry via REACH-IT.
INITIAL SUBMISSION	SUB_GBL_UC02_BR170	Your dossier does not contain the information related to a production site in IUCLID 5 section 3.3 whereas in section 1.1 the checkbox 'Manufacturer' was ticked. Please make the necessary modification and submit a new dossier.		If you are a Manufacturer and you tick the related box in section 1.1, please make sure that you have defined a "production site" in section 3.3	If you are a Manufacturer and you tick the related box in section 1.1, please make sure that you have defined a "production site" in section 3.3. Do not forget to check if a valid site link is attached to this IUCLID 5 section 3.3. Please make the necessary modification and submit your new dossier via REACH-IT.
INQUIRY SUBMISSION	SUB_INQ_UC03_BR10	Your inquiry dossier contains a category and therefore it cannot be processed. Please make the necessary modification and submit a new dossier.		Your inquiry dossier contains a IUCLID 5 category.	If you are submitting an inquiry dossier, the category approach should not be applied. Before creating a new dossier, please ensure to delete the category from IUCLID 5 section 0.2. Please make the necessary modification and re-submit your inquiry dossier as a new submission.

	REACH-IT Business rule Code	REACH-IT message Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INQUIRY SUBMISSION	SUB_INQ_UC03_BR30	The registration number you specified in section 1.3 of your IUCLID 5 inquiry dossier is not valid. Please make sure that you have reported the correct identifier related to your company and the substance for which you sent this Inquiry dossier".	Your inquiry dossier contains an invalid registration number in IUCLID 5 section 1.3.	<p>If you are submitting an inquiry dossier for a substance already registered under REACH, you should indicate in IUCLID 5 section 1.3 the registration number.</p> <p>Please make the necessary modification and re-submit your inquiry dossier as a new submission.</p>
NONs UPDATE SUBMISSION	SUB_REG_UC03_BR170	You indicated in section 1.3 of your IUCLID 5 dossier a notification number (NCD number). As all notified substances are considered registered, you should also indicate in this section the correct registration number. In case you do not have a registration number for this substance yet, you can claim it in REACH-IT.	IUCLID 5 Section 1.3 of the dossier you have submitted does not contain the REACH Registration number assigned to your previous notified substance under Directive 67/548/EEC.	<p>If you have submitted an update of a previous notified substance (under Directive 67/548/EEC) you should indicate in section 1.3 the following information:</p> <ul style="list-style-type: none"> • Notification number (assigned under the Directive 67/548/EEC), • Registration number claimed in REACH-IT for the indicated notified substance <p>Please make the necessary modification and submit a new update dossier.</p>

	REACH-IT rule Code	Business Rule	REACH-IT message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL OR UPDATE SUBMISSION	SUB_REG_UC03_BR180		You indicated the fee waiver in the IUCLID dossier header but did not indicate it in REACH-IT during submission. ECHA is unsure how to process (and invoice) your dossier and it has been aborted. Depending on whether you intended to claim the fee waiver, please resubmit accordingly.	You have claimed in your dossier header the "fee waiver", but you have not selected this option on the on-line REACH-IT submission form.	<p>Please make sure that the same information related to the "fee waiver" is indicated both in the Dossier header and in the on-line REACH-IT submission form (i.e. if in the dossier you have ticked the checkbox "fee waiver", you should remember to tick also the checkbox "fee waiver" in REACH-IT during the on-line submission procedure and vice versa.)</p> <p>Please make the necessary modification and re-submit your dossier as a new submission.</p>
INITIAL OR UPDATE SUBMISSION	SUB_REG_UC03_BR190		The tonnage band you have indicated in REACH-IT during the submission of your dossier does not match the tonnage band indicated in the dossier template of your IUCLID 5 dossier. Consequently we are not able to process your dossier.	The tonnage band entered in REACH-IT (field 'Tonnage Band') is not the same as the tonnage band of your IUCLID 5 dossier template.	<p>Please make sure that the tonnage band entered in REACH-IT during the submission of your dossier matches the tonnage band of the template of your IUCLID 5 dossier.</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
JOINT SUBMISSION – LEAD DOSSIER - INITIAL OR UPDATE SUBMISSION	SUB_REG_UC03_BR80 CLN_UC02_BR40	You are the Lead of a Joint Submission for the substance mentioned in your dossier. Consequently you are not allowed to submit a Member dossier for this substance. Please send a new dossier for this substance using the correct dossier template.		If you are the Lead of a Joint Submission, you cannot submit a dossier based on the template that should be used by the Members e.g. “REACH Registration Member of a Joint Submission – general case”, “REACH Registration Member of a Joint Submission – intermediates”, or “REACH C&L notification Member of a Joint Submission”.	<p>If you are a Lead of a Joint Submission you should not submit a dossier using the following IUCLID 5 templates:</p> <ul style="list-style-type: none"> • “REACH Registration Member of a Joint Submission – general case” • “REACH Registration Member of a Joint Submission – intermediates”. • “REACH C&L notification Member of a Joint Submission” <p>as they should be used only by a Joint Submission Member.</p> <p>During the dossier creation in IUCLID 5 , please use the dossier template for the tonnage band related to your submission (for example “REACH registration above 1000 tonnes” in case your tonnage band is >1000 tonnes).</p> <p>Do not forget to indicate in IUCLID 5 section 1.5 the necessary Joint Submission information (i.e. the Joint Submission name and the Lead of the Joint Submission).</p> <p>Once your dossier has been created with the correct template, please submit it via REACH IT.</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
JOINT SUBMISSION	SUB_REG_UC03_BR100	<p>You do not belong to a Joint Submission for the substance mentioned in your dossier. Consequently you are not allowed to submit a Member dossier for this substance.</p> <p>Please send a new dossier for this substance using the correct dossier template.</p>		<p>You have submitted a dossier as a Member of a Joint Submission (i.e. "REACH Registration Member of a Joint Submission – general case", "REACH Registration Member of a Joint Submission – intermediates" but you have not confirmed the membership to the Joint Submission for that substance in REACH-IT.</p>	<p>If you are not a Member of a Joint Submission, you should not use the Member dossier templates (i.e. "REACH Registration Member of a Joint Submission – general case" or "REACH Registration Member of a Joint Submission – intermediates").</p> <p>Please make sure to select the correct template in IUCLID 5 while creating a new dossier.</p> <p>If you are a Member of a Joint Submission, please make sure that you have completed all the following steps:</p> <ul style="list-style-type: none"> confirm the membership in REACH-IT (using the information provided by the Lead of the Joint Submission: Joint Submission name and token) indicate in IUCLID 5 in section 1.5 all information related to the Joint Submission (i.e. the name of the Joint Submission) receive from the Lead the information that a "registration number" was issued for the Lead dossier of the Joint Submission submit the dossier using one of the following template: "REACH Registration Member of a Joint Submission – general case", "REACH Registration Member of a Joint Submission – intermediates" <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT rule Code	Business Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
JOINT SUBMISSION – MEMBER DOSSIER SUBMISSION	SUB_REG_UC03_BR20	The system has detected that you are part of a Joint Submission for this substance (as a Member). Hence, you are not allowed to submit your dossier before the Lead has successfully registered the substance or sent a C&L notification (i.e. before he has a registration number or a notification number).	You have submitted your dossier as a Member of a Joint Submission before the registration/notification dossier of the Lead was completely processed.	<p>If you are a Member of a Joint Submission, you must submit your dossier only once the Lead has successfully registered the substance.</p> <p>The Lead should inform you that a registration or notification number has been assigned to the Lead Joint Submission dossier he submitted on behalf of the Members.</p> <p>Only at this point the Member can submit his dossier, using one of the two following templates:</p> <ul style="list-style-type: none"> • “REACH Registration Member of a Joint Submission – general case” • “REACH Registration Member of a Joint Submission – intermediates”. • “REACH C&L notification Member of a Joint Submission” <p>Please make the necessary modification and submit a new dossier.</p>
JOINT SUBMISSION DOSSIER INITIAL SUBMISSION	SUB_GBL_UC01_BR180	<p>The substance identity in your dossier does not correspond to the information available in the Joint Submission you have mentioned in REACH-IT.</p> <p>Or</p> <p>There are more than one Joint Submission that correspond to the substance identity in your dossier and you did not specify which one is the appropriate.</p>	<p>The dossier you have submitted cannot be processed by ECHA because there is no link between:</p> <p>the substance identity defined in REACH-IT for this Joint Submission, and the substance identity in the dossier submitted.</p> <p>there are more than one Joint Submission defined in REACH-IT that correspond to the same substance identity you have specified in your dossier.</p>	<p>In case of a Joint Submission, the system verifies the following:</p> <ul style="list-style-type: none"> • the substance identity indicated in the submitted dossier. • the substance identity and the name of the Joint Submission defined by the Lead in REACH-IT for that Joint Submission. <p>Therefore, before submitting a new dossier via REACH-IT, please check the Joint Submission information entered in REACH-IT and make sure that there is a one-to-one correspondence between the here above listed identifiers.</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT message	Rule	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR50	You have submitted an update but the last submission number indicated in your dossier is incorrect.		The submission number indicated in the 'Last submission number' field in your IUCLID 5 dossier header is not valid.	<p>If you want to update a dossier, please make sure that you indicate in the 'Last submission number' field the submission number of your latest dossier accepted by ECHA.</p> <p>Please make the necessary modification and submit a new dossier.</p>
UPDATE SUBMISSION	SUB_GBL_UC02_BR90	The given reference number in the dossier (IUCLID 5 section 1.3) is not correct.		You have reported in section 1.3 an invalid reference number. Either the number does not exist or it is not assigned to the same substance, company or dossier type.	<p>Please make sure that in section 1.3 of your IUCLID 5 dossier you indicate the correct "reference number(s)" (i.e. inquiry number, pre-registration number, registration number, PPORD notification number, authorisation number, classification & labelling number, notification number (NCD)) related to the same substance, company and dossier type).</p> <p>Please make the necessary modification and submit your dossier as a new submission.</p>

Annex 2 - List of manually checked business rules

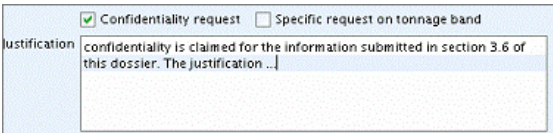
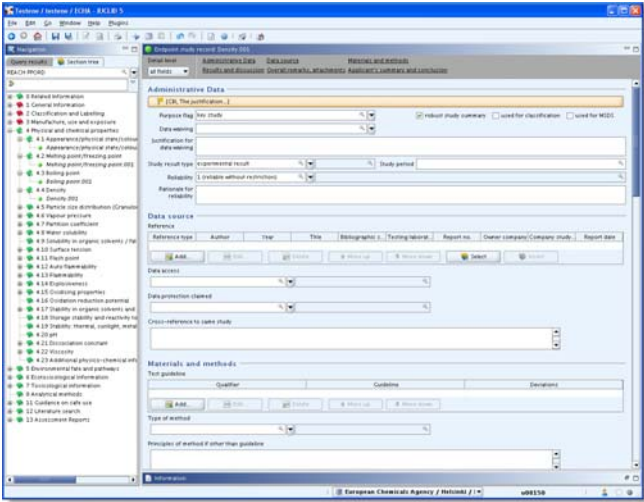
	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL AND UPDATE REGISTRATION DOSSIER	SUB_REG_UC03_BR50	The EC number of the dossier is not in line with those indicated in the result of your previous inquiry on this substance.	You have submitted an inquiry for which you received a certain EC number. Then you have submitted a dossier reporting either no EC number or a different one.	<p>If in your dossier you have indicated in section 1.3 that you submitted an inquiry, you should ensure to use the same EC number in the Reference substance you link to section 1.1.</p> <p>Please make the necessary modification and submit your dossier as a new submission.</p>
JOINT SUBMISSION	SUB_REG_UC04_BR40	You are a Member of a Joint Submission. You cannot send an update for a higher tonnage band than the tonnage band covered by the Lead dossier unless you opt-out for the additional information requirements. Otherwise the Lead should update the common dossier in advance.	You have submitted a dossier update for a change to a higher tonnage band as a Member of a Joint Submission. However, your updated tonnage band is not covered by the Lead dossier.	<p>If you need to submit an update for a change to a higher tonnage band not covered by the Lead dossier you should either:</p> <ul style="list-style-type: none"> • opt-out for the additional information requirements or • ask the Lead to submit an update of the common dossier in advance. <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL AND UPDATE REGISTRATION DOSSIER	SUB_REG_UC03_BR110	<p>One or several identifiers indicated in section 1.3 of your IUCLID 5 dossier is not valid. For information, the validity of the following identifiers is checked at this stage (if relevant): REACH inquiry number, REACH pre-registration number.</p> <p>Please make sure that you have reported only identifiers related to your company and the substance for which you sent this dossier.</p>	<p>In section 1.3 of your IUCLID 5 dossier you have indicated a REACH inquiry, pre-registration, registration or notification numbers which are not valid.</p>	<p>Please make sure that all the identifiers that you report in section 1.3 of your IUCLID 5 dossier are related to your company and/or to the substance for which you send your dossier.</p> <p>Please make sure to always indicate all identifiers you have. Here below you find a list of examples of identifiers that can be indicated in this section:</p> <ul style="list-style-type: none"> • inquiry number • pre-registration number • notification number (assigned under the Directive 67/548/EEC) • registration number (in case of update of a notified substance for which you have claimed a registration number, or in case of update of a previous registered substance) <p>Please make the necessary modification and submit a new dossier.</p>

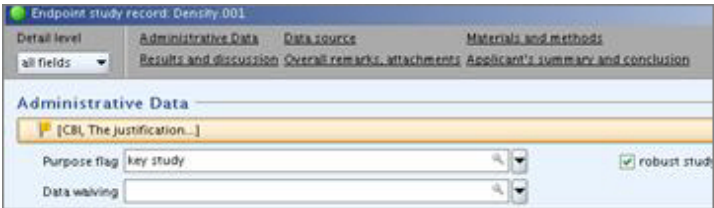
	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR60	You have submitted an update following a request/decision but the decision number(s) indicated in your dossier is (are) incorrect.	The decision number(s) indicated in your IUCLID 5 dossier header is (are) incorrect or empty.	<p>If you need to submit an update following a request/decision, please complete the following steps:</p> <ul style="list-style-type: none"> • in the dossier header you have ticked the checkbox “Is the submission an update?”. • in the dossier header you have indicated the correct “<u>last submission number</u>”. • In case that you have been requested to submit an update “further to a request of a regulatory body”, indicate in the dossier header a valid “<u>communication or decision number</u>”. • In case of a spontaneous update, specify a “Justification”. <p>You can find the correct number in the annotations tab of your dossier in REACH-IT and/or in the letter attached to an internal message sent for your dossier.</p> <p>For more information, please read chapter 1.2 of ‘Data Submission Manual 4’: http://echa.europa.eu/doc/reachit/how_submit_valid_dossier.pdf</p> <p>Please make the necessary modification and submit a new dossier.</p>
UPDATE SUBMISSION	SUB_GBL_UC02_BR80	Spontaneous updates are not allowed without a correct reference number and without an update reason.	You have submitted a spontaneous update but you have not reported an update reason in your dossier header, and/or a correct reference number in section 1.3 of your dossier.	<p>If you need to submit a spontaneous update, please do not forget to indicate the following information:</p> <ul style="list-style-type: none"> • a reason for updating in the IUCLID 5 dossier header • a correct reference number (e.g. a REACH registration number) in section 1.3. <p>If the update is for a previously notified substance under Directive 67/548/EEC, indicate in section 1.3 the correct NCD notification number and the registration number previously claimed in REACH-IT.</p> <p>Please make the necessary modifications and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION	SUB_GBL_UC02_BR120	The system has detected that two completeness check failures already occurred for this submission. The dossier shall be resubmitted as an initial one.	If your dossier has been rejected following the second TCC step, you must resubmit it as an initial one.	<p>Be aware of the fact that you cannot submit an update of your dossier in case you have failed the second time the TCC (in that case you should have received a decision stating that your dossier was rejected).</p> <p>Therefore, depending on your particular case you are asked to submit either:</p> <ul style="list-style-type: none"> a <u>new initial dossier</u> for your substance. In this case do not mention any communication/decision number in the dossier header and / or in the dossier. <p>Or:</p> <ul style="list-style-type: none"> a <u>new update</u> for your substance (in case you need to send an update due to, for example, a change of tonnage band).
UPDATE SUBMISSION	SUB_GBL_UC02_BR130	The system has detected that your submission of an update after a first Completeness Check failure is not within the given deadline.	You did not submit your updated dossier within the given deadline granted after the first TCC failure.	<p>You have submitted an update dossier after the first TCC failure. In the communication letter related to this TCC failure, a deadline was indicated.</p> <p>Unfortunately you did not submit the update before that date.</p> <p>Therefore, depending on your particular case you are invited to submit either:</p> <ul style="list-style-type: none"> a new initial dossier for your substance. In this case do not mention any communication/decision number in the dossier header and / or in the dossier. <p>Or:</p> <ul style="list-style-type: none"> a new update for your substance (in case you need to send an update due to, for example, a change of tonnage band).

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
ALL INDIVIDUAL SUBMISSIONS	SUB_GBL_BR160	Your submission was not part of a Joint Submission. In that case, the section 1.5 of your IUCLID 5 dossier must be empty.	<p>You have submitted an individual dossier (i.e. not part of a Joint Submission), but you have created a repeatable block in section 1.5 of your IUCLID 5 dossier.</p> <p>Only use section 1.5 to give information on Joint Submission.</p>	<p>If you are not the Lead or a Member of a Joint Submission, you should not create any record in section 1.5 of your IUCLID 5 dossier.</p> <p>If you are the Lead or a Member of a Joint Submission, in section 1.5 of your Lead/Member dossier, you should insert the following information:</p> <ul style="list-style-type: none"> the Joint Submission name defined by the Lead in REACH-IT the information on the Lead company. <p>Before submission, define your Joint Submission in REACH-IT.</p> <p>For more information on Joint Submissions, please refer to http://echa.europa.eu/reachit/joint_submission_en.asp</p> <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
ALL SUBMISSIONS	SUB_REG_INITIA L_BR140	<p>The checkbox 'Confidentiality request' was ticked in your dossier header. The confidentiality request in the dossier header shall only be used in the following cases: confidentiality request on the tonnage band and/or confidentiality requests which cannot be made in the other sections of the IUCLID dossier (e.g. confidentiality claim on sections 3.5 or 3.6). We have noticed that you would like to claim confidentiality on specific sections of IUCLID for which it is possible to claim confidentiality by selecting a confidentiality flag. In that case, the claim has to be made directly in the appropriate section. We are not able to process your dossier as we cannot calculate the appropriate fee. For more information, please refer to manuals 4 and 5 available on ECHA website (http://echa.europa.eu/reachit/registrati-on-it_en.asp). We invite you to make the necessary modifications and resubmit the dossier as an initial one.</p>	<p>You have ticked the checkbox 'Confidentiality request' in your IUCLID 5 dossier header, and in the 'Justification' field you have indicated that you want some sections of the dossier to be kept confidential. However, you have not flagged those sections as confidential.</p>	<p>If you want to claim confidentiality on the tonnage band and/or in sections 3.5 or 3.6 of your IUCLID 5 dossier, please tick the checkbox 'Confidentiality request' in the dossier header and state your request with a justification in the 'Justification' field:</p>  <p>However, if you want to claim confidentiality on any other section use the confidentiality flag present in that section:</p>  <p>Please make the necessary modification and submit a new dossier.</p>

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
UPDATE SUBMISSION – REGISTRATION DOSSIER	SUB_REG_UC04_BR50	The system has detected that no inquiry was made before sending an updated registration dossier due to a production volume increase whereas an inquiry should have been made. Please note that your dossier is neither accepted nor rejected. The type of this Business Rule is 'overrule'. You will receive a communication from ECHA indicating whether your dossier is accepted or not.	If you submit a spontaneous update for a tonnage band increase, you should send an inquiry before.	Before submitting a registration update for tonnage band increase, you are advised to submit an inquiry. For detailed information on the inquiry processes please refer to the Data Submission Manual 2: How to submit an inquiry available at: http://echa.europa.eu/reachit/inquiry_en.asp .

	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
ALL SUBMISSIONS	SUB_REG_UC03_BR130	<p>You submitted a dossier which included chargeable confidentiality claim(s) not supported by a justification. Chargeable confidentiality claims are ones falling under Articles 10(a)(xi) and Article 119(2) of the REACH Regulation. REACH requires that such claims must include a justification as to why publication could be harmful for your or any other concerned party's commercial interests. The absence of a justification means that ECHA is unsure whether you genuinely intend to support, and receive a fee for, the unjustified claims. Please resubmit the dossier, either (a) adding the appropriate justifications or (b) removing any confidentiality claims which you do not wish to support. The validity of your claims will be assessed by ECHA at a later date. Further information on confidentiality claims is available in the Guidance on Registration at ECHA's website.</p>	<p>Your dossier includes confidentiality requests which are subject to a fee, but you have not provided a justification for all of them.</p>	<p>Any time a flag for a confidentiality subject to a fee is indicated (CBI, IP or no PA) in your IUCLID 5 dossier the justification as to why publication on the Internet could be damaging must be provided in the adjacent field:</p>  <p>For detailed information on the confidentiality requests which are subject to a fee, please consult Annex 2 of 'Data Submission Manual 5' following this link: http://echa.europa.eu/doc/reachit/compl_tech_dossier_manual.pdf</p>

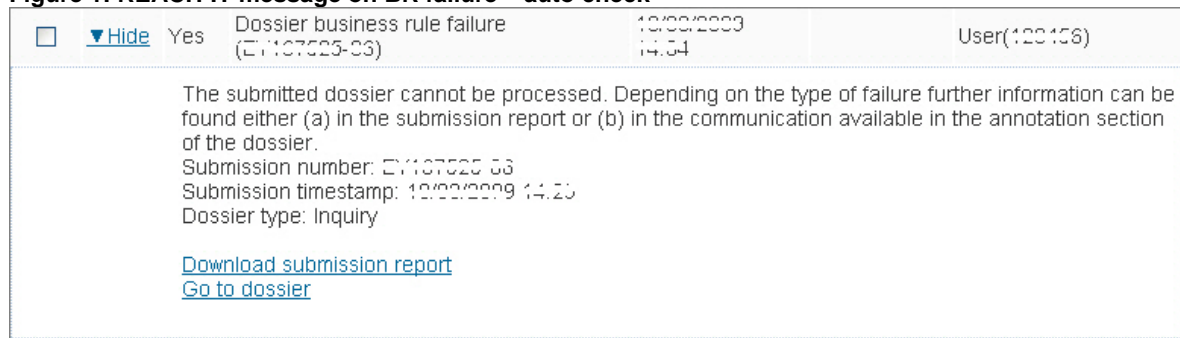
	REACH-IT Business rule Code	REACH-IT Rule message	Explanation of the reason of failure	What to do to avoid a failure in your (next) submission
INITIAL AND UPDATE REGISTRATION DOSSIER		The dossier you have submitted is related to an invalid 'category' of substances. The category is considered invalid because the substance to be registered is not clearly identified. In order to create a valid category dossier you have to clearly identify the substance you intend to register (using the REACH approach). You can find detail instructions in chapter D.8.2.5 of the IUCLID 5 user manual.	You have submitted a dossier containing a category. The system recognised that you have created your dossier without using the REACH approach (i.e. you have not generated your dossier from the substance you want to register, but from the category object that contains it).	When creating a dossier that contains a category, you should take care of generating the dossier from the substance you want to register (i.e. using the REACH category approach). If you have instead created the dossier from the category itself, then REACH-IT will not recognise it as valid. Please make sure that you activate the dossier creation procedure from the substance you want to register. More details on how to generate a REACH category is available in chapter D.8.2.5 of the IUCLID 5 user manual.
UPDATE SUBMISSION		You have indicated in section 1.3 of your dossier a registration number. This registration number relates to a substance previously notified under Directive 67/548/EEC. Please note that when updating a previous notified substance you must also indicate, in section 1.3, both the registration number and the notification number assigned to this substance under the previous legislation (NCD number).	You have submitted an update of a previously notified substance under Directive 67/548/EEC. In section 1.3 of your dossier you have indicated your registration number but you have not included the notification number assigned to this substance under the previous legislation (NCD number).	When submitting an update of a previously notified substance under Directive 67/548/EEC, please indicate in section 1.3 of your IUCLID dossier the correct NCD notification number and the registration number previously claimed in REACH-IT. Please make the necessary modifications and submit a new dossier.

Annex 3 - Finding information about your submission

What happens when a dossier fails an automated business rule?

If the submitted dossier fails at the automated business rule step, REACH-IT immediately sends a message to the registrant/notifier in the REACH-IT mailbox. In this message, “Dossier business rule failure,” the following information is displayed (see Figure 1).

Figure 1: REACH-IT message on BR failure – auto check



If you click the <Go to dossier> link, you will also notice that in the <Dossier details> tab, the status of the dossier has changed from <Pending> to <Failed> as shown here below (see Figure 2).

Figure 2: Status of a dossier in the dossier details tab



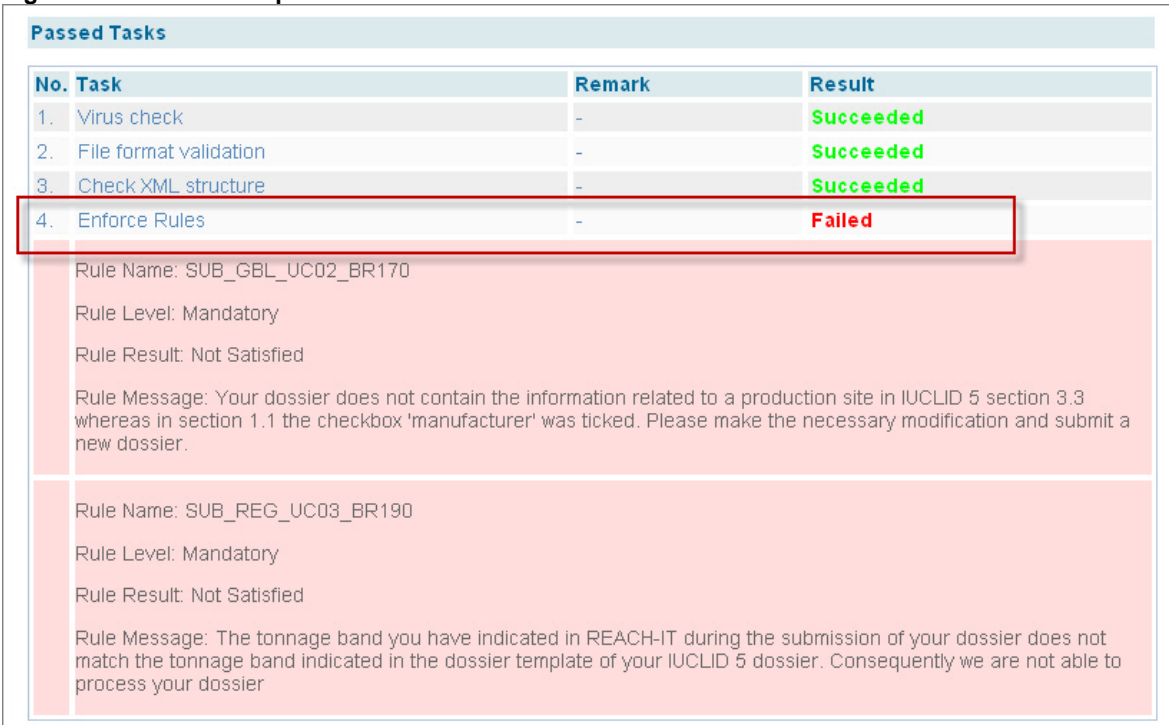
The complete list of the failed automated business rules is available by clicking the tab <Submission Report> followed by <Passed Task> and check under the number <4 Enforce Rules> section (see Figure 3).

Figure 3: Tab for checking complete list of failed automated business rules



Figure 4 provides an example of how the information on the automated business rules is displayed in the submission report.

Figure 4: Submission report



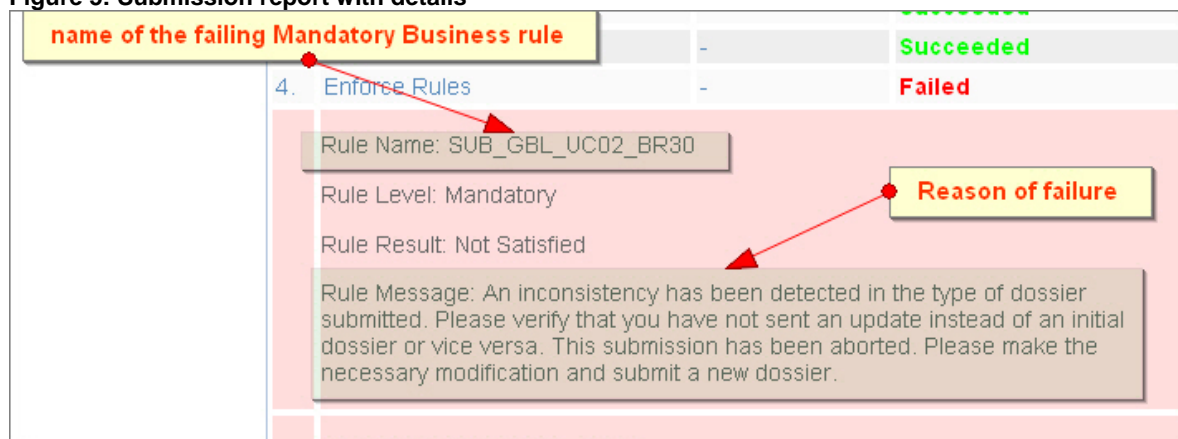
No.	Task	Remark	Result
1.	Virus check	-	Succeeded
2.	File format validation	-	Succeeded
3.	Check XML structure	-	Succeeded
4.	Enforce Rules	-	Failed

Rule Name: SUB_GBL_UC02_BR170
 Rule Level: Mandatory
 Rule Result: Not Satisfied
 Rule Message: Your dossier does not contain the information related to a production site in IUCLID 5 section 3.3 whereas in section 1.1 the checkbox 'manufacturer' was ticked. Please make the necessary modification and submit a new dossier.

Rule Name: SUB_REG_UC03_BR190
 Rule Level: Mandatory
 Rule Result: Not Satisfied
 Rule Message: The tonnage band you have indicated in REACH-IT during the submission of your dossier does not match the tonnage band indicated in the dossier template of your IUCLID 5 dossier. Consequently we are not able to process your dossier

For each failed automated business rule, the <Submission report> gives the reason of failure as indicated in Figure 5.

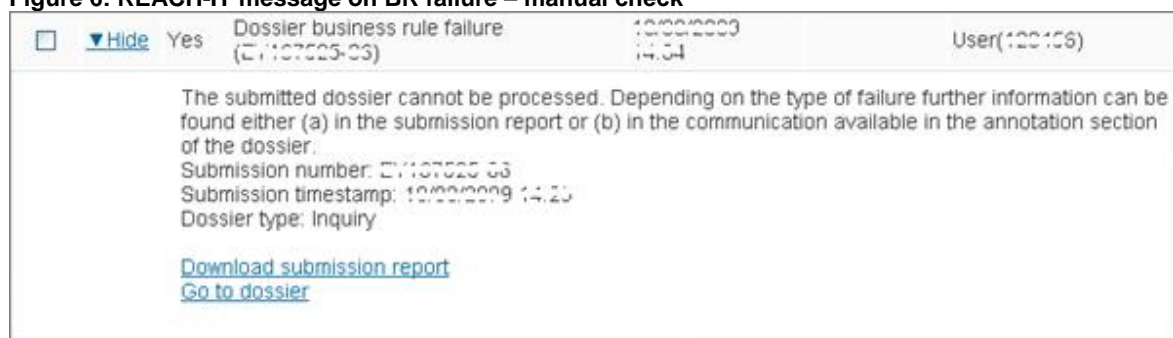
Figure 5: Submission report with details



What happens when a dossier fails a manually checked business rule?

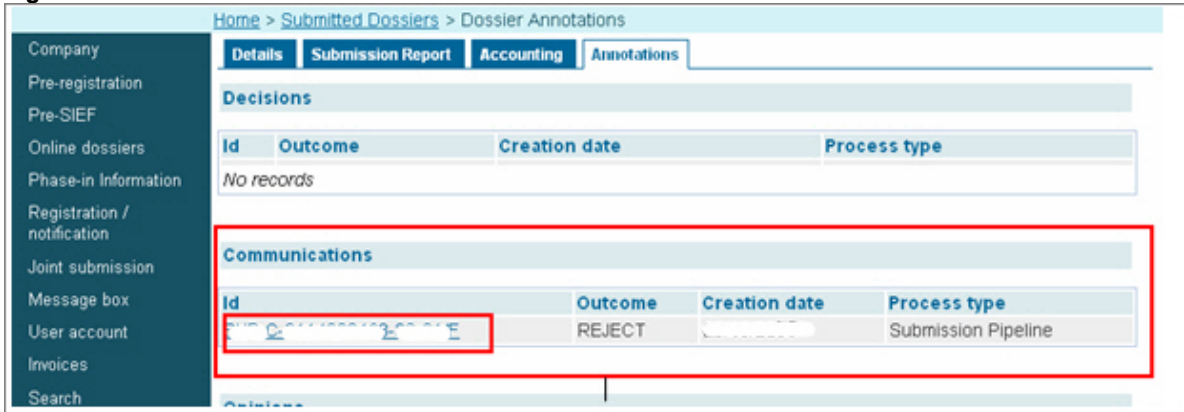
If the submitted dossier cannot be processed due to one or more manually check business rules, ECHA sends a message to the registrant/notifiers REACH-IT mailbox. This message entitled <Dossier business rule failure> is displayed in Figure 6.

Figure 6: REACH-IT message on BR failure – manual check



As stated in the message, further information is available in the <Annotation> tab under <Communications> in the dossier. The easiest way to access that information is clicking the <Go to dossier> link, and then click the <Annotations> tab (see Figure 7).

Figure 7: Annotations tab with Communications



Clicking the link of the <Communication number> (the one in the inner red box in the above screenshot) you will be able to open the attachment (a PDF document, see Figure 8) containing:

- all details on the failure
- the actions you should take to submit a valid dossier.

Figure 8: Attached communication in the dossier info



