

5 June 2018

Tips of the week for REACH 2018 registration

5 June:

Did you miss the registration deadline? Make yourself REACH compliant as soon as possible

31 May was the last chance to submit a registration for existing (phase-in) substances manufactured or imported in amounts more than one tonne per year. If the registration obligation applied to you but you did not submit your dossier by then, as of 1 June you can no longer manufacture or import your substance legally in the EU/EEA.



If you missed the deadline, you should make yourself compliant without delay:

- If you have pre-registered or inquired about your phase-in substance, you can register it directly (until further notice, you can still use the pre-registration number).
- If you have not pre-registered or inquired about your phase-in substance, you need to submit an inquiry before registering it.

If you submit your dossier after 31 May, you will need to wait until you receive your registration number before resuming or starting manufacture or import of your substance.

[Pre-registration](#) | [Inquiry](#) | [REACH 2018 web pages](#)

Issues with submission? Contact us

ECHA will continue to assist you also after the deadline:

- REACH-IT is open every day, 24 hours a day.
- Our REACH 2018 Support live chat is open on weekdays from 9:00 to 16:00 CEST until 8 June.
- You can always contact us through our contact form.

[REACH-IT](#) | [ECHA 2018 Support chat](#) | [Contact ECHA](#)

23 May:

Create your inquiry dossier with the help of our video tutorial

If you are planning to register a non-phase-in (new) substance or a phase-in (existing) substance that has not been pre-registered, you need to inquire with ECHA whether a registration has already been submitted for that substance.

To submit an inquiry, you need to prepare a IUCLID inquiry dossier. When preparing the dossier, pay attention to the substance identity information. This information should clearly describe the manufactured or imported substance.

Potential registrants need to wait for the result of the inquiry before submitting the registration.

Watch our step-by-step video tutorial on how to prepare an inquiry dossier.

[Tutorial](#)

Estimate your registration fee with the IUCLID fee calculator

Before submitting your dossier in REACH-IT, we advise you to run the IUCLID fee calculator. It allows you to estimate the fee to be paid for your registration dossier based on your company size, tonnage band and confidentiality claims. Use it before submitting and make sure that:

- you register in the right tonnage band; and
- you don't have any unwanted confidentiality claims.

Our tutorial shows how to use the calculator.

[IUCLID tutorial](#)

16 May:

What to do if your dossier is incomplete

After you submit your dossier to ECHA, we check that the information in it is complete before sending you your registration number. If some information is missing, we will inform you through your REACH-IT account.

You will then need to include the requested information in your dossier and send it to us again as an update.

You do not need to rush in sending us the update: the deadline for updating your dossier - indicated in our communication - may be set at a few months after 31 May. Take the time to make sure you understand what you need to do to complete your registration and contact us if our instructions are not clear.

After you have successfully submitted the requested update, you will receive your registration number. Your registration date will be the day we received your initial dossier, even if the update was submitted after 31 May.

Are you a member registrant? Create your dossier with the help of our video tutorials

There are three different ways to prepare your REACH registration dossiers. We have just published video tutorials showing how you can successfully prepare your member registration dossiers:

- directly in REACH-IT (if you only need to register one composition and do not plan to opt out);

- in IUCLID Cloud (for one or multiple compositions, limited number of substances);
- in IUCLID (for one or multiple compositions).

Choose the way that suits you best and submit your dossier through REACH-IT on time.

[Tutorial: REACH-IT](#) | [Tutorial: IUCLID Cloud](#) | [Tutorial: IUCLID](#) | [Conditions and minimum data requirements for online dossier](#)

New Q&A on how to create a joint submission for a UVCB substance

The Q&A offers advice to lead registrants on how to create a joint submission for substances that are of unknown or variable composition, complex reaction products or biological materials (UVCBs) without any numerical identifier (EC/CAS numbers).

If you have already created a joint submission and submitted a dossier but failed ECHA's business rules check, contact ECHA for support.

[Q&A](#)

9 May:

Are you a member registrant? Create your dossier online with REACH-IT

If you are a member registrant (not the lead registrant) and want to register a dossier with only one substance composition, the easiest way is to use REACH-IT.

Familiarise yourself with the conditions for creating a dossier online and with the minimum information you need to provide. Watch our new tutorial for step-by-step instructions for creating your dossier online using REACH-IT.

[Tutorial](#) | [Conditions and minimum data requirements](#) | [Phase 5: Creating your registration as a IUCLID dossier](#)

2 May:

Create a joint submission for your substance now

If you are going to register a substance as the lead registrant by the 31 May deadline, create a joint submission for it in REACH-IT by 9 May at the latest. If no joint submission has been created, ECHA will assume that the substance will not be registered.

Then, downstream users and distributors have the possibility to take the registrants' role and still register the substance – with the help of DCG solution 21 – and ensure that the supply of the chemical in the EU/EEA continues.

[Practical advice for new SIEFs](#) | [DCG issues](#)

25 April:

How to avoid the most common registration pitfalls

To submit your registration successfully, we advise you to:

- make sure that you indicate the IUPAC name of all substances (even for UVCB substances);
- provide a proper justification for not submitting the required studies or an adaptation;
- include the chemical safety report for registrations above 10 tonnes per year.

Have a look at our video for more simple solutions to help you address the most common challenges when preparing your registration dossier.

Remember to also check your IUCLID dossier with the Validation assistant before submitting it in REACH-IT.

[Video](#)

Downstream users and distributors: consider registering a substance yourself and benefit from DCG solution 21

If you are a downstream user or a distributor and no EU supplier intends to register a substance you rely on, you should consider importing it yourself and registering it.

If you decide to take up the role of an importer, you will need to submit an inquiry to ECHA and to submit a registration without delay. If you have difficulties in obtaining all the required information for your substance inquiry and registration by the 31 May 2018 deadline, you can apply for the DCG solution 21 and ECHA will assess your case.

Based on the evidence about your specific circumstances, the Agency will set a deadline offering you a reasonable amount of time to complete your registration.

[DCG issues](#) | [Registered substances](#) | [Lead registrant list](#) [xls] | [REACH registration and DUs](#)

18 April:

Avoid the most common business rules failures

Have a look at the most common business rules failures that happen during dossier submission in REACH-IT, why they happen and what you can do to avoid them. As these particular failures cannot be detected by the Validation assistant in IUCLID, it is important that you pay attention to them.

To avoid some of the most common mistakes make sure that you indicate:

- the same substance identity in the IUCLID dossier as the one indicated in the joint submission;
- the correct inquiry number in section 1.3 of IUCLID, if you have submitted an inquiry;

- the correct reason for updating the dossier header and the correct last submission number, in case of an update.

Always remember to run the Validation assistant on your dossier before submitting it to avoid failing any other business rules.

[Q&As on business rules](#) | [From submission to decision](#)

Are you a downstream user? Check if your substance is being registered

If your supplier manufactures or imports a substance in amounts of more than one tonne per year, it is likely that it should be registered. Check if the substance you rely on for your operations in the EU has already been registered by checking the registered substance database. If your supplier has registered the chemical for your uses, you are covered.

If your chemical has not yet been registered, you can check in the lead registrant list if there is a company that is still planning to register it. We expect this list to grow in the coming weeks so keep an eye on it!

If no supplier intends to register your substance, consider importing it yourself and register.

[Registered substances](#) | [Lead registrant list](#) [xls] | [REACH registration and downstream users](#)

11 April:

Submit your inquiry successfully

Before submitting your inquiry dossier to ECHA, make sure that all the relevant information has been included. In addition to checking your dossier with the Validation Assistant in IUCLID, make sure that the identity of your substance and its composition (reported in sections 1.1 and 1.2 of IUCLID) are consistent and supported by the analytical data (attached in section 1.4. of IUCLID). This is key to successfully receiving your inquiry number.

For UVCB substances, you need to report the description of the manufacturing process. Use the free text template for the field 'Description' in section 1.2 of IUCLID to guide you on how to fill in this information. More help is available on page 22 of the manual 'How to prepare an inquiry dossier'.

[Manual](#)

4 April:

Are you in the correct SIEF?

If you realise that the substance you pre-registered is clearly different from that of the other pre-registrants, you may want to join another substance information exchange forum (SIEF). This may also be the case if you find out that your substance is different during discussions on substances sameness.

It is important to remember that whether you find a more suitable SIEF or not, you must

register your substance using the correct identifiers, which have to be consistent with the analytical data on your substance, even if they are different from the ones used in your pre-registration.

The lists of pre-registered and registered substances are useful tools for looking for a more suitable SIEF. Take a look at our Q&A for more advice.

[Information on chemicals \(includes the lists\)](#) | [Q&A](#)

28 March:

Short of time? Make your life easier by using IUCLID Cloud

IUCLID Cloud offers SMEs and their consultants a simple and easy collaboration platform for preparing lead and member REACH 2018 dossiers. With the cloud service, you will get:

- access from anywhere, at any time to ECHA's own private, secure cloud;
- the latest version of the IUCLID application;
- regular and automated data backups by ECHA;
- easy and transparent online collaboration – you can cut down on the number of local copies and improve data security;
- responsive, 24/7 online support.

[ECHA Cloud Services](#) | [Animation](#)

21 March:

Tip of the week: Report your uses and prepare your chemical safety assessment with the help of use maps

When preparing a registration, you need to include information on the uses of your substance, including those of your customers. Use maps can help you to describe the uses in a standardised way based on the information from certain downstream user sectors.

The use maps will also give you information on the conditions of use, which can help you carry out the chemical safety assessment and to prepare a chemical safety report (CSR) that you need to include in your dossier if you register a substance for above 10 tonnes per year.

[Use maps](#) | [Phase 4 of REACH 2018](#)

14 March 2018:

Are your REACH tests going to be late for the registration deadline? Contact us!

If the tests results for your substance will not be available before the 31 May registration deadline, contact us as soon as possible and before submitting your dossier.

You can benefit from solution 10.3 of the Directors' Contact Group (DCG) – a situation where data is not available by the registration deadline - provided that you have ordered the tests related to data required in annexes VII and VIII to REACH by 31 March. If this is your situation, contact us and you will receive instructions from us on what to do next.

If you are experiencing the above or any other exceptional difficulty in completing your registration in time, check if the solutions developed by the DCG would be of help! Keep in mind that you need to apply for a DCG solution as soon as possible to register before the registration deadline on 31 May.

[DCG solutions](#)

7 March 2018:

Keep your contact details up to date in REACH-IT

Whether you are a lead registrant or a member of a joint submission, remember to keep your contact details up to date in REACH-IT. By doing this, you ensure that the other members of the joint submission can easily contact you when necessary. If you are not sure how to do it, check out our new video for practical advice.

[Video](#)

Find your lead registrant

The easiest way to find the lead registrant of your substance is to look for it in REACH-IT. Our new video shows you how to do it. You can also consult our Q&A on the topic.

If there is no lead registrant yet, consider taking up the role yourself. After you have the consent of your co-registrants, create a joint submission in REACH-IT to allow the other potential registrants to find you. If you agree, your name will then also be published in the lead registrant list on ECHA's website. Downstream users can also check this list to know if their substance of interest is going to be registered.

Additionally, if you think that you are not part of the correct pre-SIEF and the identity of your substance is different to the one you pre-registered, you can find your lead in the lead registrant list or contact ECHA for help.

[Video](#) | [Q&A](#) | [Lead registrant list](#) | [Contact ECHA](#)

28 February 2018:**Communicate clearly within your SIEF**

Companies registering the same substance (co-registrants) have to make every effort to reach an agreement on sharing data, submitting together and sharing costs in a fair, transparent and non-discriminatory way.

If a company that has the role of lead registrant does not reply to your emails, try contacting them by other means of communication, e.g. registered letter, telephone, identifying other people in the company, and keep record of your efforts. If you still do not get a reply, contact ECHA.

[Practical advice](#)

21 February 2018:**Avoid unnecessary testing on animals**

Under REACH, testing on vertebrate animals can only be used as a last resort to fulfil information requirements for registration. There are multiple ways for you to avoid testing on animals when preparing your REACH 2018 dossier. Have a look at the advice on our website.

[How to avoid unnecessary testing on animals | Practical guide](#)