



# REACH Workshop Pre-Registration in Practice

**Helena Huttunen**  
**ECHA Guidance & Helpdesks**  
**Brussels, 14 April 2008**

# Steps for Pre-Registration for Phase-in Substances



# Examples of Actions for Phase-in Substances



1. Know REACH regulation
2. Know company and its roles
3. Know substances
4. Know suppliers and recipients

# Examples of Actions for Phase-in Substances



- 1. Pre-registration strategy
- 2. Phase-in substance inventories per legal entity
- 3. Identified uses
- 4. IT tools and databases
- 5. Available data

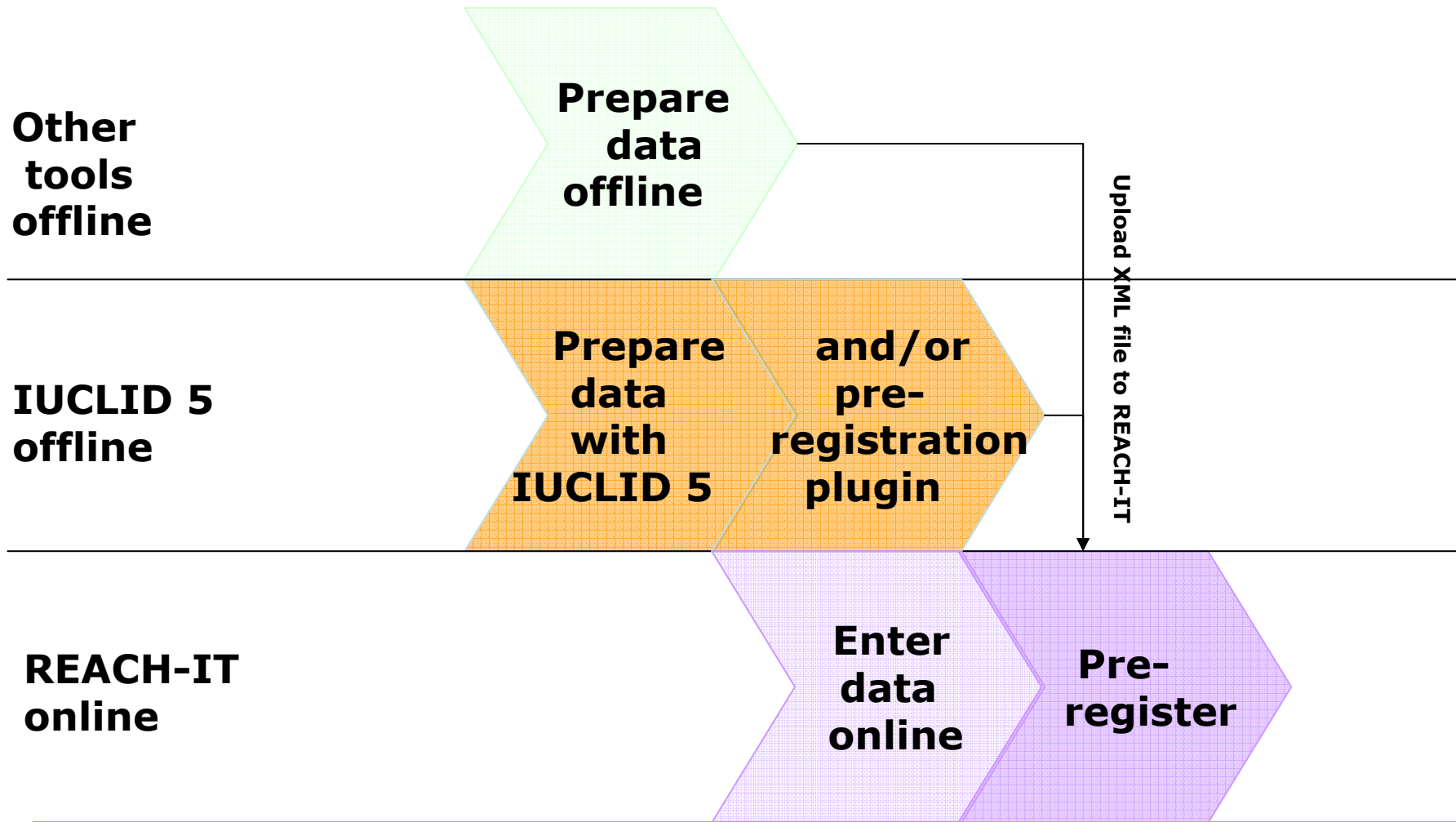
# Pre-registration Data Requirements



**REACH:**

- 1. Substance identity: EC-#, CAS-#, names**
- 2. Contact person of the registrant (company and 3<sup>rd</sup> party if needed)**
- 3. Envisaged deadline for the registration and the tonnage band**
- 4. Similar substances**

# Options to Pre-Register



# Steps for Preparing Data with IUCLID 5 and Pre-Registration Plugin



1. Optional: create substances in IUCLID 5 database for each legal entity (recommended for saving the data for later uses)
2. Create a pre-registration list in plugin tool
3. Add/create substances to the pre-registration list
4. Validate your data
5. Export the bulk/single xml files (per legal entity)
6. Upload the pre-registration XML files to REACH-IT (per legal entity)

# Example of Substance Inventory

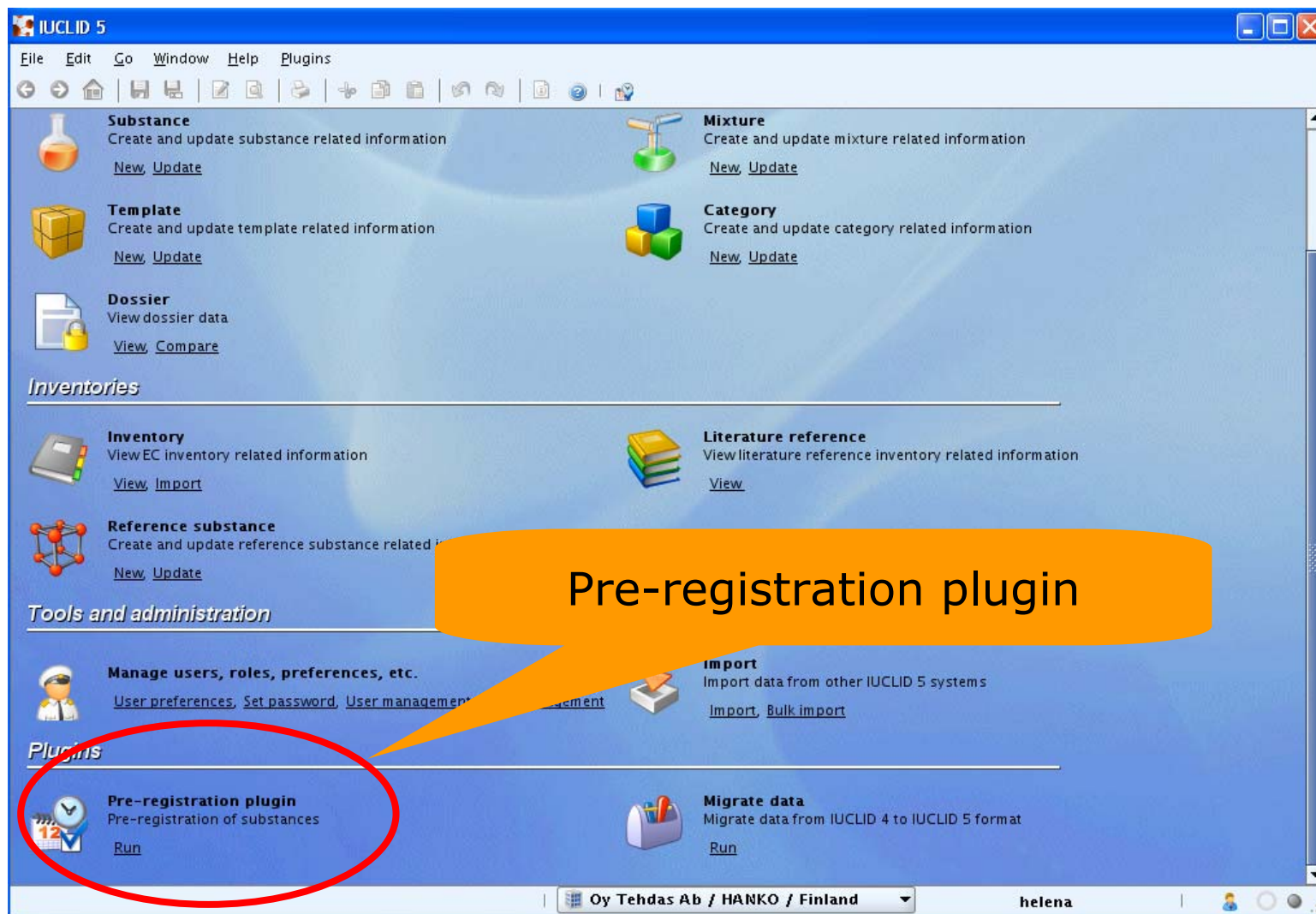


<b>Legal Entity</b>	<b>Role</b>	<b>Substance (EC, CAS, name)</b>	<b>Envisaged Deadline and Tonnage Band</b>	<b>Contact</b>	<b>Similar Substances for Read- Across Purpose</b>

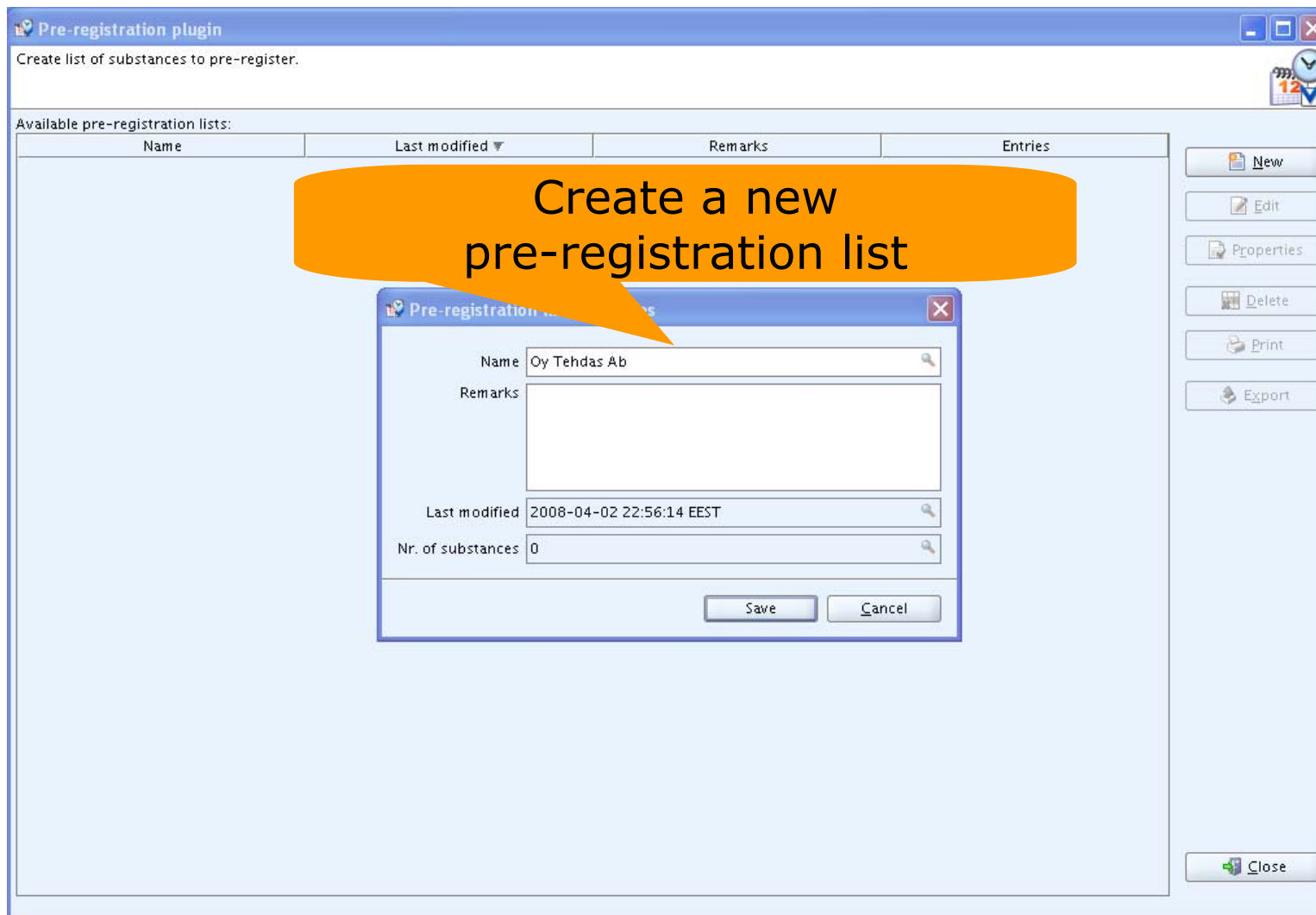
One company can have several legal entities and roles



# Example: Pre-Registration Plugin



# Example:Pre-Registration Plugin



Pre-registration plugin

Create list of substances to pre-register.

Available pre-registration lists:

Name	Last modified ▼	Remarks	Entries
------	-----------------	---------	---------

**Create a new pre-registration list**

Pre-registration lists

Name: Oy Tehdas Ab

Remarks:

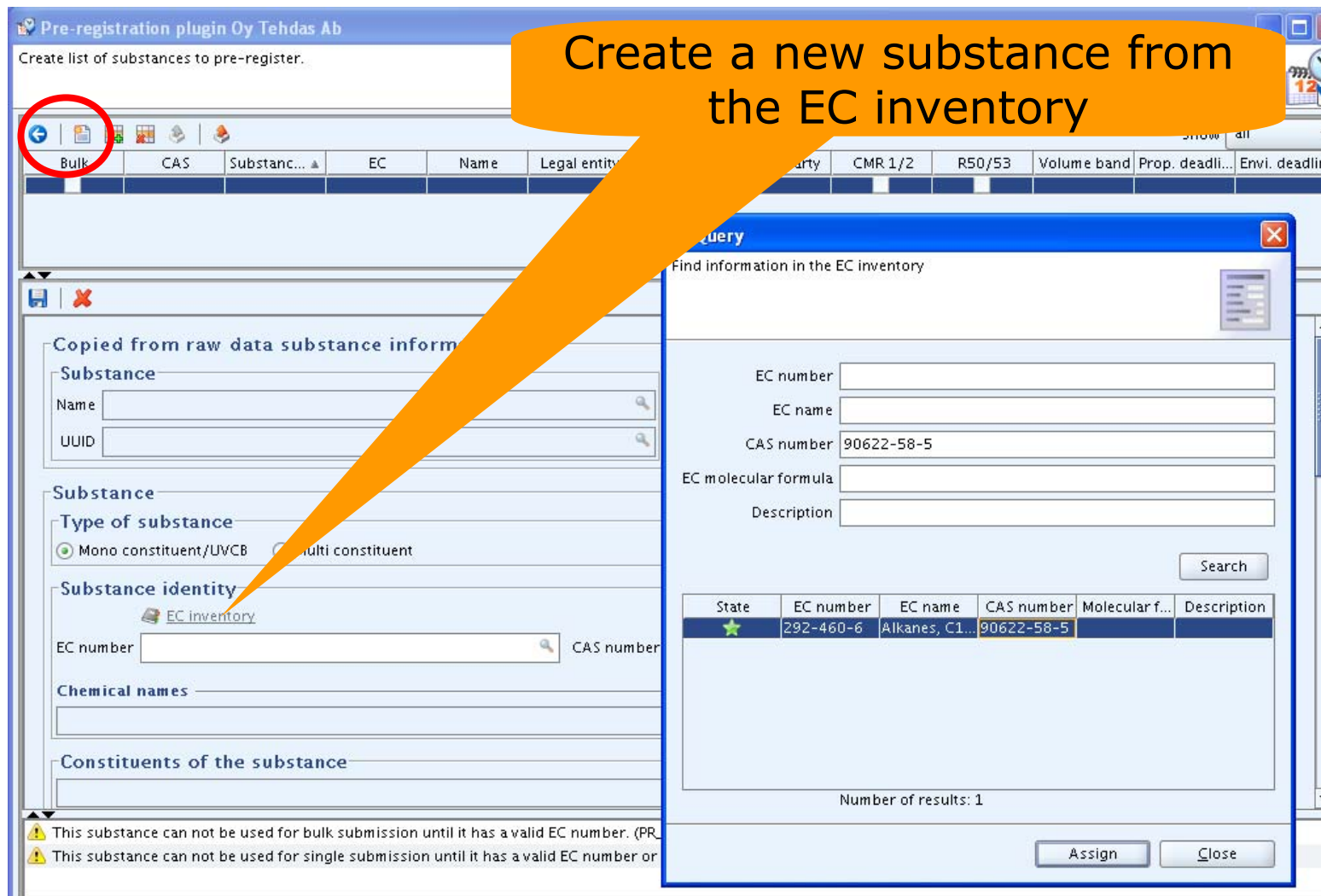
Last modified: 2008-04-02 22:56:14 EEST

Nr. of substances: 0

Buttons: New, Edit, Properties, Delete, Print, Export, Save, Cancel, Close

# Example: Pre-Registration Plugin

Create a new substance from the EC inventory



The screenshot shows the 'Pre-registration plugin' window with a table of substances. A red circle highlights the 'Bulk' button. An orange callout box points to the 'EC inventory' link in the 'Substance identity' section. A search dialog is open, showing a search for '90622-58-5' and a result table.

State	EC number	EC name	CAS number	Molecular f...	Description
★	292-460-6	Alkanes, C1...	90622-58-5		

Number of results: 1

Buttons: Assign, Close

Warning messages:  
⚠ This substance can not be used for bulk submission until it has a valid EC number. (PR...  
⚠ This substance can not be used for single submission until it has a valid EC number or

# Example: Pre-Registration Plugin

Pre-registration plugin Oy Tehdas Ab

Create list of substances to pre-register.

Bulk	CAS	Substanc...	EC	Name	Legal entity	Contact per...	Third party	CMR 1/2	R50/53	Volume band	Prop. deadli...	Envi. deadline
<input checked="" type="checkbox"/>	90622-58-5		292-460-6	Alkanes, C1...				<input type="checkbox"/>	<input type="checkbox"/>	1000+	2010-11-30	2010-11-30

Phone

Mobile

**Fill in tonnage and deadline**

Third party representation

UUID  Legal entity name

**Tonnage**

Volume band

**Envisaged deadline for registration**

Proposed deadline

Envisaged deadline

**Classification elements**

R50/53

CMR 1/2

Remarks

**Information**

Enable messages

# Example: Pre-registration Plugin

Pre-registration plugin Kemtrade b.v.  
Create list of substances to pre-register.

Bulk	CAS	Substanc...	EC	Name	Legal entity	Contact per...	Third party	CMR 1/2	R50/53	Volume band	Prop. deadli...	Envi. deadline
	7782-63-0			Iron(II)sulp...		Haas	IUC5-08ce9...			10-100	2018-05-31	2013-05-31

Country:

Phone: +31181123455

Mobile:

Fax:

E-mail: frank.haas@kemtrade.com

Remarks:

**Third party representative**

UUID: IUC5-08ce9c76-6cfc-49a7-9d42-5bdd7ff87f37    Legal entity name:

**Tonnage**  
Volume band: 10-100 tonnes/year

**Envisaged deadline for registration**  
Proposed deadline: 2018-05-31  
Envisaged deadline: 2018-05-31

**Classification elements**  
 R50/53  
 CMR 1/2

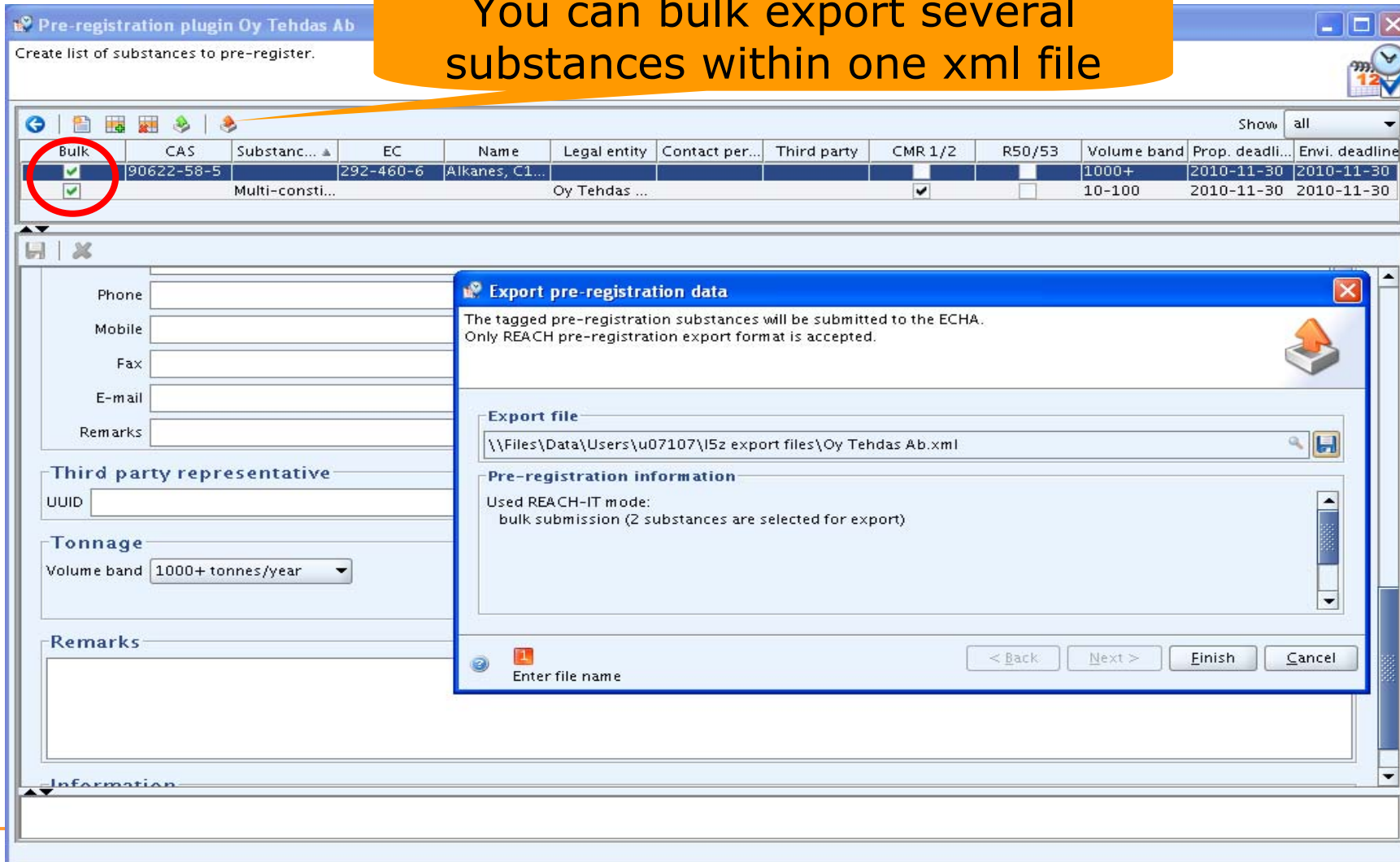
**Remarks**  
This substance will be used only as a transported intermediate.

⚠ This substance can not be used for bulk submission until it has a valid EC number. (PR\_Substance.mainSubDef.mainsubstance)  
⚠ This substance can not be used for bulk submission until it has a valid EC number. (PR\_Substance.readAcrossSubDefs[0].mainsubstance)

Paste the UUID of 3rd Party Representative (identical with REACH-IT)

# Example: Bulk Export from Pre-Registration Plugin

You can bulk export several substances within one xml file



The screenshot shows the 'Pre-registration plugin Oy Tehdas Ab' interface. A table lists substances with columns for Bulk, CAS, Substanc..., EC, Name, Legal entity, Contact per..., Third party, CMR 1/2, R50/53, Volume band, Prop. deadli..., and Enwi. deadline. The 'Bulk' column has a red circle around a checked box. An 'Export pre-registration data' dialog box is open, displaying the following information:

**Export pre-registration data**

The tagged pre-registration substances will be submitted to the ECHA.  
Only REACH pre-registration export format is accepted.

**Export file**  
\\Files\Data\Users\u07107\I5z export files\Oy Tehdas Ab.xml

**Pre-registration information**  
Used REACH-IT mode:  
bulk submission (2 substances are selected for export)

Buttons: < Back, Next >, Finish, Cancel

Enter file name



## Recommendations for IUCLID 5



- Pre-registrations must be submitted per legal entity
- A legal entity can identify a 3rd party representative by typing its UUID (should be equal to REACH-IT)
- Bulk pre-registration of several phase-in substances as one XML file requires EC-#s. Special cases without EC-# can be exported as single XML files from IUCLID or encoded directly online via REACH-IT.
- Contact information can be entered in REACH-IT or in IUCLID 5
- More detailed user guidance is available on <http://echa.europa.eu/iuclid>

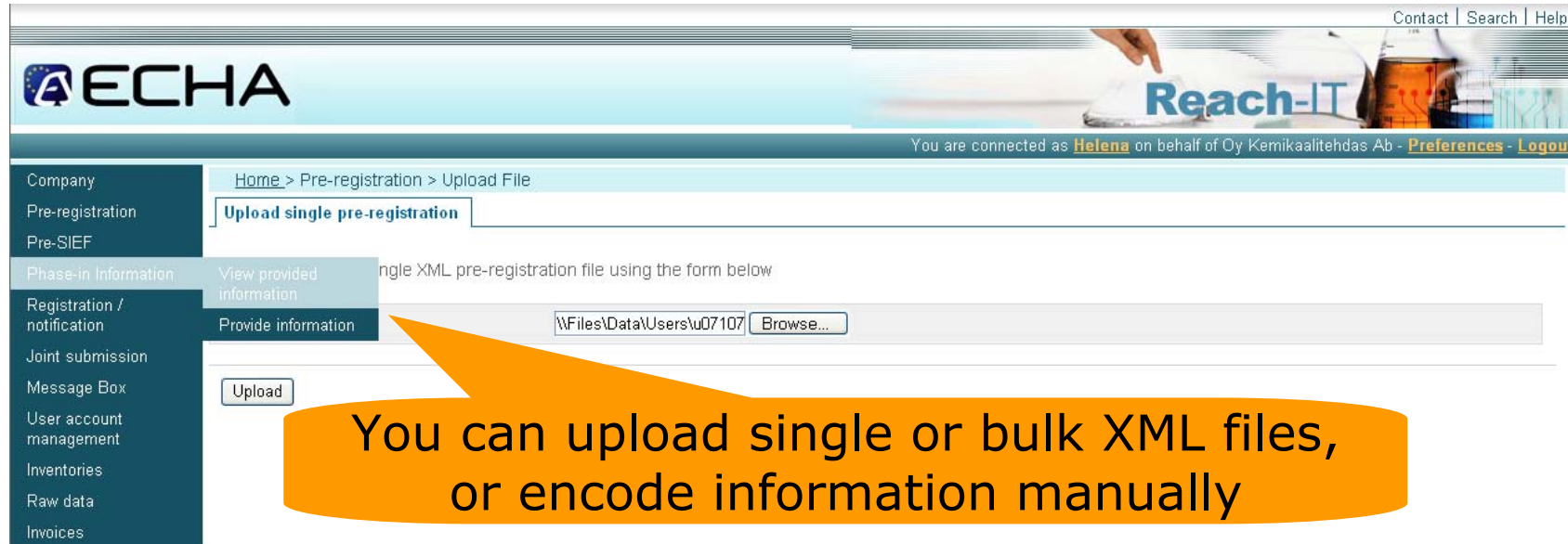
# Steps for Pre-Registering with REACH-IT



1. Create a company in sign-up
  - Create a REACH-IT account for your **legal entity** (login & password)
  - Import or enter company information
  - Enter billing information
  - Add contact persons
  - Check the information you have entered and validate it
  
2. Add data and submit pre-registration
  - Encode or upload pre-registration data
  - Validate and submit
  - System generates the pre-registration number (e.g. 05-1234567-12-0000)
  
3. PRE-SIEF formation
  - Shows pre-registrants of the same substance
  
4. Publication of list of pre-registered substances



# Example: Upload of XML file to REACH-IT



Contact | Search | Help

**ECHA**

You are connected as **Helena** on behalf of Oy Kemikaalitehdas Ab - [Preferences](#) - [Logout](#)

Home > Pre-registration > Upload File

**Upload single pre-registration**

View provided information  
Provide information

Single XML pre-registration file using the form below

**You can upload single or bulk XML files, or encode information manually**

# Recommendations for REACH-IT



- Fill in company contact information (at least) here
- Import/create 3<sup>rd</sup> Party Representative UUIDs first here (for reference to IUCLID 5 users)
- Phase-in substances without EC-# need to be single imported/encoded online in REACH-IT
- Bulk submissions will have one submission # per batch but one pre-registration # per substance
- Any other data than company and substance identity can be edited later (also in pre-SIEF)
- A pre-registration can be de-activated later
- In case of uncertain substance identity, a conservative pre-registration strategy is recommended (esp. multi-constituent substances)

## List of Pre-Registered Substances



- Will be published by ECHA by 1.1.2009
- Data holders join in and start indicating their available data
- They cannot see the participants in the pre-SIEF, but can be contacted by the participants

# Options to Pre-Register

