



How do I pre-register a substance?

What follows is a description of the information that must be kept in readiness and the details of the pre-registration procedure.

A foundry that is under an obligation to register may opt to pre-register a substance so as to make use of the transitional period before the final registration. Pre-registration, which is handled exclusively by ECHA, is done electronically through REACH IT. This is the Agency's central IT system by which it provides each enterprise with a user account for submitting and storing the final version of the dossier and tracking its status as well as for pre-registering. Please remember that pre-registration as well as registration must be done by each legal entity on its own. Thus, for example, a plc branch is not an autonomous legal entity, so that it is under no obligation to pre-register. This is not true for the parent companies and subsidiaries of groups, which are obligated to conduct their own pre-registrations.

The person who first registers on behalf of his company will become its account manager. By entering his user ID and his password, he may create additional user accounts and define related user profiles whenever another substance needs to be registered. Except for material identifications, any and all information may be updated at a later time. While a pre-registration may be deactivated until the end of November 2008, it cannot be deleted entirely. According to the Agency, manually entering the information required for pre-registration takes about ten minutes. Substances may be pre-registered online either individually by manual input or in bulk, meaning that up to 500 substances may be pre-registered simultaneously, in which case an XML file must be generated and forwarded. The online forms developed by the Agency for this purpose are available free of charge at

<https://reach-it.echa.europa.eu/reach/public/welcome.faces>

(→ [Sign up as a company](#) or, after a corporate user account has been created, under → [login](#) to the system).

Unfortunately, the form is currently available only in English.
Pre-registration is free!

The ECHA offers further assistance in creating corporate user accounts and in substance pre-registration at

http://echa.europa.eu/doc/reachit/pres_reach-it_signup_en_20080530.pdf

and

http://echa.europa.eu/doc/reachit/pres_reach-it_pre_reg_en_20080530.pdf

Unfortunately, the test run which serves to 'rehearse' the creation of a user account and the pre-registration of a substance has been published only in English.

Preparing the transmission of data

To make sure that the creation of a corporate user account and the subsequent pre-registration work without a hitch, all relevant data should be available, having been compiled previously. The following information should be accessible immediately (see also Art. 28 REACH regulation):

Material-related data

- Material identification: EINECS number, CAS number, substance designation (as alloys are special preparations, each alloy component, i.e. each individual substance, must be pre-registered separately)
- Optional comments on the substance addressed to other SIEF participants
- Registration deadline¹ and quantity range per year²
- State whether the substance has been classified as belonging to CMA categories 1/2 or R 50/53

Company-related data

- Enter the name and address of your foundry as well as the name and the e-mail address of the contact person.
- Define the company³ as
 - 'micro-sized' (< 10 employees, annual turnover ≤ € 2m),
 - 'small' (< 50 employees, annual turnover ≤ € 10m), or
 - 'medium' (< 250 employees, annual turnover ≤ € 50m/balance total ≤ € 43m).
- Billing address of the company (not necessarily the same as the postal address) because it may be needed for registration
 - Specifying your VAT and D-U-N-S number (international corporate ID number whose assignment is chargeable; frequently used in the motor-vehicle industry) is optional.

Manual online input

There are various ways of creating a corporate user account and pre-registering a substance. Those who intend to pre-register only a few substances are advised by the Agency to use the online pre-registration process and enter the data required manually. As an alternative, either IUCLID 5 or XML may be used, in which case the data will have to be entered in the in-house IT system, which should permit conversion into the requisite XML format. However, the effort involved in this method appears too great for registering a few substances. As far as the foundry industry is concerned, therefore, manual entry seems to be the most suitable option

¹ Deadline schedule:

End of Pre-Registration December 1, 2010 for:

- substances ≥ 1,000t/a
- cmr substances (category 1 and 2) ≥ 1t/a
- substances categorised as R 50/53 ≥ 100t/a

End of Pre-Registration June 1, 2013 for:

- substances ≥ 100 – 1,000t/a

End of Pre-Registration June 1, 2018 for:

- substances ≥ 1 – 100t/a.

² t/a is determined by computing the average quantity of three or more immediately preceding contiguous calendar years in which the substance was manufactured or imported.

³ The SME definition follows Commission Recommendation 2003/361/EC.

for data submission. The IT assistant will display this option next to the two others, to be selected by mouse click.

Creating a corporate user account

On a dedicated web page, REACH IT provides every enterprise or, more precisely, every legal entity with a user account of its own. User accounts with EchA can only be created online. For this purpose, a variety of data have to be communicated to the Agency which, although not used in the pre-registration itself, will be needed for the subsequent registration process. Online pre-registration can be implemented only after a corporate user account has been created (signup). Creating an account involves 5 steps through which you are guided by the system. In each case, you confirm your input by clicking on the NEXT button. The process is comparable to the creation of a corporate account and customer profile with an online shop or the creation of an email account. Creating a user account involves the following 5 steps:

1. Specify the REACH IT administrator (name, email address, user ID, user-defined password that will be required for every subsequent login).
2. Enter the information relating to your company ('company information', i.e. the name and address of the foundry and its classification as either 'micro', 'small', or 'medium' (s.a.).
3. Billing address and VAT (DE-123-456-7890) and D-U-N-S number (optional)
4. Further contacts (optional)
5. Validate and transmit the company data input by entering a so-called CAPTCHA, a system-defined security number.

Transmitting the pre-registration data itself

Once a corporate user account has been created, the foundry will receive a so-called universal unique identifier code (UUID). After this, substances may be pre-registered, once again using the NEXT button for confirmation. The input of data consists of the following steps:

1. Enter any information relating to the substance/substance identification:
 - EINECS number
 - CAS number
 - Substance designation(For assistance, use the SEARCH function linked to ESIS (European chemical substances information system) which can be found at this point.)
2. Entries under 'similar substances' are optional.
3. Enter the period envisaged and the quantity range.
4. Name any contact for substance pre-registration who does not have automatic access to the company page in REACH IT (for this, a separate user account would be required that can be created only by the administrator).
5. Naming a 'third-party-representative' (to mask your own company's identity) is optional.
6. At this point, you may also enter any 'remarks' addressing pre-SIEF participants. Another optional specification is whether or not you wish to receive information about pre-SIEFs which would be sent to the REACH IT mailbox. If you do not activate the remark 'I want to receive pre-SIEF-related notifications for this substance', your company will be a passive member and will not be provided with

further information. Unless the identity of a substance is problematic or undefined as yet, passive membership in pre-SIEF will be enough.

7. Validate, correct if necessary, and transmit your data input.

Receipt of further information to be retained

After the data have been validated and transmitted, the foundry will receive its own communication number. At the same time, a link will be sent by email to the mailbox generated by the REACH IT system which contains a transmission report (pdf file) and a unique pre-registration number for the pre-registered substance, which can be downloaded. As it documents the pre-registration, the download should be filed away carefully. The retention period for such documents amounts to ten years!

Non-registration procedure

A pre-registration cannot be deleted, but it can be deactivated. This action sufficiently shows that no registration is intended in the future, and that the exchange of information that is obligatory within the SIEF will no longer be carried out.

