

Update on reporting to ECHA using REACH-IT

Webinar "How and when downstream
users need to report to ECHA"

Laura Walin
Directorate of Registration
ECHA

08 April, 2013
11:00 - 12:30 Helsinki Time (GMT +2)

Update since May 2011

Webinars archive

Webinars on 2011

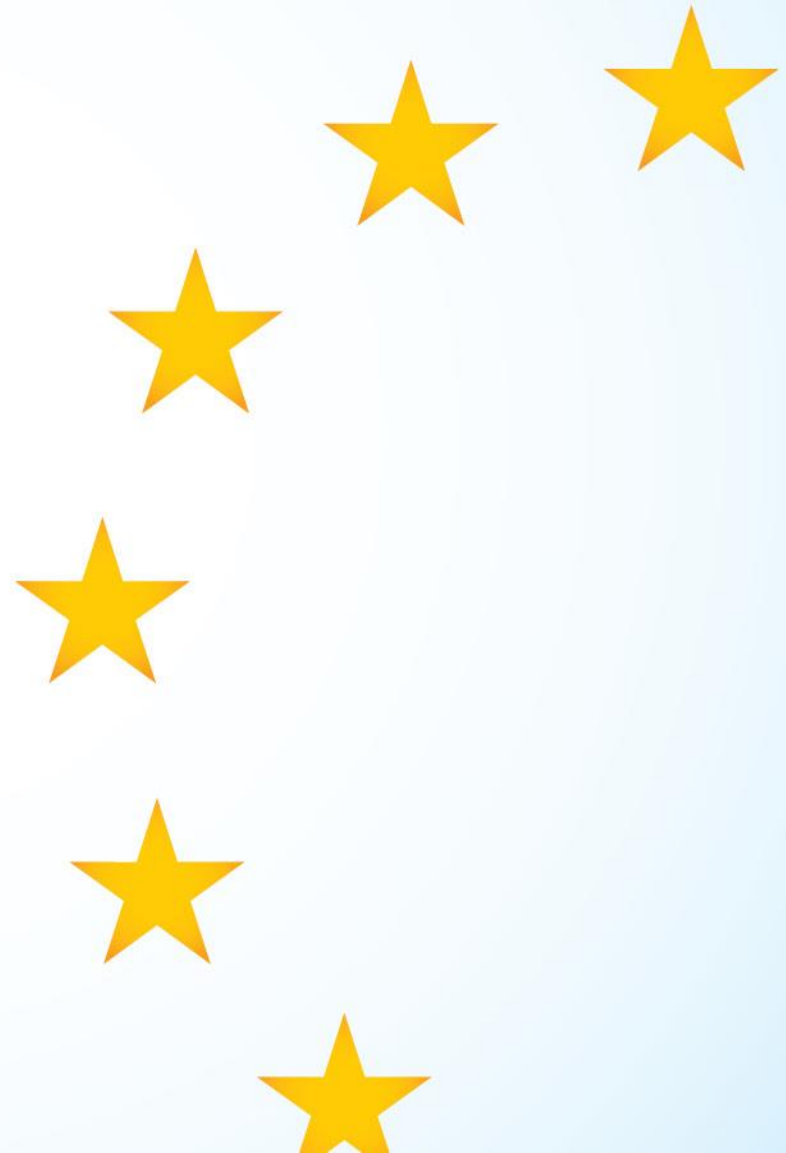
IUCLID Advanced - TCC plug-in 16 November 2011	Practical information to understand how the technical completeness check (TCC) plug-in works.
IUCLID Basics 27 September 2011	Practical information to get started with IUCLID, including how to download and install IUCLID and getting familiar with the tool and its environment.
Downstream users reports 31 May 2011	Information on how to complete a downstream user report using IUCLID 5 and successfully submit it to ECHA via REACH-IT.
Inquiry process 25 May 2011	Basis of the inquiry process covering assessment of the substance identity, aspects of data sharing and common deficiencies in the inquiry dossiers related to substance identification and verification of substance identity.
Notifications of substances in articles 19 May 2011	This webinar provides legal background and practical information on how to prepare and submit a notification of a Substance of Very High Concern in articles using IUCLID and REACH IT.

<http://echa.europa.eu/support/training-material/webinars/webinars-archive>

Contents

- Completing the template on conditions of use
- Amending a previously submitted report
- Reporting downstream user classification

Reporting conditions of use to ECHA



What is required in REACH

The information reported by the downstream user shall include

- brief general description of the use(s), and
- of the conditions of use(s)

ECHA template for conditions of use

DOWNSTREAM USER REPORT DESCRIPTION OF CONDITIONS OF USE			
Company		Date	
Substance		Ref	
Environmental Exposure²			
Use not covered			
Reason why use is not covered in supplier Exposure Scenario	<input type="checkbox"/> Title/Activity <input type="checkbox"/> Quantity <input type="checkbox"/> Other OC/RMM <input type="checkbox"/> _____	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Downstream <input type="checkbox"/> Downstream <input type="checkbox"/> Downstream <input type="checkbox"/> Downstream
<i>Tick all not covered or matched in ES</i>			
Substance quantity ²	Annual Site Quantity: _____ (units) _____ Maximum Daily Quantity: _____ (units) _____ Substance supplied downstream <input type="checkbox"/> Yes <input type="checkbox"/> No		
Operational Conditions and Risk Management Measures (OC/RMM) ²	<ul style="list-style-type: none"> Technology/process techniques determining the initial release of substance from process to waste, waste water or exhaust air Air filters, incineration, waste water treatment, other technical measures to reduce release to air and water 		
Human Exposure²			
Use not covered			
Reason why use is not covered in supplier Exposure Scenario	<input type="checkbox"/> Title/Activity <input type="checkbox"/> Concentration <input type="checkbox"/> Other OC/RMM <input type="checkbox"/> _____	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Downstream <input type="checkbox"/> Downstream <input type="checkbox"/> Downstream <input type="checkbox"/> Downstream
<i>Tick all not covered or matched in ES</i>			
Substance concentration ²	Concentration range in own processes _____ % Concentration range in supplied product _____ % Substance supplied downstream <input type="checkbox"/> Yes <input type="checkbox"/> No		
Operational Conditions and Risk Management Measures (OC/RMM) ²	<ul style="list-style-type: none"> Operational conditions Technical and organisational risk management measures Product form/design/composition aspects that influence exposure 		

- Word format
 - Includes an empty template and an example
- Available on the ECHA website*
- Completed report to be attached to the section 13 of IUCLID in the DU report dossier

* <http://echa.europa.eu/web/guest/support/dossier-submission-tools/reach-it/downstream-user-report>

Sections of the template

DOWNSTREAM USER REPORT			
DESCRIPTION OF CONDITIONS OF USE			
Company		Date	
Substance		Ref	
Environmental Exposure¹			
Use not covered			
Reason why use	<input type="checkbox"/> Title/Activity <input type="checkbox"/>	<input type="checkbox"/> Own <input type="checkbox"/>	<input type="checkbox"/> Downstream <input type="checkbox"/>
Human Exposure¹			
Use not covered			
Reason why use	<input type="checkbox"/> Title/Activity <input type="checkbox"/>	<input type="checkbox"/> Own <input type="checkbox"/>	<input type="checkbox"/> Downstream <input type="checkbox"/>

Administrative information

1. Name of your company

DOWNSTREAM USER REPORT DESCRIPTION OF CONDITIONS OF USE			
Company	<i>DU company</i>	Date	<i>8 April 2013</i>
Substance	<i>DU substance</i>	Ref	DUR-1234

**2. Substance name
(or trade name)**

**3. Your internal
reference**

Conditions of use for environmental exposure

1. Use (verbal description + use descriptor)

Environmental Exposure ¹	
Use not covered	<i>Formulation of coatings (ERC2)</i>
Reason why use is not covered in supplier Exposure Scenario	<input type="checkbox"/> Title/Activity <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Other OC/RMM <input type="checkbox"/> <hr/> <i>Tick all not covered or matched in ES</i>
Substance quantity²	Annual Site Quantity: _____ 10 _____ (units) <u>tonnes</u> Maximum Daily Quantity: _____ 400 _____ (units) <u>litres</u> Substance supplied downstream <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Operational Conditions and Risk Management Measures (OC/RMM)³	<i>Daily site quantity exceeds the amount covered in the ES. We recently installed a modern waste water treatment plant with low release factor which ensures minimal environmental impact.</i>

2. Reason(s)

3. Information on quantity

4. Operational conditions and risk management measures

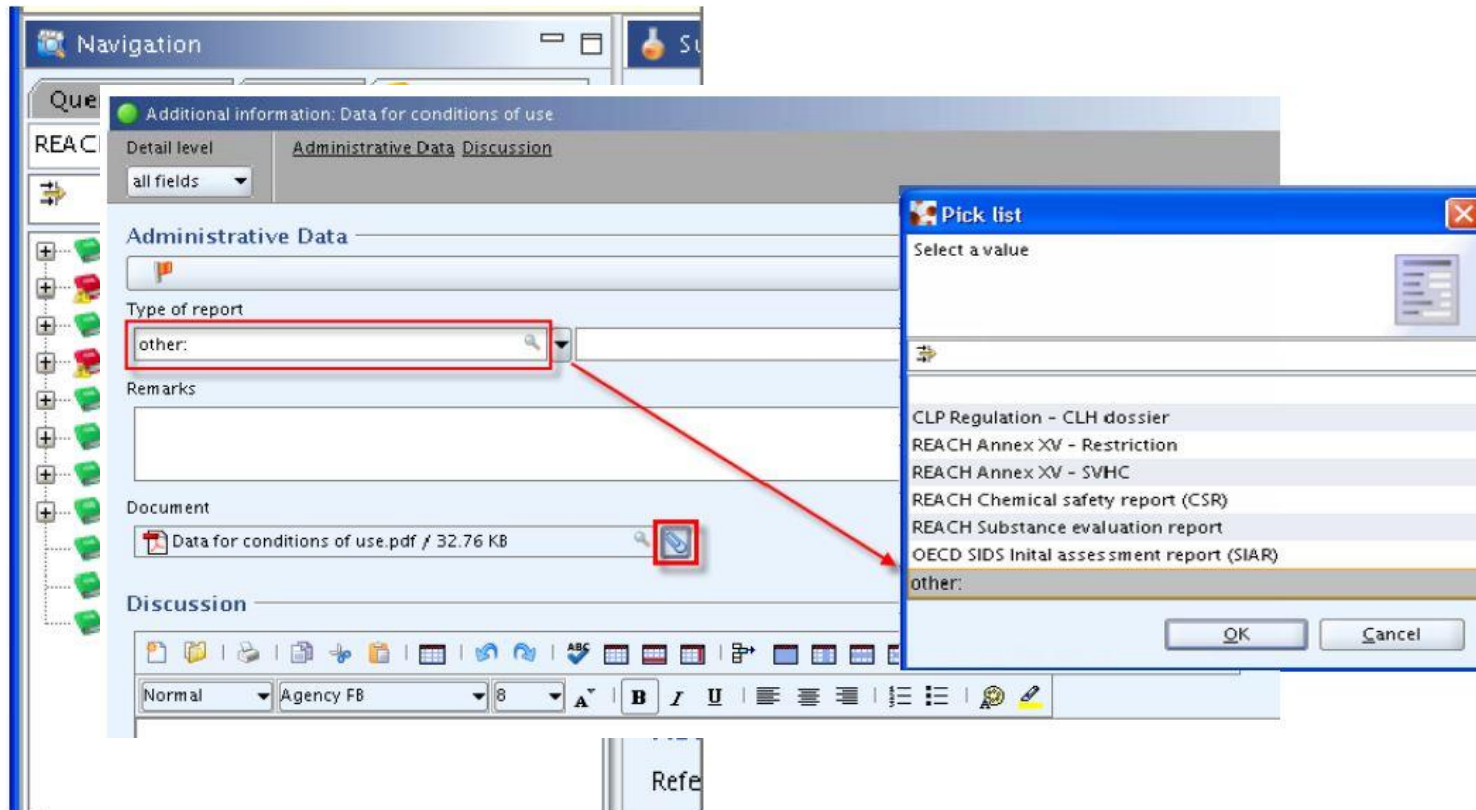
Conditions of use for human exposure

Human Exposure ¹													
Use not covered	<i>Mixing of coating preparation (PROC5).</i>												
Reason why use is not covered in supplier Exposure Scenario	<table border="0"> <tr> <td><input type="checkbox"/> Title/Activity</td> <td><input checked="" type="checkbox"/> Own</td> <td><input type="checkbox"/> Downstream</td> </tr> <tr> <td><input type="checkbox"/> Concentration</td> <td><input type="checkbox"/> Own</td> <td><input type="checkbox"/> Downstream</td> </tr> <tr> <td><input checked="" type="checkbox"/> Other OC/RMM</td> <td><input type="checkbox"/> Own</td> <td><input type="checkbox"/> Downstream</td> </tr> <tr> <td><input type="checkbox"/> _____</td> <td><input type="checkbox"/> Own</td> <td><input type="checkbox"/> Downstream</td> </tr> </table> <p><i>Tick all not covered or matched in ES</i></p>	<input type="checkbox"/> Title/Activity	<input checked="" type="checkbox"/> Own	<input type="checkbox"/> Downstream	<input type="checkbox"/> Concentration	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream	<input checked="" type="checkbox"/> Other OC/RMM	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream	<input type="checkbox"/> _____	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream
<input type="checkbox"/> Title/Activity	<input checked="" type="checkbox"/> Own	<input type="checkbox"/> Downstream											
<input type="checkbox"/> Concentration	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream											
<input checked="" type="checkbox"/> Other OC/RMM	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream											
<input type="checkbox"/> _____	<input type="checkbox"/> Own	<input type="checkbox"/> Downstream											
Substance concentration²	Concentration range in own processes <u>10-100</u> % Concentration range in supplied product <u>10</u> % Substance supplied downstream <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No												
Operational Conditions and Risk Management Measures (OC/RMM)³	<i>Substance (in powder form) is charged to vessel in water soluble bags, giving no potential for exposure. On-site risk assessment indicates that LEV controls specified in ES are not required.</i>												

1. Information on concentration



Attaching the conditions of use document in IUCLID



Amending a previously submitted report



When to update?

- If there is change in the information reported
 - Own contact details
 - Supplier details (including supplier's registration number)
 - Uses that are reported
- "Without delay"

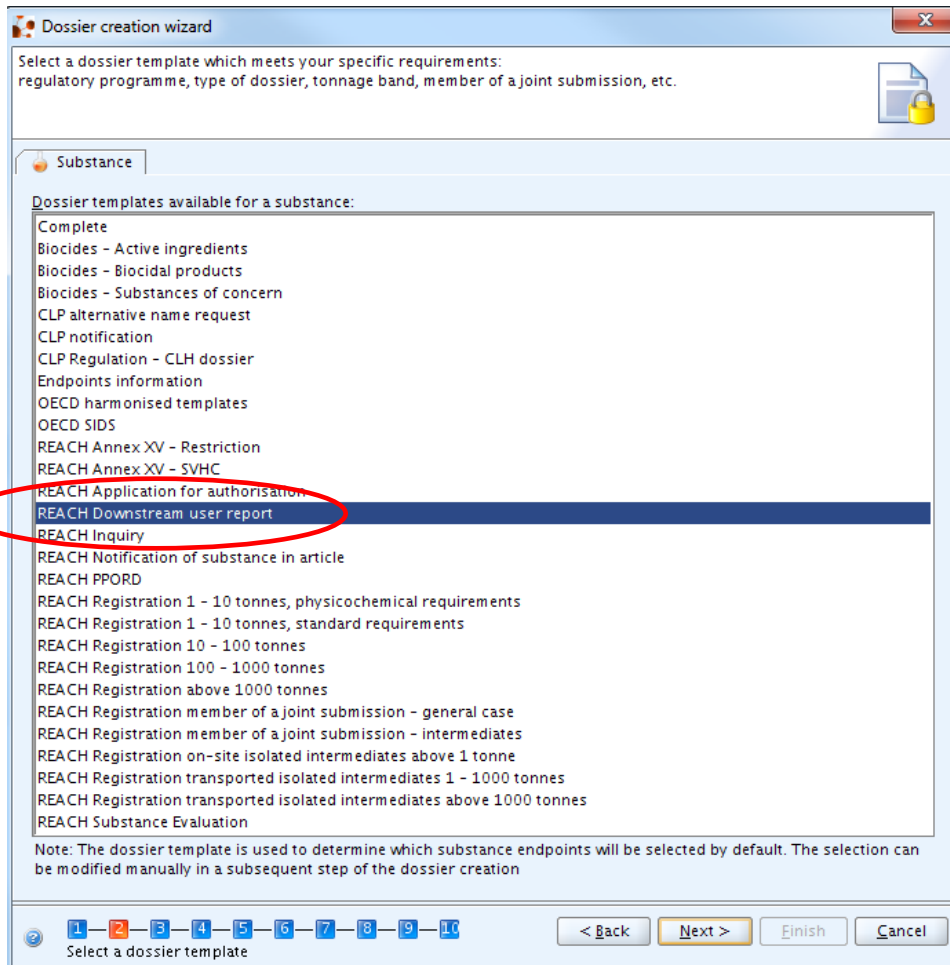
1-2. Open the original DU report dataset in IUCLID and amend as required

The screenshot displays the IUCLID 5.4.1 interface. The main window shows a dataset titled 'downstream_user'. The interface includes a navigation pane on the left, a search bar at the top right, and several data tables. The 'Formulation' table is visible, showing a single entry for 'Mixing of Biocidal Product'. Below it, the 'Uses at industrial sites' table shows an entry for 'Spray Application'. The 'Uses by professional workers' table is also visible but empty. The bottom of the interface features an 'Information' tab with sub-tabs for 'Information', 'Modification history', 'Access', 'Consultation', 'Attachments', 'Annotations', and 'Validation'.

Flags	Identified Use number	Identified Use name	Brief description o...	Tonnage of substa...	Number of sites ra...	Environmental Rel...	Process Category	Product Category ...	Tech...
		Mixing of Biocidal Product		10.0	1-10	ERC 2: Formulatio...	PROC 5: Mixing or...	PC 8: Biocidal pro...	Biocid...

Flags	Identified Use number	Identified Use name	Brief description o...	Tonnage of substa...	Number of sites ra...	Environmental Rel...	Process Category	Product Category ...	Sector of
		Spray Application		10.0	1-10	ERC 4: Industrial u...	PROC 7: Industrial...	PC 8: Biocidal pro...	SU 4: Manuf...

3. Create the DU report dossier



4. Fill in the administrative information (step 7 of the dossier creation in IUCLID)

1. Indicate update → The submission is an update

2. Previous submission number → Last submission number: CR013576-27

3. Reason for update → Spontaneous update

4. Justification → Justification: other: not preparing CSR

Remarks: exposure scenarios provided by supplier

5. Submit the dossier via REACH-IT



ECHA
EUROPEAN CHEMICALS AGENCY

REACH-IT

You are connected a

[Home](#) > [Submit Dossier Intro](#)

Registration / notification submission

Here you can begin the submission process of your dossiers for the processes in the drop-down menu shown below. To submit an update you should use the same process as for the initial submission. The new dossier submitted as an update must also contain all the previously submitted required information.

Fields marked with an asterisk () are mandatory.*

*Submission type:

- Registration
- Registration of on-site isolated intermediate
- Registration of transported isolated intermediate
- Substance in article notification
- Product and Process Orientated Research and Development (PPORD) notification
- Classification and Labelling (C&L) notification
- Downstream user report**
- Inquiry notification

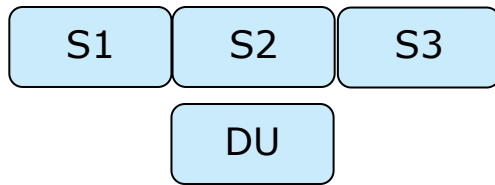
REACH-IT - [2.6.0.4.b5] [13/03/2013 15:17]
TCC - [e6.06] [r2.2.6]

Reporting downstream user classification of a substance

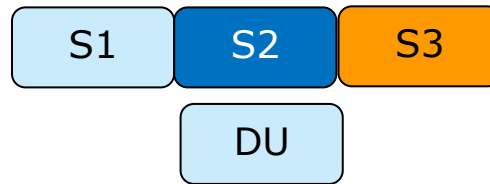


Article 38(4) of REACH - Interpretation

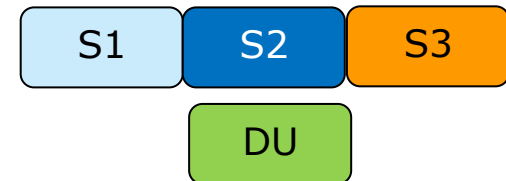
Reporting only when downstream user classifies the substance differently than any of his suppliers



No report



No report



Report

How to report

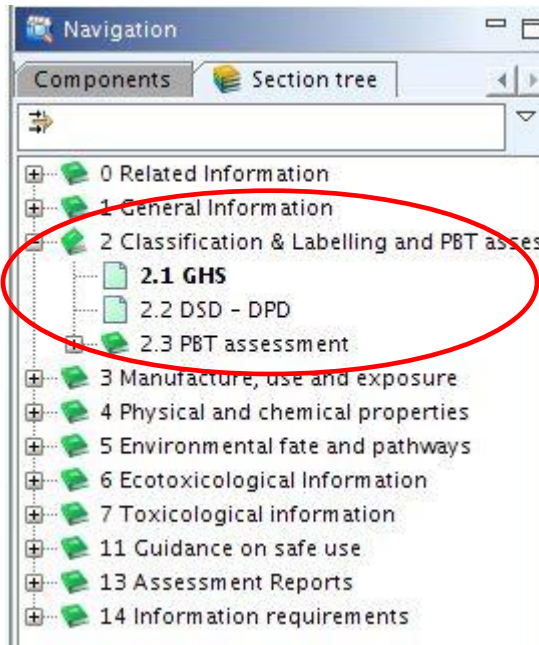
Cannot be done via the webform!



Reporting classification to ECHA – what steps to take

- Prepare a downstream user report dossier in IUCLID
- Enter information on your own classification in the dossier
- Create the dossier in IUCLID and export it
- Submit the report via REACH-IT

Preparing the IUCLID dossier



Classification

Physical hazards

	Hazard category	Hazard statement
Explosives	Expl. Div. 1.1	H201: Explosive; mass explosion
Flammable gases	Flam. Gas 1	H220: Extremely flammable gas.

Health hazards

	Hazard category	Hazard statement
Acute toxicity - oral		
Acute toxicity - dermal		
Acute toxicity - inhalation		

Environmental hazards

	Hazard category	Hazard statement
Hazardous to the aquatic environment (acute/short-term)		
Hazardous to the aquatic environment (long-term)		

REACH-IT for entering reason for submitting a DU report

*Submission type:

The submitting party declares the information above is correct and the company size to be calculated according to Annex to Commission Recommendation 2003/361/EC concerning the definition of micro, small and medium-sized enterprises. The submitting party also declares that, following careful verification, the substance subject of the present registration/ notification is appropriate for registration/ notification under Regulation (EC) No 1907/2006

1. The particular use(s) is/are not covered in the exposure scenarios received from our supplier because we prefer not to provide the information on our uses (and our further supply chain) due to:

*Reason(s) for submitting Downstream user report:

2. CBI reasons

Burdens of supply chain communication mechanisms

Other reason(s) **3.**

The particular use(s) are not covered in the exposure scenarios received from our supplier although we communicated relevant information on our use(s) (and the further supply chain) due to:

Include exemptions for DU-CSR:

Thank you

