HOW TO GET YOUR DATA TOGETHER

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EVERY STEP OF THE WAY

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HOW TO GET YOUR DATA TOGETHER

- under time pressure -

1. Substance identity
2. Member dossier
3. Lead dossier
4. Final notes: how to find a trusted partner

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Substance identity

Starting point for all registrations

SUBSTANCE ID

Starting point for all registrations

Substance identity: **What substance do you really have?**

What does your production process look like

SUBSTANCE ID

Starting point for all registrations

Substance identity:

What substance do you really have?

What does your production process look like

strategy

Are impurities present?

Which impurities are present?

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SUBSTANCE ID

Starting point for all registrations

Substance identity: **What substance do you really have?**

What does your production process look like

strategy

Are impurities present?

Which impurities are present?

- Substance name
- Molecular and structural formulae (if applicable)

- Spectral data (identification)
  UV/Vis, IR, 1H-and 13C-NMR (MS)

- Analytics to identify and quantify your substance and to determine purity and impurities of the substance
  Chromatography with identification possibility (LC-MS, GC-MS)
  Karl Fischer titration (if presence of water can be expected)
  …

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Member dossier

MEMBER

Lead can be found via REACH-IT, ECHA web site*, GOOGLE

Contact the lead to become a member:

1. Sign SIEF/ SUBSTANCE agreement

Check list:

- Check quality of dossier (disseminated dossier)
  - If not compliant: consider opt-out
- How are costs calculated?
  - It should be fair, transparent and non-discriminatory
  - Is access granted for REACH only, or is use for read across/ global purposes included?
- Can you terminate the agreement when you cease import/ manufacturing?
- Are the obligations of the lead well-defined?
- Can your affiliates use the same LoA?
- …

**https://echa.europa.eu/registration-statistics-infograph#*

MEMBER

Lead can be found via REACH-IT, ECHA web site, GOOGLE

Contact the lead to become a member:

1. Sign SIEF/ SUBSTANCE agreement
2. Pay for Letter of Access

3. Prepare dossier via IUCLID (stand-alone/ cloud)

Include information on your role (importer, manufacturer, Only Representative), yearly tonnages (at least 3 previous years), sites (in case manufacturing in EU), uses, guidance on safe use (SDS, unless shared)

4. Prepare CSR (only for >10 t/a; only if not shared)

If you receive template from lead:
Check if your uses are covered
Uses to be provided by all users in your supply chain!

MEMBER

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4. Prepare CSR (only for >10 t/a; only if not shared)
5. Confirm member ship in REACH-IT
6. Submit dossier, wait for outcome TCC, pay invoice

Lead dossier

PREPARATION LEAD DOSSIER

Day 1

Goal: prepare compliant dossier time- and cost efficiently

KEY ELEMENTS OF THE DOSSIER:

- Administrative information (same as member dossier)
- Physico-chemical parameters
- Environmental fate
- Ecotoxicology
- Human toxicology

→ Classification and labelling (all tonnage bands)
→ PBT assessment (> 10t/y)
→ Chemical safety assessment (> 10t/y)

PREPARATION LEAD DOSSIER

Day 1

Inform potential co-registrants to avoid double work/ duplicate animal testing

PREPARATION LEAD DOSSIER

Day 1

Time savers on **the first day** - Know your substance!

1) Substance identity (same as member dossier, plus definition your test substance)

→ Identify optimal sample for testing
→ SIP (representative of substances of all members)

PREPARATION LEAD DOSSIER

Day 1

Time savers on **the first day** - Know your substance!

1) Substance identity (same as member dossier, plus definition your test substance)
2) Evaluate your substance:

- Is it exempt?

  - Annex III (phys/chem only)
  - Re-import
  - Naturally occurring substance
  - Polymer
  - Recycled substance
  - …

PREPARATION LEAD DOSSIER

Day 1

Time savers on **the first day** - Know your substance!

1) Substance identity (same as member dossier, plus definition your test substance)
2) Evaluate your substance:

- Is it exempt?
- Can testing be waived based on substance-specifi

- If the substance has corrosive properties, no local tests, no acute toxicity testing and no testing for skin sensitizing properties is required
- If the substance is inorganic, no testing for biodegradation or partition coefficient needs to be conducted
- Ecotoxicity testing might not be required if substance is highly insoluble in water or unlikely to cross biological membranes
- Ecotox testing needs to be adapted if rapid degradation occurs
- ….

PREPARATION LEAD DOSSIER

Day 1

Time savers on **the first day** - Know your substance!

1) Substance identity (same as member dossier, plus definition your test substance)
2) Evaluate your substance:

- Is it exempt?
- Can testing be waived based on substance-specific properties?
- Literature search: Data available? Data on analogue substances?
- Address potential drawbacks by evaluating structural alerts →
  - OECD Toolbox
  - DEREK
  - EPISUITE

OUTCOME FIRST DAY: Data gap analysis

Seek expert advice

Disclaimer: Expect the unexpected

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PREPARATION LEAD DOSSIER

Testing phase

- All testing should be performed according to OECD/EC guidelines
- Ecotoxicity/ human toxicity testing to be done according to GLP principles

Annex VII/VIII: melting/freezing, boiling point, rel. density, vapor pressure, water solubility, partition coefficient, flammability, explosive/oxidizing properties, granulometry

Physico-chemical properties → ≥ 3 months

Ecotoxicity/ E-fate testing → ≥ 3 months

Annex VII: Acute daphnia and algae test, biodegradation;
Annex VIII: Microbial toxicity, acute fish testing, hydrolysis, adsorption/ desorption

Please note that time-lines are based on start of the project until final report date

PREPARATION LEAD DOSSIER

Testing phase

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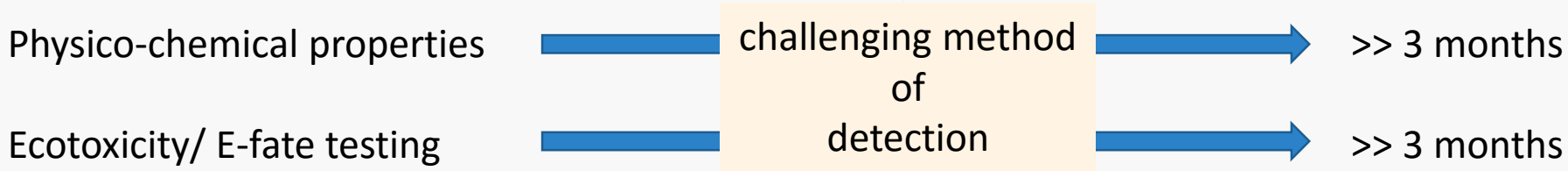

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PREPARATION LEAD DOSSIER

Testing phase

Human toxicity testing Annex VII

Acute testing: ≤ 3 months (in vitro eye and skin irritation, AMES, acute toxicity testing)

PREPARATION LEAD DOSSIER

Testing phase

Human toxicity testing Annex VII

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Preferred: step-wise approach acute oral testing, await outcome local tests

PREPARATION LEAD DOSSIER

Testing phase

Human toxicity testing Annex VII

Acute testing: ≤ 3 months (in vitro eye and skin irritation, AMES, acute toxicity testing)

Skin sensitizing properties: Step-wise approach

1. Two *in vitro* tests → appr. 2 months
2. Potentially 3rd *in vitro* test → another 2 months

3. If results indicate skin sensitizing properties: LLNA → again, another 2 months

PREPARATION LEAD DOSSIER

Testing phase

Human toxicity testing Annex VIII

Additional route acute toxicity (if required)

Chromosome aberration and mammalian cell gene mutation studies (preferred start when AMES is done)

Repeated dose testing and screening for repro/developmental effects: 5-6 months

Overall conclusion:
Testing Annex VII will take at least 4 months
Testing Annex VIII will take at least 5 months

PREPARATION LEAD DOSSIER

Dossier preparation

- Insert administrative data in IUCLID
- Include substance identity plus define boundary composition
- Include uses
- Include waivers for endpoints where no data are inserted
- Prepare robust summaries in IUCLID
- Prepare Endpoint summaries
- Include test proposals (if needed, eg in case positive AMES test or poorly water soluble substance)
- Conclude on classification and labelling
- Include guidance on safe use

Annex VII: 40 - 60 hours
Annex VII + VIII: 80 – 100 hours
can - in part- be started during test phase

PREPARATION LEAD DOSSIER

Dossier preparation

Annex VIII and up:
- Prepare PBT assessment
- Derive PNECs and DNELs

} Up to 20 hours

- Perform chemical safety assessment, attached chemical safety report

} 8 - 16 hours (unclassified substance)
60 – 100 hours (classified substance)
Note: Strongly depends on number exposure scenarios, DNELs/PNECs, refinements needed, …

Time needed when testing is final: at least 40 hours (ANNEX VII) or 100 hours (ANNEX VIII)

Run validation assistant

Note: Dossier might still not pass manual check by ECHA

Final notes: How to select a partner

HOW TO SELECT A PARTNER

Test work/ dossier preparation

CONTRACT RESEARCH ORGANIZATION

- Choose a lab that has experience with OECD guidelines and GLP
- Choose a lab that has experience with substances like yours
- Check availabilities – what are estimated turnaround times?

CONSULTANT

→ ECHA published a checklist to hire a good consultant* and a practical Guide for SME managers**

- Multi-disciplinary team
- Check experience — Have they worked on a substantial number of lead dossiers?
  Do they have experience with ECHA evaluations?
- Availability/ flexibility
- "Click"

**https://echa.europa.eu/documents/10162/13559/dcg_consultant_checklist_en.pdf/e6600a27-b2d6-447e-abce-95e6e2e1e26a*
*** Practical guide for SME managers and REACH coordinators How to fulfil your information requirements at tonnages 1-10 and 10-100 tonnes per year*

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