

## REACH 2018



### EU REACH 2018 – Upgraded Tools for Registration 'IUCLID 6 & REACH-IT'

by Dr. Bhavika Patel, Toxicologist, CONUSBAT

**The final deadline for REACH registrations of phase-in chemicals is on the 31 May 2018.** The deadline applies to pre-registered substances manufactured or imported into the EU in quantities of 1-10 tons/year and 10-100 tons/year. These tonnage bands are crucial for the vast majority of substances used as ingredients in cosmetic products. Important IT-tools for the submission of registrations are REACH-IT, the submission portal on the ECHA website, and IUCLID, the submission software. Several updates thereto were made by middle to end of the last year, 2016.

**The new version of IUCLID, IUCLID 6,** is built on new technology, which allows the development of customized interfaces, as well as to connect IUCLID to other data management systems. IUCLID 6 is available for free on the IUCLID website. All information that users have stored in IUCLID 5.6 can be migrated to the new format. IUCLID 6 contains an extensive help system within the tool itself, allowing the user to get targeted help while filling in the data. Registrants can check the completeness of their information with a verification tool called the 'Validation Assistant', which is available within IUCLID. This tool will also report potential inconsistencies, which can be fixed before submitting the registration to ECHA.

**REACH-IT,** adjusted to the requirements of the new IUCLID 6 format, was made available in June 2016 and as a consequence only dossiers prepared in IUCLID 6 format are accepted. The new REACH-IT is far more intuitive and user-friendly and introduces new features in line with the changes made to the REACH registration process in 2016. Based on a new navigation structure and design, the REACH-IT homepage allows quick access to key functionalities and information directly from the homepage or through the revised menu. Submitting a IUCLID dossier is now simpler also due to a revamped submission wizard, which also includes checklists that give further help. In addition, the system allows quick and easy access to post-submission information (e.g. the status of your submission) through the submission report and the reference number overview pages. The reference number overview page gives insights for each regulatory process and is the starting point for dossier updates. In addition, the search functionality was redefined. After selecting the type of item to search, results can be filtered for specific criteria. The completeness check that ECHA performs on each incoming registration has also been adapted to the new IUCLID format and to the changes in the information requirements (e.g. the extended one-generation reproductive toxicity study). The IUCLID Validation Assistant now allows that dossiers can be checked before submission. The automated completeness check in REACH-IT is complemented by a manual verification performed by ECHA on elements that cannot be checked automatically.

**One substance, one registration** - REACH-IT now assures that registration dossiers cannot be submitted individually if a registration for the same substance and registration type already exists, as such meeting the

'one substance, one registration' principle. Different options are provided for the two existing dossier types, the lead registrant dossier can only be created in the new IUCLID 6 software; whereas, the member registration dossier can be created in IUCLID 6 and also directly at the new REACH-IT portal.

**The new generation of these tools** has been tested by industry users, who confirmed that they are easier to use than the previous generation. The visibility of lead registrants is more prominent in the new REACH-IT, as in a joint submission, REACH-IT will automatically display the lead registrant's contact details to those who have registered, pre-registered or inquired for the same substance. Additionally, if a lead registrant agrees to have the company name published on ECHA's website, it will be indicated on the joint submission page of REACH-IT. All lead registrants are encouraged to allow this in order to increase their visibility among potential registrants and to reassure downstream users that the substance they are using has been registered up in the supply chain.

**REACH-IT's new features** aim to ease the work of small and medium-sized enterprises (SMEs). It includes useful information and guidance, as well as practical advice on how to create a dossier in IUCLID or directly in REACH-IT. The IUCLID 6 and REACH-IT 3 user manuals are also available, and will be soon in 23 EU languages.

**REGISTER NOW!** The final deadline to register chemicals is the 31. May 2018. After completing the REACH registration, a company can continue to legally supply chemicals to the EU market.

---

**CONUSBAT Regulatory Services:** Our expertise lies in the current EU 28 member states legislation as well as global compliance support for cosmetics, personal care, fine chemicals & the borderline industries. We provide safety assessments, substance inventories (SIs), registration dossiers, representation, i.e., REACH Only Representative (OR), Responsible Person (RP). Additionally, we cooperate with strategic global regulatory partners for the core sectors we service.

*CONUSBAT didn't write the regulation; our job is keeping you compliant with it!*

---

CONUSBAT Regulatory Services || Steven L. Hanft, M.A., President  
Kruppstr. 18, D-52072 Aachen, Germany || T. +49 241 9391 7084  
[steven.hanft@conusbat.com](mailto:steven.hanft@conusbat.com) || [www.CONUSBAT.com](http://www.CONUSBAT.com)

If you wish not to receive the CONUSBAT Regulatory Update, [click here](#) to unsubscribe