

Updating individual registrations to Joint Submission

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This paper explains the process that companies have to follow in case they have submitted 'individually' and they now want to update their dossiers in order to become part of a Joint Submission in accordance to article 11. The following steps need to be followed:

1. Contact the Lead Registrant/consortium

The first step needs to be done outside REACH-IT. It consists of contacting the corresponding Lead Registrant or consortium in order to learn about the conditions to receive the information that has been jointly submitted, the name of the Joint Submission Object, and the token. In some cases, it may imply the signature of the SIEF agreement and the subsequent payment of a Letter of Access. The price of such Letter of Access needs to be in line with the principles of fair, transparent and non-discriminatory cost sharing.

For more information see documents below:

- Cefic recommendation on Letters of Access:

http://cefic.org/Documents/IndustrySupport/Cefic_recommendation_letter_of_access_FINAL.pdf

- Cefic note on transparency in cost sharing:

http://cefic.org/Documents/IndustrySupport/Cefic-note_transparency-on-cost-sharing-in-SIEFs_310510.pdf

- Cefic note on fair cost sharing:

http://cefic.org/Documents/IndustrySupport/Cefic-note_fair-cost-sharing%20in%20SIEFs_070910.pdf

In some cases, the company may not know who the Lead Registrant is. In order to find out, companies are invited to check the pre-SIEF page in REACH-IT and their mailboxes as there may be messages from the Lead Registrant.

An alternative is to consult lists of consortia publicly available, or to contact the ECHA helpdesk and ask for help in identifying the relevant Lead Registrant.

2. Sign up to the Joint Submission in REACH-IT

Once the company is in possession of the name of the JSO and the token¹, it needs to sign-up to the JSO. The ECHA user manual part 7 explains the process in detail:

http://echa.europa.eu/doc/reachit/industry_user_manual/reachit_joint_submission_en.pdf

3. Re-submit registration dossier as an update

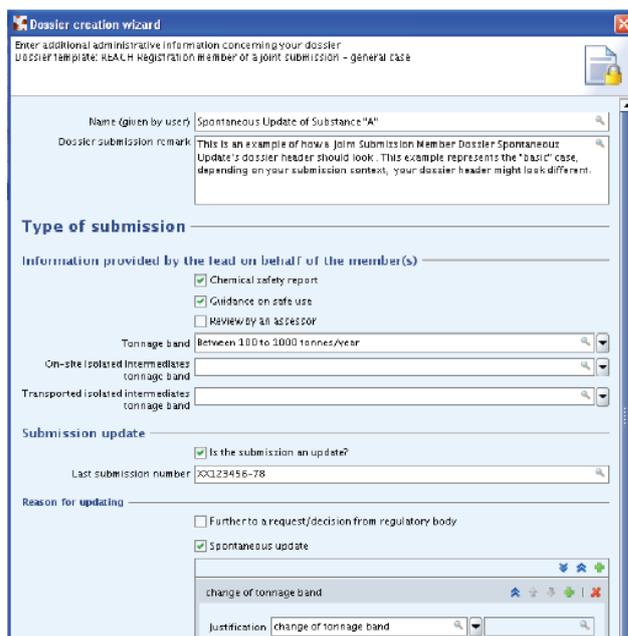
Finally the last step is a re-submission of the registration dossier as a spontaneous update of the previously submitted dossier.

When doing a spontaneous update, the company is requested to provide the reason that has triggered the update. In the particular case of an individual registration being updated to become a member of a Joint Submission, companies have to select 'Change of tonnage

¹ Please note that the token has a validity of 30 days. The token may have expired and needs to be re-generated by the Lead Registrant. Please consult the ECHA manual on Joint submission for more information on the token:

http://echa.europa.eu/doc/reachit/industry_user_manual/reachit_joint_submission_en.pdf

band' in the dossier creation wizard (see image below). This reason for updating has to be selected for technical reasons even if there is no actual change of tonnage band².



The image above also shows that the latest submission number (in this case related to the individual submission) needs to be provided.

Please note:

- The previous registration number will have to be included in section 1.3 of the IUCLID dossier
- There will be no fee associated to such an update, unless it is an actual change to a higher tonnage band than previously registered, or additional claims on confidentiality have been included.
- It should also be noted that the dossier submitted as an update, will undergo the current Business Rules and Technical Completeness Checks. In case of failure of the update submission, the initial dossier is not deleted.

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² The technical rationale behind this is that for REACH-IT the current tonnage band of the member in the JSO is going to be updated from "non existing" (as the member registration is still not part of the JSO), to the actual tonnage band. In case a different reason for updating is selected in the dossier header, the dossier will fail the Business rules check