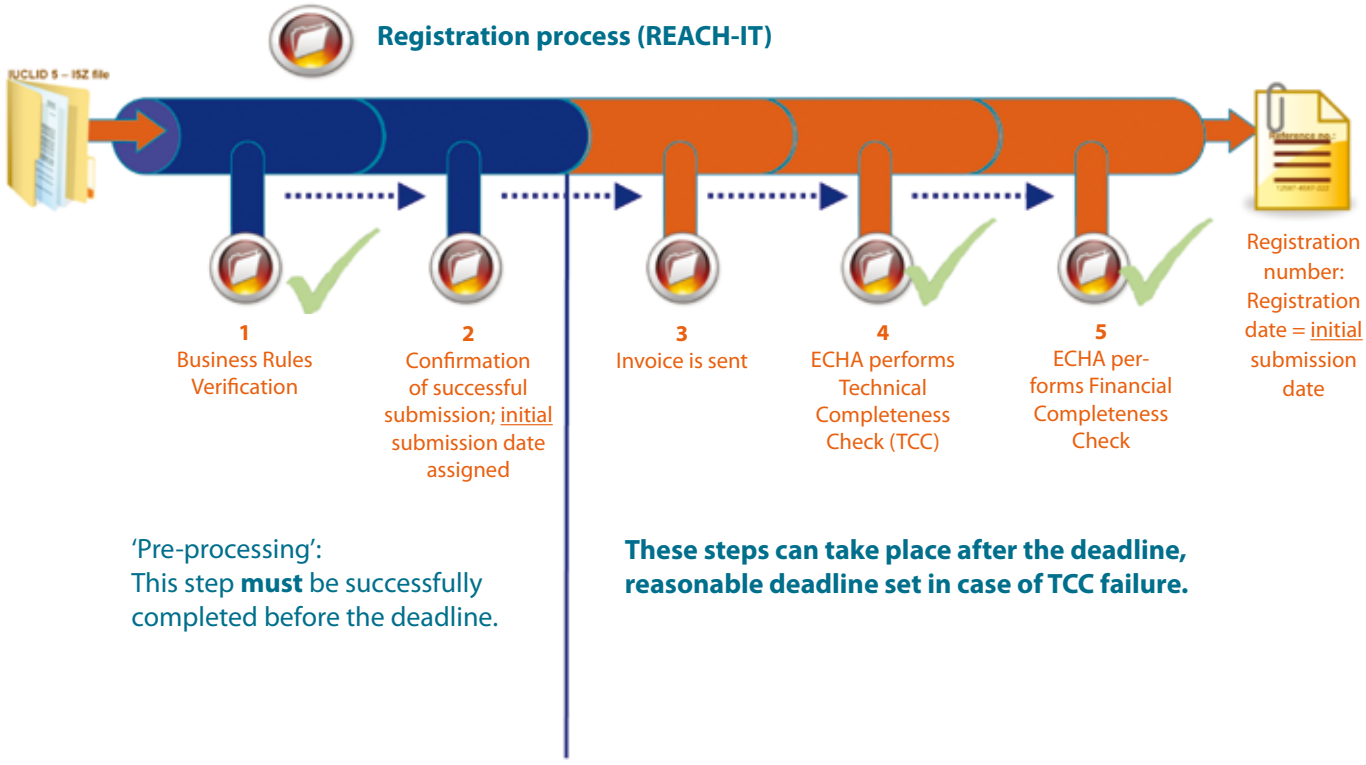
ECHA | Newsletter
№4
Aug
2010

First registration deadline for substances: 30 November 2010



Classify and label!
1 December 2010

ready?

Notify classification and labelling!
3 January 2011

ECHA
European Chemicals Agency

Editorial

Here at ECHA we are preparing ourselves for a busy time in the weeks leading up to the November registration deadline. The number of Lead Registrants has been steadily increasing since the beginning of the year, but we are expecting numbers to increase rapidly between now and the deadline. I would encourage you to submit your registrations early to give yourself time to resubmit if you need to. Your dossier needs to pass the business rules before it is accepted for processing, so it is important to learn to successfully submit one dossier before submitting the rest. In any event,we are ready to help you and to meet the challenge that the EU has set for us.

I would also like to urge companies submitting registrations and claiming SME status to take care when assessing their company size. This is important as any mistakes made in relation to company size could result in the imposition of administrative charges. In order to assist companies with this assessment a new page dedicated to SMEs can be found on the ECHA website. I trust that the information available here will be of help to companies who wish to check whether they qualify for SME status.

We have also provided information online for registrants related to confidentiality claims and on issues connected with data sharing. I hope that this information will prove helpful in supporting companies with their registrations and help to ensure the smooth running of the system for both sides.

Last but not least, we are – together with the European Commission and the Member States – preparing the next steps in our campaign in order to raise awareness on the obligation to notify the classification and labelling of substances by 3 January next year. Our slogan "CLP – notify in time!" needs to reach a wider audience than REACH because this will affect many more companies than those affected by the first registration deadline.

I wish you the very best with your registrations and notifications and hope to meet you either in person or by video-link at our next Stakeholders' Day on 4 October.

Photo © ECHA

Geert Dancet,
Executive Director

© Getty Images/Caspar Benson

In this issue

To subscribe to the ECHA news alerts and newsletter, send your e-mail address to:
info@echa.europa.eu

Disclaimer: The views presented in the Newsletter do not necessarily represent the official position of the European Chemicals Agency. All the links are up to date at the time of publication.

European Chemicals Agency
Annankatu 18, P.O. Box 400,
FI-00121 Helsinki Finland
Tel. +358 9 6861 80
Fax +358 9 6861 8210

http://echa.europa.eu
press@echa.europa.eu

ready?

1 December 2010 brings dual classification and new labels

Companies are obliged to classify their substances by 1 December 2010 according to both the Dangerous Substances Directive (DSD) and the new Regulation on Classification, Labelling and Packaging (CLP). Companies also need to label and package accordingly the substances that are placed on the market from 1 December onwards. Substances already on the market can keep their original DSD labels until 1 December 2012.

The EU Regulation on classification and labelling[1] applies to companies who manufacture, import, use or distribute chemical substances or mixtures. Companies must classify, label and package any substance or mixture, regardless of its annual tonnage, in accordance with the CLP Regulation, before placing it on the EU market.

Placing a substance or mixture on the market means making it physically available to third parties, whether in return for payment or free of charge. Importing as well as sending samples are also considered as placing on the market.

For substances placed on the market, after 1 December 2010, companies must notify the classification and labelling of those substances to ECHA within one month after placing them on the market. The first notification deadline is 3 January 2011 and affects all substances that are on the market on 1 December 2010.

Until 1 December 2010, a substance must continue to be classified, labelled and packaged in accordance with the Dangerous Substances Directive[2].

A substance may also be classified, labelled and packaged according to CLP, in which case the labelling and packaging provisions of the DSD shall no longer apply. In this case, both the classification based on DSD and the CLP classification must appear on the Safety Data Sheet.

An overview of CLP can be found in the Introductory Guidance to CLP, available on ECHA´s website:

http://guidance.echa.europa.eu/docs/guidance_document/clp_introductory_en.pdf

ECHA´s CLP web pages:

http://echa.europa.eu/clp_en.asp

Legislation (CLP, DSD and DPD):

http://echa.europa.eu/legislation/classification_legislation_en.asp

The hazard symbols are listed on the UNECE website on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

http://www.unece.org/trans/danger/publi/ghs/pictograms.html

From 1 December 2010 the following rules apply[3]:

- **Substances** *must* be classified in accordance with both DSD and CLP;
- **Substances** *must* be labelled and packaged in accordance with CLP only, but substances already classified, labelled and packaged according to DSD and placed on the market (i.e. "on the shelf") before 1 December 2010 will only have to be re-labelled and re-packaged by 1 December 2012;
- Until 1 June 2015, **mixtures** *must* continue to be classified, labelled and packaged in accordance with the Dangerous Preparations Directive, DPD[4]. However, a mixture *may* also be classified, labelled and packaged according to CLP before this date. When this is done, the labelling and packaging provisions of DPD shall no longer apply to the mixture. This means that labelling and packaging *must* respect the provisions of CLP;
- Until 1 June 2015, the classification of a **substance** according to DSD *must* be provided in the Safety Data Sheet, in addition to the CLP classification. This will both apply to Safety Data Sheets for substances on their own and to Safety Data Sheets for mixtures containing these substances;
- Until 1 June 2015, the classification of a **mixture** according to DPD *must* be provided in the Safety Data Sheet;
- Until 1 June 2015, if a **mixture** is classified, labelled and packaged according to CLP, the CLP classification *must* appear on the Safety Data Sheet, alongside the classification based on the DPD. However, a supplier may choose to identify the CLP classification of a mixture in advance of applying CLP to it in full. Where this happens, the supplier may include this information on the accompanying Safety Data Sheet, under the 'other information' heading.

[1] CLP: Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures, amending and repealing directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (REACH). It came into force on 20 January 2009.

[2] Council Directive 67/548/EEC (Dangerous Substances Directive, DSD)

[3] Source: Introductory guidance to Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of substances and mixtures, page 21.

[4] Directive 1999/45/EC (Dangerous Preparations Directive, DPD)

The route to success:

Pass the 'Business Rules'

The business rules are a set of pre-requisites that must be fulfilled before ECHA can start processing a dossier in REACH-IT. The business rules check ensures that the information provided is unambiguous (e.g. the identity of the registrant) so that decisions taken at a later stage are based on correct information.

For instance, a company which has submitted a dossier as an update without providing the previous submission number will fail business rules. Such a failure is caused by the fact that the system is unable to create a link with the previous submission without its reference number. The registrant will be informed that an important piece of information is missing.

In short, the business rules stage ensures that the dossier can be processed. Resubmissions due to business rules failure are free-of-charge and the number of times a dossier can go through this stage is unlimited, although **it is of course essential to pass this step prior to the registration deadline**. The business rule result is normally available within 1–2 days of making the submission.

Of the total dossiers submitted, 70% "pass" the business rules check and around 30% are required to resubmit a modified dossier.

Currently, one of the most common business rule failures is a mismatch between the Legal Entity in the IUCLID dossier and the one used for submitting the dossier in REACH-IT.

Issues with substance identity are also common: in order to record the identity of the relevant substance, an EC number (e.g. an EINECS number), a CAS number or a chemical name needs to be provided.

Finally, further business rule failures are caused when, after an initial failure at the business rules stage, companies try to resubmit their dossiers as a regulatory update. Such dossiers cannot be considered as updates as the first dossier had not been accepted for processing.

In order to reduce the number of such failures, **the Technical Completeness Check (TCC) plug-in** (see below) has been developed to check most of the business rules; its use is helping companies to avoid errors at the pre-processing stage. In addition, it is crucial to read the related technical manual, the Data Submission Manual, part 04.

© Getty Iages/Tom Grill

Once a dossier has successfully passed the business rules stage, 90% go on to pass the initial TCC, and the vast majority of these pass the second TCC. Only 2% of submissions accepted for processing are ultimately rejected (either because they have failed twice the TCC stage or have failed to pay their invoice in time).

Of the more than 1000 registration dossiers that ECHA has accepted this year until now, only 2 dossiers were rejected for a second TCC failure and less than 10 invoices were not paid on time.

The TCC tool

▸ With the Technical Completeness Check (TCC) plug-in in IUCLID 5 you can test the technical completeness of your registration or your PPORD notification before submitting it. It also allows you to check most of the "Business Rules".

Some specific Business Rules checks can only be performed in REACH-IT itself. Therefore the results of the test with the plug-in cannot guarantee that your dossier will pass the Business Rules check in REACH-IT successfully. However, if it fails, an explanatory message will be created in REACH-IT.

Please check your dossier carefully and consult the relevant technical manuals. In case of difficulties that may arise during the submission process and should the information not be found in the relevant manuals, please send an enquiry to the ECHA Helpdesk.

The Technical Completeness Check plug-in supports both the distributed and standalone versions of IUCLID, but note that it can only be used with IUCLID version 5.2 and subsequent versions.

For full details, please also consult the release note which is included in the installation package. The installation package can be downloaded from the IUCLID website in Download \ Version 5.2.0 \ TCC Plugin.

IUCLID 5 web site:
http://iuclid.echa.europa.eu/

See what will be made public from your dossier

The IUCLID 5 Dissemination Plug-in allows you to see which information from your registration dossier will be made publicly available over the internet by ECHA. The Plug-in can be downloaded from the IUCLID website.

The plug-in simulates ECHA's automatic filtering which is carried out to remove confidential information. Companies will thus be able to use this tool to check which information from their dossier will be published on the ECHA website.

This allows companies to check that they have not entered confidential business information in error in a part of their registration dossier that will be made public, and to determine if they will need to make a confidentiality claim on information contained in their registration dossier.

The Dissemination Plug-in will remove information claimed confidential by default. However, ECHA will perform an assessment of every confidentiality claim falling under REACH Article 119(2). Should ECHA reject any such confidentiality claim(s), the information claimed confidential may be disclosed at a later stage, after consultation with the registrant.

The IUCLID 5 Dissemination Plug-in supports both the distributed and standalone versions of IUCLID, and can be used only in connection with REACH registration dossiers. It can be downloaded from the IUCLID website at Download / Version 5.2.0 /Dissemination Plugin.

Please note that the Dissemination Plug-in runs only with the latest version of IUCLID (5.2). Before attempting to use the plugin, please upgrade any previous IUCLID installations using the installation packages and manuals available from the 'Get IUCLID 5' section of the IUCLID website.

SME invited to verify their company size

ECHA encourages companies and Only Representatives (OR) declaring themselves as SMEs in their dossiers to check carefully that their company is in line with the EU definition of an SME.

In line with the REACH Fee Regulation, ECHA is checking the cases of companies identifying themselves as micro, small- or medium-sized. Companies may be asked by ECHA to prove their SME status. If they fail to do so, they will be charged the full REACH fee or the fee applicable to their size.

ECHA will start collecting an administrative charge for any incorrect SME registration in the coming months. To this effect, the Agency has submitted a draft Management Board (MB) decision for the approval of the European Commission. The exact level of the administrative charge will be determined accordingly.

On ECHA's website you will find an online tool which enables you to check whether your company complies with the EU definition of an SME.

In cases where a revision of the SME status is needed, clear guidelines on how to do this are also given.

For more information: **echa.europa.eu/sme_en.asp** **NEW**

Public consultation ongoing on two restriction proposals under REACH

A **public consultation** on two restriction proposals – Lead in jewellery and Dimethylfumarate treated articles – was launched at the end of June. Interested parties are encouraged to provide comments on the proposals by 21 September 2010 to allow the Risk Assessment and Socio-economic Analysis Committees to discuss and take them into account early in the process. The consultation is open until 21 December 2010, and thus further comments can be submitted until that date.

Two reports have been submitted to ECHA by France, proposing to restrict the use of Lead and its compounds in jewellery and the placing on the market of consumer articles treated with Dimethylfumarate.

Lead in jewellery: Children may be exposed to lead when they suck or ingest jewellery. In general, the adverse health effects of lead are severe. Children are more vulnerable than adults to the effects lead can have on the central nervous system.

Dimethylfumarate in articles: Dimethylfumarate (DMFu) is used as an anti-moulding agent to protect articles during storage and transport. Consumer articles containing DMFu (e.g. furniture, clothing and shoes) can cause severe skin problems (dermatitis).

Further information on the proposals and on the ongoing consultations: **http://echa.europa.eu/consultations/restrictions/ongoing_consultations_en.asp**

Kevin Pollard, Head of the Registration and Dossier Submission Unit, advises companies to get familiar with the submission system and the key manuals, consult the webinars on ECHA's website and pay their registration invoice in time. Follow this and they will be able to submit their registrations and notifications of classification and labelling successfully.

Photo © ECHA

"The vast majority of companies register their substances successfully," says Kevin Pollard, Head of Registration and Dossier Submission.

Kevin Pollard and his team are in charge of the submission pipeline through which the registrations and notifications are received and the company and substance information is checked, invoices created, and the registration number is issued. Then the dossiers move on in a workflow to other units dealing with their contents e.g. dossier evaluation.

Prior to joining ECHA, Mr Pollard was working in the UK competent authority for pesticides, mainly in the field of exposure assessment. He was among the first staff members to join ECHA in autumn 2007 and in February of this year, he was appointed Head of the Registration and Dossier Submission Unit.

Mr Pollard, how are registrations of chemicals submitted to ECHA?

The actual submission of the registration to ECHA relies on two pieces of software, the first one is IUCLID 5 and the second one is REACH-IT. What companies need to do is to compile the dossier in IUCLID 5 and then submit it via REACH-IT.

In general, are companies registering successfully?

The vast majority of companies register their substances successfully. In fact, we have a less than 2% rejection rate for the final registration decisions. However, a number of steps need to take place before the registration number is issued, and for those earlier steps there are slightly lower first time success rates. Currently, approximately 65–70% of the dossiers pass in the initial business rules check which is made to ensure that ECHA is able to process the dossier. Companies who do not succeed at this stage can correct their dossier and resubmit it before the deadline.

What seems to be most difficult for the registrants?

The most challenging aspect seems to have been the work in Substance Information Exchange Forums (SIEFs). Companies are having complex negotiations within the SIEFs to assess the extent of available data and then to assess and share the data and compile, where necessary, the Chemical Safety Report.

In terms of the submission itself, the main challenge is passing the business rules – making sure that we have the information we need to process the dossier – and the technical completeness check (TCC) where we verify that the dossier is complete. The other challenge is paying the invoice on time! It is important that companies make arrangements with their financial departments to pay the invoice on time – the law is strict on this. These are three practical areas where companies really need to focus and make sure they understand the system.

What else could help registrants succeed in registering?

It is very important that companies take a close look at the technical manuals and other information which assist in ensuring that the business rules and technical completeness check can be successfully carried out.

For both the business rules and the technical completeness check there is a IUCLID 5 plug-in called the TCC tool which allows companies to pre-check their dossiers. This tool checks all of the TCC rules and the majority of the business rules. It is absolutely essential that companies do that, and this will give a much greater security of successfully meeting the deadline.

What is ECHA doing to help the registrants?

In addition to the technical manuals, ECHA has carried out quite an extensive information campaign including a series of detailed technical webinars, which are available on our website to assist with dossier compilation and submission. And on top of that, there has been a Directors´ Contact Group working with representatives from the Commission, industry and ECHA, to identify and solve any outstanding issues during the lead up to the deadline.

How can a company submit a notification of classification and labelling to ECHA?

You always submit via REACH-IT on ECHA's website. We have a range of different methods for preparing the notification. The most straightforward method is to make your C&L notification directly online via REACH-IT, and this is a system which has been deliberately kept as simple as possible. For companies having a large portfolio of substances for which they need to submit a C&L notification, there are other systems. They can make a bulk submission for many substances and also have the possibility to form a group of companies who make a single notification for a range of substances.

Do you have any special advice to companies that need to notify their classification and labelling?

Of course number one is to prepare to notify in time. And remember that you need to keep this information up to date after the initial submission to ECHA.

For the submission itself it means you need to familiarise yourself well in advance with the different submission systems and decide which one is most appropriate for you, and also of course to consult the associated material on our website including the technical manuals. Our recent Stakeholder Day presentations which are available online give some pointers on how to identify and select the best submission system for you. This information is all available on the CLP section of ECHA's website.

How many registrations and classification and labelling notifications does ECHA expect to receive?

There are a range of estimations on how many registration dossiers could be submitted this year. The latest information from industry would indicate that we could receive around 40 000 dossiers, but the estimations vary, and we have planned for a range of between 25 000 to 75 000 dossiers. The number of classification and labelling notifications is quite difficult to estimate, but we currently believe that it will be in the millions.

How will ECHA be able to cope with these large volumes?

This has been an area of substantial work for myself and my colleagues during the last couple of years. We have made a number of significant improvements to the efficiency of REACH-IT, and our colleagues in IT are currently carrying out intensive stress and performance testing of the system to ensure that it can cope with these high volumes. We in addition have developed a back-up system to be able to accept dossiers if REACH-IT needs to be down.

We also have a detailed resource planning in place to ensure that we have the right people here at ECHA to process these dossiers properly and correctly.

Have you a message for companies who would like to register and notify as smoothly as possible?

The key message is to familiarise yourself with the submission system, to take time to read the key manuals, and if any doubt, to check the more detailed information such as the wide range of webinars we have available on our website. For companies who need to make multiple submissions, I would strongly advise to prioritise at least one dossier for submission as early as possible in order to develop first hand experience of the submission system.

And one area where I would suggest that companies particularly focus on is the initial submission functionalities. In other words: to carefully consult the Data Submission Manual number 4 on passing the business rules.

Published in July–August

General	
Evaluation under REACH Progress Report 2009 **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=reports**
Multi-Annual Work Programme 2011–2013	**http://www.echa.europa.eu/doc/work_programme/2011_2013/echa_wp_2011_2013_en.pdf**
Guidance	
Guidance Fact Sheet on the User Descriptor System **(English version + translated versions)**	**http://guidance.echa.europa.eu/guidance3_en.htm**
Guidance Fact Sheet on the Waste and Recovered Substances **(translated versions)**	**http://guidance.echa.europa.eu/guidance3_en.htm**
Practical Guide 1 "How to report in vitro data" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
Practical Guide 2 "How to report weight of evidence" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
Practical Guide 3 "How to report robust study summaries" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
Practical Guide 4 "How to report data waiving" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
Practical Guide 5 "How to report Q(SAR)s" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
Practical Guide 8 "How to report changes in identity of legal entities" **(translated versions)**	**http://echa.europa.eu/publications_en.asp?view=practical_guides**
CLP FAQ **(updated)**	**http://echa.europa.eu/clp/clp_help/clp_faq_en.asp?fuseaction=home.faq**
IT manuals	
Industry User Manual 6: Dossier Submission **(translated versions)**	**http://echa.europa.eu/help/help_docs_en.asp?view=Registration**
Industry User Manual 7: Joint Submission **(translated versions)**	**http://echa.europa.eu/help/help_docs_en.asp?view=Registration**
Data Submission Manual 19: How to submit the CSR as part of a joint submission?	**http://echa.europa.eu/doc/reachit/dsm_19_how_joint_csr_en.pdf**
Data Submission Manual 16: Confidentiality Claims: How to make confidentiality claims, and how to write Art 119(2) confidentiality claim justifications	**http://echa.europa.eu/doc/reachit/dsm_16_confidentiality_claims.pdf**
Data Submission Manual 1: How to prepare and submit a PPORD notification **(translated versions)**	**http://echa.europa.eu/help/help_docs_en.asp?view=REACHIT**
Data Submission Manual 15: How to determine what will be published on the ECHA website from the registration dossier **(updated)**	**http://echa.europa.eu/help/help_docs_en.asp?view=dissemination**

New Directors and Heads of Unit

New Director of Evaluation

▸ Ms Leena-Ylä-Mononen has been appointed as Director of the new Evaluation Directorate as of 1 November 2010. At the moment, she is working as the Head of Unit for Committees and International Relations Unit.

New Director of Risk Management

▸ Mr Jack de Bruijn has been appointed as Director of the new Risk Management Directorate. At the moment, he is working as the Head of Unit for Risk Management.

New Head of Unit for Committees and International Relations

▸ Ms Pilar Rodríguez-Iglesias has been appointed as the Head of Unit for Committees and International Relations Unit as of 1 November 2010. At the moment, she is working in ECHA as the Head of Unit for Guidance and Helpdesk.

New Head of Evaluation I Unit

▸ Mr Wim De Coen was appointed in May 2010 as the new Head of Unit for the Evaluation I Unit in the Directorate for Assessment.

New Head of Classification Unit

▸ The former Head of the Evaluation I Unit, Mr Jörg Lebsanft, has been leading the Classification Unit since May 2010.

New Director for Information Systems

Source: Luisa Consolini. Other photos © ECHA

▸ Ms Luisa Consolini has been appointed as the Director of ECHA's new Directorate for Information Systems. She will join ECHA in September 2010. Ms Consolini is Italian and before joining ECHA she worked as the Director of the ICT Centre of Bologna University, which serves 80 000 students, 10 000 staff, 23 Faculties and 70 research departments. The ICT Centre of Bologna University is responsible for the University's ICT infrastructure and distributed services, software development and maintenance of the main information systems, information security management, business continuity and user support.

Ms Consolini will be in charge of the new Directorate for Information Systems from 2011.

Management Board

ECHA's tasks 2011–2013 and SME verification discussed

▸ At its 19th meeting on 22–23 June 2010, the ECHA Management Board adopted the Agency's multi-annual work programme 2011–2013, a key strategy document which is published on the ECHA website and will be translated into 21 EU languages. The Management Board also agreed on a draft decision allowing ECHA to levy administrative charges to cover the workload which results from the verification of the documentation of companies claiming fee reductions based on their status as a small, medium or micro-sized company. The draft decision was forwarded to the European Commission from which a favourable opinion needs to be obtained before the decision enters into force.

The Management Board also discussed ECHA's stakeholder policy, in particular the participation of stakeholder organisation observers and case holders in meetings of the Member State Committee, as well as a report from the Board's working group on audit matters.

Public Consultation on inclusion of substances in the authorisation list

ECHA launched on 1 July a public consultation on its draft recommendation of eight substances to be included in the Authorisation List (i.e. Annex XIV of the REACH Regulation). Interested parties can submit comments until 30 September 2010.

Comments are particularly welcome on any uses which merit exemption from the authorisation requirement. To comment, use the web form on ECHA's website.

Based on an assessment of the available information, ECHA recommends eight substances from the fifteen substances that were added to the Candidate List early in 2010 for inclusion in the Authorisation List. These substances are:

- Diisobutyl phthalate (DIBP)
- Diarsenic trioxide
- Diarsenic pentaoxide
- Lead chromate
- Lead sulfochromate yellow (C.I. Pigment Yellow 34)
- Lead chromate molybdate sulfate red (C.I. Pigment Red 104)
- Tris (2-chloroethyl) phosphate (TCEP)
- 2,4 – Dinitrotoluene

On the basis of the comments received during this consultation, ECHA may modify the draft recommendation which also proposes sunset dates by which users of substances must have submitted an application for authorisation to be able to continue to use the substances. In this process, it will also take into account the opinion of the Member State Committee.

Thereafter, the ECHA recommendation will be submitted to the European Commission for final decision.

The ultimate aim of authorisation is that the inherent risks of these high concern chemicals are properly controlled and that they are progressively replaced by suitable alternatives.

Public consultation on ECHA's second recommendation of priority substances to be included in Annex XIV (web forms for commenting, recommendation documents and background information):

http://echa.europa.eu/consultations/authorisation/draft_recommendations_en.asp

Candidate List for eventual inclusion in Annex XIV:

http://echa.europa.eu/chem_data/candidate_list_en.asp

Authorisation process:

http://echa.europa.eu/chem_data/authorisation_process_en.asp

Trade Unions call their members to act as

REACH and CLP ambassadors in companies

Photo © ECHA

The European Trade Union Confederation, ETUC, together with the European Mine, Chemical and Energy Workers´ Federation EMCEF, are launching a campaign in the autumn to raise awareness within companies of their REACH and classification and labelling obligations. ECHA and the European Agency for Safety and Health at Work are supporting the campaign. The trade unions intend to reach more than 60 million workers through their elected representatives in companies. Dr Tony Musu, Senior Researcher at ETUC and an ECHA Management Board member, explains in this interview why the trade unions are launching this campaign.

Mr Musu, why is this campaign necessary?

The starting point is that most of the companies in Europe are still unaware of their obligations under REACH, especially small and medium-sized enterprises. The idea is to use workers´ representatives in companies to try and raise awareness with their management. Not all companies are members of industry associations, but most of the companies have trade union representation. The idea is really to use those people in companies to try to reach them and to tell them: "Please inform your employer that we have the REACH and CLP Regulations and your company now has obligations under them."

Why is it relevant for the trade unions to promote REACH and CLP?

We want to tell the workers that if their company fails to comply, it might put the company at risk, and to avoid that they should inform their management about the new obligations.The idea is also to pass on the message that REACH is good for health and safety in the workplace. The goal is to have better control of chemical risks.

That is why trade unions have been working on REACH for many years now. We have a lot of diseases in the work places wich are caused by chemicals. ETUC made studies based on Eurostat data in 2004 and we found out that one occupational disease in three is caused by chemicals. That is a huge number! The European Agency for Safety and Health at Work in Bilbao estimated in 2009 that every year, 74 000 workers die in Europe because of the use of hazardous chemicals in the workplace. We really believe that REACH will improve the situation in the workplace.

And the Classification and Labelling Regulation, CLP?

The most important sources of information for workers are labels and Safety Data Sheets. Most of the time, they only have the labels and no Safety Data Sheets, even though it is a legal requirement to have them. And we know that there is often a lack of information and sometimes even wrong information on labels and on Safety Data Sheets. Of course we expect the CLP Regulation and REACH to improve the situation.

Safety Data Sheets are extremely important because now, thanks to REACH, they will contain additional information: the risk management measures that the producers of the chemical recommend for each identified use. That is completely new. A worker will be able to find in the Safety Data Sheet the risk management measures that are targeted for his own use of the substance.

The situation varies between companies. We really want to target with our campaign those small and medium-sized companies which may not have an agreed culture of health and safety but most often have at least a workers´ representative in the company. We would like to reach them and tell them with the campaign leaflet: be aware that we now have REACH and that your company needs to comply with these new rules.

Reserve the 4 October 2010

▸ ECHA´s fifth Stakeholders´ Day on 4 October 2010 at the Helsinki Exhibition & Convention Centre will focus on registration, evaluation, authorisation and classification and labelling notification. The event is especially targeted to all who need to meet the first REACH registration deadline on 30 November 2010 and the C&L notification deadline on 3 January 2011 or are closely involved in the process.

Stakeholders will have an opportunity to ask questions both during the Q&A sessions and at one-to-one meetings with ECHA staff.

Registration to the event is free of charge. The registration is open on ECHA´s website until 19 September 2010.

The language of the event is English. Live web streaming of the event can be followed free of charge on the internet, and the link will be available 24 hours before the event. **http://echa.europa.eu/news/events/5th_stakeholders_day_en.asp**

Avoiding surprises

Despite the warm weather in Helsinki, the significant increase in the overall amount of submissions over the last two months has kept the Registration Unit very busy. In July, the Unit has accepted for processing triple the amount of dossiers than in May and twice as many as in June. As could be expected, there has been a marked increase in the number of dossiers associated with the 2010 registration deadline, including the number of high tonnage band dossiers.

Although the first registration deadline is approaching, the Registration team has still to receive the majority of submissions expected for this year. Potential registrants are advised not only to register well in advance of the deadline, but also to take steps in order to avoid having to re-submit their dossiers. Such steps could range from watching the online webinars available on the ECHA website to reading the relevant technical manuals. A better understanding of the registration process will reduce the likelihood of errors. Additionally, companies are advised to coordinate with their financial departments in order to ensure prompt payment. Finally, a manual and a template for entering confidentiality claims in the IUCLID 5 dossier have been recently made available on the ECHA website. Use of all of these materials will help potential registrants to ensure a successful registration and thus, without surprises.

Manuals and templates: **http://echa.europa.eu/**

TCC Plug-in: **http://iuclid.echa.europa.eu/**

I PRE-PROCESSING

Dossiers accepted for processing in 2010

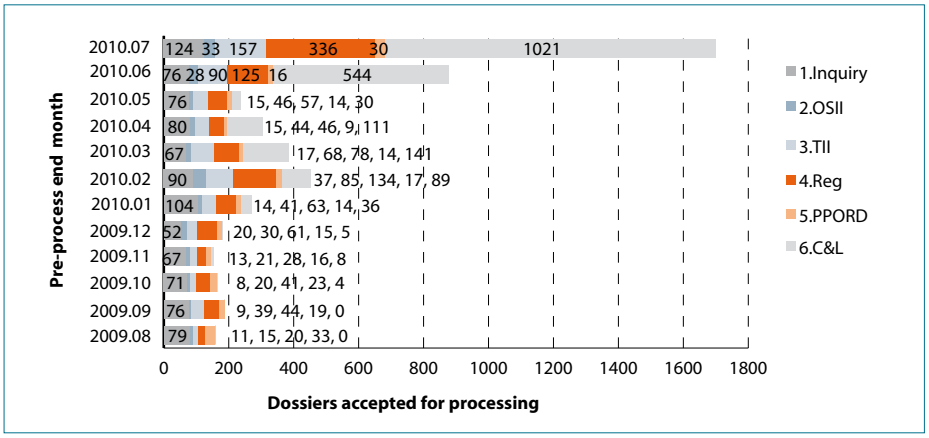
	1.Inquiry	2.OSII	3.TII	4.Reg	5.PPORD	6.C&L	Total:
Germany	188	85	240	339	41	488	**1381**
Spain	35	18	43	33	4	490	**623**
United Kingdom	77	8	59	84	5	285	**518**
Italy	58	10	29	29	19	234	**379**
The Netherlands	49	2	33	134	12	57	**287**
Belgium	39	7	36	77	8	84	**251**
France	58	11	34	57	10	49	**219**
Hungary	3			2		192	**197**
Ireland	53	6	21	3	5	9	**97**
Finland	6	1	2	20	2	53	**84**
Sweden	20	5	9	5	2	18	**59**
Austria	4		6	9	5	1	**25**
Poland	1	2	6	10			**19**
Czech Republic	3	1	7	3	1	1	**16**
Denmark	3	1	2	6	1	3	**16**
Luxembourg	7			9			**16**
Greece	11			2			**13**
Romania				4		6	**10**
Norway	1		0	5		1	**7**
Slovakia	0	2		2	1		**5**
Malta	1		3				**4**
Portugal			1	2	1		**4**
Cyprus				3			**3**
Bulgaria				1			**1**
Latvia						1	**1**

Report refresh date 2/08/2010

Year	Dossier Type	Accepted for Processing
2010	1.Inquiry	617
	2.OSII	159
	3.TII	531
	4.Reg	839
	5.PPORD	117
	6.C&L	1972
	Sum:	**4235**

Report refresh date 2/08/2010

NOTE: Yearly table includes all dossiers until the report refresh date.



Report refresh date 2/08/2010

II PROCESSING

Processed dossiers

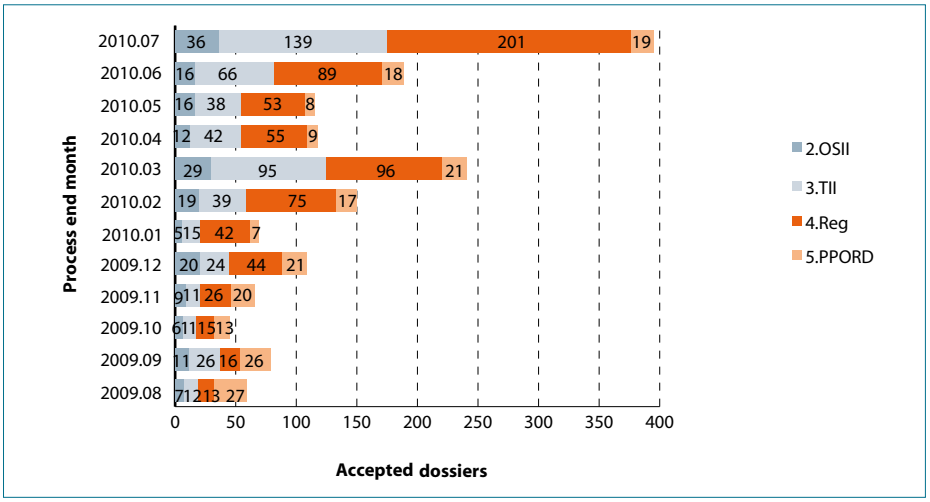
Year	Dossier Type	Accepted	TCC Processing failure %
2010	2.OSII	133	9 %
	3.TII	434	9 %
	4.Reg	611	7 %
	5.PPORD	99	3 %
	Total:	**1277**	**8 %**

Month	Dossier Type	Accepted	TCC Processing failure %
2010.07	2.OSII	36	16 %
	3.TII	139	5 %
	4.Reg	201	8 %
	5.PPORD	19	0 %
	Total:	**395**	**8 %**

Month	Dossier Type	Accepted	TCC Processing failure %
2010.06	2.OSII	16	0 %
	3.TII	66	15 %
	4.Reg	89	8 %
	5.PPORD	18	14 %
	Total:	**189**	**11 %**

NOTE: TCC processing failure (%) is the number of dossiers that failed TCC during this period divided by the number of dossiers that underwent TCC during this period.

Report refresh date 2/08/2010



Report refresh date 2/08/2010

Behind the figures

After a dossier has been uploaded, REACH-IT performs various process steps. This overall processing of a dossier can be divided into two parts, namely pre-processing and processing.

The pre-processing is obligatory for all dossier types and includes the virus scan, file format and "business rules" validation steps. The business rules validation step checks if dossiers submitted contain all the relevant information to be able to be processed correctly. A successful pre-processing results in the issuing of a submission number.

During the processing, a technical completeness check (TCC) and a financial completeness check are made, and they result in the issuing of a reference number and the sending of a decision to inform the company of the outcome.

(Please note – the data provided is reported by the number of dossiers undergoing pre-processing or processing during the given period. The dossiers taken into account in the pre-processing table and in the processing table are not necessarily the same dossiers and therefore numbers can not be compared.)

The first part of the statistics reports on dossiers that have gone through the pre-processing procedure and the second part reports on dossiers that have reached the end of the processing procedure. Data is provided for the following dossier types; inquiries, registration of on-site isolated intermediates (OSII), registration of transported isolated intermediates (TII), "standard" registrations, product and process oriented research and development notifications (PPORD) and classification and labelling notifications (C&L). Inquiries and C&L notification dossiers do not undergo a TCC under Article 20 of REACH and are therefore not included in the processing statistics.