REACH-IT Frequently Asked Questions
Version 1.8 – 08/12/2008

Changes made from version 1.01
Reviewed questions
#16, #19, #21, #22
New questions
#24, #26, #27, #28, #29 and #30
Changes made from version 1.1
Reviewed questions:
#16, #19, #20, #21, #28, #29
New questions:
#16.1, #16.2, #19.1, #19.2, #19.3, #31, #32, #33, #34 Known issues #2, #3
Changes made from version 1.2
Reviewed questions:
#29
Changes made from version 1.3
Reviewed questions:
#6, #19.2
Changes made from version 1.4
Reviewed questions:
#17, Known issue #3
Changes made from version 1.5
Reviewed questions:
#19.1
Changes made from version 1.6
Reviewed questions:
#21, #23, #26, #28, #31, #34 Known issue #2, #3
Changes made from version 1.7
Reviewed questions:
#9, #16, #19.1, #19.2, #21, #28, #29, #31, #32, #33, #34, Known issue #2, #3

Index of questions

Invoices and payments

Technical issues

Known issues

INVOICES AND PAYMENTS IN REACH-IT

1.   How will I receive the invoice?

After your submission has been received by ECHA you will receive an invoice electronically via REACH-IT and on paper by registered mail

The paper invoice does not contain any additional information. Therefore, if you can download the electronic invoice, it is recommended that the invoice is paid on the basis of the electronic invoice in order to save time.

2.   When do I have to pay?

The date on which the full amount of the payment is ordered to ECHA's bank account is the payment date. ECHA may request you to send it a proof of payment.

The Fee Regulation (Commission Regulation (EC) No 340/2008 of 16 April 2008) stipulates the payment terms for ECHA's invoices.

The deadlines for payment depend on the type of submission under consideration.

Registrations (including updates and confidentiality requests)

The first due date for payment in connection with registration submissions and updates is 14 days after the submission date specified in the acknowledgement of receipt. This is because Article 20(2) of the REACH Regulation requires the Agency to perform the completeness check, including whether the fee has been paid, within three weeks.

However, in the case of registration submissions of pre-registered substances notified within the two months that precede the relevant deadline of Article 23 of the REACH Regulation the deadline for payment is 30 days.

It is important to note that the Agency will establish a second deadline before the submission is rejected. The extended deadline depends on the submission type but is a minimum of 60 days after the first deadline.

PPORD notifications

The first deadline for payment in connection with a request for a PPORD exemption is seven days. This is because the exemption automatically applies if the Agency has not reacted within two weeks (*see* Article 9(5) of the REACH Regulation). The first deadline for payment of a request for an extension of the PPORD exemption is 30 days.

It is important to note that the Agency will establish a second deadline before the submission is rejected. The extended deadline depends on the submission type but is a minimum of 60 days after the first deadline.

3. How do I pay ECHA's invoice?

Bank transfer is the only payment method accepted. ECHA's full bank details are given in the invoice. Other types of payment, such as cheque, bankers draft or cash, are not accepted by ECHA.

Within the Single European Payment Area (SEPA) it is obligatory to use the IBAN and the BIC/SWIFT code. These are indicated on ECHA's invoice. We recommend that you pay the invoice as a SEPA payment with shared cost. This will ensure that ECHA receives the full invoiced amount without any deducted bank charges. If you choose another kind of bank transfer, please make sure that your company bears the full cost of the bank transfer. A payment not received in full by ECHA will delay the processing of your submission.

4. What is ECHA's bank account number?

Payments for registrations and notifications must be made in Euros by means of a bank transfer to:

Bank: Pohjola Bank Plc, P.O. Box 308, FIN-00013 POHJOLA Finland

Account number: 500001-20243349

IBAN Code: FI9850000120243349

BIC/SWIFT Code: OKOYFIHH

5. What should I indicate as a message to ECHA with the payment?

It is very important that your message to ECHA is in the correct format, as your payment is dealt with automatically by ECHA. **In the free text message/communications field of the payment you should indicate only the payment reference indicated on the invoice.** The payment reference equals the invoice number. It is comprised of 8 digits and you will find it next to the ECHA's bank details on the invoice. This is the only message that you should enter at the start of the free text message/communications field in the payment. **Please do not indicate anything other than the reference number**. ECHA knows that you are paying the invoice so please do not add words like "Invoice', "Inv", and "Submission" etc. Please instruct your bank accordingly. If this instruction is not followed, the consequence will be a delay in the processing of your payment.

Payment details:

Bank:	Pohjola Bank Plc, Box 308, FIN-00013 POHJOLA Finland
Account number:	500001-20243349
IBAN Code	FI98 5000 0120 2433 49
BIC/SWIFT code:	OKOYFIHH
Payment Reference(=Invoice number)	12345678
Due date:	07.07.2008

This number must be the only message to ECHA in your payment (the n° here is an example)

Only payments by bank transfer are accepted. No cash or cheque payments. The communication should contain ONLY the Payment Reference Number

Please note that there are separate instructions for appeal fees.

6.   Do I have to pay value added tax (VAT)?

ECHA does not carry out an economic activity within the meaning of Directive 2006/112/EC on the common system of value added tax. Consequently, no VAT has to be paid on the fees defined in Regulation No 340/2008. Therefore ECHA has no VAT number and ECHA's invoices are without VAT.

7.   Can I group several invoices in one bank transfer?

You must <u>not</u> group several invoices in one payment. As your payment is dealt with automatically by ECHA, you must create a separate bank transfer for each invoice. Each invoice has a unique reference number. **In the free text message/communications field of the payment you should indicate <u>only</u> the payment reference indicated on the invoice. Please do not indicate anything other than the reference number**.

8.   How should I react to a reminder?

ECHA sends one reminder for an unpaid invoice. The reminder contains an extended due date.
If you receive a reminder but you have already paid the invoice by the first due date then you can ignore the reminder, as the payment is on its way to ECHA.
If you have not yet paid when you receive the reminder, please make sure that you respect the extended due date as your submission will otherwise be rejected.

Please note that there will be separate instructions for appeal fees.

9. I already paid my invoice. Does ECHA send me a confirmation of receipt of payment? Why is the status still indicated as "unpaid" in REACH-IT?

ECHA does not send confirmations of receipt of payment, but you can check the status of your invoice in REACH-IT. Please note that it takes several days before ECHA has received the payment and it has been validated within REACH-IT. In addition, ECHA does not change the status of the invoice in REACH-IT for **registrations** until the outcome of the technical completeness check (TCC) is finalised. This is because under certain circumstances the TCC outcome can impact on the fee and require a correction to the invoice.

Please note that a submission is subject to both a technical and a financial completeness check. Therefore the status "Paid in full" of an item on the invoice, confirming the receipt of payment, and the invoice status "Closed" does not necessarily indicate an accepted submission.

10. How should I deliver a proof of payment?

Proof of payment can be sent either by mail to the address ECHA, Accounting, Annankatu 18, P.O. Box 400, FIN-00121, Helsinki, Finland or scanned to the e-mail box payments@echa.europa.eu. Please indicate 'Proof of payment' and the invoice number in the subject. Example: "Proof of payment 12345678". This e-mail box must not be used for queries. If you have a query concerning an invoice, please instead contact ECHA by using the web-form at: http://echa.europa.eu/about/contact-form_en.asp, then selecting the menu item 'Enquiry on specific submission to ECHA'.

The proof of payment takes the form of a confirmation from your bank stamped in due form. The reception of the proof of payment by ECHA supports the payment confirmation procedure but does not replace the actual receipt of the money into ECHA's bank account. If ECHA has received your proof of payment but has not received the payment within a time period judged normal for bank transfers, ECHA will contact you.

11. Does ECHA send credit notes?

If an issued invoice is incorrect and ECHA's accounting department has not yet allocated any received payment to the invoice, you will receive both a credit note for the whole amount and a new invoice will be issued to you.

12. If I have received two invoices and one credit note; which invoice reference do I indicate in the payment?

In this case you should indicate the reference number of the latest invoice in your bank transfer.

13. How should I contact ECHA if I have a question concerning an invoice?

You should contact ECHA by using the web-form at: http://echa.europa.eu/about/contact-form_en.asp, then selecting the menu item 'Enquiry on specific submission to ECHA'.

14. Who sets ECHA's fees?

ECHA fees and charges are set by the European Commission, with the agreement of the EU Member States. They are laid down in Commission Regulation (EC) No 340/2008 of 16 April 2008 on the fees and charges payable to the European Chemicals Agency, OJ L 107, 17.4.2008, p. 3, and are subject to regular reviews.

For more information, we kindly advise you to consult the European Commission website: http://ec.europa.eu/enterprise/reach/reach_fees_en.htm

TECHNICAL ISSUES

15. Which web browsers are supported by REACH-IT?

The only web browsers supported by the REACH-IT System are:

- Microsoft Internet Explorer 6.X and above
- Mozilla Firefox 2.X and above

16. What do I do if my account is blocked?

In REACH-IT if you have the role of Organisation Manager of your Company and after several attempts you could not remember your password correctly, your account will be blocked by the system. In this case you need to go to our website at http://echa.europa.eu/about/contact-form_en.asp and select the REACH-IT web form. Please fill the form indicating that your account is blocked and identifying your userID so that it can be unblocked.

If your user account within REACH-IT is blocked, please remember that your Organisation Manager is able to unblock your account. Find out who is the responsible person and he/she will be able to unblock it.

Remember that the CAPTCHA used to confirm the login does not affect the number of attempts to login; therefore it is not the cause of blocking an account.
Under no circumstances should you send your REACH-IT account password via email. If there is any problem with it, the password can be reset, but we advise you not to send it to anyone including the European Chemicals Agency.

17.   What should I do if I forget my REACH-IT UserID or my password?

If you are a REACH-IT Organisation Manager, please go to the login page and click on the link **"Forgot your userID or password?"** Follow the instructions and you will automatically get the information you need.

Please remember that if you have been given a UserID from your company's REACH-IT Organisation Manager, you need to ask him/her to unblock your account. ECHA only unblocks REACH-IT Organisation Manager's userID accounts.

18.   Can I enter data for testing purposes and remove the account afterwards?

Unfortunately it is not possible to create testing accounts in REACH-IT. In the future we aim to have a training site so that companies can test their submissions and perform training. Unfortunately, we cannot modify live data in the system. Therefore users must not create accounts that are not real at this stage.

19.   Modifying/deleting your pre-registrations

19.1   How do I delete a pre-registration?

A pre-registration cannot be deleted manually in REACH-IT, but can be deactivated from the pre-SIEF forum to indicate that you will not be interested in actively participating in the pre-SIEF discussions, for whatever reason. For further information about this option, check the next **question #19.2**

In the case you would like to request a deletion of your incorrect pre-registration you shall send *a formal letter by registered mail* to ECHA indicating the reference number (pre-registration number), your contact details and attach the submission report you received. The letter should be addressed to:

European Chemicals Agency
Directorate C
Pre-registration Team
Annankatu 18
00121 Helsinki
Finland

The deletion requests should be sent as soon as possible, 1st of December as the latest. We also recommend you also to deactivate your incorrect membership in the pre-SIEF by following the steps:

- Log-in REACH-IT
- Select pre-SIEF --- show pre-SIEF memberships
- Enter the substance name (or part of it, you can use * as wildcard)
- Push the search button
- Select your substance by pushing on the substance's name
- Select the pre-registration by push the left "circle"
- Push the "deactivate" button
- Confirm with "yes"
- Your membership in the pre-SIEF is deactivated

Note that deletion of the pre-registration of those substances will trigger the deletion and end of the company's participation in the pre-SIEF for the selected substance.

19.2   How do I deactivate my pre-registration?

Please note that, as it was mentioned in the Press Release available in our website at http://echa.europa.eu/news/press_en.asp from 14/11/2008 the improvements performed in the REACH-IT system included the temporary discontinuity of several pre-SIEF functionalities (including the de-activation) which will be enabled again very soon.

Once the functionality will be enabled again, pre-registrations can be de-activated from the pre-SIEF forum to indicate that your company will not be interested in actively participating in the pre-SIEF discussions, for whatever reason. Note,

however, that even as a non-active participant to the pre-SIEF forum a company may still be asked to share data in the SIEF(s). Of course companies are not obliged to request and pay for data that are not needed for its own registration purposes, *Art.53 REACH*.

In order to deactivate, please go to the main menu on the left and:

1. Go to **Pre-SIEF** and click on **View Pre-SIEF membership**
2. **Search** for your pre-registration
3. Select it by clicking in the link of the **Pre-SIEF for substance** column
4. On the bottom of the page, several buttons will appear. One of them is the "**Deactivate**" button. Click on it.
5. Confirm the deactivation to finalise the process.

The pre-registration and the future registration are not affected by the de-activation from the pre-SIEF forum. Also the right to benefit from extended registration deadlines is not related to the pre-SIEF status (i.e. whether it is active or not).

The "**Status**" column that describes the status of your participation in the pre-SIEF will turn into a [I] indicating that you are inactive **"Deactivated"** from it. The same way, users can re-activate their membership in the pre-SIEF discussions by clicking the button "**Activate**" in the bottom of the page. The status for this case is [A]. In case a member of a pre-SIEF is the SIEF Formation Facilitator, the status would be [F]

19.3   How do I change my pre-registration Contact information or any other information that appears in the pre-SIEF?

In order to change the Contact information that appears in the pre-registration, users need to follow these steps:

1. Select **Pre-registration >> View pre-registrations** in the main left menu.
2. "**Search**" for the pre-registration for modification. Leaving all fields blank will give users the full list of pre-registrations; otherwise users can filter the results by entering some information.
3. After searching, the list of all pre-registrations made by the user will appear. Select the **pre-registration number link** of the pre-registration to be updated.
4. Select the "**Contact**" Tab
5. Users may:

   a. create a new user by clicking on the link "**new contact person**", filling the information and clicking "**add**" on the bottom of the page. Then select this user and click "**save**"
   b. change the contact person to another one already existing by clicking "**edit**", selecting the appropriate one and clicking **"save"**. The Contact that will appear in the pre-registration and the pre-SIEF will be the one in **bold** characters
   c. update the information on an existing contact by going to the main menu and clicking **Company >> View**. Then click on the **Contacts Tab**, select

the appropriate contact to be updated by clicking "**Modify**" Once the data is updated "**save**" the contact. To select this updated contact, users need to go back to the pre-registration details as described previously and select the user as the contact for that pre-registration.

All these modifications will update the information in the pre-SIEF as well. Users don't need to submit anything else to ECHA. Users may check their pre-registrations in the pre-SIEF in order to confirm that the data has been updated as requested. Users will get a message in their message box announcing the modifications made to each pre-registration.

Changing any other type of information in your pre-registration

In order to change any other data, such as the tonnage band and the envisaged deadline, users need to follow the steps 1 to 3 as described previously and then:

4. Select the **Tab** containing the information to be updated
5. Press the button **"Edit"**
6. Make the changes and **"save"**

20.   How can I be updated with the latest news or the status of REACH-IT?

We advise you to regularly visit our website, check the latest news at http://echa.europa.eu/news/press_en.asp. We also recommend that you subscribe to our **News Alert Service** by sending an email to info@echa.europa.eu

Please remember that you can always be updated with the current status of the REACH-IT portal at http://echa.europa.eu/reachit/portal_en.asp.

21.   How do sign up in REACH-IT if my company has different roles and/or acts as an Only Representative?

Currently, there are two ways to sign-up in REACH-IT:

-   As a **Company** - this is also the correct way for the Only Representative as the REACH-IT system does not differentiate between OR and manufacturers or importers.
-   As **Third Party Representative**. Third party representatives should not be confuse with the Only Representative and cannot make pre-registrations of their own and the functionalities in REACH-IT reserved for them are limited.

If a company represents more then one company as OR they will have to sign-up as a "**Company**" as many times as non-Community manufacturers they represent.

It is not possible to use the same Legal Entity Object (LEO) having the same company UUID for multiple accounts, but it is possible to use the same company identification information (name, VAT, address, etc...). Only Representatives may consider adding a numerical or other identifier to their company name when signing up in REACH-IT, to facilitate the management of different legal entity accounts. Note that in the "Company Size" field, the OR must indicate the size of the non-Community manufacturer they are representing. Only Representatives can provide different contact details for each account.

Note that for the "company size", Only Representatives must indicate the size of the non-community manufacturer they are representing.

We recommend users taking a look at the **Pre-registration Q&A** document published in our website at http://echa.europa.eu/doc/pre-registration/pre_reg_qa_en.pdf where more information regarding the pre-registration process is available.

We invite users to read the **Guidance on Data Sharing** available in our website at http://reach.jrc.it/docs/guidance_document/data_sharing_en.pdf where **section 3.4** describes who can pre-register and defines the different roles

In case you need to perform any changes in your REACH-IT account or the pre-registrations made, please take a look at question #19 in this document.

22. How can I identify a Third Party Representative (TPR) when pre-registering?

In order to be able to select a TPR during pre-registration the TPR needs to have signed-up in REACH-IT in advance so that his UUID can be selected. Users can obtain a UUID from the IUCLID 5 website http://echa.europa.eu/iuclid or from REACH-IT.

- You first need to ensure that the TPR signs up in REACH-IT, thereby obtain his/her UUID "*Universal Unique Identifier*" online directly from REACH-IT or from the IUCLID 5 website at http://echa.europa.eu/iuclid and then upload that UUID during the sign up in REACH-IT.
- The TPR then needs to communicate his/her UUID to you.
- You are then able to make a link to the TPR in your pre-registration using the UUID. This is done selecting the tab labelled as "representative".
- The TPR will be then entitled to act on your behalf within the associated pre-SIEF and data sharing process. The contact details of the third party representative will then be made visible in the pre-SIEF for other pre-registrants to be contacted.

Note that a company using a TPR will be able to see both names in the Pre-SIEF (their TPR name and after that, their name in brackets). However, only the TPR's name will be visible to the other participants in the Pre-SIEF, keeping the identity of the registrant hidden and safe…

23. Is there a pre-registration number distributed to the pre-registrant?

Yes, every successfully pre-registered substance is assigned a pre-registration number. This number will be unique for every company and pre-registered substance.

The structure of the pre-registration number will be:
<TYPE>-<BASE-NUMBER>-<CHECKSUM>-<INDEX-NUMBER>
Example: 05 - 1234567890 - 49 – 0000, where:

- 05 is the pre-registration type
- 1234567890 is the random unique 10-digit number
- 49 is the calculated checksum (variable 2-digit number)
- 0000 is the index number

This structure is of the same basic format as the other registration and notification numbers that REACH-IT will provide.

24. What is the difference between submission number and pre-registration number?

The submission number is a unique number generated per each submission - as mentioned in Article 20 of the REACH Regulation. It is issued at every submission using the format "FD120238-61". The pre-registration number is a unique number generated per each pre-registered substance and company. It is issued only once at the end of the initial, and successful, submission of a pre-registration. The format used in this case is 05-1234567890-77-0000.

25. Can I, as a downstream user, check on-line the pre-registration number and see if my supplier has pre-registered?

No, there is no functionality planned for REACH-IT that would accommodate and distribute such information as this information could be considered as confidential business information. Downstream users may wish to make appropriate contractual arrangements with their suppliers to ensure that they comply with REACH and that pre-registration takes place within the pre-registration period.

26. This question was related to pre-registration. Its content has been removed since it is not relevant any longer.

27. What does [A], [F] or [I] mean when checking the pre-SIEF Membership of my pre-registered substances?

[A] stands for active, [F] stands for pre-SIEF facilitator and [I] stands for inactive. The last status doesn't mean that the pre-registration was not successful, only that the company has de-activated itself from the pre-SIEF forum.

28. Internal Messaging. How do I manage my messages?

All notifications are done through an internal messaging system. Internal Messages are different from e-mails. They are generated by the REACH-IT system and delivered to the user's message box *inside* REACH-IT. The aim of the internal messages is to inform, request actions from, or to provide feedback to the user. All REACH-IT users have their own inbox where they can access messages directed to them personally, to their group (users with the same role) or party.

Additionally, if you want to receive alerts when a message is received in the internal message system, you can define this as an option in your **User preferences.** The notification of the reception of such messages via email can be configured so that:

- The user does not receive any notification of any internal message received in the REACH-IT system (default setting),
- The user receives a notification every time an internal message is generated,
- The user receives once a day (or once a week) a notification with a summary of all internal messages received depending on the number of messages that the user expects to receive.

These emails do not contain any business information. Upon receipt of such e-mails, the user may connect to REACH-IT and consult his message box.

However, be aware that in order to speed up the processing of pre-registrations in REACH-IT, the e-mail messages alerting existing pre-SIEF members of a new pre-registration was discontinued during the last weeks of the pre-registration period. Pre-registrants can still see other members of their pre-SIEF by checking their pre-SIEF page in REACH-IT.

29. I submitted my pre-registration (single or bulk) but I still don't have any pre-registration number.

If the bulk pre-registration file that a company submitted complied in format, structure and content with the requirements, **the date of submission given to the company is the pre-registration date recognised by REACH-IT**. If the bulk pre-

registration file failed, the company was informed by REACH-IT within 3 hours, and must have submitted a new file for which it would have received a pre-registration date.

Where can I see it?

When a pre-registration is processed by REACH-IT a message is sent to the user's Message Box. This message contains a link to the submission report that includes the pre-registration number. You must download the report and then open it in order to see the content.

Note that modifications in pre-registrations that were sent manually online or via single submission files triggered the creation of a notification that was sent to the user's Message box. However, updates on already pre-registered substances submitted via bulk pre-registration files did not trigger any notification. In a bulk pre-registration only the new substances included in the file (not the updates on already pre-registered substances) were included in the new submission report.

Submission reports do not include information on updated pre-registrations. In order to see an updated pre-registration, users need to access via the main menu **Pre-registration >> View Pre-registrations** search for the appropriate one for review and select it.

When does a pre-registration number arrive?

When a user submits a pre-registration, the submission number is automatically generated if everything is ok.

Unfortunately, due to high volume of the REACH-IT requests that ECHA received during the last week before the deadline, the processing time of submitted bulk pre-registration dossiers increased. Processing of this type of pre-registration submission can take several days for successful dossiers. Users are kindly requested to be patient since in case of an invalid file users received a message announcing this failure within 3 hours in their REACH-IT Message Box.

A new version of REACH-IT has been deployed. The performance of the system has been improved and the processing time has been reduced. However, we kindly ask for your patience. If you received your submission number and you did not receive any further notification, this means that your pre-registration is valid and it is in the queue waiting to be processed.

In any case, please remember that you can always be updated with the current status of the REACH-IT portal at http://echa.europa.eu/reachit/portal_en.asp.

30. UUID synchronisation between REACH-IT and IUCLID 5 LEOX

Introduction

A Legal entity is either a Company/organisation or a natural person capable and having the right to engage in contracts or commercial transactions. In IUCLID, a **Legal Entity Object (LEOX)** is a specific element to store and manage Legal entity information. This information includes the name, the address and other contact details, the contact person(s), and Legal entity specific identification numbers which may help identifying it in an unambiguous manner, such as VAT (*Value added tax*) or DUNS (*Data Universal Numbering System*) numbers.

Every data object is uniquely identified by a **UUID**, which stands for "Universal Unique Identifier". Basically, the intent of UUIDs is to enable distributed systems (like the thousands of IUCLID installations out there...) to uniquely identify information without significant central coordination.

Managing LEOX

Only official LEOX are accepted by REACH-IT. An official LEOX can only be created through:

- the IUCLID 5 website at http://echa.europa.eu/iuclid (UUID format: IUC5-1234567890…7890) and
- in the REACH-IT system (UUID format: ECHA-1234567890…7890)

When signing-up in REACH-IT you can import your LEOX created in the IUCLID 5 website or create your own LEOX in REACH-IT online. Both types of LEOX can be downloaded into a file that can be imported into the IUCLID 5 application.

A LEOX can be updated or modified in the IUCLID 5 application but can only be imported into REACH-IT once. Therefore, if you have already inserted your details during the sign-up creation process, you are not able to upload the LEOX again.

A LEOX cannot be re-imported again to create a new account nor to update existing data; therefore if you need to change a UUID the only possible solution is to create a new account in REACH-IT and insert the data again in order to get a new official LEOX (new UUID) or create a new LEOX from the IUCLID 5 website.

You can always edit and modify all your data in REACH-IT except the UUID and the sign-up userID. Therefore you can modify the contact information, company size, billing information and additional user's data. However, once a REACH-IT account is created and the LEOX information, including the UUID exists, the data in REACH-IT becomes the master data; therefore it is recommended that only this information is updated. If you update your information in the IUCLID 5 application or the IUCLID 5 website, always update the data in REACH-IT as well. This update can only be done manually, not by importing the LEOX as already mentioned.

31. What kind of information is included in the pre-registrations?

IUCLID 5 allows users to store/maintain information on their substances. IUCLID 5 also provides a plug-in to get the necessary information from your IUCLID 5 database and create valid pre-registration files that can be exported and submitted to ECHA via REACH-IT. Some information is skipped because it is not necessary for pre-registration.

The **Pre-registration plug-in Guide** at the ECHA website, in the IUCLID 5 section http://ecbwbiu5.jrc.it/index.php?fuseaction=home.preregistration&type=public explains in detail which information is used to build the files. Pay especial attention to **chapter 6.4.2** and **table 2.**

We also advise you to read the **Data Submission Manual 6: Submission of Bulk Pre-registration** at http://echa.europa.eu/reachit/pre-registration-it_en.asp where you will find a lot of information on the structure of the pre-registration XML file and the data that is used for pre-registration.
Question 1.26 of the **Pre-registration Q&A** document published in our website at http://echa.europa.eu/doc/pre-registration/pre_reg_qa_en.pdf also refers to this subject.

We advise you to take a look at the **Guidance on Data Sharing** available on our website at http://reach.jrc.it/docs/guidance_document/data_sharing_en.pdf where **section 3.8** gives a detailed description of the information that was required by ECHA for pre-registration while **section 3.9** provides some details on substance identification in order to know what was needed to pre-register.

32. Where/How can I see the list of substances that have been pre-registered?

As stated in the REACH Regulation, ECHA will publish by 1st January 2009, a list of pre-registered substances on its website. The list will include all substances that will have been pre-registered by 1st December 2008. For each substance the following information will be given:

- Substance identification: EC number, CAS number and names of the substance
- Substance identification of the similar substances, if applicable
- First envisaged registration deadline

Please note that this list will not mention the names of the companies who pre-registered the substances.

A second Intermediate List of Pre-registered Substances was published on the ECHA website on 01/11/2008. It contains more than 40,000 substances which were pre-registered by 1st November 2008, one month before the deadline. The purpose of the

intermediate list is to give Downstream Users of chemicals a possibility to determine whether substances of their interest to them have been pre-registered.

You can check the list at http://apps.echa.europa.eu/preregistered/pre-registered-sub.aspx

33. Why is my pre-registered substance not included in the preliminary list of pre-registered substances?

We would like to clarify that the published list is only an intermediate list of pre-registered chemical substances. Since the list is not final, substances are missing as they are still under verification by ECHA. The final list will be published by 1st January 2009 and will comprise all phase-in substances pre-registered within the time period starting on 1st June 2008 and ending 1st December 2008. However ECHA decided to release this second intermediate list, without being obliged to do so by the legal text.

ECHA would like to advise you to check carefully if you pre-registered correctly and also verify whether your substances fulfil the criteria of being a phase-in substance as described in the Article 3 (20) of the REACH Regulation.

In certain cases, when ECHA has doubts on the validity of a submitted pre-registration, the company concerned is contacted to clarify its pre-registration. The substances identified in these pre-registrations may not appear on this intermediate list. Companies which are contacted by ECHA are kindly requested to respond to ECHA as soon as possible.

For further information on this issue, please take a look at our **Guidance on Registration**, especially **Section 1.7.1**, where you will find information in this regard. This Guidance is available at our website at http://reach.jrc.it/docs/guidance_document/registration_en.pdf

We would also like to invite you to check the **List of pre-registered substances page** at http://apps.echa.europa.eu/preregistered/pre-registered-sub.aspx where additional information is provided.

34. I manufacture and import the same substance and submitted two pre-registrations. Did I proceed correctly?

The Guidance on Registration (Section 1.6.2.2, p. 29) stipulates that, "in any case, it will be necessary to sum up all the tonnage of the substance that are intended to be manufactured and imported by the given registrant and that are not exempted from registration." Therefore it is necessary that legal entities with dual roles (manufacturer

and importer) sum up all the tonnage of the substance that are intended to be manufactured and imported and need to be registered.

For this purpose users should have signed up in REACH-IT only one time and when submitting the pre-registration add up the tonnages manufactured and imported when determining the tonnage band and the registration deadline. If you already pre-registered the tonnage of the substance you manufacture or submitted two separate pre-registrations please modify the tonnage pre-registered to reflect the total tonnage of the substance intended to be manufactured and imported. Upon expiry of the staggered deadline for registration you will only need to submit one registration for the total tonnage manufactured and imported. The relevant deadline for registration is determined in relation to the total tonnage manufactured and imported.

We advise readers to take a look at **question #19** in this document in order to learn how to modify pre-registrations **(#19.3)**. Since the pre-registration period has expired, be careful when considering which pre-registrations you need to delete (#19.1) since you will not be able to pre-register it again.

KNOWN ISSUES

Known Issue #1: Why do I get a session timeout error message such as "REACH - Unauthorized or expired session" after re-login?

When a user session has timed out, the user will be prompted for a new login after the user carries out some more activity. When the user then provides the login details and clicks "login", REACH-IT may give an error message such as:
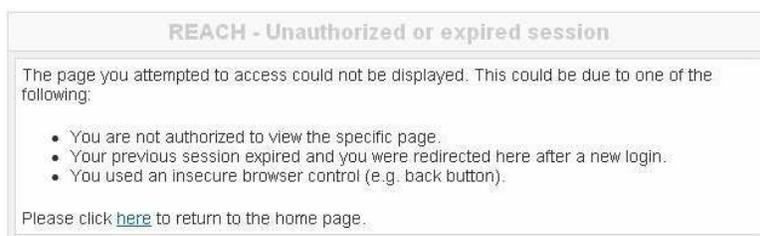
In this case, users should click on the link 'here' and will be returned to the home page.

Known Issue #2: The status of the members in a pre-SIEF regarding their participation maybe incorrect

The attributes [A] active and [I] inactive that indicate the status of the members in a pre-SIEF regarding their participation may be incorrect. The value [F] Facilitator is always correctly assigned but still users are advised to verify the real status of the other members' participation by checking the messages received regarding that particular pre-SIEF.

Known Issue #3: Some pre-SIEF functionalities are not available.

Please note! As mentioned in its press release
http://echa.europa.eu/doc/press/pr_08_54_end_of_%20preregistration_20081202.pdf
ECHA is looking at validating the remaining unprocessed pre-registrations. ECHA
has identified company information which appears to be incorrect or inaccurate and
consequently ECHA will re-open the pre-SIEF functionality later than initially
planned. No definite date has been set.