

Pitfalls – bottle necks - challenges

- ❑ Get your pre-registrations sorted out
 - Contact details ok in existing ones?
 - Need new ones (late pre-registration till 31 May 2017)?
 - Answer to emails you receive from the SIEF
- ❑ When to decide on the need of registration?
 - Registration cost vs added value
 - Get datagap analysis done and find out!
 - Define cost vs added value
- ❑ Analytics (substance ID and quantification)
 - May be difficult to analyze / unstable or reactive
 - Start early!
- ❑ Availability of labs!!
- ❑ Availability of representative sample



17

Pitfalls – bottle necks - challenges

- ❑ High cost
 - REACH is very expensive
 - LoA cost can vary between few 100€ to several 100.000€
 - Ask for LoA cost breakdown! ECHA guidance available!
 - Find co-registrants! Work together!
- ❑ How to choose a good, reliable consultant?
https://echa.europa.eu/documents/10162/13559/dcg_consultant_checklist_en.pdf
- ❑ LR role: be prepared! Get help (e.g.ROSC)!
- ❑ IUCLID 6
 - Extra fields need entry compared to IUCLID 5
 - Data bought via LoA need update to IUCLID 6
- ❑ May 2018 = deadline for registration - NOT for REACH!

18

Summary

- ❑ Make your REACH 2018 inventory now!
- ❑ Find out if you have orphans + get budget estimate!
- ❑ Go for a stepwise approach
- ❑ If you don't have time / personel: hire help!
- ❑ LR role is not unmanageable
- ❑ Decide on your level of involvement
- ❑ Choose your consultant wisely: cost efficient solutions do exist!



19

Useful websites

- ❑ <http://wko.at/reach>
- ❑ <http://www.hse.gov.uk/reach/>
- ❑ <http://echa.europa.eu/reach-2018>

- ❑ <http://www.arche-consulting.be/>
- ❑ <http://www.chemservice-group.com/home.html>
- ❑ <http://www.kvconsultings.com/>
- ❑ <http://www.ROSconsortium.eu>



20



Karine Van de Velde
ROSC, Secretary General
Tel: +32 3 297 60 92
Mobile: +32 478 327 562
karine@ROSCconsortium.eu
<http://www.ROSCconsortium.eu>

21

Abbreviations used

□ CSR	Chemical Safety Report
□ ECHA	European Chemicals agency
□ GLP	Good laboratory practice
□ ID	Identification
□ Intl	International
□ IUCLID	Intl Uniform Chemical Information Database
□ LoA	Letter of Access
□ LR	Lead Registrant
□ LtU	License to Use
□ ROSC	REACH Orphan Substances consortium
□ SIEF	Substance information exchange forum
□ SVHC	Substance of very high concern
□ T	Tonne

22