

## REACH Registration as Joint Submission (JS)



### 'The Principal of One Substance, One Registration minimises animal testing and data fees'

In joint submission, the lead registrant (LR) or consortium will do most of the work, data collection, development of technical dossier, Chemical Safety Report (CSR), and submit the joint registration dossier to ECHA. Co-registrants only need to pay LR or consortium a fee to refer to the joint registration dossier and then prepare their own individual part of the dossier.

### Joint Submission Options

Registrants will have two options to complete registration as a member of joint submission:

- Purchase a letter of access
- Join REACH consortium.

Both options allow registrants to refer to the joint registration dossier prepared by lead registrant or REACH consortium. Generally, a letter of access is cheaper because it does not grant ownership of data.

### REACH Registration Process for Phase-in Substances

After pre-registration, all pre-registrants of the same substance are put into one Substance Information Exchange Forum (SIEF), in which members exchange information and share data;

- SIEF facilitator conducts survey on registration intention, substance sameness and data availability;
- Lead registrant is elected by all SIEF members (in many cases, LR is a large company or a member of a consortium);
- Lead registrant collects data, prepares joint registration dossier (technical dossier and/or Chemical Safety Report) and submits the dossier to ECHA in REACH-IT;
- Co-registrants pay lead registrant a fee (buy a letter of access or join REACH consortium) to refer to the common part of registration dossier and receive the name of joint submission and a security token from lead registrant;
- Co-registrants confirm membership of joint submission in REACH-IT, complete the individual part of registration dossier in IUCLID 5 and submit it to ECHA;
- Co-registrants pay ECHA administrative fee and receive a registration number;

In rare cases, joint registration dossier might not include Chemical Safety Report or not cover certain uses. Member registrants need to prepare their own Chemical Safety Report correspondingly.

### What total fees are involved?

- **Data fees**- paid to lead registrant or Consortium to purchase letter of access to refer to the common parts of registration dossier.
- **Consultancy fees**- paid for advice on registration process and preparing the individual part of registration dossier in IUCLID 5.
- **ECHA fees**- dependent on the annual tonnage of the substance and company size. Small and medium-sized enterprises (SME) enjoy discounts on ECHA fees (Euros).

### Our REACH Registration Services

Our full-range REACH registration services will provide end-to-end solutions to REACH registration. We have helped hundreds of companies acquire over 180 REACH registration numbers up to date.

For more information contact [morgan@cirs-reach.com](mailto:morgan@cirs-reach.com)

