

REACH Only Representative Services for Phase-In Substances

Under three basic kinds of services related to Only Representation, ChemADVISOR Europe provides flexibility in how clients based outside of the European Union approach REACH requirements.

ROR Basic

ROR Basic allows entities outside of the European Union to maintain control over the REACH Registration process.

- The client hires ChemADVISOR Europe to act as the Only Representative for specified substances.
- ChemADVISOR preregisters phase-in substances nominating the client as the Third Party Representative.
- All pre-SIEF and SIEF communication directly goes to the client and is processed by the client directly.
- The client drafts and sends the final version of the Registration Dossier in IUCLID5 format to ChemADVISOR.
- Specifics regarding a joint submission are decided in accordance with the client.
- ChemADVISOR submits in a timely manner the Registration Dossier via REACH-IT to ECHA.
- Updates to Registration Dossiers are fielded through notification by client.
- Additional services available upon request of the client.

ROR Basic SIEF+

ROR Basic SIEF+ allows the client to maintain control of critical decisions over the REACH Registration process, while supporting some administration and technical work involved in the building of the dossier.

- The client hires ChemADVISOR Europe to act as the Only Representative for specified substances.
- ChemADVISOR preregisters phase-in substances nominating the client as the Third Party Representative.
- All pre-SIEF and SIEF communication directly goes to ChemADVISOR and is processed by ChemADVISOR.
- All critical decisions regarding the purchase and use of test data in excess of pre-approved limit is forwarded by ChemADVISOR to the client for review and authorization.
- Data garnered in the SIEF data exchange process is assembled into IUCLID5 export files or bundled as a directory of Adobe files and sent to the client for review.
- The client sends the final version of the Registration Dossier to ChemADVISOR.
- Specifics regarding a joint submission are decided in accordance with the client.
- ChemADVISOR submits in a timely manner the Registration Dossier via REACH-IT to ECHA.
- Updates to the Registration Dossier are fielded by ChemADVISOR staff after consultation with the client.
- Additional services available upon request of the client.

ROR Advanced SIEF+

ROR Advanced allows full integration of ChemADVISOR's technical and regulatory expertise with the client's decision making.

- The client hires ChemADVISOR Europe to act as the Only Representative for specified substances.
- ChemADVISOR preregisters phase-in substances without nominating a Third Party Representative.
- All pre-SIEF and SIEF communication directly goes to ChemADVISOR and is processed by ChemADVISOR.
- All critical decisions regarding the purchase and use of test data in excess of pre-approved limit is forwarded by ChemADVISOR to the client for review and authorization.
- Data garnered in the SIEF data exchange process is organized into substance datasets.
- ChemADVISOR assists the client in generating technical aspects and client specific aspects of the Registration Dossier.
 - o Assistance in the categorization of substances and set-up of substance templates and categories in IUCLID5
 - o Assistance in finding adaptations to the testing requirements and data on related substances
 - o Assistance in drafting the Chemical Safety Report, if necessary
 - o Assistance in compiling the first three chapters of the substance dataset in IUCLID5 including:
 - General Information
 - Identification
 - Analytical information
 - Suppliers
 - Composition
 - Joint submission
 - Recipients
 - Identifiers
 - Sponsors
 - Classification and Labelling
 - Globally Harmonised System
 - Dangerous Substances Directive – Dangerous Preparations Directive
 - Manufacture, Use and Exposure
 - Technological process
 - Sites
 - Identified uses and exposure scenarios
 - Waste from production and use
 - Estimated quantities
 - Form in the supply chain
 - Uses advised against
 - Exposure scenarios
- ChemADVISOR drafts a REACH Registration dossier and Safety Data Sheets, complete with Exposure Scenarios if necessary, and sends to the client for review.
- Specifics regarding a joint submission are decided in accordance with the client.
- ChemADVISOR submits in a timely manner the Registration Dossier via REACH-IT to ECHA.
- Updates to the Registration Dossier and Safety Data Sheet (or extended Safety Data Sheet) are fielded by ChemADVISOR staff after consultation with the client.
- Additional services available upon request of the client.