

## Chris Barrington

**From:** The Iron Platform REACH Consortium [sief@iron-consortium.org]  
**Sent:** 14 September 2010 09:24  
**To:** ipia@pigiron.org.uk  
**Subject:** IUCLID-Iron - Preview

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## The Iron Platform - the REACH consortium for IRON

An industry initiative

14 September 2010

### SIEF Facilitation

The Iron Platform is acting on behalf of ArcelorMittal, the Lead Registrant for Iron [including Iron, Furnace].

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### Iron Platform substance portfolio

[Click here to view the Iron Platform substance portfolio](#)

### Substance: Iron [including Iron, Furnace]

Dear Members of the SIEF for Iron [Einecs number 231-096-4] and Iron, Furnace [Einecs number 265-998-4]:

We are pleased to advise that the Lead Registrant has submitted the IUCLID dossier for Iron and that the dossier has passed the overall completeness check by ECHA. Member registrants should now proceed to create and submit their own IUCLID dossiers. We urge you to do this in good time and well in advance of the deadline. There are various guidance documents which will help you with this process on the [Guidance Page](#) of the Iron Platform website. In particular, may we refer you to the guidance documents on completion of sections 1 & 3 of IUCLID, these being the sections that have to be completed by each member registrant - there are separate guidance documents for elemental iron, iron, furnace [pig iron, hot briquetted iron and direct reduced iron] and iron powders.

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May we also refer you to ECHA's [REACH-IT Industry User Manual: Part 06 Dossier Submission](#) which takes you through the process of dossier submission step by step.

### Letters of Access

In order to join the Joint Submission for Iron [including Iron, Furnace], those who are not members of the Iron Platform [or affiliates of members] will need to purchase a Letter of Access to the iron dossier. Thanks to those SIEF members who have already done so. Those who have not yet done so may purchase their Letter of Access via the online portal on our website, linked from the [Letter of Access page](#). Please be sure to read the instructions carefully before submitting your application and please do not leave it until the last minute to submit your application.

Once you have submitted your application and paid the subsequent invoice, you will be provided with the token details for joining the Joint Submission. You will also be provided with the Chemical Safety Report and Guidance for Safe Use for iron.

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## Chemical Safety Report

Please note that the Lead Registrant has submitted a Joint Chemical Safety Report, both parts A and B. If you wish to submit your own Part A [for example if you are unable to make the statements submitted by the Lead Registrant] you may do so - follow the instructions in the [ECHA Data Submission Manual No. 19](#) - see section 4.2.

A typical case in point is that of an Only Representative. The following steps are suggested:

- IUCLID: add a remark in section 13 *"Although the Lead Registrant has submitted a Joint CSR Part A & B, we have submitted our own CSR Part A as we are an OR and not a manufacturer in the EU therefore the declaration of implementation of RMM during the manufacture is not relevant to us and we have made our own declaration. In addition, in Part A, we have only provided the RMM relevant for our specific substance"*
- CSR Part A Section 2 DECLARATION THAT RISK MANAGEMENT MEASURES ARE IMPLEMENTED *"As Only Representative the registrant declares that the risk management measures referred to in section 1 are communicated to the non-EU company that is represented."*
- CSR Part A Section 3 DECLARATION THAT RISK MANAGEMENT MEASURES ARE COMMUNICATED *"The registrant declares that the risk management measures referred to in section 1 are communicated to all customers when they are relevant for their uses."*

### REACH registration for specified IRON substances

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