**GUIDANCE ON COMPLETION OF SECTIONS 1 AND 3 OF THE IUCLID 5 DOSSIER:**

**IRON [EINECS number 231-096-4, CAS number 7439-89-6]**

**as elemental iron in massive form and in powder form**

[**INTRODUCTION** 2](#_Toc332645036)

[**1. GENERAL INFORMATION** 3](#_Toc332645037)

[1.1 IDENTIFICATION 3](#_Toc332645038)

[1.2 COMPOSITION 6](#_Toc332645039)

[1.3 IDENTIFIERS 8](#_Toc332645040)

[1.4 ANALYTICAL INFORMATION 9](#_Toc332645041)

[1.5 JOINT SUBMISSION 11](#_Toc332645042)

[1.6 SPONSORS 12](#_Toc332645043)

[1.7 SUPPLIERS 13](#_Toc332645044)

[1.8 RECIPIENTS 14](#_Toc332645045)

[**3. MANUFACTURE, USE AND EXPOSURE** 15](#_Toc332645046)

[3.1 TECHNOLOGICAL PROCESS 15](#_Toc332645047)

[3.2 ESTIMATED QUANTITIES 17](#_Toc332645048)

[3.3 SITES 19](#_Toc332645049)

[3.4 INFORMATION ON MIXTURES 21](#_Toc332645050)

[3.5 LIFE CYCLE DESCRIPTION 22](#_Toc332645051)

[3.6 USES ADVISED AGAINST 25](#_Toc332645052)

[3.7 Exposure Scenarios, exposure and risk assessment 25](#_Toc332645053)

[3.7.1 Exposure scenarios and local assessment 25](#_Toc332645054)

[3.7.2 Environmental assessment for aggregated sources 25](#_Toc332645055)

[3.7.3 Generic exposure potential 26](#_Toc332645056)

[3.8 BIOCIDAL INFORMATION 27](#_Toc332645057)

[**RECOMMENDATIONS CONCERNING SUBMISSION** 27](#_Toc332645058)

**INTRODUCTION**

This document details the information submitted by the Lead Registrant for Iron [with respect to elemental iron in massive or powder form] and is intended as a guide to member registrants for completion of the necessary fields of sections 1 and 3 of their IUCLID 5.4 dossiers for Iron.

Note however that the text of REACH Regulation is the only authentic legal reference and the information contained in this document does not constitute legal advice. It is therefore recommended that member registrants should read all relevant ECHA Guidance documents, for [example Practical Guide 9: How to do a registration as a member of a joint submission](http://echa.europa.eu/doc/publications/practical_guides/pg_9_reg_member_subm_rev11_en.pdf) (August 2010).

Member registrants should make themselves aware of all new updates of the IUCLID software and its plug-ins ([IUCLID installation kit](http://iuclid.eu/index.php?fuseaction=home.menuNOTSignedUp&page=home.download54)).

This document contains two types of information:

* that which will be common to all dossiers which are part of the Joint Submission for Iron - the cells for which in this document are highlighted in orange;
* that which is particular to your company - the cells for which in this document are highlighted in blue;
* Cells highlighted in grey relate to headings only and have no content.



In order to input data to fields, please click on the EDIT button or select Control-E.



Do not forget to save data entered by clicking on the save button.

Do not forget to check your substance and dossier files with the IUCLID 5.4 Technical Completeness Check (TCC) plug-in tool [don’t forget to update this plug-in].



If confidentiality is required, the registration fee will be more expensive and a justification has to be provided! Note that ECHA has issued in July 2012 a [guidance document on confidentiality claims](http://echa.europa.eu/documents/10162/13653/dsm_16_confidentiality_claims_en.pdf) - this can be downloaded from the ECHA website - [Data submission manuals](http://echa.europa.eu/web/guest/support/dossier-submission-tools/reach-it/data-submission-industry-user-manuals) or from the Library page of the Iron Platform website.

A fee calculator plug-in is available. This plug-in assists Legal Entities in calculating fees associated to REACH or CLP dossiers.



Information on the creation of a new substance is available on the Iron Platform website in the [SLIDES FROM IUCLID AND REACH-IT WEBINAR 08/07/2010](http://www.iron-consortium.org/assets/files/Guidance/IPwebinar100708.pdf) [slides 14-20]. Member registrants will have to import all IUCLID files [reference substances and the file containing the uses] provided by the Iron Platform before creating their substance files. A guidance document “How to import an i5z file into IUCLID 5.2” is available on the Iron Platform website [also applicable for IUCLID version 5.4].

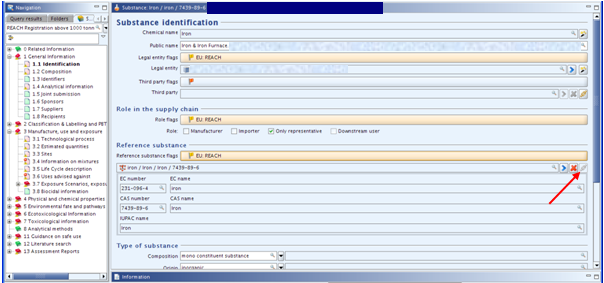
An IUCLID 5.4 dissemination plug-in is available. This allows a registrant to preview or simulate the information from its registration dossier that ECHA will make available via the internet. You can find more information on disseminated data in the [ECHA Data Submission Manual, Part 15 - Dissemination](http://echa.europa.eu/documents/10162/13653/dsm_15_dissemination_manual_en.pdf) (July 2012) and its [Technical annex for IUCLID section 1, 2, 3](http://echa.europa.eu/documents/10162/13653/dsm_15_dissemination_annex_1-3_en.pdf) (July 2012) - these documents are also avaiulable on the Library page of the Iron Platform website.



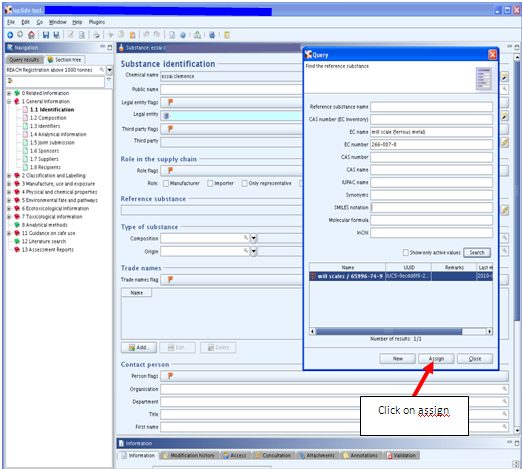
Note: The new version of IUCLID does not have an impact on TCC requirements for the moment. New fields related to the CSR information will not be subject to TCC until 2014 (see [ECHA Q&A on IUCLID 5.4 (April 2012) for more information](http://echa.europa.eu/documents/10162/13651/questions_and_answers_iuclid5_4_en.pdf) - also on the Library page of the Iron Platform website). Members are free to fill in these new fields.

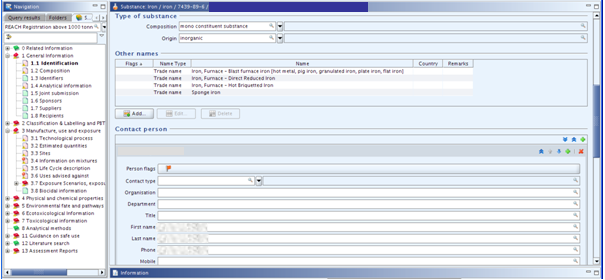
**1. GENERAL INFORMATION**

**1.1 IDENTIFICATION**

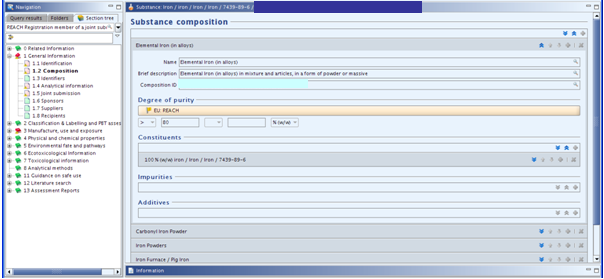
****

| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Substance identification** | Heading only |  |
| **Chemical name** | Iron |  |
| **Public name** |  | We suggest that “Iron in alloys” be entered in this field. |
| **Legal entity or third party flags:** |  | Click on the flag if you want to assign confidentiality and programme restrictions. |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Role in the supply chain** |  | Choose your role and tick appropriate box. Note:  If “manufacturer is selected, a production site is needed in section 3.3  “downstream user” cannot be selected if the submission covers only intermediates  If “downstream user” is selected, “substance in article” must be ticked in section 3.4  “only representative” cannot be selected together with “manufacturer” or “importer” |
| **Role flags** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Reference substance** | Heading only |  |
| **Reference substance flag** |  | Click on the flag if you want to assign confidentiality and programme restrictions. |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Reference substance** | iron / iron / iron / 7439-89-6 | To locate the reference substance from the IUCLID data base, click on this icon [see red arrow in screenshot above].    Select your substance from the database by typing in the name, EC or CAS number, click SEARCH, select the substance name and click Assign [see screenshot below].  Two problems may arise:  • If no entry is found, you have first to import the substance from the EC inventory to the reference substance inventory.  • If an entry is found but inactive, right mouse click and set to “active reference substance.”  In order to simplify matters, the Iron Platform will provide reference substance files which member registrants can import into their IUCLID dossiers. |
| EC number / name |  | This information is automatically provided when the reference substance is assigned. |
| CAS number |  | This information is automatically provided when the reference substance is assigned. |
| IUPAC name |  | This information is automatically provided when the reference substance is assigned. |
| **Type of substance:** | Heading only |  |
| Composition | mono constituent substance |  |
| Origin | inorganic |  |
| **Trade names** | Heading only |  |
| **Trade names flag:** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Name** |  | If you have trade name[s] for your substance, add it/them here |
| **Contact person** |  | These fields are for your own company information. The details entered should correspond with the information contained in REACH-IT. Several contacts can be provided. Click on  to add one. |



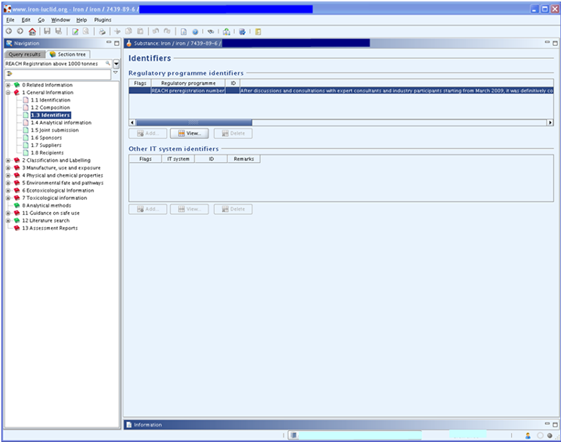


**1.2 COMPOSITION**



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Substance composition** | Heading only | Create a block here for each registered form of iron |
| Name | Elemental Iron (in alloys) |  |
| Brief description |  | Enter an appropriate description of your substance as placed on the market, e.g. elemental iron in alloys, in a mixture, in an article - in massive or powder form. |
| Composition ID |  | A number is automatically created here by IUCLID. |
| **Degree of purity flags:** | Heading only | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Degree of purity** | 100% [w/w] |  |
| **Constituents** | Heading only |  |
| Reference substance | iron / iron / iron / 7439-89-6 | To locate the reference substance from the IUCLID data base, click on this icon [see red arrow in screenshot above].    Select your substance from the database by typing in the name, EC or CAS number, click SEARCH, select the substance name and click Assign [see screenshot below].  Two problems may arise:  • If no entry is found, you have first to import the substance from the EC inventory to the reference substance inventory.  • If an entry is found but inactive, right mouse click and set to “active reference substance.”  In order to simplify matters, the Iron Platform will provide reference substance files which member registrants can import into their IUCLID dossiers. |
| Typical concentration | 100 % [w/w] | In order to be consistent with the approach taken by the Lead Registrant 100% [w/w%] should be entered in this field. |
| Concentration range | > 80 < 100 % [w/w] | This is per the sameness specification agreed by the SIEF. |
| Remarks | Alloys (REACH Article 3(41)) are special type of preparation ‘special preparation’ (Recital 31, Annex I and Annex II). Only the individual substances (here metals) require registration (REACH article 6) and not the alloys themselves.  As the substance is part of the chemical matrix of an alloy, impurities cannot be meaningfully assigned to the substance.  Thus, the purity of the substance is 100%. | Recommended text. |
| **Impurities** | Heading only | Do not create a block here |
| Additives | Heading only | Do not create a block here |

**1.3 IDENTIFIERS**



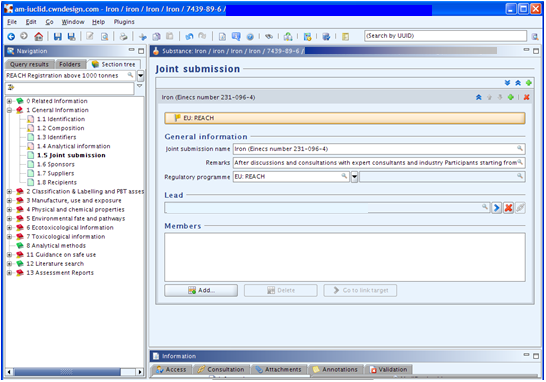
| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Regulatory programme identifiers** | Heading only | Click on |
| **Flag** | Heading only | Click on the flag if you want to assign confidentiality and programme restrictions. |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Regulatory programme** |  | Select REACH Pre-registration number or REACH Inquiry number from the pick list. |
| **ID** |  | Enter your pre-registration or inquiry number. |
| **Remarks** |  | Leave blank |
| **Other IT system identifiers** |  | Leave blank |

**1.4 ANALYTICAL INFORMATION**

For guidance on the analytical methods to use, please refer to the [ANALYSIS METHODS FOR USE IN DEMONSTRATING SAMENESS - IRON](http://www.iron-consortium.org/assets/files/Guidance/Analysis-IronV3_100723.pdf) document in the guidance and training for REACH registrants on the Iron Platform website or via the link in this sentence.

| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Analytical information flags:** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| Analytical methods and spectral data | The constituent substances are bound in the chemical matrix. Methods such as XRF, XRD and ICP are appropriate techniques.  However, while it may provide structural information concerning the alloy, XRD is unlikely to yield information of the sameness. | Recommended statement: the concentration of elemental iron is 100% meaning that analysis of elemental iron is not appropriate. We therefore recommend that you carry out chemical analysis of your alloy[s] - see “analysis results” below and also section 3.4 below. |
|  |  | Attach this document which explains the methods of analysis suitable for iron. Alternatively, you can attach your own document describing your analysis methods for your alloys. |
| Optical activity |  | Leave blank |
| **Results of analysis - chemical analysis sameness** | Heading only |  |
| Analysis type | Elemental iron in alloys |  |
| Tested substance |  | Enter “Elemental iron in ....” [.... is the name of your alloy, e.g. ferro manganese]. |
| Analysis results |  | Attach a PDF document on your letter head along the lines of this template.    Ensure that the information provided in this attachment is consistent with your other registrations of alloying elements. |
| Method used | Please refer to the document “name.pdf” attached above. | This is the document referred to in the row immediately above. |
| **Remarks** | The registered substance is inorganic and a constituent of an alloy, where the constituent substances are bound in the chemical matrix. GC, HPLC, IR, NMR, MS and UV are not appropriate spectral techniques for alloys. Methods such as XRF, XRD and ICP are more appropriate techniques for the provision of the required structural and compositional information for this type of inorganic substance and a usual practice in the metals industry. However, while it may provide structural information concerning the alloy, XRD is unlikely to yield information useful for the determination of the sameness of the constituent and reference substances. This is due to the influence of the relative atomic size of the constituents, which determine the crystal structure adopted by the alloy, the extent of lattice strain and the range of solid solubility as well as the position taken up by individual atoms either in the lattice itself or in the interstice. In addition, the cooling rate as well as the thermal and mechanical history has a profound influence on the crystal structure of the alloy. |  |
| **Results of analysis** |  | Do not create any additional blocks in this section. |

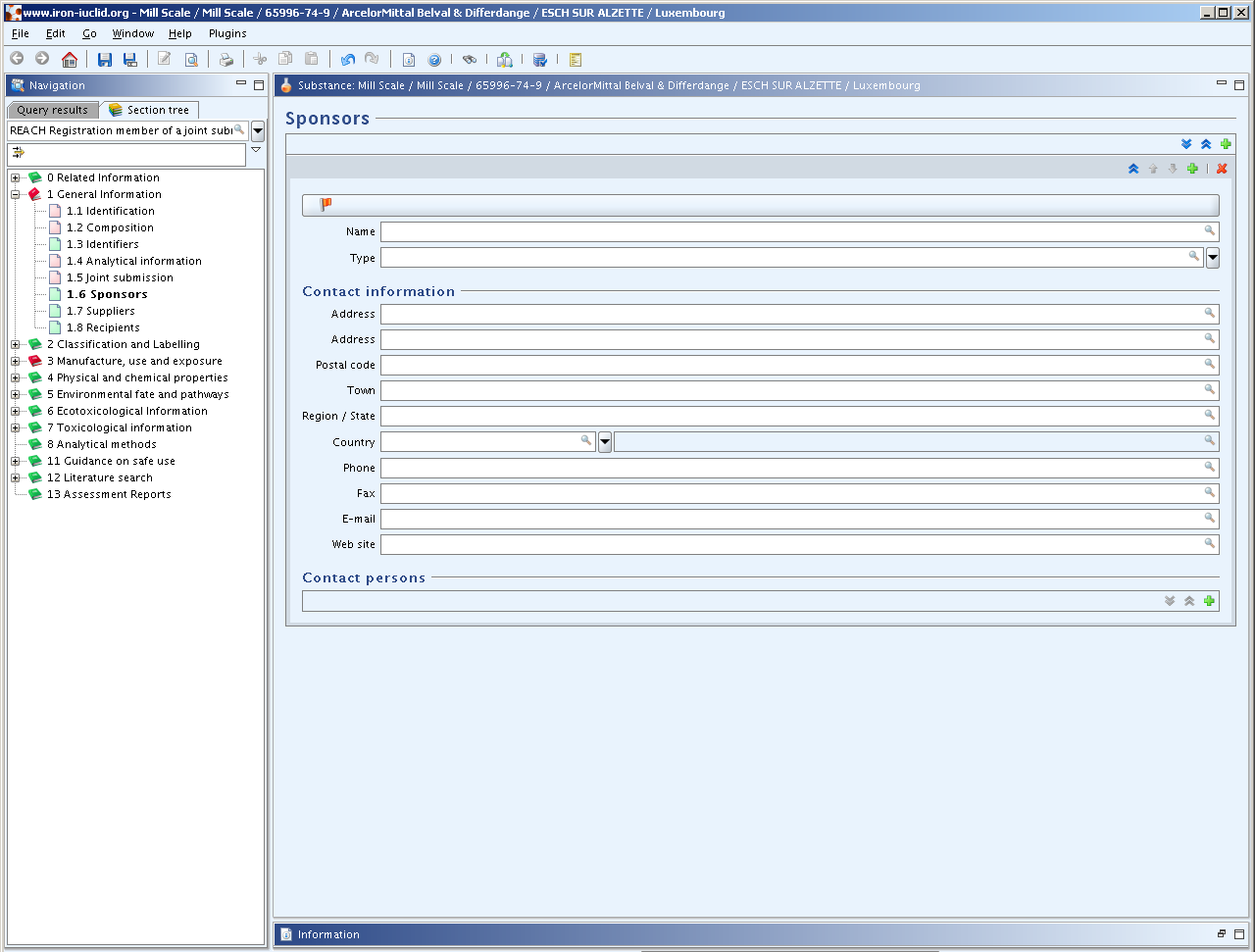
**1.5 JOINT SUBMISSION**



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Joint submission** | Heading only | Create a block |
| **Joint submission flags:** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| programme restrictions |  | Select EU: REACH from pick list. |
| **General information** |  |  |
| Joint submission name | Iron (Einecs number 231-096-4) |  |
| Remarks |  | Leave blank |
| Regulatory programme |  | Leave blank or select EU: REACH. |
| **Lead** | Heading only | Leave blank |
| **Members** | Heading only | Leave blank |

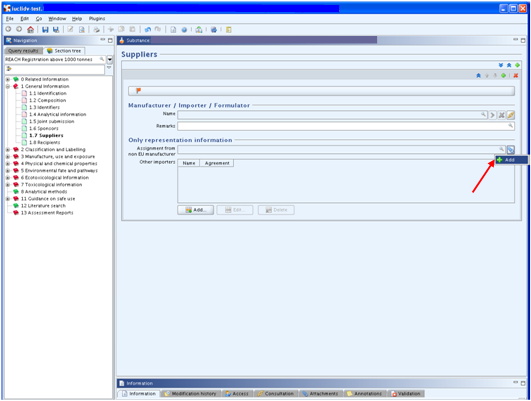
**1.6 SPONSORS**

It enables to specify different Sponsor organisations, e.g. a Competent Authority in the context of the OECD HPV Chemicals programme or a Company in the context of the US EPA HPV Challenge programme. Otherwise leave this section blank.



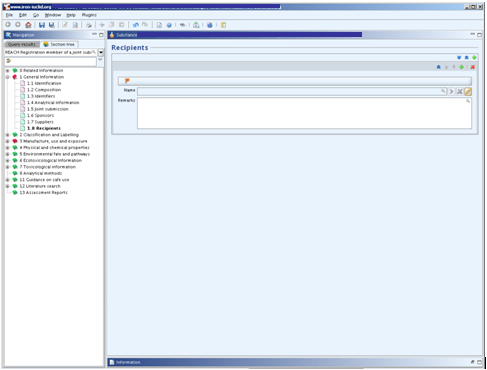
**1.7 SUPPLIERS**

Leave this section blank unless you are Only Representative. Although not mandatory, ECHA recommends that as an Only Representative you should attach clear documentation of your appointment as Only Representative, for example a copy of the appointment letter sent to importers. In this case you are also advised to indicate the list of importers’ names covered by the registration in the field “Other importers”. The Iron Platform strongly advises Only Representatives to follow ECHA’s recommendation.



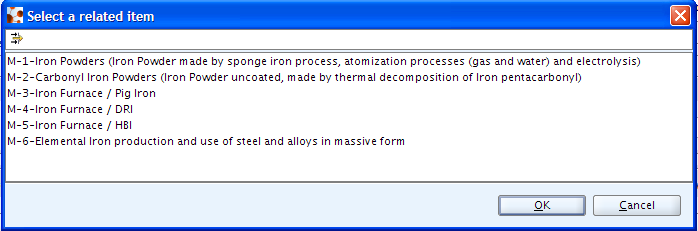
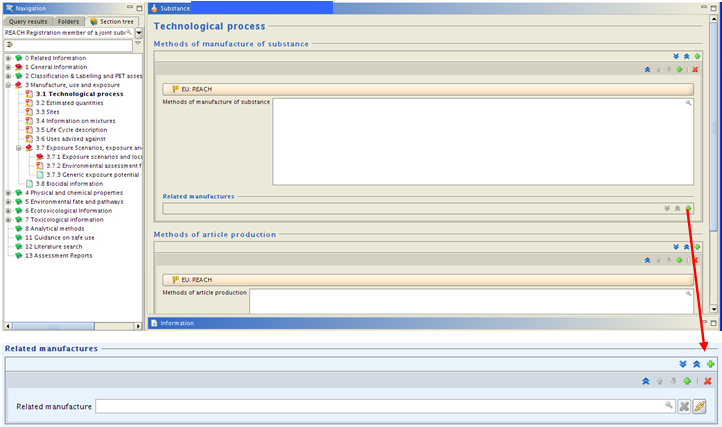
**1.8 RECIPIENTS**

A recipient can be a Downstream user, a Distributor or a Customer (e.g. in the context of Product and process orientated research and development (PPORD)) being supplied with a Substance, or a Mixture or an Article. These definitions never include consumers.



**3. MANUFACTURE, USE AND EXPOSURE**

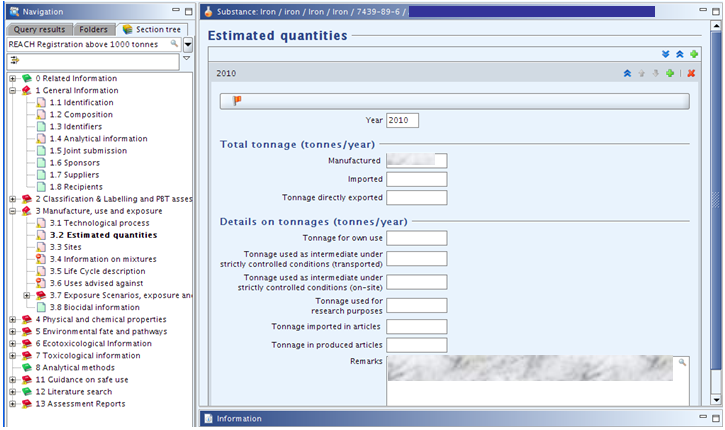
**3.1 TECHNOLOGICAL PROCESS**



Note: the related manufacture is linked to the manufacture part of the section 3.5 – Life Cycle description. This field is not subject to TCC rules until 2014 (see [ECHA Q&A on IUCLID 5.4 (April 2012) for more information](http://echa.europa.eu/documents/10162/13651/questions_and_answers_iuclid5_4_en.pdf)). Members are free to fill in this field.

| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Methods of manufacture of substance** | Heading only | Click on  to add a block |
| **Technological process flags:** | Heading only | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Methods of manufacture** |  | The Iron Platform suggests that EU manufacturers provide a brief description of the manufacturing process for their mixtures in this field. |
| **Related manufactures** | Heading only | Add a block by clicking on |
| Related manufacture |  | Click on  to select the item related to elemental iron |
| **Methods of article production** | Heading only | This field has to be completed only when there is possible exposure from an article containing a substance intended for release. This field is not subject to TCC rules until 2014. Members are free to describe production of their own articles in case they have concerns. |

**3.2 ESTIMATED QUANTITIES**



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Year** |  | Enter the current year |
| **Estimated quantities flags:** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| programme restrictions |  | Select EU: REACH from pick list. |
| **Total tonnage** |  | If the substance has been imported or manufactured for at least three consecutive years, the tonnes per year shall be calculated on the basis of the average tonnes manufactured or imported in the three preceding calendar years. If the substance has not been manufactured or imported for three consecutive years then the tonnes manufactured or imported in a calendar year should be used (see [ECHA guidance on registration](http://echa.europa.eu/documents/10162/13632/registration_en.pdf), May 2012)  To determine the amount of a substance in an article or preparation, see the notes immediately below. |
| **Details on tonnages** |  | If you feel the need to provide an explanation for the basis of your tonnage, include it here. |

**Amount of a substance in a mixture**

In order to be able to calculate the amount of a substance in a mixture, the total tonnage of the mixture is multiplied by the fraction of the constituent substance. This value can for example be obtained from the safety data sheet of the mixture. When only a range of concentrations of a substance in a mixture is available, then the maximum tonnage of the substance is calculated using the highest possible content of that substance in the mixture. Without more precise information on the composition, this tonnage should be used for the purpose of registration.

Source: ECHA Guidance: [Guidance on registration](http://echa.europa.eu/documents/10162/13632/registration_en.pdf), version 2.0, May 2012

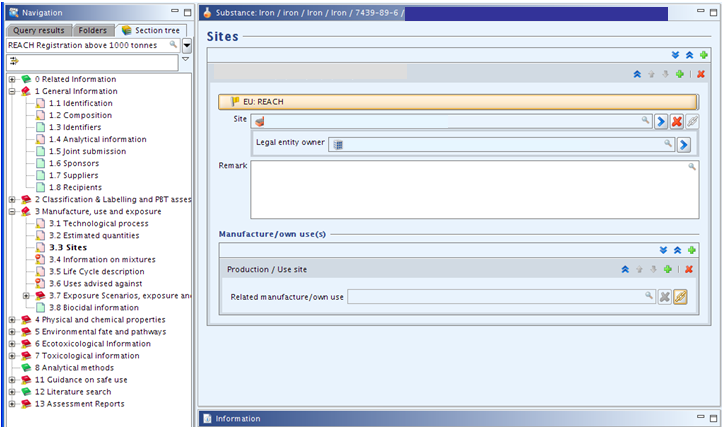
**Amount of a substance in an article**

In the case of articles which contain a substance that is intended to be released under normal or reasonably foreseeable conditions of use, then:

* If the weight by weight content of that substance is known, then this value is multiplied by the total mass of the produced and/or imported article; or
* If the weight of substance per unit article is known then this value is multiplied by the total number of imported articles.

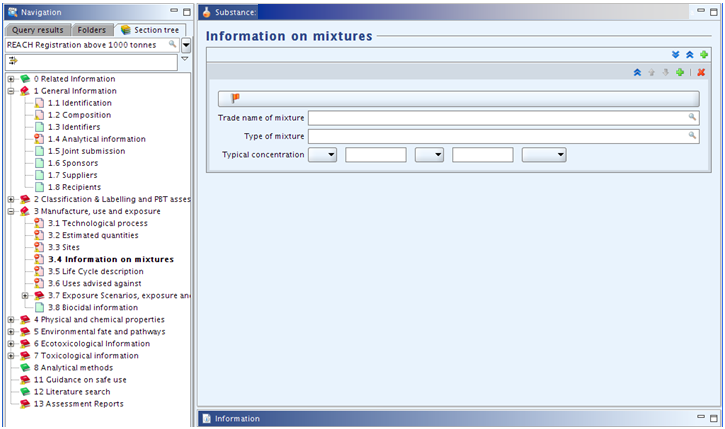
Source: ECHA Guidance: [Guidance on requirements for substances in articles](http://echa.europa.eu/documents/10162/13632/articles_en.pdf), version 2, April 2011

**3.3 SITES**



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Sites** | Heading only | Create a block by clicking on |
| **Site** |  | Click on  to select an existing site or create a new site  Enter the name and location of your site(s). The minimum contact address information is town/city and country, but ECHA recommends filling all address fields.  An Only Representative or Importer can assign a site, but this is not mandatory.  If “Manufacturer” is selected in section 1.1, at least one production site must be entered in section 3.3. |
| **Site flags:** |  | Click on the flag if you want to assign confidentiality and programme restriction |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Legal entity owner** |  | Select the name of the legal entity which owns the site. |
| **Manufacture/own use(s)** |  | Create a block. Click on . Select appropriate manufacture(s) or use(s) from the section 3.5 Life Cycle description. This field is not subject to TCC rules until 2014. Members are free to fill in this field. |

**3.4 INFORMATION ON MIXTURES**

****

| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Information on mixtures** | Heading only | Create a separate block for each type of ferro-alloy |
| **Flags** |  | Click on the flag if you want to assign confidentiality and programme restrictions |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| **Trade name of mixture** |  | Give the name of your alloy[s], e.g. High Carbon Ferro-chrome, etc. |
| **Type of mixture** | State the physical form of your alloy, e.g. massive, powder. |
| **Typical concentration** | Specify the content of iron contained in your alloys[s] - this can be a range or by default the maximum value. Ensure that the figure given for iron is consistent with the value[s] for other alloying elements given in other registration dossiers for this alloy. |

**3.5 LIFE CYCLE DESCRIPTION**

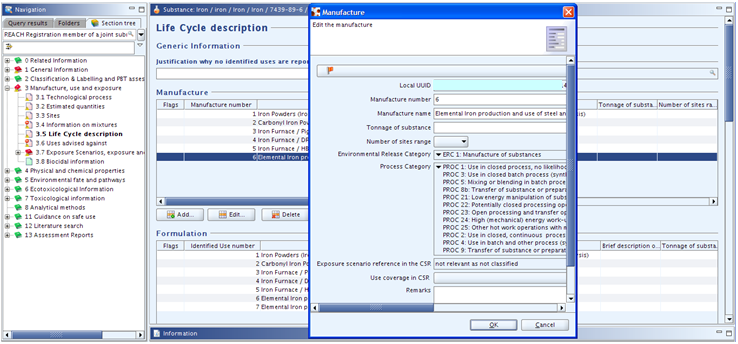
Information on uses is available on the Iron Platform website in the document [Identified uses of iron](http://www.iron-consortium.org/assets/files/TWG/TWG119B%20Iron-Chapter_3_5%20Identified%20usesV2_100803.pdf) <http://www.iron-consortium.org/assets/files/Guidance/IronMergerGuidance100602.pdf> on the iron SIEF documents area or via the link in this sentence. Table 6 refers to Elemental Iron: production and use of steel and alloys in massive form and table 7 to Elemental Iron: production and use of steel and alloys in powder form.

There is conflicting advice as to whether member registrants should select only certain uses or should select them all - the advice of the Iron Platform is to select them all so as not to have to modify the dossier in the future when a new use is entered into.

The Iron Platform provides an IUCLID file containing all the uses for Iron which you can upload to your IUCLID file and then copy/paste in the corresponding fields of your substance file ([IUCLID files for download](http://www.iron-consortium.org/Iuclid-Files-for-download.html)) (link to i5z file [here](http://www.iron-consortium.org/Iuclid-Files-for-download.html))

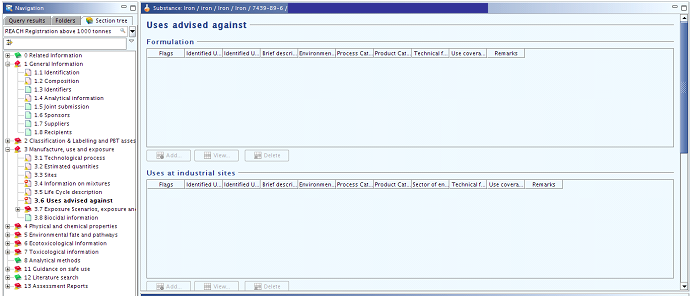
If you wish to specify only certain uses, create a block here by clicking on the “Add” button and tick the relevant options.

Note: New fields were added during the IUCLID upgrade to version 5.4.0. (See fields with the explanation ‘New field, you are free to fill it” in the table below). These fields are not subject to TCC rules until 2014 (see [ECHA Q&A on IUCLID 5.4 (April 2012) for more information](http://echa.europa.eu/documents/10162/13651/questions_and_answers_iuclid5_4_en.pdf)). However, member registrants are free to fill them in if they wish.



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Life Cycle description** | Heading only |  |
| **Generic information** | Heading only |  |
| Justification why no identified uses are reported |  | Leave blank - unless you have not added uses below in which case select in the pick list the justification about the absence of reported uses |
| **Manufacture** | Heading only |  |
| Manufacture name |  |  |
| Tonnage of the substance |  | New field, you are free to fill it |
| Number of sites range |  | New field, you are free to fill it |
| Environmental Release Category |  | Select relevant options in the picklist |
| Process Category |  |
| Use coverage in CSR |  | New field, you are free to fill it |
| **Formulation** | Heading only |  |
| Identified use name |  |  |
| Brief description of use process |  |  |
| Tonnage of the substance |  | New field, you are free to fill it |
| Number of sites range |  | New field, you are free to fill it |
| Environmental Release Category |  | Select relevant options in the picklist |
| Process Category |  |
| Product Category formulated |  |
| Technical function of the substance during formulation |  |
| Substance supplied to that use in form of |  |
| Use coverage in CSR |  | New field, you are free to fill it |
| **Use at industrial site** |  |  |
| Identified use name |  |  |
| Brief description of use process |  | New field, you are free to fill it |
| Tonnage of substance |  | New field, you are free to fill it |
| Number of sites range |  | New field, you are free to fill it |
| Environmental Release Category |  | Select relevant options in the picklist |
| Process Category |  |
| Product Category used |  |
| Sector of end use |  |
| Technical function of the substance |  |
| Substance supplied to that use in the form of | In a mixture | Select “In a mixture” from drop down list - see screenshot above. |
| Subsequent service life relevant for that use | Yes | Select “Yes” from drop down list - see screenshot above. |
| Link to subsequent service life |  | New field, you are free to fill it |
| Use coverage in CSR |  | New field, you are free to fill it |
| **Consumer Uses** | Heading only | This is not relevant in this case so do not create a block here and leave this section blank |
| **Article service life** | Heading only |  |
| Service life name |  |  |
| Tonnage of substance |  | New field, you are free to fill it  You may insert the maximum content of the concentration of the Substance in the article in tonnes. |
| Article used by |  |  |
| Article category related to subsequent service life |  |  |
| Further description of article |  | New field, you are free to fill it; You may provide the description of your article and give information about it, such as:  • its function [the purpose of its use]  • its shape (description of the object from a dimensional point of view - length, width and height).  • its surface [outermost layer of the object]  • its design [arrangement of the elements of design to best accomplish a particular purpose]  • all other possible article identifiers |
| Exposure related description of article |  | New field, you are free to fill it |
| Environmental Release Category |  | Select relevant options in the picklist |
| Process Category for articles used by workers |  |
| Typical concentration of the substance in article % |  | New field, you are free to fill it |
| Technical function of the substance |  | Select relevant options in the picklist |
| Use coverage in CSR |  | New field, you are free to fill it |

**3.6 USES ADVISED AGAINST**



Do not create a block for Section 3.6 and leave it blank as there are no uses advised against.

**3.7 Exposure Scenarios, exposure and risk assessment**

The former section 3.7 Waste from production and use (IUCLID 5.3 and former versions) is attached as an html file in the section 3. Delete it if you need to update and resubmit your dossier since html attachments are not supported by ECHA business rules checks.

The former section “3.8 Exposure estimates” was replaced by the following subparts.

**3.7.1 Exposure scenarios and local assessment**

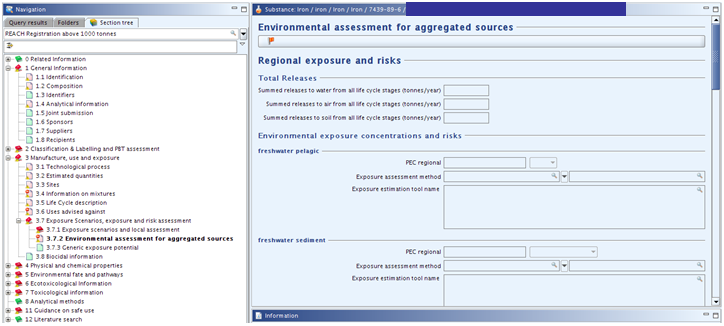
Note: This part was added in June 2012 during the upgrade to IUCLID 5.4.0. It will be taken into account by the TCC in 2014.

No endpoint should be created; the substance is not classified, hence no exposure scenario should be developed.

**3.7.2 Environmental assessment for aggregated sources**

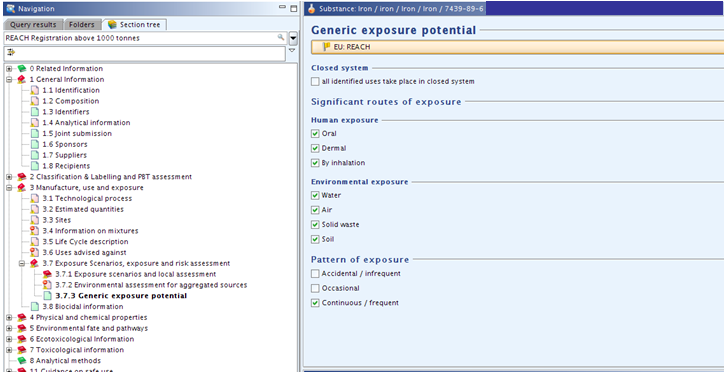
Note: This part has been added in June 2012 during the upgrade to IUCLID 5.4.0. It will be taken into account by the TCC in 2014.

This section should be left blank since the substance is not classified.



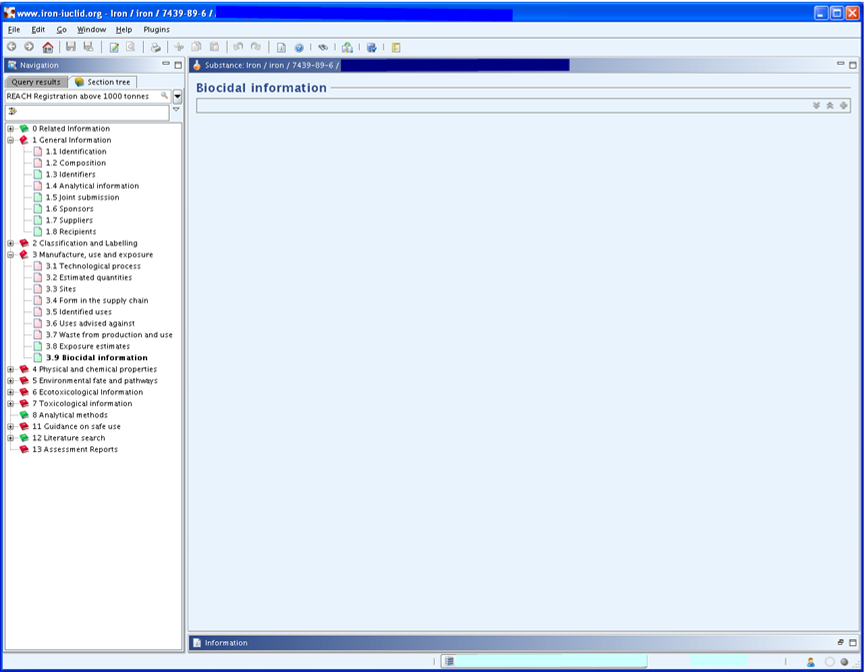
**3.7.3 Generic exposure potential**

Note: this section was previously part of the former 3.5 Identified uses.



| **ITEM** | **TEXT TO BE ADDED** | **EXPLANATION** |
| --- | --- | --- |
| **Flags** |  | Click on the flag if you want to assign confidentiality and programme restrictions |
| Confidentiality |  | Leave blank or select the right level of confidentiality. If confidentiality is required, a justification has to be provided. |
| Programme restrictions |  | Select EU: REACH from pick list. |
| Closed system |  | This box should be ticked when the substance is used in a closed system, such as the use of liquids in hydraulic systems, cooling liquids in refrigerators and lubricants in engines and dielectric fluids in electric transformers and oil in heat exchangers. |
| Significant routes of exposure |  | Either tick the same boxes as the Lead Registrant or make your own selection as appropriate. The Lead Registrant has ticked the following boxes:  **Human exposure:**   * Oral * Dermal * By inhalation   **Environmental exposure:**   * Water * Air * Solid waste * Soil   **Pattern of exposure:**   * Continuous / frequent |

**3.8 BIOCIDAL INFORMATION**



Section 3.8 should be left blank as it is not relevant in this case - do not create a block for it.

**RECOMMENDATIONS CONCERNING SUBMISSION**

**Before submitting your dossier, do not forget to:**

1. check your substance file with the TCC Tool plug-in:

* If TCC fails, correct all mistakes or create a new substance file
* If TCC passes, go to the next step

1. create a dossier by right clicking on your substance
2. check your dossier file

* If TCC fails, create a new dossier file
* If TCC passes, go to the next step

1. export your dossier file on your computer by right clicking on the dossier
2. open your account on ECHA REACH-IT
3. if the dossier file size is larger than 20MB => request a large file access code before submission on ECHA REACH-IT [it is normally immediate and you will receive the code in your REACH-IT message box]
4. follow the prompts to submit your dossier file [for more detailed information, please consult the [ECHA Guidance on submission](http://echa.europa.eu/documents/10162/13654/ium6_dossier_submission_v1-7_en.pdf) (July 2012)]

**After submission:**

1. check your message box in ECHA REACH-IT to follow progress of ECHA’s 14 dossier examination steps via the submission report;
2. take the necessary actions, for example paying the registration fee.

Disclaimer: The Iron Platform and Iron Platform Services Ltd. do not make any representations or warranties in relation to the content of this guidance document. In particular, the Iron Platform and Iron Platform Services Ltd. do not make any representations or warranties regarding the accuracy, timeliness or completeness of its content. The Iron Platform and Iron Platform Services Ltd. will not be responsible for any loss or damage caused by relying on the content contained in this document.

Document history:

|  |  |
| --- | --- |
| **Date** | **Version - Main changes** |
| October 16th, 2012 | Minor format changes |
| August 13th, 2012 | Changes to fit the new IUCLID version (5.4.0) |
| September 7th, 2010 | Minor changes |
| August 2010 | First version |