



Q & A ABOUT JOINING THE JOINT SUBMISSION¹

1. Why is it so important to keep the names and tokens confidential?

Because you have paid for the authority to use them, either through your membership of the Iron Platform or through purchase of a Letter of Access. We do not want tokens to fall into the hands of anyone that hasn't paid and allow them a free ride.

2. How can the Iron Platform Secretariat ensure that there is no unauthorised use of the tokens?

With your help in ensuring that you keep them strictly confidential. The tokens have quite a short validity period before they expire. The Secretariat and each Lead Registrant will monitor the Joint Submission lists in REACH-IT, frequently checking that only recognised and authorised names are on it. Unauthorised names will be contacted, and then reported to ECHA if necessary.

3. Why do the tokens expire, and what does that mean in practice?

Limited token validity is an ECHA mechanism to help the Lead Registrants restrict the use of tokens. Whilst insufficient on its own, it does mean, however, that anyone joining a Joint Submission has a short period in which to do so, thus the time available for improper use is limited.

4. What if the token expires before I join the joint-submission?

The Lead Registrant through the Iron Platform Secretariat has the ability to provide you with another token, but you should please make every effort to use the first token within its period of validity so that we can keep token activity to a minimum. The more tokens issued, the more the scope for token abuse.

5. Should all Iron Platform members join the Joint Submission now, even if it isn't necessary to register until 2013 or 2018?

Yes, all Iron Platform members are strongly encouraged to join NOW. It is not an irreversible step. REACH-IT includes a mechanism to 'leave' any joint-submission, so if your registration intentions change, you can go back into REACH-IT at any time in the future and remove yourself from a joint-submission by just clicking on the 'leave' button. [The only entity that cannot do this is a Lead Registrant, unless the LR responsibility has already been handed on to new LR, or if there are no joint-submissioners for that substance]. There are no charges for joining a Joint Submission.

¹ with grateful thanks to the International Molybdenum Association

6. If we join a Joint Submission in 2010, but intend to register in 2013 or 2018, could it mean that will ECHA somehow charge us the 2010 fee level?

No. When you generate your REACH Registration dossier in IUCLID 5.2 you will select the tonnage band that is appropriate for your registration and ECHA will invoice you the fee for that tonnage band, after you have submitted your dossier.

7. Can we submit our REACH registration in 2010 even if our tonnage band means we are not required to register until 2013 or 2018?

Yes. As mentioned above, you select the tonnage band as part of the dossier 'generation' in the IUCLID software that you use to prepare your REACH-registration. So if you wish to get your REACH-registrations over and done with this year, you are able to do so.

8. How to calculate your tonnage band

The [ECHA Guidance on Registration document \(November 2009\)](#), Section 1.6.2.4 on page 31 explains how to calculate the volume to be registered. This can be downloaded from the Iron Platform website via the link above.