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From: The Iron Platform REACH Consortium [sief@iron-consortium.org]
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To: ipia@pigiron.org.uk
Subject: IUCLID - Mill scale - 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, Lead Registrant for Mill Scale.

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Iron Platform substance portfolio

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

Substance: Mill scale (ferrous metal)

Dear Members of the SIEF for Mill Scale [Einecs number 266-007-8]:

We are pleased to advise that the Lead Registrant has submitted the IUCLID dossier for Mill Scale 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 document on completion of sections 1 & 3 of IUCLID for Mill Scale, these being the sections that have to be completed by each member registrant.

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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 Mill Scale, those who are not members of the Iron Platform [or affiliates of members] will need to purchase a Letter of Access to the Mill Scale 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 Mill Scale.

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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