



# REACH REGISTRATION PROCESS

**Steps and estimated Timelines to Register  
Chemical Substances in the EU  
REACH Only Representative on behalf of a  
non-EU manufacturer**

# STEP 1 – INQUIRY DOSSIER

- Mandatory step for all substances to be registered
- Needs to include Substance Characterization by UV-Vis, IR, NMR, HPLC, GC-MS or other more suitable Spectral and Analytical data depending on the type of substance, report indicating description of analytical methods, results and conclusions with substance composition (1-2 months depending on availability of testing Laboratories)
- Prepared in IUCLID software and filed by the Only Representative (OR) to the European Chemicals Agency ECHA (1-2 weeks)
- No ECHA fee for this notification
- ECHA takes between 1-4 weeks to review/validate the notification
- Purpose is to get access to the SIEF (Substance Information Exchange Forum) and all the registrants of the same substance including the Lead Registrant to enable registration

# STEP 2 – BUYING THE LETTER OF ACCESS

- The Lead Registrant (LR) will provide the Letter of Access (LoA) cost for the required tonnage band (1-2 weeks depending on communication with LR)
- The SIEF Agreement needs to be signed (1 week)
- LR will send invoice and after payment is completed will provide the Token that will allow to become member of the Joint Submission and file the co-registration company specific member dossier to ECHA to obtain own registration number (1 week)
- In most cases the LR will provide the CSR (Chemical Safety Report) and Uses Template
- Company to be invoiced will be the Only Representative who will hold the registration and will pay to the LR

## STEP 3 – REGISTRATION CO-REGISTRATION MEMBER DOSSIER

- Prepared in IUCLID Software and filed to ECHA in REACH-IT (1-2 weeks)
- Includes Only Representative administrative data, substance ID (composition, purity, spectral and analytical data to verify the identity/composition), Uses, Chemical Safety Report (CSR), Guidance on Safe Use (GSU), PBT assessment and Appointment Letter
- ECHA Registration fee depends on size and turnover of the non-EU manufacturer represented by the Only Representative
- Automated and manual verification by ECHA, issue registration number (1-4 weeks)
- Company to pay the invoice with the Registration fees to ECHA will be the Only Representative

# REGISTRATION DOSSIER UPDATES

- The registration dossier is a living document that may need to be updated:
  - Increase of tonnage band implies also new LoA (not applicable for substances registered above 1000 ton/year)
  - New uses
  - Update of the CSR
  - Requests by the ECHA during lead dossier evaluation and substance evaluation imply costs to be shared equally among all registrants of the same substance (mainly for substances classified as hazardous)
  - Other ECHA requests during dossier evaluation phase applicable also to co-registrations
- ECHA fees for dossier updates apply only to increase in tonnage band

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Email: [contact@onlycorechem.com](mailto:contact@onlycorechem.com)

Phone: +351 963 705 402

[www.onlycorechem.com](http://www.onlycorechem.com)

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