

### **Overview of REACH INTEGRA Regulatory services**

2021





### Our values

- Defence of the interests of Industry and their customers.
- Deep knowledge of **REACH and CLP**, Spanish model business organization in matters of REACH.
- **Relationships with key REACH agents** in Europe: European Agency, business organizations, administrations, industries.
- Fluid relationship with associations and its industries.

- Expert company in REACH and CLP, with services covering all phases and disciplines.
- Engineering leader with more than 25 years working with Industry.
- Technical capacity (300 Professional).
- Knowledge of industrial reality, independence and solvency.









# WHY REACH INTEGRA?

- **Comprehensive consultancy**, tailored to the needs and requirements of each company.
- **Continuous advising** in all matters involving REACH, CLP and parallel legislation throughout the compliance cycle..
- A **team of experienced Professionals** in all REACH and CLP phases.
- **Dialogue ability** at all levels: Supply chain, ECHA, Lead registrants, Consortia, SIEF, competent authorities, labs, etc.
- **Only representatives** (Members of Only Representative Organization).
- Guarantee absolute **confidentiality**.



REACH Integra REACH and CLP services

#### I. Planning, implementation and training on REACH and CLP

#### II. REACH and SDS Regulations:

- 1. Individual registration and substance characterization
- 2. Full registration and Consortium management.
- 3. Extended Safety data sheets.
- 4. Management of physicochemical and (eco)toxicological test
- 5. SVHC substances. Use authorization.
- **III.** Only representative services
- **IV. CLP Regulation**
- V. PCN notification
- vi. REACH and CLP audits



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Planning, implementation and training on REACH and CLP

#### - Implementation

- REACH, CLP and SDS legislation Compliance Audits.
- Development of procedures for the implementation of REACH and CLP management systems.
- Inspections and chemical safety audits preparation.

Analysis of strict control conditions of strict control for intermediates

#### - Training

• In-company and trainings.

#### - Technical support to business associations

- Assistance for internal meetings and training sessions for members.
- Helpdesk and document development.



### REACH AND SDS REGULATIONS



#### **Individual registration**

- Development and submission of the Inquiry dossier to ECHA
- Development and submission of the individual registration dossier to ECHA
  - Registration general case.
  - Registration of on-site isolated intermediate substances.
  - Registration of transported isolated intermediate substances.
- Representative
  - Representation in substance information exchange forums (SIEF) and Consortia.
  - Third part representative (TPR) in SIEF.
  - Manage participation in the Joint submission and consortia, acquiring letter of access, SIEF Agreement, ...





#### **Complete registration and SIEF and Consortium management**

#### **Complete registration**

- · Development of common dossier (IUCLID 6).
- · Data gap analysis, test proposal and classification and labeling.
- Technical-economic evaluation of studies.
- Collection of bibliographic information and information generation (read-across, group category, QSAR -Episuite, OECD Toolbox- etc. ).
- Use mapping and generic exposure scenarios (ES) for workers, consumers and environment (ECETOC TRA, ART, EUSES, ...) and refined (Consexpo, ART, STOFFEN MANAGER, ...).
- Development of chemical safety report (CSR), hazard assessment (D(M)NEL/PNEC) and risk characterization (CHESAR, ECETOC TRA).

#### **SIEF and Consortium management**

- · Lead registrant and facilitator.
- Financial management of the consortium and cost sharing management in the consortium and SIEF.
- · Consortium administrative management and agreement development.
- SIEF management and letter of access development.
- · Confidentiality agreements.

#### - Laboratory management

 Mangement of budgeting, outsourcing and monitoring of studies on physicochemical properties and (eco)toxicology. Effects.



### REACH AND SDS REGULATIONS



#### Safety data sheets (SDS)

- Audits of suppliers and own SDS.
- Procedures of SDS review.
- SDS preparation and adequacy of substances and mixtures.
- Collection of information to complete the SDS.
- Development of communication sheets of Article 32 information.
- Development of ES and scaling.
- Management of SDS and SDS translations.

#### **Downstream users**

- Management of communications with suppliers and customers.
- Analysis of exposure scenarios application (scaling).
- CSR and ES (own and customers use) preparation.
- Uses communication to ECHA.



### REACH AND SDS REGULATIONS



#### SVHC substances. Use authorization.

- SVHC substances in articles:
  - Identification of SVHC substance uses.
  - Analysis and identification of SVHC substances in articles.
  - Notification of SVHC in articles.
  - SCIP Notification
- Substance use authorization (Annex XIV).
  - Analysis of the adequacy of the authorization.
  - $\cdot$  Notification to ECHA of the submission of application for

authorization and informative meeting with ECHA.

- Development of specific CSR, use mapping and refined ES.
  Analysis of alternatives and substitution plans.
- Socioeconomic analysis.
- Development with IUCLID and submission of application for authorization.
- Management of participants in the authorization.



### REACH AND SDS REGULATIONS



## Only representative services

- Designation as only representative (OR).
- Development of representative agreement.
- Only representative change.
- REACH and CLP guidance.
- Legal entity in Europe maintenance.
- Development of late pre-registrations, registration dossiers, Inquiry dossier presentation, authorization, ...
- SIEF and Consortia participation.
- Management of the communication to importers.
- Management of pre-registrations and registrations before ECHA.
- Financial management of letters of access and ECHA taxes.
- SDS and updated export list maintenance.





- Determination of classification and labeling of substances and mixtures.
- Classification and labeling notification (development and submission to ECHA).
- Technical assistance in activities in the REACH-IT platform for harmonized classification and labeling.
- Development of harmonized classification and labeling modification proposal.
- Labels design.
- PCN Notification



## CLP services



BPR services and national regulation

- I. Planning, implementation and training on BPR
- II. National and Union authorization of biocidal products

IUCLID dossier, SPC and Draft risk assessment of biocidal products

- **III.** Same biocides
- IV. Article 95 communication to List of substances and suppliers
- V. Technical equivalence, level I and II
- vi. National authorization according to R.D. 363/1995
- VII. Management tests of physical, chemical and technical properties

VIII. Management of physicochemical and (eco)toxicological test

