

Webinar: Future of ECHA's submission systems Questions and answers

This document is based on the questions received during the <u>webinar</u> organised on 6 June 2023. Editorial changes have been made to improve clarity and similar questions have been combined.

The European Chemicals Agency does not accept any liability regarding the use that may be made of the information contained in this document. Use of the information in this document remains the sole responsibility of the reader.

For the most up-to-date advice, <u>contact us</u> or refer to our <u>website</u>.

#	Question	Answer
1	Are there any plans to extend this submission system to also cover the information submission required by the ESPR and more concretely by the DPP?	The scope of our future industry portal covers those regulations where ECHA has a mandate. ESPR (Ecodesign for Sustainable Products Regulation) and DPP (Digital Product Passport) are not currently under ECHA's remit.
2	Can you clarify if it is the complete new system that is planned for 2026 or the first step with REACH IT and the ECHA submission portal?	The intention is to start with merging REACH-IT and the ECHA Submission Portal under a new system in the first phase. There will be a transition phase for the rest of the submission systems that will be merged gradually to the new system after 2026.
3	Currently it is possible to use the different tools (R4BP3, PCN, PIC) with one account defining different rules. Will this remain in the new system?	We are not planning to change the user account management system or anything related to current user accounts.

1

#	Question	Answer
4	Do you foresee to harmonise the vocabulary (taxonomy/ontology) for the submission system. This helps to facilitate integration and data exchange.	Yes, this is part of the work we are planning to do.
5	Hi! Is it true that the notification according to Article 66 for Downstream Users of Annex XIV substances will no longer be possible via REACH IT?	The notifications for Article 66 will continue to be submitted via REACH-IT for now. The only difference is that you should prepare your dossier via IUCLID (stand alone or Cloud) instead of using the online preparation tool in REACH-IT. This new regime will be implemented in phases starting in October. For more information please contact us.
6	How shall notifications according to Article 36 REACH (Downstream User CSRs) be made? / Which system?	We assume that you mean Downstream User notifications under REACH article 38. For now you will continue submitting via REACH-IT as usual. The new industry portal will not go live before 2026 as will be presented during this webinar.
7	In context of the CSS: Will the design of the future submission systems alredy take the future study notification requirements for all substances into account?	Yes, the new industry portal will be designed to be flexible to accommodate future notification needs. This is one of the main objectives of the new approach.
8	Is the S2S for SCIP affected, too?	The S2S submission mechanism will continue as is since there is no user interface involved.
9	Is the SCIP notification portal affected, too?	Yes, all four ECHA submission systems are included (REACH-IT, R4BP 3, ePIC and ECHA Submission portal, which is used for SCIP notifications among other submission types).
10	Thanks. Are you planning to take benefit of existing vocabularies (eSDScom.eu, EClass, IEC common dictionary, Catena-X,)? Can one contribute to this work?	Any decision on this will be taken during the project accordingly. The vocabularies mentioned don't seem to be relevant for the submission system but please feel free to contact us for further feedback/consultation on this topic.
11	When will you hold the next webinar on this topic?	At the moment we have no concrete schedule for new webinars. Please follow the ECHA website and social media where any future announcement will be published.
12	Who will have to confirm that all data were transferred? will it be ECHA's or the user's responsibilty?	The data submitted so far will not be lost. The data submitted in the past will be available in the future industry portal.
13	Will Poison Centre Notifications also be "shifted" away from REACH IT? To which new format / portal?	Poison Centre Notifications have never been managed via REACH IT. They are part of the Submission Portal, which is part of this exercise.
14	Will the ECHA dissemination site not be updated anymore until there is a new system in 2026?	The ECHA dissemination site and update is not related to the development of the new industry portal. For more information please refer to the <u>dedicated webinar on data</u> <u>availability</u> that took place recently.
15	Will the future submission systems already take needs for the future	The future submission systems will be designed to standardise as much as possible the way to receive data. This will be functional to structured storing of information, that will be the

#	Question	Answer
	data flows regulation / 'one substance one assessment' into account?	starting point for further common elaboration/sharing of data in the context of other regulatory processes
16	Will the IUCLID format continue to be the core/base for new regulations being implemented?	Depends on the information requirements and needs of every regulation. In principle IUCLID is the format and tool for data preparation for chemical regulation submissions.
17	Will the new portal also be applicable to SCCS Dossier submissions for Cosmetic Ingredients which will be evaluated by the SCCS?	The cosmetic products notification portal (CPNP) is out of the scope of ECHA's future industry portal, as this task is not under ECHA's mandate. The idea is that all industry submissions under ECHA's mandate will be unified under our future portal.
18	Will the notifications made so far stay available in REACH IT? Or will the content be lost at some point? Shall we download our previous inputs and re-supply?	The data submitted so far to REACH-IT will not be lost. The data submitted in the past will be available in the future industry portal.
19	Will the trial versions: ECHA submission portal trial and IUCLUD 6 trail be maintained? Please note that those trial versions are very useful for IT providers.	The future industry portal is still in very early phases of ideation. During the development, together with the stakeholders, decisions will be done on the best approach to tackle such needs.
20	Will there be a possibility to separate tasks better - if e.g. users are responsible for PCN, but not for SCIP, it is not possible to grant different permission	Thank you for your suggestion. This will be taken into account in the design process where the users will be consulted via the dedicated user group.
21	Will we have to redo all previous SCIP submissions and creation of legal entities or data will be transferred automatically?	The data submitted so far will not be lost. The data submitted in the past will be available in the future industry portal.
22	With the new Portal for ECHA PCN submission: 1) the PCN format will change? if yes, it will be compatible with current IUCLID PCN format v5?	The development of the format is a separate process and will continue as it is. Nothing should change compared to what happens at the moment.
23	With the new Portal for ECHA PCN submission: 2) the technical structure of S2S for sending to PCN portal the PCN notifications (as iuclid dossiers) will change?	As we already replied to a similar question, the S2S submission mechanism will continue as it is since there is no user interface involved.