

SPECIAL PREPARATIONS

Pre-registration

Practical Aspects

EUROFER Workshop 28 May 2008

Pre-registration: the case of ferro-alloys

1. Principles

2. Practical example

3. IT Tool

Pre-registration: the case of ferro-alloys

1. Principles

Recommendation of EIMAG (European Industry Metallic Alloys Group):

- Pre-registration to stay on the safe side in case of doubt:
keep the "phase-in" status (*)
- Pre-registration does not necessarily imply registration
- Pre-register as "substance in preparation" or as
"multiconstituent" substance.

(*) *phase-in substance means substance listed in EINECS; or manufactured in the EU since April 1992 but not placed on the market; or placed on the EU market before 1 June 2007 and considered as notified under Article 8 (1) of Directive 67/540*

Pre-registration: the case of ferro-alloys

1. Principles

(pre-) registration of substances in preparation:
what threshold or level of details ?

It should be done according to the following principles:

- only (pre)-register the constituents that are intentionally used/added (smelting)
- impurities are not concerned (being purified in a further step or left over)
- the constituents respond to the need and specifications of the customers (identified function)
- yearly quantity above 1 ton is concerned (aggregate tonnages of the legal entity)

**No threshold in % for preparation or alloys.
The only legal reference is 1 ton !**

Pre-registration: the case of ferro-alloys

1. Principles

Irrespective of the status selected for (pre-)registration, the decision should not lead to less protection of the human health and the environment at the assessment stage

Pre-registration: the case of ferro-alloys

1. Principles

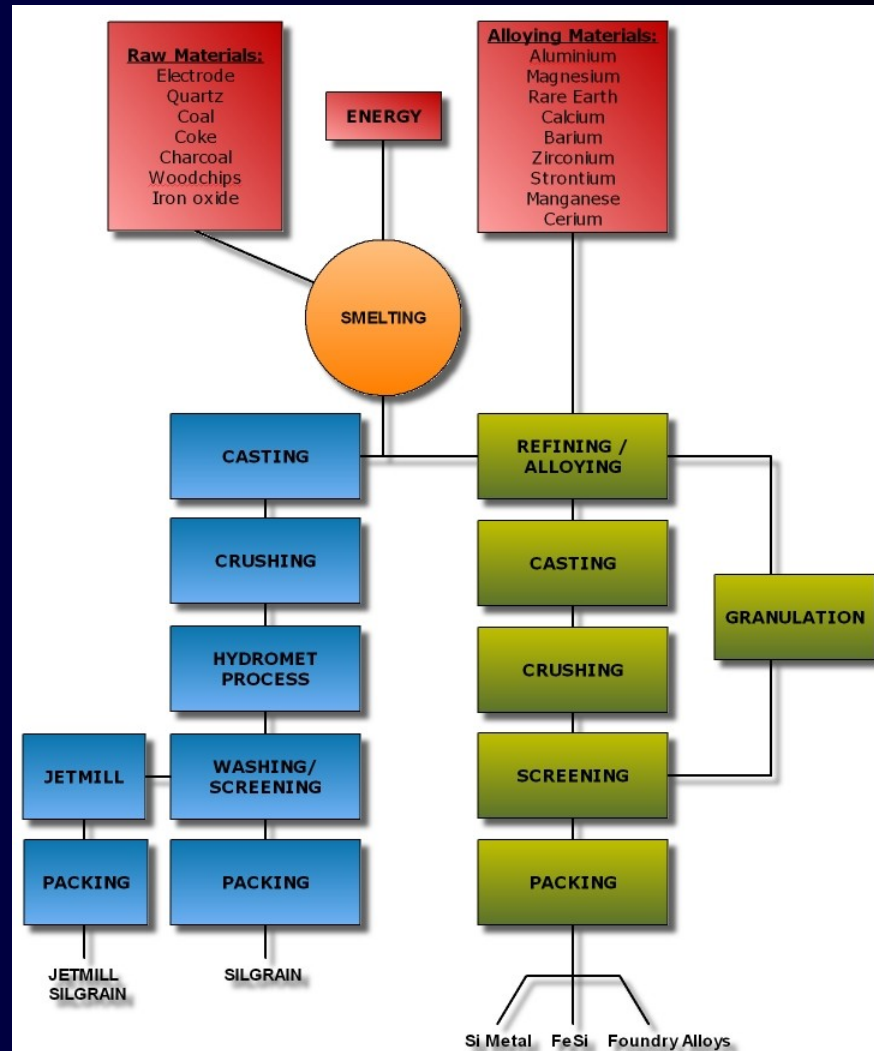
Recommendations:

1. Explore the possibility to follow both options for ferroalloys: pre-registration metal by metal and for the ferroalloy itself (MCS)
2. According to Article 7.6, the registration requirements applicable for substances in articles intended to be released shall not apply to substances that have already been registered for that use.

Since the registration of the substance has not yet taken place, substance in article with intended released should be pre-register in order to make use of the phase-in scheme and to allow the article to still be manufactured and imported

Pre-registration: the case of ferro-alloys

2. Practical example



Source : Elkem

Pre-registration: the case of ferro-alloys

2. Practical example

	FeSi Inoculent	
	Element	Element
1	Silicon	(Si)*
2	Iron	(Fe)*
3	Aluminum	(Al)*
4	Calcium	(Ca)*
5	Barium	(Ba)*
6	Zirconium	(Zr)*
7	Strontium	(Sr)
8	Manganese	(Mn)*
9	Cerium	(Ce)*
10	Lanthanum	(La)*
11	Antimony	(Sb)
12	Tin	(Sn)
13	Boron	(B)
14	Soufre	(S)
15	Bismuth	(Bi)

Noduliser: Mg + *

2. Practical example: registration of FeSi inoculant

Inoculant FeSi: 1500 T/y				
Major constituent	Chemical formula	Range or arithmetic	Process	Registration status
Silicon	Si	70-80	Smelting	Registration
Barium	Ba	2 - 3	Melting (EU supplier)	DU no reg
Calcium	Ca	0,8-2,2	Smelting	Registration
Aluminium	Al	0,8-1,5		Impurity: no reg
Zircon	Zr	Max 0,5	Melting (Imported)	Registration
Iron	Fe	balance	Smelting	Registration
Minor constituent				
Titan	Ti	0,06		Impurity: no reg
Manganese	Mn	0,16		Impurity: no reg
Trace elements				
Cerium	Ce	0,01		Impurity: no reg
Magnesium	Mg	0,04		Impurity: no reg
Nickel	Ni	0,02		Impurity: no reg

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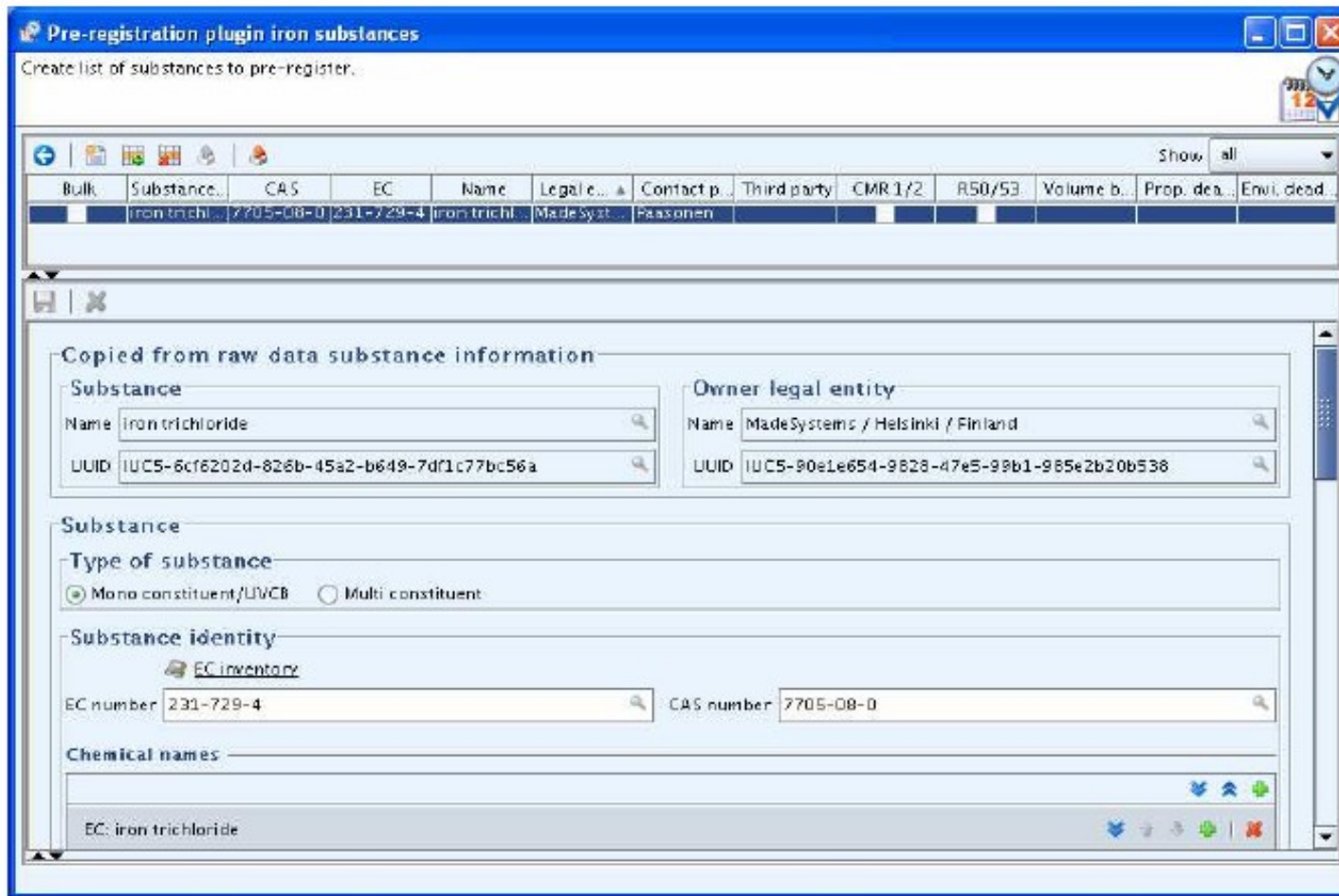
3. IT tools

	On-line via REACH-IT	<u>Single</u> upload, created in IUCLID 5 or company's application	Bulk upload, created in IUCLID 5 or company's application
A mono-constituent substance or a multi-constituent substance (MCS) of which all constituents are listed in EINECS*	X	X	X
A substance (or constituent for read across) is not listed in EINECS	X	X	-
As a newcomer after 1st December 2008	X	X	-

* all substances for read-across are also listed in EINECS

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3. IT tools



Pre-registration plugin iron substances

Create list of substances to pre-register.

Bulk	Substance	CAS	EC	Name	Legal e...	Contact p...	Third party	CMR 1/2	R50/53	Volume b...	Prop. des...	Envi. dead...
	iron trichl...	7705-08-0	231-729-4	iron trichl...	Made syst...	Haasonen						

Copied from raw data substance information

Substance

Name: iron trichloride

UUID: IUC5-6cf8202d-826b-45a2-b649-7df1c77bc56a

Owner legal entity

Name: MadeSystems / Helsinki / Finland

UUID: IUC5-90e1e654-9828-47e5-99b1-985e2b20b538

Substance

Type of substance

Mono constituent/LVCB Multi constituent

Substance identity

[EC inventory](#)

EC number: 231-729-4 CAS number: 7705-08-0

Chemical names

EC: iron trichloride

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3. IT tools

The screenshot shows the REACH logo website interface. At the top left is the REACH logo. At the top right are links for Contact, Site map, Search, and Hi. Below the logo, a navigation bar shows the user is connected as Catherine.Cornu on behalf of Catherine's Specialty Chemicals Company. The main navigation menu includes Company, Pre-registration, Substance, Dossier, Joint submission, Pre-SIEF, Worklist, Messages, Users, and Inventories. The Pre-registration section is active, showing tabs for Identification, Similar substances, Tonnage, Contact, Representative, Remarks, and Validation. The Identification tab is selected, displaying the text: "You can specify up to 10 substance constituents which should be contained in your reaction mass with an amount of 10 <= X <= 80%(w/w)". The number "10" is highlighted with a red box. Below this text is a section titled "List of selected substance identities" containing two entries: [R-(E)]-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one with EC number 246-069-2, and [S-(E)]-4-(2,6,6-trimethyl-2-cyclohexen-1-yl)-3-buten-2-one with EC number 238-862-9. Each entry has a "Remove this identity" link. At the bottom of the list is an "Add" button.

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3. IT tools

Pre-registration of multi-constituent substances:

Only the EINECS n° of the constituents can be indicated, no place for a n° for the MCS as such

For MCS, pre-SIEF webpages are created for the individual constituents.

Unless by indicating as one of the constituents the EINECS n° of the alloy itself (if any), using the MCS at the pre-registration stage approach for a better identification of M/I of the ferro-alloy at stake becomes useless !