

REACH & CLP - Exemplar Projects

Technical and consortium management for REACH consortia

ToxMinds provides technical REACH support for a number of REACH consortia covering all together far more than 75 chemical substances, predominantly UVCBs. For one consortium, we also provide the consortium management support and represent the interest of consortium members (CMs) in the SIEFs. As part of our technical work, we review the chemical specifications of the substances to be registered, conduct desktop searches and data gap analyses, manage consortium testing programmes along with establishing substance specific REACH registrations strategies. Subsequently we develop the IUCLID5 registration dossiers including chemical safety assessments (CSA) and safety reports (CSR) where required by the regulation. As part of the CSR development process, we work with the consortium member companies to collect all information required to develop the exposure scenarios, calculate human and environmental exposures using a variety of exposure assessment tools as per the ECHA guidance documents and determine the respective risk characterisation ratios (RCR) for the individual substance and member company specific exposure scenarios. Where necessary and possible, we conduct higher tiered risk assessments to achieve RCR values < 1 by refining the underlying human and environmental exposure and risk assessment assumptions.

Client representation in REACH consortia or SIEFs

ToxMinds consultants have been engaged by different chemical companies to represent their interests and positions, predominantly in the Technical Advisory Groups (TAG) of consortia or in the SIEFs. As part of these activities, ToxMinds consultants attend the meetings, review and provide input into technical documentations circulated by the TAG/SIEF, identifies client specific implications of the REACH work and provides technical and strategic suggestions to our clients on possible courses of action.

Preparation of CLP notification dossiers

ToxMinds has been responsible for the preparation and submission of notifications to the C&L inventory established by ECHA for a number of our clients. This work has involved compiling individual submissions for a number of substances already classified as hazardous as well as those substances that are subject to the REACH regulation. Each notification had to have a specific set of information including the name and contact details of the notifier as well the identity of the substance; classification of the substance according to the CLP criteria; reason for any 'no classification'; any specific concentration limits or M-factors and label elements. Once the information was compiled, the submission of each notification was performed via REACH IT for some clients and for other clients using the IUCLID 5 format. ToxMinds have also been involved with the update of ELINCS dossiers by submitting NONs dossier updates using IUCLID 5.

Portfolio review to meet the new CLP requirements

ToxMinds provided its REACH consortia members with C&L support by provision of C&L proposals for substances and mixtures according to the new CLP requirements. These proposals were agreed at consortium level and have then been communicated to other SIEF members to assist in the submission of harmonised classifications and labelling to the CLP inventory established by ECHA. In this overall context, ToxMinds consultants provided advice and guidance on the re-classification of substances and mixtures subject to the new CLP requirements based on the available and newly generated physical-chemical, environmental and toxicological data and recommended appropriate hazard communication via the safety data sheets.