

## Passing on the regulatory role for REACH and CLP in an organisation

### Introduction

Good management of any organisation includes “succession planning”, which allows any role to be transferred to a new individual in case of retirement or resignation. It also allows for critical cover of a staff member’s key responsibilities during periods of absence. In an ideal situation, incumbent REACH practitioners will ensure that they leave a legacy for their successor and, at the very least, have working instructions to help colleagues manage obligations in their absence.

REACH and CLP not only create a whole set of issues that require long-term planning and consistency, but also sets legal requirements for record keeping and justifications.

Anyone inheriting a regulatory role will need to pick up many threads of legal and commercial importance. Irrespective of the talents and abilities of this new person, there are limitations of what they can efficiently achieve without some help from their predecessor. Such support takes many forms, from simply retaining access to REACH-IT and IUCLID to more complex technical justifications for the creation of SDS, the company’s registration strategy or the particular classification of mixtures.

There will be similar issues in all chemical and related legislation, including Biocides, Cosmetics, transport labelling. Compliance is the legal responsibility of the senior management; if the company fails to implement a system to allow succession, there may be serious consequences.

This document offers some advice on how to ensure a smooth handover.

### Login details

Perhaps the easiest step to implement is to document (securely) relevant usernames and passwords. Whilst it may not be appropriate to share passwords widely, you may feel it important that more than one person in the organisation knows the login details to REACH-IT and IUCLID and security details for password recovery. An alternative, and perhaps more conventional, approach is to ensure there is always more than one user set up for REACH-IT and IUCLID.

### REACH-IT

REACH-IT passwords need updating periodically; many users add an incremental number for each update. The REACH-IT account should be accessed regularly and the password kept up to date. If the account is not used for long periods, users may need to contact ECHA to reset the password. In such cases, the new login details are sent to the e-mail address of the person listed as main contact (“Company Manager”) in REACH-IT. Therefore, access to this e-mail account is required.

Advice:

- Access REACH-IT on a regular basis and keep up to date users’ details;
- Assign more than one user for your company’s REACH-IT account;
- Provide a handover/instructions on the basic functionality;
- Ensure that the e-mail address used in REACH-IT is accessible – consider using a generic address such as reach@company.co.uk.

If a successor does not have access to a predecessor's account and no other users are set up for the company REACH-IT account, ECHA can provide new login details. Although responses are initially sent to the e-mail address in the system (generally within 48 hours), the details can be ultimately recovered after proving that the new contact is entitled to access. ECHA is contacted from the link on the login page of REACH-IT; it is possible to go straight to ECHA without first seeking help from the national helpdesks as only ECHA can provide the support and national helpdesks have a very limited role in REACH-IT support.

### **IUCLID software**

Each user of an IUCLID installation has his/her own password. The **SuperUser** user account is used at installation and to carry out system changes and may be used to delete, modify or create new users. The default password is **root** and may not have been changed. Once logged in as SuperUser, use the "User Management" facility to reset user passwords, create new user accounts and manage existing users.

If you are unable to access IUCLID as either a user or SuperUser, if the data has been lost or become corrupted, or if IUCLID has been installed on a new machine, dataset recovery is unlikely. However, copies of dossiers submitted to ECHA can be requested through the company's REACH-IT account – which can be used to recreate manually the individual datasets.

General advice:

- Back up substance datasets and dossiers regularly you can export files from IUCLID (.i6z);
- Export and archive any bespoke reference substances created in IUCLID;
- Archive attachments such as CSR and analytical reports;
- Ensure that an IT administrator or co-worker(s) has full access to IUCLID (IUCLID users must have 'administrator' or 'SuperUser' roles assigned to use IUCLID fully);
- If setting up new user accounts in IUCLID, assign the relevant legal entities to that user in the "User management" facility.

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### **SIEFs and consortia**

Maintaining contact with existing SIEFs and consortia for registered substances is important. Every (potential) registrant should establish links with the Lead Registrant, which will be particularly useful should copies of documents be required, as well as for discussing and agreeing actions required to maintain existing and achieve future registrations.

Advice:

- Maintain a record of the contact information for the Lead Registrant or consortium (or its secretariat), or the main contact(s) on the SIEF leadership team. Include relevant web links, email addresses and any direct points of contact;
- Make an inventory and archive for future access to the information received from the LR, consortium or SIEF, for example, data sharing agreements, Letter of Access, CSR template.

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### **Record keeping**

As stipulated in Article 36 of REACH, the minimum length of time to retain information and allow access is 10 years from the date of last manufacture, import, use or supply.

Anyone inheriting the role of SDS writing or responsibility for labelling, for example, must be able to see historical decision-making processes and see SDS records. Archived versions of the SDS are also important under workplace safety legislation, such as the UK's COSHH Regulations; complaints and litigation based on injuries spanning many years may be influenced by decisions taken a long time ago. These decisions may have been correct at the time with the information then available; good record keeping and access to these records is essential for such a defence.

Advice:

- Have internal systems in place to retain documents and decision-making processes;
- Establish and maintain a tonnage tracking system;
- Ensure senior managers have access to these records;
- Collate as much old information as possible (paper or electronic records), including past e-mails, analytical reports and test data so that previous decisions can be understood; otherwise, review affected products immediately.

## Further information

If you are passing on the responsibility for REACH and CLP within your organisation, or if you have just taken over the role, we can help you with a smooth handover. Through REACHReady's Consultancy service we can help you understand what you need to do and how to do it.

As a Gold subscriber you can speak to one of our technical team by contacting the REACHReady Helpdesk at [enquiries@reachready.co.uk](mailto:enquiries@reachready.co.uk) or on +44 (0)207 901 1444.