PPORD dossier creation

Introduction

The PPORD exemption allows manufacture or import of 1 tonne or more per year of a substance for production and process oriented research and development by yourself or customers without full registration. Only if the trials are successful and there is a need for commercial production or use, will a full registration be needed.

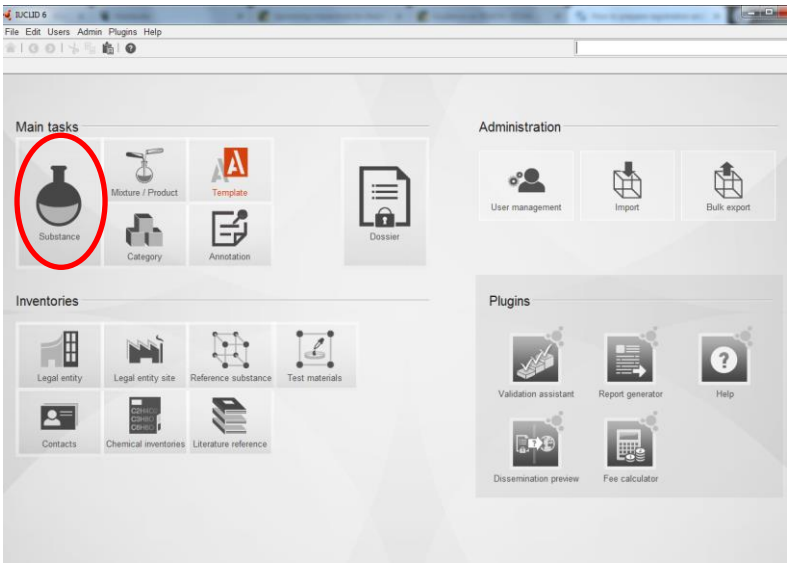
This short guide has been prepared to help with PPORDs, using IUCLID and REACH-IT. The guide does not consider the functions and purpose of PPORD and when it can be used, but only covers practical issues. It is only supplementary to the official guidance; for more information on when PPORD exemptions can be used, information can be found on the ECHA website

This guide assumes a working knowledge of IUCLID 6 and the REACH-IT system.

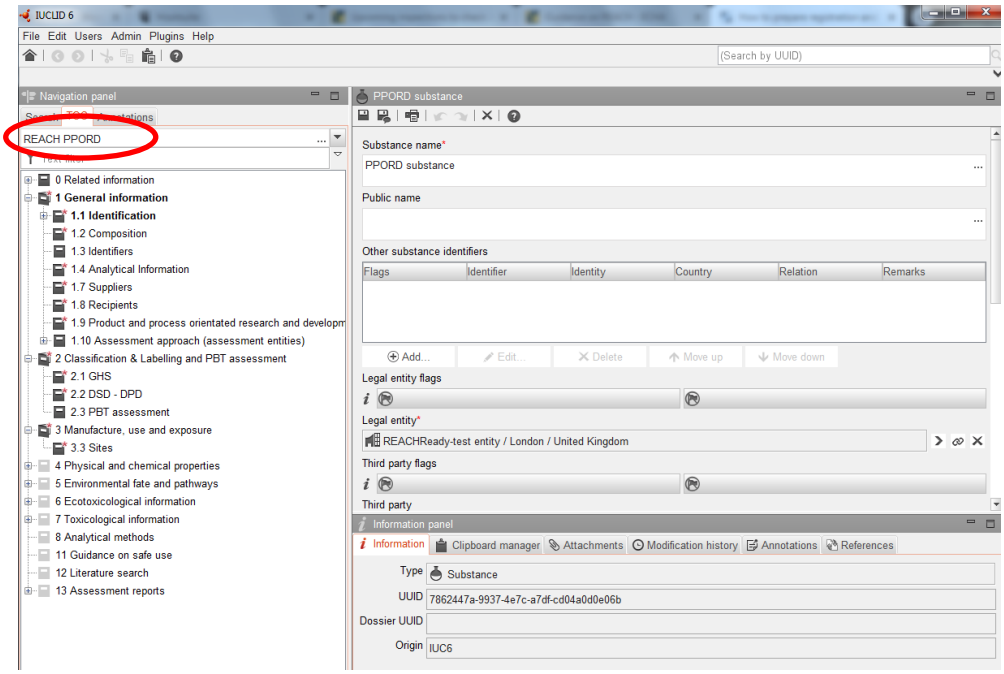
IUCLID 6 data input

The PPORD dossier needs to be created as an IUCLID 6 file, completing sections 1, 2 and 3 (substance and registrant identification, classification and labelling, and manufacture and use sites respectively) with dataset type identified as PPORD. This guidance shows screen shots from IUCLID version 6.3

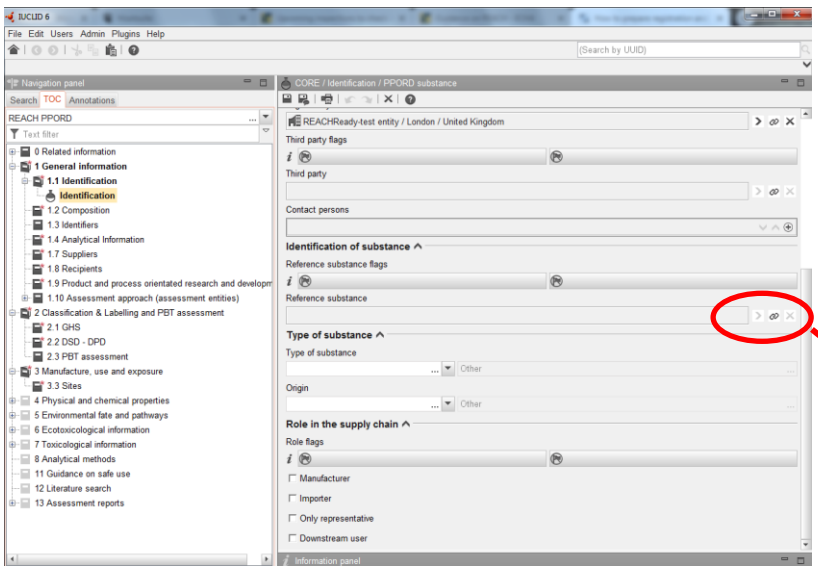
1 From the IUCLID home page, create a new substance and enter the name you want to use in the PPORD dossier.

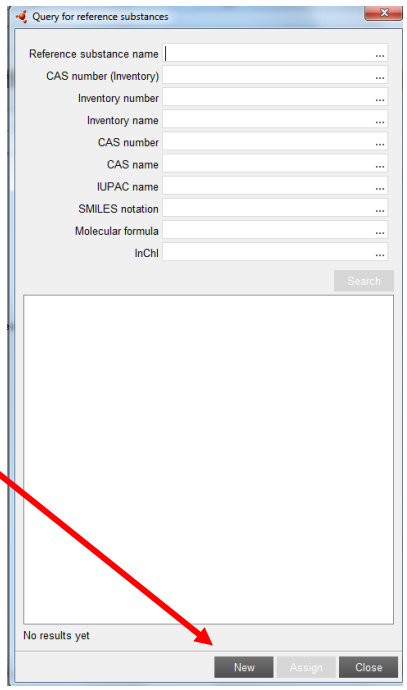


2 Click on “Section tree” to activate the list of IUCLID sections and then select PPORD from the dropdown menu box immediately below the Section tree tab. The sections to be completed have a red asterisk next to them.



3 If the substance is not included in EINECS, it is unlikely to be found in the database of reference substances on the IUCLID website. Therefore you will need to create a new reference substance for your PPORD substance. In section 1.1 of the PPORD dataset, open the reference substance query window and select “New” at the bottom and complete the necessary identification information.

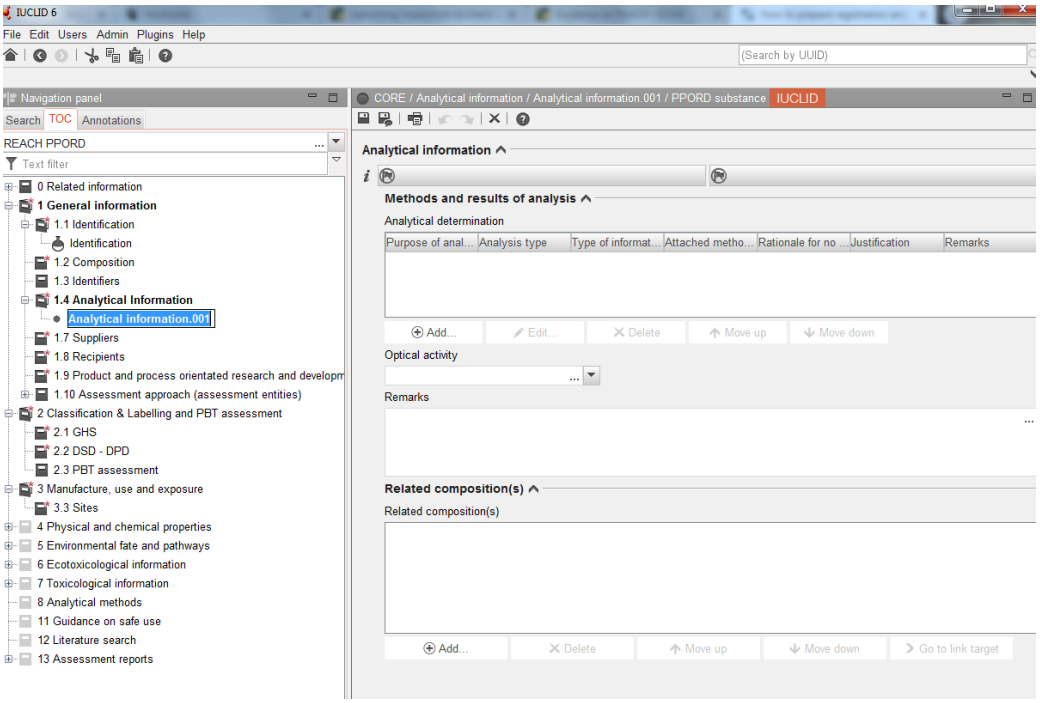




4 Other red sections of IUCLID must be completed; key areas are described below.

Section 1.4: analytical information

This section of the dossier is probably the technical part most likely to cause rejection of the dossier. The simple rule is that there should be sufficient evidence presented in section 1.4 to confirm the identity described in 1.1 and 1.2. Therefore, if claiming a certain structure, molecular weight and purity, section 1.4 needs the evidence.



In many cases, providing evidence for Section 1.4 will need a variety of methods and if the substance is still in pilot plant or laboratory stage of development, methods may not have been considered fully; this method development could indeed be part of the justification for the PPORD development work. Evidence may therefore be based on both measured results and on theoretical chemistry based on firm evidence of the identity of starting materials.

There is no simple guidance to follow and will need input from experienced analytical chemists.

For monoconstituent organic substances the basic requirements are:

- NMR spectra
- IR spectra
- UV-Vis spectra (at pH range of 4-9 if water soluble)
- Chromatography, such as HPLC or GC.

Other methods such as Gel Permeation Chromatography (GPC) may be used for high molecular weight materials and a good chemist may be able to suggest other methods. Inorganic substances, for example, lead to a range of analytical issues and element analysis and refractometry may be decided as the best options.

Optical analysis is identified in IUCLID as a requirement; it only needs to be considered if different isomers exist.

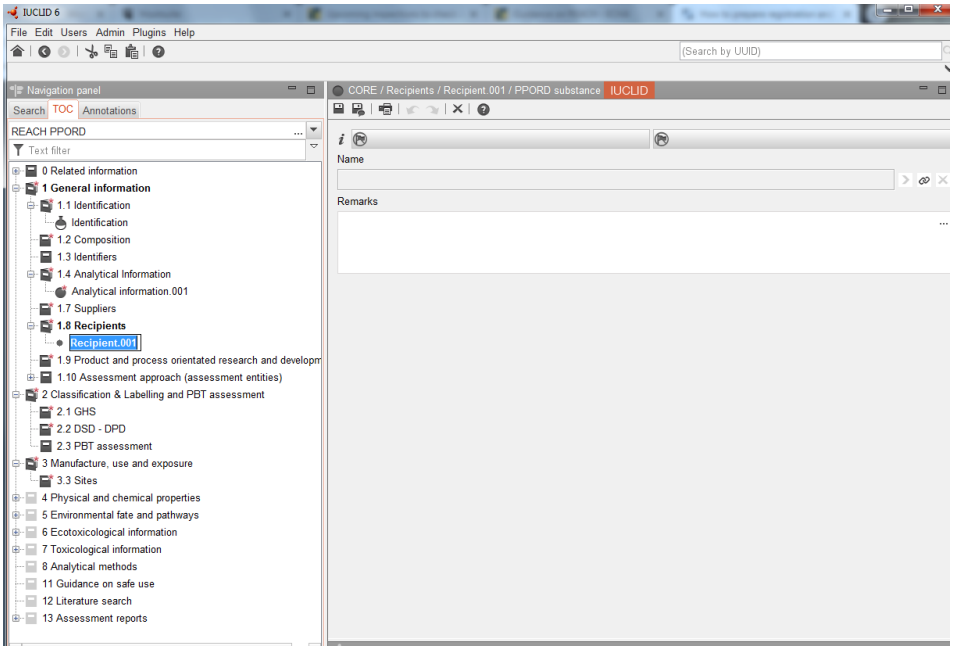
It is worth spending the time on this section as rejections of the PPORD will be time consuming itself and the level of analysis developed for the PPORD will in turn be required later if a full registration is sought.

Other important notes for submitting analysis details:

- Try to get all the spectra into one report to attach to the IUCLID file; it is possible to create repeat blocks to add separate files, but a single spectra report is the best way.
- The chromatography and other analysis should again be condensed to a single report and attached to the IUCLID section prompting these details.
- For all analysis work, try to use the same sample, recording a batch number or laboratory code with dates, identity of the facility where analysis took place, details of equipment, sample preparation, methods etc.
- GLP is not required, but it is recommended that work be performed to Good Laboratory Practice standards with maintenance of records, signatures of responsible people, and internal checking.

Section 1.8: recipients of the substance participating in the PPORD activity

This section can be used to indicate the identity, address and contact details for each customer or recipient involved in the PPORD activity. Official legal entities are not required; the legal entity of each PPORD customer can be created directly from IUCLID 6 as non-official legal entity containing as a minimum the name and contact address, including town and country.

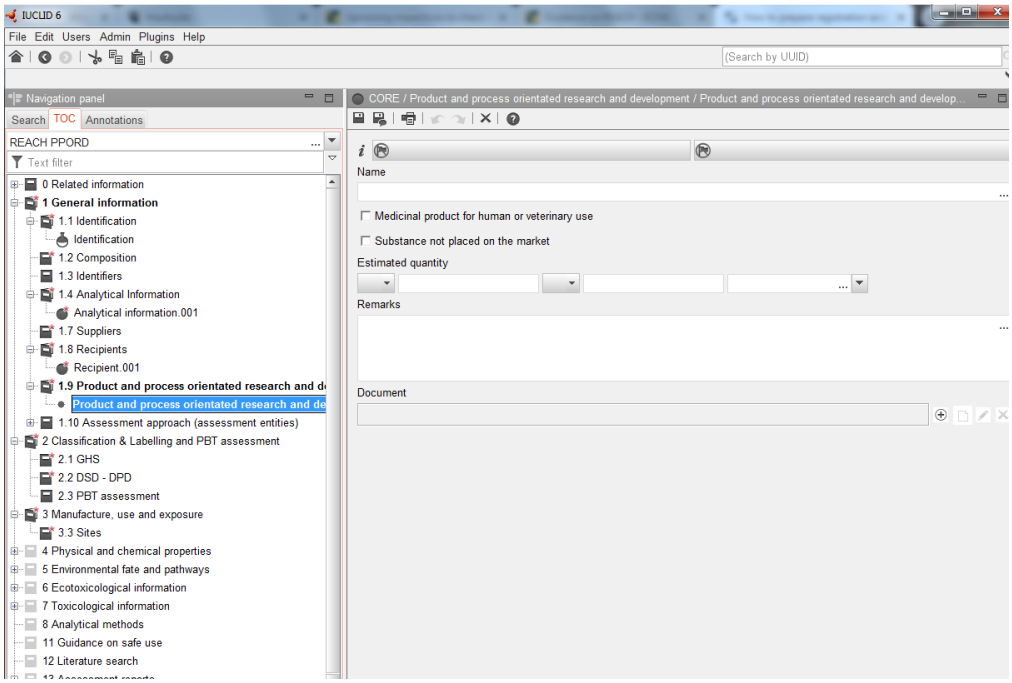


Section 1.9: Details of the PPORD activity

This field is repeatable and allows more than one process research application to be described if necessary. It also prompts the question of whether it is a medicinal product or is just not placed on the market. Note that to be valid for a PPORD, the substance should not be placed on the open market, but should only be supplied for restricted uses to specified recipients; it should never be supplied to non-skilled users or the general public.

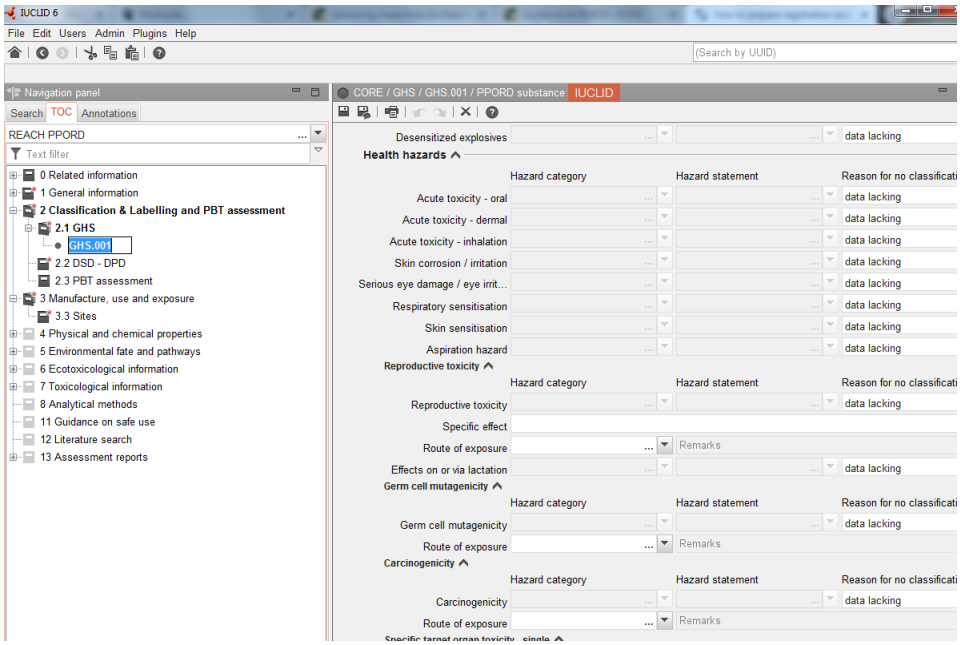
The section allows the option to add a document and it is recommended to use the pre-REACH Process Orientated Research and Development ("PORD") application form as a guide. An example of a completed version is attached to this guide.

The justifications for a PPORD must meet the restrictions laid down in the legal text and in associated ECHA guidance and include indications of tonnage, use patterns, levels of exposure etc.



Section 2: Classification and labelling

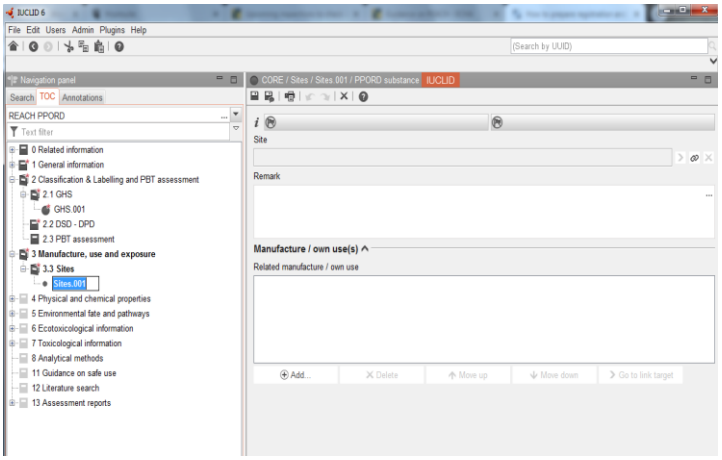
Section 2 must be completed using GHS and EU endpoints.



Although there are no formal data requirements for testing substances for a PPORD, an absence of data does not justify a claim that a substance is non-hazardous. If the PPORD activity includes making the substance available to third parties, European supply and transport legislation applies and the supplier must have sufficient knowledge about the substance to allow recommendations to be made for labelling and safe handling.

Section 3: Sites

This section is used to indicate the sites where the PPORD activity of the notifier takes place. More than one site can be included by adding further repeatable fields, indicating whether manufacture and/or use takes place on each site.Sites of downstream recipients involved in the PPORD activity should NOT be included.

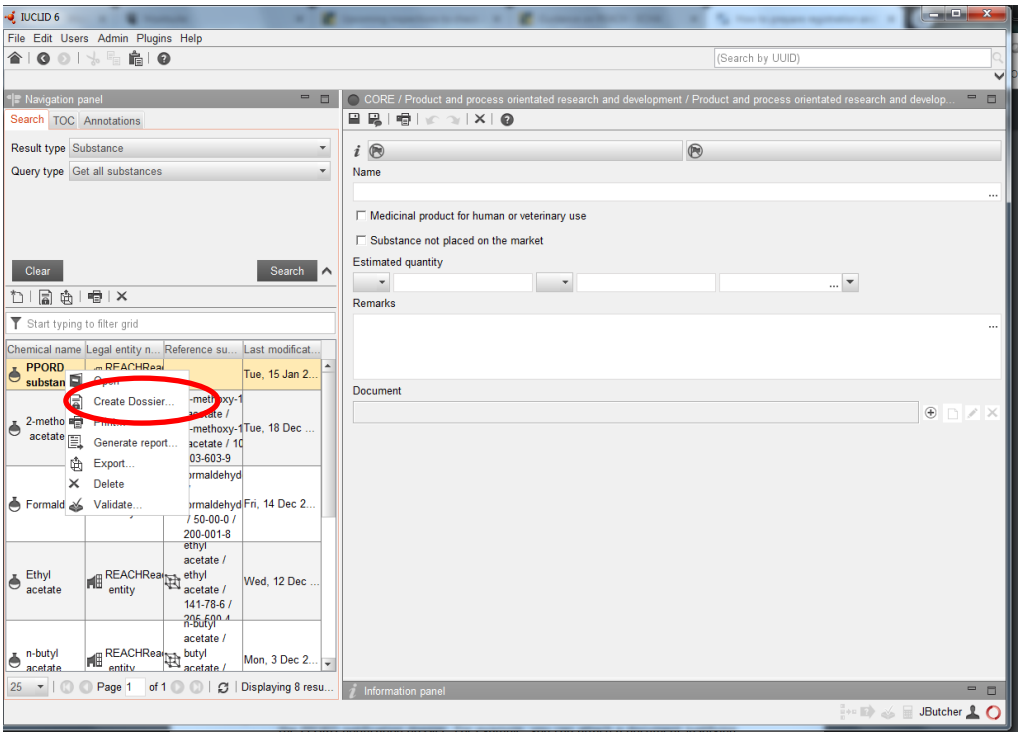


Creating the dossier

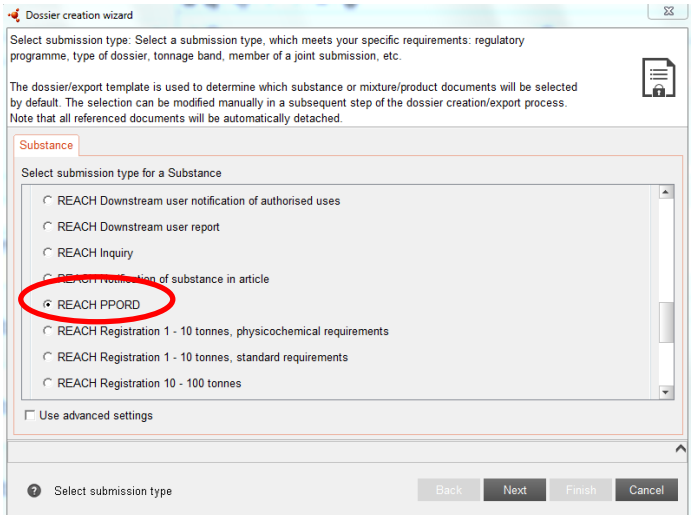
We recommend making use of the validation assistant plugin for IUCLID to verify the dataset before creating a dossier for submission so that any errors or omissions can be corrected.

Once the dataset is complete, including the required attachments, use the dossier creation tool in IUCLID:

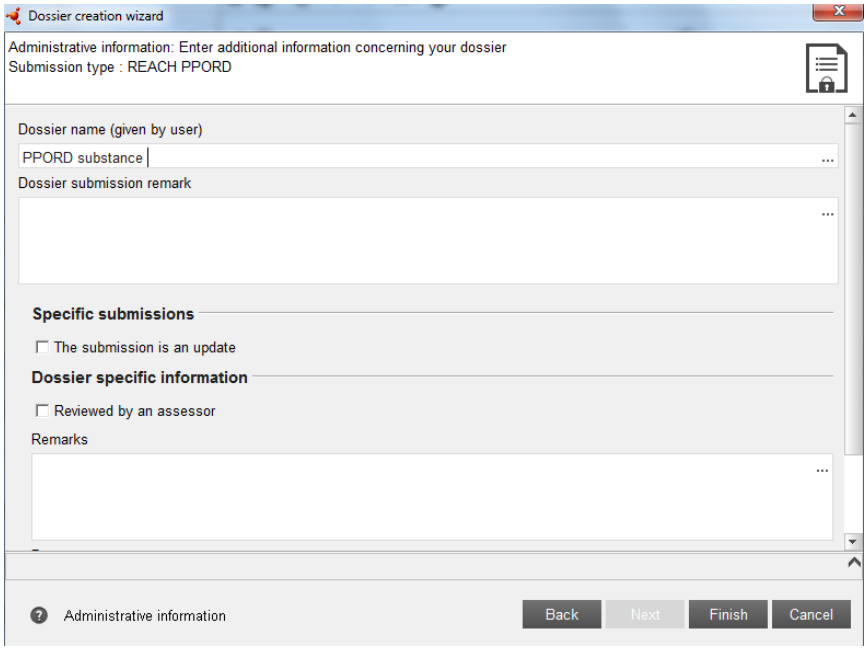
1. With the substance dataset open, click on “File” and select the “Create dossier” option; IUCLID may prompt you to save any changes. Alternatively, right-click on the substance in the “Query results” pane on the left of the IUCLID view.



2. Select the “REACH PPORD” dossier. It is essential to use the correct dossier for the type of submission to avoid inconsistencies preventing correct processing by REACH-IT.



3. On the next page, give your dossier a name and include any other additional information such as if the dossier is an update



4. When you finish, you can view the dossier. We recommend using the validation assistant plug-in on the dossier prior to submission as it will check against additional business rules, such as that the legal entities in the dossier and its header are consistent.

Exporting the dossier

From the IUCLID home page select the dossier and export it from IUCLID (right-click the dossier from the Query results pane and select Export). Do not worry about the option to export with annotations; these are usually used by reviewers or regulators when commenting on a dossier. Define a filename for the dossier and to where it will be saved. Click Finish to export the dossier and wait for confirmation from IUCLID.

Submission

Log into the REACH-IT account for the legal entity used for the IUCLID dossier creation (some organisations may have more than one REACH legal entity to cover difference business groups). Verify the company size information is correct according to the criteria laid down in European Commission Recommendation 2003/361/EC (see the guidance document at http://ec.europa.eu/enterprise/policies/sme/files/sme_definition/sme_user_guide_en.pdf for more information).

What happens next?

Automatic pre- processing and Business Rules checks will take place once the dossier is submitted. Within a few hours to days you should receive a message in the REACH-IT message box to confirm the submission number, and any comments on issues found within the dossier in the initial screening – for example, incorrect file formats for attachments or chemical structure picture files.

Once the dossier is accepted for processing and completeness checking an invoice will be received, again in the REACH-IT message box. Note the payment terms on the invoice to avoid any possible delay or rejection of the PPORD. The information on ECHA's bank details, reference numbers to be quoted and permitted payment methods at http://echa.europa.eu/reachit/reachit_faq_en.asp should prove useful in setting up any company system to initiate payment.

Annex: Completed generic PPORD justification

Research and development details

What is the envisaged use of the substance?

Substance X is required for the synthesis of a pharmaceutical intermediate. Previous trials have been quite successful and further scale-up is required, to remove or reduce impurities formed in these previous. At this time, without scale-up, the manufacturer does not know if the impurity targets can be achieved. Therefore, an R & D plan, including pilot plant production, is necessary to test the reproducibility of lab trial into production scale.

What R&D work has already been carried out either by you or, if appropriate, by the customers involved in the R&D programme (e.g. internally or under the <100kg p.a. scientific R&D derogation)?

Kilo quantities have already been synthesised, but scale up is required to ensure commercial production can produce the high specification material required.

What is your justification for wanting to use this derogation (including an assurance that you do not currently know whether you can achieve the desired effect)?
Scale-up of production processes

What additional information will be gained through the proposed R&D program?

Confirmation of methods and systems to be used to meet high standards of purity required

Please give a summary of the R&D plan, included the process to be investigated, the timetable and a proposed start date.

During late 2012 and 2013, scale up trials will continue, requiring in total more than 1 tonne of the new substance. Four trial batches are planned, with a total of approximately 12 tonnes produced.

What is the justification for the quantity involved in the proposed R&D program (including the justification for the number of batches and the quantity per batch, etc.)?

It is considered four batches will be sufficient to complete the trial.

Please confirm that the substance, or any preparation containing it, will only be handled by the customer's staff under controlled conditions and will not be made available to the general public.

The substance will not be supplied to the general public or to any organisation other then the customer [details].

If supply is greater than 1 t.p.a., please supply sufficient information about the process, disposal procedures, etc. to demonstrate that the potential for environmental exposure will be kept to a minimum. Details of the process should include batch sizes, identification of any potential losses (e.g. process emissions to waste water, reactor washings and residual material left in containers) and information regarding any treatment of wastes and waste disposal practices for all potential waste streams.

The substance will be consumed in trials by the customer in [ ]. Any waste, including residue from packaging, will be disposed of as chemical waste with the warning that the substance has not yet been fully tested. There will be no loss of washings to waste water and all waste will be collected for chemical waste disposal. The substance is produced and used as dedicated chemical plants with high levels of control for worker protection and environmental loss.

Do you intend to use the substance to produce articles and, if so, would these be made available to the general public?

No

Attach:

Safety data sheet (if relevant)