Brief Recommendations for Keeping REACH Dossiers Up to Date

Purpose of this document

This is a communication with practical recommendations to help REACH registrants comply with their legal obligations under Article 22. It aims to support companies in maintaining up-to-date registration dossiers by highlighting common update triggers, legal deadlines, and best practices drawn from industry experience.

1. Keep Your Dossier Active

Update without delay when:
- Company info changes
- Substance composition changes
- Tonnage band changes (up or down)
- New information on risk or hazard
- New tests are planned.

2. Follow the Right Timeline

Trigger	Deadline
Admin/Legal Entity changes	3 months
New hazard or risk info	6 months
New CSR / safe use guidance	12 months
New use or cease of manufacture	3 months
Testing proposal (Annex IX/X)	6- 12 months

Start counting from the trigger date (e.g. decision taken, tonnage reached).

3. Indicate the right reason to update in IUCLID

In IUCLID, choose clear "update reason(s)"
- Avoid selecting "Other" unless you explain it
- Use multiple reasons if needed

4. Track Tonnage

- Use Substance Volume Tracking (SVT) tools
- Review tonnage annually per legal entity.
- If decreasing ➜ submit evidence (contracts, forecasts)
- If increasing ➜ inquire & update within 3 months. This is counted from the date when all required data for the new tonnage band is available. The registrant may continue manufacturing/importing the substance at the higher tonnage while waiting for the decision of their registration update, as long as they fulfil all the applicable deadline.

5. Review Joint Submissions

Every update by the Lead is a trigger for co-registrants to review:
- Substance identity
- Uses & exposure scenarios
- Safe use advice
- CSR alignment

Don't include uses you don't have – it may trigger unnecessary compliance checks.

6. Flag and Communicate Hazards

- If new literature or tests reveal risk update CSR + SDS
- Check for harmonised classification changes (ATP)
- Regularly review your chemical portfolio, update with new CLH, prioritise updating dossiers
- Review your self-classification if data evolves

7. Keep up to date with your REACH-IT Details

- Company address, contacts, and size – update directly in REACH-IT
- Deactivate registrations if ceased (use the on/off button)
- Request ECHA revocation of registration number if bankrupt
- Check your REACH-IT tasks and messages regularly for communications and action requests from ECHA.
- In case of legal transfer of assets, indicate company changes in REACH IT.

REACH-IT

8. Prepare for Evaluations

Consider that:
- No updates accepted after ECHA draft decision
- Tonnage downgrades and cease of manufacturing before final decision can be considered, if well justified
- Keep evidence ready for decisions

9. Involving co-registrants potentially subject to Russia sanctions

- Screen co-registrants for EU sanctions
- If affected:
  - Notify ECHA and national authorities
  - Document your due diligence
  - Avoid antitrust risks in communications

10. Checklist

- Ceased manufacture? Notify ECHA
- Updated composition? Still within boundaries?
- All uses covered in joint CSR?
- Still compliant with exposure scenarios?
- CSR + eSDS shared in the supply chain?
- Registration valid? Have you paid all your referral rights to the latest version of the Lead dossier?