

CLP NOTIFICATIONS (Summary of instructions)

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- ▶ Refer to the ECHA website for background information on the CLP Regulation <https://www.echa.europa.eu/regulations/clp>
- ▶ There are several alternatives available to carry out a CLP notification. For details, refer to <https://www.echa.europa.eu/support/dossier-submission-tools/reach-it/notification-to-the-cl-inventory>
 - ▶ For Petroleum Substances and Sulfur, the only appropriate alternative is the submission into REACH-IT of a “CLP notification dossier” created with **IUCLID6**.
 - ▶ This document provides a high-level description of the IUCLID6 process for submission of CLP notification files for Petroleum Substances and Sulfur.
 - ▶ For more details, refer to the ECHA Manual https://echa.europa.eu/documents/10162/22308542/manual_cl_notification_en.pdf



- ▶ If not already done, create an User account in REACH-IT for your Legal Entity that will submit the CLP notification. For details, refer to the ECHA Manual

https://www.echa.europa.eu/documents/10162/21721613/echa_accounts_en.pdf

- ▶ If not already done, download and install the latest version of IUCLID6. For details, refer to the IUCLID6 download webpage

<https://iuclid6.echa.europa.eu/download>



- ▶ Refer to the Concaawe website for background information on CLP notifications of Petroleum Substances and Sulfur
<https://www.concaawe.eu/reach/clp-notification-page/>
- ▶ Concaawe has prepared CLP notification files, publicly available for free in the Concaawe website.
 - ▶ Check that your substance to be notified is included in the Concaawe Inventory as supported by Concaawe.
 - ▶ The Concaawe Inventory can be downloaded from <https://www.concaawe.eu> under **REACH -> Documents to download**
 - ▶ The CLP notification files prepared by Concaawe can be downloaded from [\[insert link\]](#)
 - ▶ Download the CLP **.i6z** file for your substance (see details in the next slide).



- ▶ The files distributed by CONCAWE may appear to be in either an IUCLID6 format (".i6z") or in a ZIP format (".zip"), depending on a number of server and local computer settings.
 - ▶ If the file downloaded from CONCAWE ends with ".i6z", no additional steps are required.
 - ▶ If the file downloaded from CONCAWE ends with a double extension ".i6z.zip", the extraneous ".zip" extension must be removed so that the file only ends with ".i6z".
 - ▶ If the file downloaded from CONCAWE ends with ".zip", open the ".zip" file with your ZIP compression software.
 - ▶ If the ".zip" file contains a single file with extension ".i6z", extract or copy that ".i6z" file to an appropriate folder.
 - ▶ If the ".zip" file does not contain a single file, but instead contains several files ending with ".i6d", close the ".zip" file without extracting any of the files and rename the file changing the ".zip" extension to ".i6z".



Import the Concaawe CLP notification file

- ▶ Import into IUCLID6 the CLP .i6z file (use option "**Replace**").
- ▶ A substance dataset for your substance and the Legal Entity "Concaawe" will be created in IUCLID6.
 - ▶ The substance datasets provided by Concaawe conform to the following naming convention: **ECnumber** blankspace **Concaawe** blankspace **CLPNotification** blankspace **CategoryAcronym** e.g. "**231-722-6 Concaawe CLPNotification Sulfur**" for the stand-alone substance "Sulfur" EC 231-722-6, "**265-041-0 Concaawe CLPNotification Naphtha**" for the substance "Naphtha (petroleum), heavy straight-run", EC 265-041-0, member of the Naphtha category.
- ▶ **NOTE: The Concaawe substance datasets cannot be used directly for CLP notifications (see next slide)**



- ▶ If not already done, create **your own substance dataset** for **your Legal Entity** and your substance.
 - ▶ Recommended naming: **CLP** blankspace **ECnumber** blankspace **LegalEntityAcronym** e.g. **“CLP 265-041-0 MyCompany”** for the substance “Naphtha (petroleum), heavy straight-run”, EC 265-041-0
 - ▶ **NOTE: A different substance dataset must be created for each combination of Legal Entity and substance to be notified**



- ▶ **Some data must be copied to your substance dataset from the corresponding Concaawe substance dataset, as described below.** For more details, refer to the IUCLID6 Manual (can be invoked with the key F1).
 - ▶ Link your substance dataset to your Legal Entity.
 - ▶ Link your substance dataset to the **same** Reference Substance as the Concaawe substance dataset.
 - ▶ Ensure that the fields “Type of substance” and “origin” in your substance dataset have the **same** content as the Concaawe substance dataset.
 - ▶ Copy and paste (via the IUCLID6 clipboard) Section 2.1 from the Concaawe substance dataset to your Substance dataset.
 - ▶ Complete Section 1.2 with a description of the composition of your substance.



- ▶ Create a CLP notification dossier for your substance dataset in IUCLID6.
- ▶ Use the Validation Assistant plug-in to validate your CLP notification dossier.
 - ▶ **NOTE: A valid CLP notification dossier cannot have "Submission checks" errors. Some substances may raise "Quality checks" warnings that will not stop the dossier from being accepted in REACH-IT; Concaawe is working to address the issues with Section 2.1**
- ▶ Export the CLP notification dossier as an ".i6z" file.
- ▶ Log into the REACH-IT website with the User account for the Legal Entity and upload the CLP notification dossier ".i6z" file.

