IP & STPP Consortium
Joint Registration Notes

21/11/2017

IP (Inorganic Phosphates) REACH Consortium
STPP REACH Consortium

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STPP Consortium Website
www.reachcentrum.eu/EN/consortium-management/consortia-under-reach/stpp-reach-consortium.aspx

List of contents of this document:

1. IMPORTANT INFORMATION – please read:

Please be aware that this document is issued by the IP and STPP Consortia with the aim of helping registrants having purchased access to the Joint Registration dossier developed by the relevant Consortium, and not as formal instructions. The information in it is correct to the best of our knowledge and understanding, but **the Consortium accepts no responsibility for the accuracy of this document nor for any consequences resulting from following instructions in it or from assuming it is correct**. It is each registrant's own legal responsibility to collect any necessary information, to verify all information, and to carry out their own registration preparation and submission. The IP and STPP Consortia, their Members, ReFaC (Consortium's service provider) and the Secretariat cannot be held responsible in any way for difficulties other registrants joining the Joint Registration may encounter.

Please note that the IP and STPP Consortia, the Lead Company, the Consortia's technical service provider (e.g. ReFaC) and the Consortia Secretariats do NOT have any legal obligation, and do not have resources, to provide assistance to registrants which are not relevant Consortium Members.

We cannot therefore answer individual company questions as to how best to complete your company-specific registration dossier, how to obtain spectra, how to submit the dossier, what substance to register when, etc.

We provide these "Registration Notes" with the aim of giving basic information, and would be happy to receive any comments relevant to improve or correct them for future reference, but it is your company's responsibility to obtain professional resources if necessary (e.g. consultants such as ReFaC), if you require particular advice or specific assistance in preparing and submitting your registration.

2. ECHA Fees

You are responsible for paying your own ECHA Registration Fees. These are NOT included in the cost of dossier access invoiced by the IP and STPP Consortia. Note that if you flag as confidential the substance composition/impurities part of your registration submission (section 1.2), an additional Registration Fee will be charged by ECHA.

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.139.01.0001.01.ENG

3. Joint Submission and what you will receive

Companies purchasing access to a substance Joint Registration Dossier will receive the following:

Note that you will only receive these AFTER receipt by the Consortium Secretariat of full payment of invoices.

- Token and Joint Submission name = this enables each registrant to enter the Joint Submission Object (this can be done before Lead Registrant dossier is submitted)

  Non confidential / non company specific parts (see detail in table below) of Chapters 1 and 3 of the IUCLID file in Iuclid (i5z or i6z) format; for substances NOT updated since June 2016 this will be in IUCLID 5 format, for substances that have been updated since June 2016 this will be in IUCLID 6 format. For classified substances this will include a proposal for chapter 11 (Guidance on Safe Use), for use in preparing the company-specific individual dossier for

Registration. NOTE: dossiers first submitted in 2010 have been updated from old versions of IUCLID this may have impacted the "uses" section (IUCLID 3.5) – all registrants should verify that this section is correct and covers all their known downstream uses and users.

- Full IUCLID records are not provided as this information can be viewed on the ECHA dissemination portal.

For ***classified*** *substances*: model text in WORD format for CSR, to be adapted as required, at attached to your company-specific individual dossier. For substances updated or submitted in 2016 onwards Chesar files containing the exposure assessment will also be provided.

For ***NON-classified*** *substances*: CSR and Guidance on Safe Use (IUCLID section 11) will be submitted by the Lead Registrant and cannot be modified by other registrants. A PDF print will be provided to other registrants for information. In this case, other registrants should NOT submit CSR or section 11 of IUCLID.

4. Important notes on dossier submission:

If you agree entirely with the Joint Registration dossier and your substance conforms to the sameness and other properties described in this dossier, and if you have no reasons for a partial opting-out, then **do NOT submit (filled in) any parts of the IUCLID dossier (other than chapters 1 and 3, plus for classified substances chapters 11 and 13)**, otherwise your company dossier will probably FAIL and/or additional ECHA fees may be charged. For NON classified substances, chapter 11 Guidance for Safe Use and chapter 13 CSR will be submitted jointly and only by the Lead Registrant, and you should click "Provided by the Lead Registrant" when creating your individual dossier.

Selecting "*Provided by the Lead Registrant*" when creating your company registration dossier constitutes agreement to the content of the Joint Registration dossier and confirmation that your company's product is conform to the sameness defined in the SIEF Agreement Contract and to the other properties described in the Joint Registration dossier.

After Registration, you will also be informed by the Consortium of any significant **future developments concerning the Dossier**.

5. Which parts of IUCLID you will receive / which you should fill in

Important notes to tables:

(**) → not including LR company specific or company confidential information, see detail in tables below

(XX) → requesting confidentiality for these sections will result in additional ECHA Fees

(#) → resubmitting these sections means "opting out", and so must be justified, may result in additional ECHA fees, dossier failure or other complications

(ZZ) → the file is supplied named with the chemical name and followed by 'for SIEF'. If you use this file for submission, please remove 'for SIEF' from the file name.

(§) → these sections are provided as already completed by the Lead Registrant. DO NOT MODIFY or your submission will no longer match the Joint Registration. This is particularly important for substances with more than one EINECS number.

(YY) → LR should leave blank. ReFaC (Consortium's service provider) to insert any other EINECS numbers and related details (substances) covered by the dossier here.

(+) → LR includes composition information concerning its own company specific products as placed on the market. Plus, in accordance with the new requirements of IUCLID 6, the LR will also submit a 'boundary composition' detailing the composition as specified in the relevant SIP.

(WW) → Only applicable for classified substances: This information is not included in the Registration Dossiers submitted for the IP or STPP Consortia for 2010 substances (using IUCLID 5.3). At present there is no requirement from ECHA to fill in this section. If individual companies do want to fill this in with data from the CSRs, then they can do this in their own joint registration dossiers. If filled in, this data could be susceptible to be disseminated in the ECHA portal.

Summary of how you will receive the IUCLID Dossier:

This is explained in more detail (chapter by chapter) on the following pages

File format	**For NON Classified substances**	**For CLASSIFIED substances**	*Standard file name* *(IP99 = IP N° or STPP as relevant; 000-000-00 = EINECS; xx-xx-xxxx = doc date)*
Provided automatically to all SIEF members which have purchased and fully paid for LoA			
Needed for your company dossier submission			
IUCLID (i5z or .i6z)	Chapters 1-3 and PBT assessment (**)	Chapters 1-3, PBT assessment and (**) Chapter 11 (Guidance for Safe Use)	*IP99_000-000-00_part-iuclid for SIEFxx-xx-xxxx*
WORD	-	Model CSR	*IP99_000-000-00 model CSR_xx-xx-xxxx*
Chesar (chr)	-	Chesar Assessment	*IP99_000-000-00_Chesar Assessment - xx-xxxx*
NOT needed for your company dossier submission			
PDF	CSR as submitted jointly by LR (parts of, see **)	-	*IP99_000-000-00_non-confidentialsubmitted CSR_xx-xx-xxxx*

Detail of whether you should modify / resubmit IUCLID sections 1-3:

IP & STPP Reach Consortia ***IUCLID section***		***This column does NOT concern SIEF participants:*** *File preparation by:*	Provided to all Registrants completed in IUCLID format	Each Registrant may modify if wished	Blank in IUCLID – to complete by each Registrant = company specific	Company confidential
1. General Information						
1.1	Chemical name	*ReFaC*	YES	YES	*See Note ZZ*	
	Legal Identity	*LR*			YES	NO
	Role in the supply chain	*LR*			YES	NO
	Reference substance	*ReFaC*	YES	NO	*See Note §*	
	- EC Number, EC Name	*ReFaC*	YES	NO	*See Note §*	
	- CAS number, CAS name	*ReFaC*	YES	NO	*See Note §*	
	- IUPAC name	*ReFaC*	YES	NO	*See Note §*	
	- Related CAS information	*ReFaC (YY)*	YES	NO	*See Note §*	
	Type of substance	*ReFaC*	YES	NO	*See Note §*	
	Trade names	*LR (optional)*			YES	NO
	Contact person	*LR*			YES	NO
1.2	Composition	*LR (+)*			YES	Option (XX)
1.3	Identifiers	*LR*			YES	NO
1.4	Analytical information	*LR (+)*			YES	Option(XX)
1.5	Joint Submission	*ReFaC*	YES	NO		
1.6	Sponsors	*Option*		YES	Option	YES
1.7	Suppliers	*Option* *Option*		YES	Option	YES
1.8	Recipients	*Option*		YES	Option	YES
2	**Classification**					
2.1	GHS	*ReFaC*	YES	NO	*LEAVE BLANK (see #)*	
2.2	DSD - DPD	*ReFaC (optional)*	YES	NO	*LEAVE BLANK (see #)*	
2.3	PBT assessment *(classified substances)*	*ReFaC*	YES	NO	*NO*	*NO*
2.3	PBT assessment (*non-classified substances)*	*ReFaC*	YES	NO	*LEAVE BLANK (see #)*	
3. Manufacture, use and exposure						
3.2	Estimated quantities	*LR*			YES	YES
3.3	Sites	*LR*			YES	YES
3.4	Information on mixtures	*LR*			YES	YES
3.5	Life cycle description (includes covered uses under the subheadings labelling 3.5.0 – 3.5.6)	*LR*	YES	YES	NO	Option to add confidential uses (XX). If uses are added or modified, then ensure CSR is conform.
3.6	Uses advised against	*LR*			YES	NO

3.7	Environmental assessment for aggregated sources	*Not provided (see WW)*	In some cases (If relevant)	YES	Option (WW)	Option (XX)

Detail for IUCLID sections 4-13 & CSR – NON-Classified substances:

For NON-Classified substances		***Does NOT concern SIEF participants:*** *File preparation by:*	Provided to Registrants completed in IUCLID format	Company may modify if wished	Blank in IUCLID – to complete company specific	Company confidential
IUCLID section						
4 - 7	Physical and Chemical Properties, Environmental Fate and Pathways, Ecotoxicological Information, Toxicological Information	*ReFaC*	NO	NO	**IMPORTANT NOTE:** **<u>You must NOT re-submit this part of IUCLID</u>.** **If you do so, this may result in your dossier being rejected or additional "opt out" ECHA Fees.** This data is not provided by the IP Consortium since the information is freely available on the ECHA website and can be viewed in the data summaries in the CSR.	
8	Not applicable	Not Applicable			Empty do not fill in	
11	**Guidance for Safe Use**	*ReFaC*	NO -> PDF	NO		
			We recommend NOT to modify or resubmit this section in order to maintain consistency with jointly submitted dossier.			
12	Literature Search	Not Applicable			Empty do not fill in	
13	**Chemical Safety Report (CSR)**	*ReFaC*	NO	NO		
			Submitted by Lead Registrant (sections 1-8 only for Non-Classified substances) **You should NOT re-submit** **You will receive a PDF copy for information.** The jointly submitted CSR will cover the substance composition as specified in the SIP, and quantities used for risk and exposure assessments will reflect the worst cases (highest plant capacity, highest local use ...) No detailed exposure scenarios are prepared.			

Detail for IUCLID sections 4-13 & CSR – CLASSIFIED substances:

<table>
<tr><th colspan="2" rowspan="2">For CLASSIFIED substances

IUCLID section</th><th>Does NOT concern SIEF participants: File preparation by:</th><th>Provided to Registrants completed in IUCLID format</th><th>Company may modify if wished</th><th>Blank in IUCLID – to complete company specific</th><th>Company confidential</th></tr>
<tr><td>4 - 7</td><td>Physical and Chemical Properties, Environmental Fate and Pathways, Ecotoxicological Information, Toxicological Information</td><td>ReFaC</td><td>NO</td><td>NO</td><td colspan="2">IMPORTANT NOTE:
<u>You must NOT re-submit this part of IUCLID</u>.
If you do so, this may result in your dossier being rejected.
This data is not provided by the IP Consortium since the information is freely available on the ECHA website and can be viewed in the data summaries in the CSR.</td></tr>
<tr><td>8</td><td>Not applicable</td><td colspan="3">Not Applicable</td><td colspan="2">Empty do not fill in</td></tr>
<tr><td rowspan="2">11</td><td rowspan="2">Guidance for Safe Use</td><td rowspan="2">ReFaC</td><td>YES</td><td>YES</td><td></td><td></td></tr>
<tr><td colspan="4">You should modify and complete this section to correspond to modifications and additions made in the CSR and your own SDS, see below.</td></tr>
<tr><td>12</td><td>Literature Search</td><td colspan="3">Not Applicable</td><td colspan="2">Empty do not fill in</td></tr>
<tr><td colspan="2" rowspan="2">13. Chemical Safety Report (CSR)</td><td rowspan="2">ReFaC</td><td>WORD model</td><td>YES</td><td>YES – you MUST fill in and submit</td><td>YES</td></tr>
<tr><td colspan="4">A "model" CSR will be provided in WORD format (sections 1-10).
Companies are free to modify to include specific impurities, specific and/or confidential uses (for which they must develop or adapt specific exposure scenarios). A Chesar file is also provided to allow you to add or remove exposure scenarios if required.
NOTE – see in annex indications as to which sections of the CSR you should expect to modify / complete.</td></tr>
</table>

6. How to fill in the CSR (CLASSIFIED substances only)

*NOTE: for **NON** Classified substances, the CSR is submitted in the joint registration by the Lead Company, is not modifiable, and should not be re-submitted unless you wish to "opt out".*

First page: “Registrant’s identity”
→ indicate your company name (registrant legal entity) and UUID number (optional)

Substance composition (1.2 CSR, 1.2 IUCLID):
→ a standard or typical substance composition is included in the model CSR (agreed substance sameness SIP). You may decide to leave this general composition or, if it is different, report your own specific composition as reported in your IUCLUD dossier section 1.2

Manufacturing (2.1 CSR, 3.1 IUCLID)
→ A general description of technological manufacturing processes of the substance is included in the model CSR covering different known technologies. You may leave this general description or replace, modify or complete it to better describe your company’s own processes and products.
→ If you are an Only Representative, we recommend to leave the general description as provided and state “the registrant does not manufacture “substance name” in the European Union”

Use and Uses advised against (2.2 / 2.3 CSR, 3.5 / 3.6 IUCLID)
→ The list of uses covered by the dossier as submitted by the Lead Registrant, and the list of uses advised against, are included in sections 2.2 and 2.3 of the CSR and in sections 3.5 and 3.6 of the IUCLID. You may leave these as they are, or if appropriate modify to add specific uses of your products or specific uses advised against, but if you do make any changes you must then ensure that any added uses or use descriptors are covered within the related exposure assessment in section 9 of the CSR.
→ You should be careful when updating or modifying information in CSR that relevant related sections of your company-specific IUCLID mini-dossier are also updated to ensure coherence.

Each registrant will also be provided with a Chesar file (for classified substances which have been updated since 2016) which contain the assessment of the most common / frequently reported uses of the substance. If you have a use that is not assessed in the supplied CSR, you may adapt the Chesar to suit your supply chain. Uses may also be deleted to reflect each registrants’ supply chain and tonnage.

7. Multiple EINECS numbers and names

For certain substances, the same substance may have more than one EINECS number, or different forms may have different EINECS numbers but be considered (after discussion of Sameness) to be the same substance for REACH Registration purposes, that is only one dossier will be submitted. For such cases, the Consortium has indicated in the SIEF Agreement Contract which will be the EINECS number used to identify the substance Registration Dossier, and the Joint Dossier IUCLID will specify the other applicable EINECS numbers (covered by the Dossier) in $1.1 “Related CAS information”. In this case, companies having pre-registered under theses other EINECS number can refer to the Joint Registration Dossier, even if they have not pre-registered under the EINECS number used to reference this dossier.

Also, the EU EINECS system name will be used as the dossier reference name, and other names used for the substance will be included in the “Related CAS information” field.

8. Composition and purity of the Substance

Composition and purity

The composition and purity specification ranges for the "substance identity" covered by the Joint Registration Dossier are specified in the SIEF Agreement Contract, which your company agreed and accepted as a condition for purchasing Letter of Access and entering the joint registration submission. **It is your company's responsibility to verify that your own substance (in all forms manufactured and marketed) conforms to this substance identity definition**: if it does NOT then it is NOT covered by the Joint Registration Dossier, or you must explain in your company-specific dossier why the differences do not modify relevant properties and Joint Registration Dossier conclusions.

ECHA Fees and composition and purity information

It is our understanding that confidentiality claims related with composition are only subject to an ECHA fee if the purity or impurity/ies for which the confidentiality is claimed is relevant for classification and labeling (cf. REACH Regulation article 119 – 2 (a))

*We suggest that you prepare **now** and without waiting to formalise LoA purchase etc. the following information, ready to complete your company-specific information for this part of your registration submission:*

Purity

Purity, for typical commercial batches of the substance (i.e. a mean value, or the value of a representative batch), and the upper limit and lower limits (in terms of percentage) which are expected.

Purity (% substance w/w or w/v):

Typical ..... %

Lower limit ..... %

Upper limit ..... %

Composition

Composition of substance: % substance, % water, % other substances (impurities), indicating for each one mean value of a representative sample and also upper and lower expected limits.
Important note: TOTAL should be 100%

Constituent	*Mean %*	*Range %*
TOTAL:		

9. Impurities in the substance

*We suggest that you copy the table below and **complete separately for EACH impurity***

Nature of the impurity, e.g. other substance, isomer, by-product etc.:
.....
Chemical name (preferably in IUPAC nomenclature) of impurity
.....
CAS number (if allocated).....
(% of impurity w/w or w/v):
Typical ..... %
Lower limit ..... %
Upper limit ..... %

10. Essential additives

You should prepare information concerning any "essential additives" in the substance (eg stabilisers): IUPAC name and CAS name and number; amount added to the registered substance; function of the additive(s).

*We suggest that you prepare complete the table below separately for **EACH essential additive***

Chemical name (preferably in IUPAC nomenclature) of essential additive

.....

CAS number (if allocated).....

Functions:.....

(% of essential additive w/w or w/v):

Typical ..... *%*

Lower limit ..... *%*

Upper limit ..... *%*

11. Granulometry

The granulometry range for the "substance identity" covered by the Joint Registration Dossier are specified in the Substance Sameness document available to the SIEF (on the Consortium website).

In particular, the conclusions of inhalation toxicity endpoints and GHS cover this granulometry range only.

It is your company's responsibility to verify that your own substance (in ALL forms manufactured and marketed) conforms to this granulometry range: if it does NOT then it may NOT be covered by the Joint Registration Dossier. In this case, you must explain in your company-specific dossier why the differences do not modify the Joint Registration Dossier conclusions and the GHS Classification and Labelling conclusions, or provide results of studies using the substance corresponding to your specific granulometry or pH-value.

In particular you should verify that your own substance conforms to the respirable fraction indicated in the "substance identity", that is generally the part with diameter < 5 µm.

12. Information concerning substance specification and spectra

All registrants are required to provide analytical information on their substance. At least 2 sources of information should be provided: 1 compositional (see purity and impurities, above) and 1 structural. Where standard methods as identified by REACH are not used then adequate justification is required.

Spectral data is a mandatory requirement for each registrant under REACH (Article 11 Joint submission of data by multiple registrants): each registrant shall subsequently submit separately the information specified in Articles 10(a)(i),(ii),(iii) and (x) and in Article 10(ii) and the identity of the substance as specified in section 2 of Annex VI: 2.3.5 Spectral data (ultra-violet, infra-red, nuclear magnetic resonance or mass spectrum), 2.3.6 High-pressure liquid chromatogram, gas chroma-togram.

This is clarified in Section 4.2.1.3 Analytical information (p24) of the REACH Guidance document http://guidance.echa.europa.eu/docs/guidance_document/substance_id_en.pdf

Sufficient spectral data is needed to confirm the structure of a mono-constituent substance. Several spectroscopic methods can be suitable, in particular Ultraviolet and Visible Absorption Spectroscopy (UV/VIS), Infrared Spectroscopy (IR) Nuclear Magnetic Resonance Spectroscopy (NMR) and Mass Spectroscopy (MS). For inorganic substances, the use of X-Ray Diffraction (XRD) or X-Ray Fluorescence (XRF) or Atomic Absorption Spectroscopy (AAS) may be more suitable. Chromatographic methods, such as Gas Chromatography (GC) or High-Performance Liquid Chromatography (HPLC) are needed to confirm the composition of the substance. If appropriate,

also other valid constituent separation techniques may be used.

Please note that **at least one spectral method is mandatory for registration.** However, it is advised to provide as many different spectral methods as possible to provide full analytical and composition characterisation of your substance. Full method and operating conditions must be provided for each of spectra supplied (in any European language, not necessarily English). Spectra do not need to be obtained in compliance with GLP.

The Consortium has prepared proposed "standard" waiver texts which all registrants entering the Joint Registration can use to justify why certain types of spectra are not applicable to INORGANIC PHOSPHATES and so are not provided in your dossier (see below).

If the spectral method used to provide structural data is considered to be inadequate on its own, supporting evidence using other methods can also be included. This supporting evidence may include compositional data using the same or different methods (same or different data) than those used to fulfil information requirements on purity and impurities as above.

You should **also provide analytical results for substance purity** and attach detail of analytical method used to produce this data, see below.

Full method must be provided (in any European language, not necessarily English) as a reference to the method used is not sufficient.

*Please note that for **IP48 (Orthophosphoric acid)** and **IP50 (Polyphoshoric acid non polymer grade)**, specific indications concerning substance specification testing are given in the SIPs available on the IP Consortium website.*

13. Overview of required structural data (spectra):

Not all of the information below is required as explained above.

Spectral method as identified in REACH Section VI	Applicability to inorganic phosphate substances	Comments
UV/VIS (*Ultraviolet and Visible Absorption Spectroscopy*)	Not applicable	
IR (*Infrared Spectroscopy*)	Limited information can be obtained using this method. Please note this cannot be used as a stand-alone method and additional supporting data should be supplied.	Ca. €1,000
NMR (*Nuclear Magnetic Resonance Spectroscopy*)	Only 31P NMR applicable	Can be performed on materials that are soluble in either aqueous media or other suitable solvents. Ca. €1,000
MS (*Mass Spectroscopy*)	Not applicable	
HPLC (*High-Performance Liquid Chromatography*)	Not applicable (but, if justified, can be used to provide compositional data on purities/impurities and can be used as supporting evidence to other structural data)	
GC (*Gas Chromatography*)	Not applicable (but, if justified, can be used as supporting evidence	

	to other structural data)
Spectral methods not identified in REACH regulation but may be applicable to inorganic phosphates	**Comments**
X-ray crystallography	This is useful for identifying metal and form (i.e. oxide) - X-ray fluorescence is recommended as preferred to this method ca. €250
X-ray fluorescence	Stated in REACH guidance as being suitable for inorganic substances - fluorescence would identify the form ca. €250
Atomic absorption spectroscopy	Will identify the metal **but** further analysis is required ca. €1,500
ICP-MS	Will identify the metal **but** further analysis is required. ca. €250 - €500
Titration based on P-acid	Can be used as compositional data or as supporting evidence for structural data. ca. €500
Ion exchange chromatography	Technique has been identified in literature as being suitable for characterising phosphate substances this can be used to characterise both low solubility and high solubility substances. ca. €500 - €1,000

NB. For all analytical information you will be required to provide and submit full methodology as part of your joint registration dossier. All cost estimates are indicative and vary between laboratories.

14. Proposed standard spectra waiver statement texts

For the spectra which you decide NOT to include for your substance, after having selected analysis methods to include according to the guidelines above, we propose the following standard "waiver" statement texts appropriate for inorganic phosphates.

IMPORTANT REMINDER: It is necessary to include waiver statements for the spectra (as required by Annex VI of REACH) for which you do NOT provide data, in order to avoid risk of failing completeness check.

Spectral method as identified in REACH Section VI	Proposed waiver statement
UV/VIS(*Ultraviolet and Visible Absorption Spectroscopy*)	According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. XXXXX is an inorganic substance and as such will not absorb radiation in the UV/Vis region, therefore no data is provided as this would not give any useful information for the characterisation of the substance in question.
IR (*Infra Red Spectroscopy*)	According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. Inorganic phosphates are largely comprised of ionic bonds and as such Infra Red spectroscopy would only provide information limited to certain covalent bonds (i.e. O-H) that would not be sufficient to fully characterise the substance.

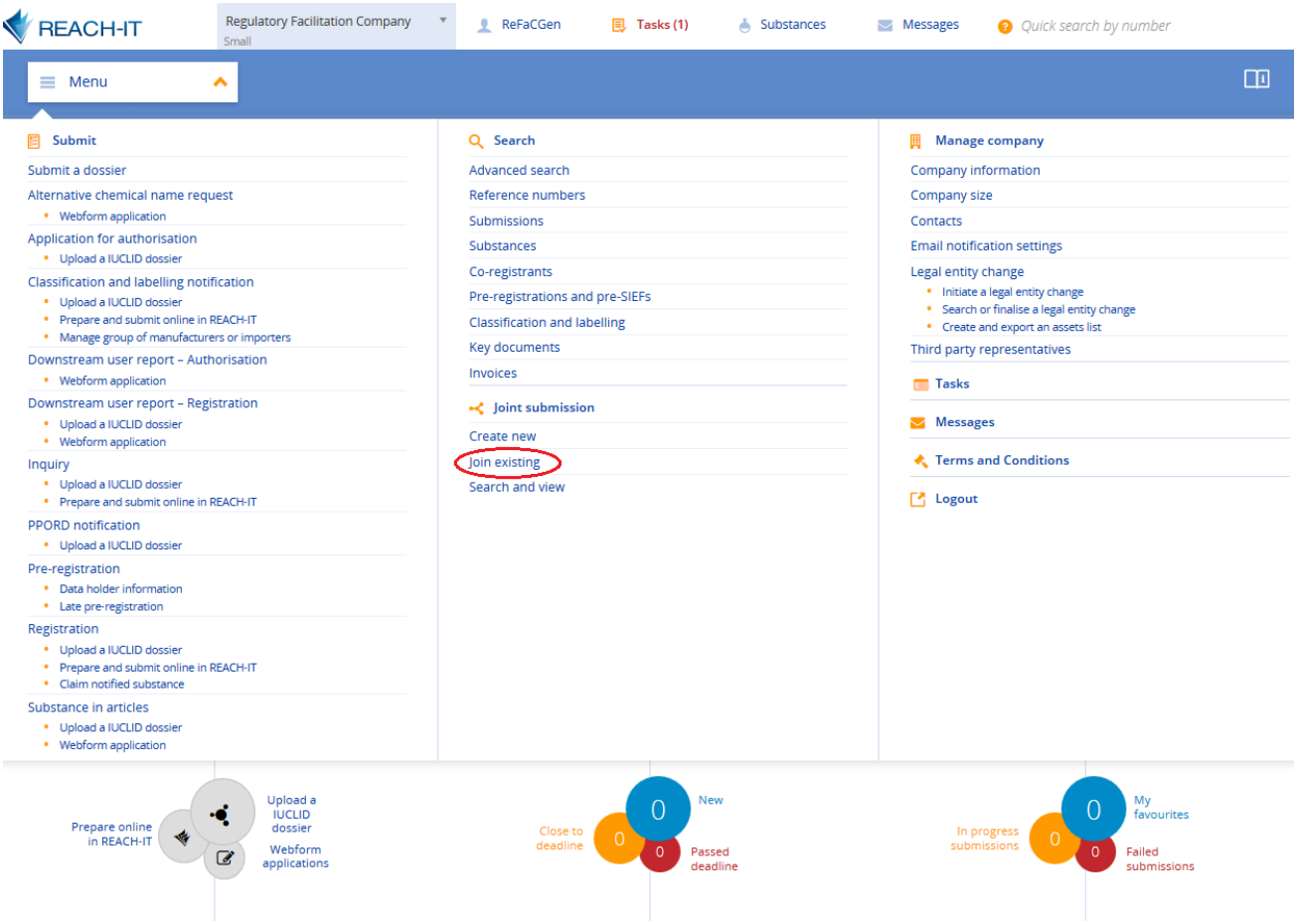
	It is therefore not deemed necessary to provide this data as other methods that are more suited to inorganics have also been provided and show a level of analytical and compositional data greater than can be achieved by this method.
NOTE concerning IR Spectra for Phosphoric Acid	IR spectra analysis of phosphoric may pose problems for carrying out and for reliability with laboratories, because standard sample holders are incompatible (ClNa and BrK), apparently because of water in the phosphoric acid. In this case, you may wish to perform a Raman spectroscopy (see method detailed below), or NMR plus CE (Capillary Electrophoresis), in addition or instead of the IR. The issue should be posed when requesting spectra from laboratories. This is individual responsibility of each Registrant, so this information is provided as indication based on Consortium Member experience only. In the Joint Submission IUCLID, will be included a general statement in section 1.4 which each Registrant can used or not or adapted as you wish: "An IR is included but complemented with XXXX as the substance interfere with the IR method due to its nature. The XXX is considered more accurate to identify Phosphoric acid". <u>Example Raman experimental method</u> Spectra were recorded on a JASCO NRS-3100 dispersive spectrometer. 100 spectra were accumulated over the range 1500-500nm. Spectra were collected at room temperature using the following setup: laser operating at a785nm, 600 l/mm grating and 0.2mm slit. Sample preparation method: A droplet was deposited on a 0.5mm diameter glass vessel and the spectra were recorded directly on the droplet surface
NMR (*Nuclear Magnetic Resonance Spectroscopy*)	***For soluble materials:*** According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. As inorganic phosphates are phosphorous-containing, it is technically possible to conduct ^{31}P NMR, however this would only provide confirmation that phosphorous is present within the substance and would not provide a detailed description of the composition of the material. It is therefore not deemed necessary to provide this data as other methods that are more suited to inorganic substances have also been provided and show a level of analytical and compositional data greater than can be achieved by this method.
MS (*Mass Spectroscopy*)	According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. Mass spectroscopy is not a recommended method for inorganic substances and would not yield any usable information. The substance is essentially non-volatile and this and the inorganic state make ionisation of the substance not possible. Standard ionisation techniques within MS are not applicable to this substance. It is therefore not deemed necessary to provide this data as other methods that are more suited to inorganics have also been provided and show a level of analytical and compositional data greater than can be achieved by this method.
HPLC (*High-Performance Liquid Chromatography*)	According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. Normal and reverse phase HPLC is not applicable to this substance due to the inorganic nature. Other techniques and analytical composition data provided

	show more relevant and useful information.
GC (*Gas Chromatography*)	According to the ECHA guidance document; 'Guidance for Substance Identification and naming in REACH', Section 4.2.1.3 the requirements for spectroscopic and analytical methods, as defined in Annex VI, Section 2.3.5 of Regulation (EC) No. 1907/2006, may be amended if more suitable methods are available. Gas chromatography is not an applicable method for characterisation of inorganic phosphates due to the absence of thermal stability for acid salts and the essentially non-volatile nature. It is therefore not provided.

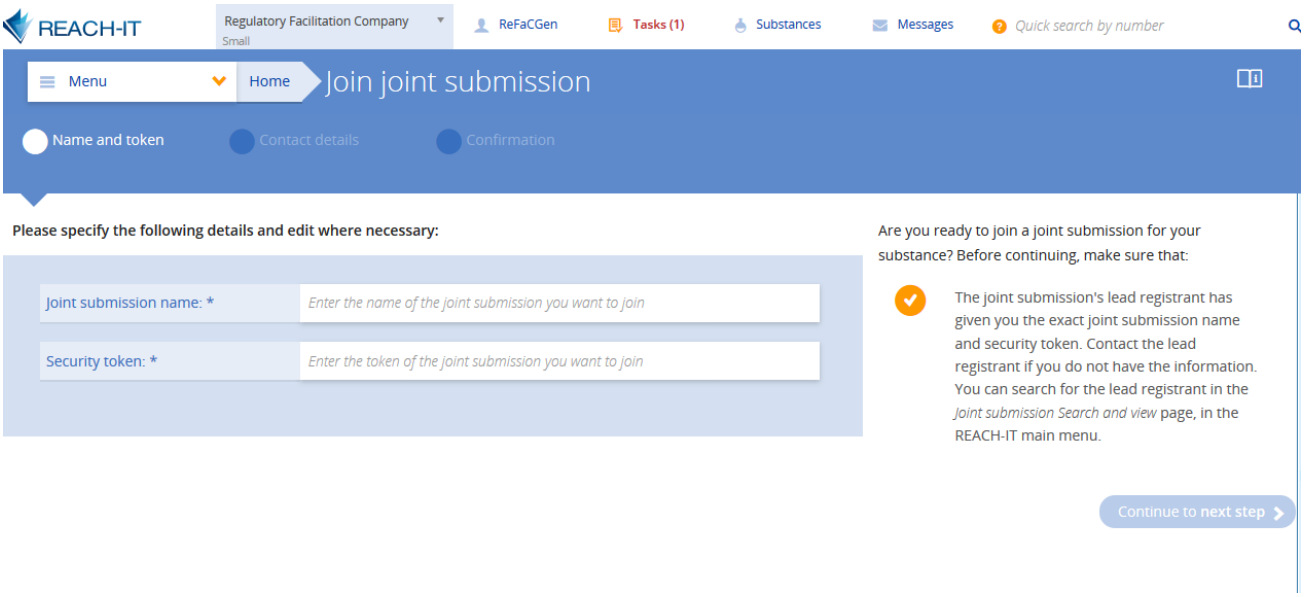
15. How to use the "Token" and join the Joint Submission

Instructions to join the Joint Submission as a member:

- Login in your REACH IT account
- Go to 'menu' drop down and click on 'join existing' under the sub-heading **Joint Submission** (circled in red below)

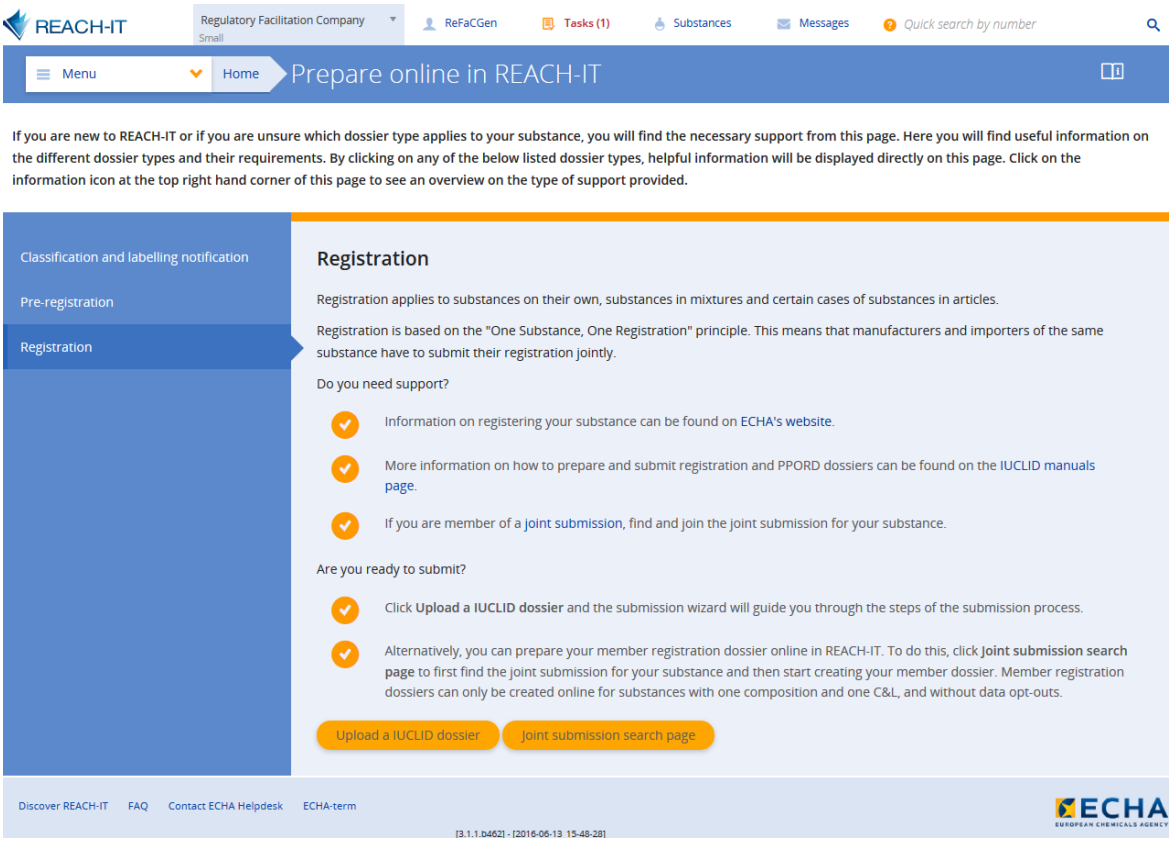


- On the next screen input the Joint Submission name and token code (which will be supplied to you AFTER payment of LoA), and then follow the instructions.



Confirming membership of the Joint Submission is free of charge and it doesn´t imply the obligation to submit immediately, you can proceed with submission when appropriate before your specific deadline.

For submission you will use the menu function again to either upload an IUCLID file or to prepare the dossier online in the REACH-IT system. In order to submit online you will need to link the dossier you are preparing to the joint registration you have already joint. Use the 'joint submission search page' button to find this.



This token code is valid for one month only, and it is only necessary for membership confirmation (once you are a member you won't need it anymore). If you pass this deadline without confirming your membership of the Joint Submission, you will have to contact the Consortium and request a new token.

16. For Classified substances, parts of CSR you should specifically fill in and complete

In red below the parts that each individual registrant necessarily must complete

NOTE: you should also modify and complete any other part for which the products, processes, uses or other information from your company poses specific safety risks or requires specific risk management measures other than or in addition to those proposed in the "model" CSR provided by the IP and STPP Consortia.

Part A

1. SUMMARY OF RISK MANAGEMENT MEASURES
2. DECLARATION THAT RISK MANAGEMENT MEASURES ARE IMPLEMENTED
3. DECLARATION THAT RISK MANAGEMENT MEASURES ARE COMMUNICATED

Include company name in highlighted sections.

Part B (company specific)

1. IDENTITY OF THE SUBSTANCE AND PHYSICAL AND CHEMICAL PROPERTIES
1.2. Composition of the substance **Copy from IUCLID**

2. MANUFACTURE AND USES
2.1. Manufacture **Copy from IUCLID**
2.2. Identified uses See Joint CSR part B.
2.3. Uses advised against See Joint CSR part B.

3. CLASSIFICATION AND LABELLING See Joint CSR part B.

9. EXPOSURE ASSESSMENT See Joint CSR part B.

10. RISK CHARACTERISATION See Joint CSR part B.