



THE REACH BORON CONSORTIUM

REACH REGISTRATION OF PHOSPHORUS AS A COMPONENT OF A MIXTURE [ALLOY]

INTRODUCTION

The REACH Boron Consortium will, in addition to the REACH registration of boron, deal with the full REACH registration of Phosphorus [Einecs number 231-768-7, CAS number 7723-14-0]. The 2010 REACH registration dossier for Phosphorus was prepared by the P4 White/Yellow REACH Consortium [Lead Registrant PCC Rokita SA] as an intermediate.

Members of the REACH Boron Consortium are manufacturers and importers of ferro-phosphorus and other phosphorus-containing alloys and will register Phosphorus as a component of their alloy[s]. As the intermediate registration dossier is inadequate for the registration of Phosphorus as a component of a mixture [alloy], the REACH Boron Consortium will prepare a full REACH registration dossier for Phosphorus. PCC Rokita SA has offered to act as Lead Registrant for this dossier also.

It is apparent that at the pre-registration stage, producers and importers of ferro-phosphorus and other phosphorus-containing alloys followed a variety of approaches to pre-registration of their alloys, including:

- FeP [Name: iron phosphide, Einecs number 235-798-1, CAS number 12751-22-3]
- Fe₂P [Name: diiron phosphide, Einecs number 215-178-7, CAS number 1310-43-6]
- Reaction mass of FeP and Fe₂P
- FeP [Name: iron phosphide, Einecs number 247-751-2, CAS number 26508-33-8]
- Cu₃P [Name: tricopper phosphide, Einecs number 234-647-7, CAS number 12019-57-7]
- Ni₂P [Name: dinickel phosphide, Einecs number 234-828-0, CAS number 12035-64-2]

Quite possibly there are some others also.

Those producers and importers [and only representatives] wishing to follow the approach being taken by members of the REACH Boron Consortium will therefore need to join the Phosphorus SIEF and register, for example, Phosphorus and Iron separately as components of ferro-phosphorus alloy.

The procedure for those who have not pre-registered iron [Einecs number 231-096-4 CAS number 7439-89-6] and phosphorus [Einecs number 231-768-7, CAS number 7723-14-0] is not entirely straightforward and we recommend the following approach:

- use the procedure outlined below to migrate from the SIEF for the substance that you have pre-registered to the SIEF for phosphorus;
- submit an Inquiry dossier to ECHA so that you can register iron [or other alloying element(s)].

There are various guidance documents about Inquiries provided by ECHA. These can be downloaded from the ECHA website, but for convenience we have added them to the [REACH documents page](#) of our website:

- ECHA - Questions and Answers on Inquiry [November 2012]
- ECHA - Data Submission Manual: how to prepare and submit an inquiry dossier using IUCLID 5

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[version 2.1, November 2012]

- ECHA - REACH-IT Industry User Manual: Part 11 - online dossier creation and submission for inquiries [version 2.1, November 2012]

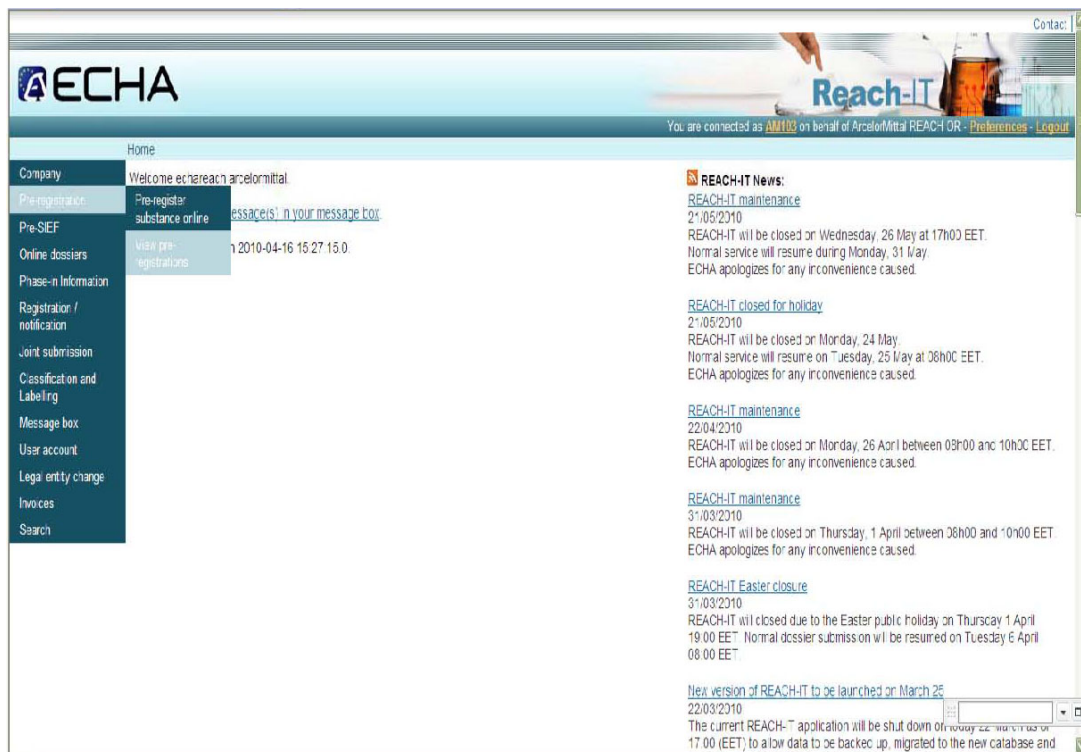
The Inquiry process can be protracted - please contact us in case you have difficulties.

Those who have not yet purchased a letter of access to the Iron dossier can do so via the REACH Iron Platform's online portal at http://www.iron-consortium.org/Letters_of_Access.html. For access to the dossiers for other alloying elements, please contact the relevant REACH consortium - information can be found on the Eurometaux REACH Metals Gateway at <http://www.reach-metals.eu/>.

HOW TO MIGRATE TO THE PHOSPHORUS SIEF

1. Go to your account in REACH-IT, search for your pre-registration - you can do this using the substance name or identifier [EC or CAS number] - see screen shots 1 and 2.

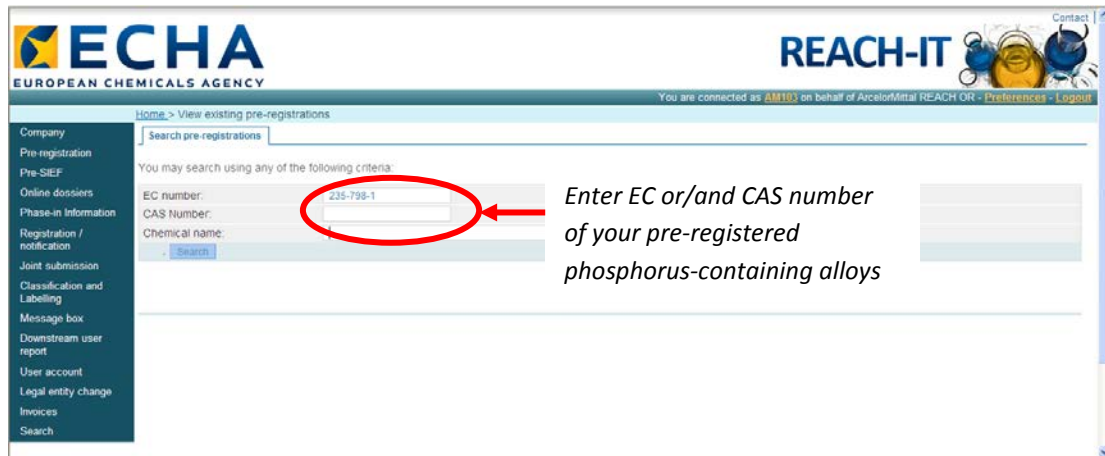
Screen Shot 1



The screenshot shows the REACH-IT web application interface. At the top left is the ECHA logo. Below it is a navigation menu with the following items: Home, Company, Pre-registration, Pre-SIEF, Online dossiers, Phase-in Information, Registration / notification, Joint submission, Classification and Labeling, Message box, User account, Legal entity change, Invoices, and Search. The main content area displays a welcome message for user 'AMM103' and a 'REACH-IT News' section with several announcements regarding system maintenance and closures. The news items include: 'REACH-IT maintenance' (21/05/2010), 'REACH-IT closed for holiday' (21/05/2010), 'REACH-IT maintenance' (22/04/2010), 'REACH-IT maintenance' (31/03/2010), and 'REACH-IT Easter closure' (31/03/2010). A footer note mentions the next version of REACH-IT to be launched on March 25, 2010.

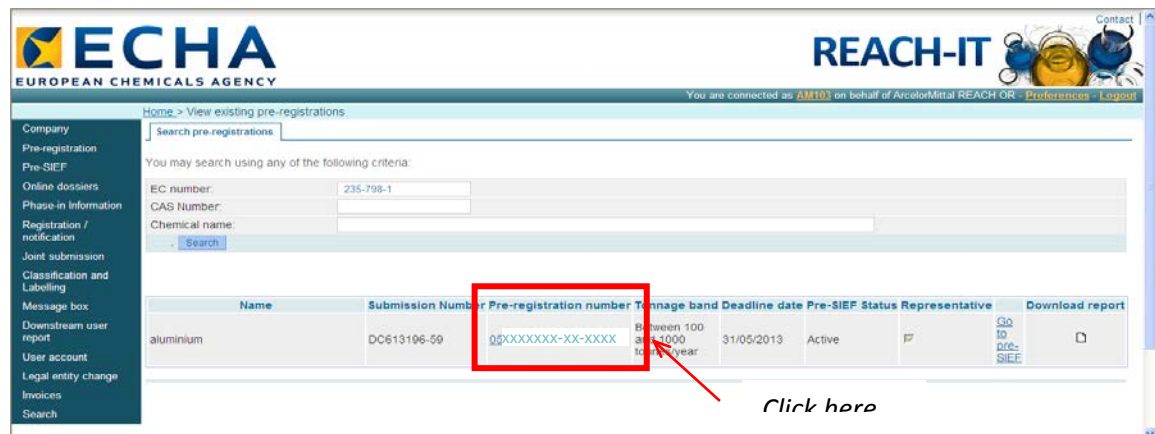
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Screen Shot 2



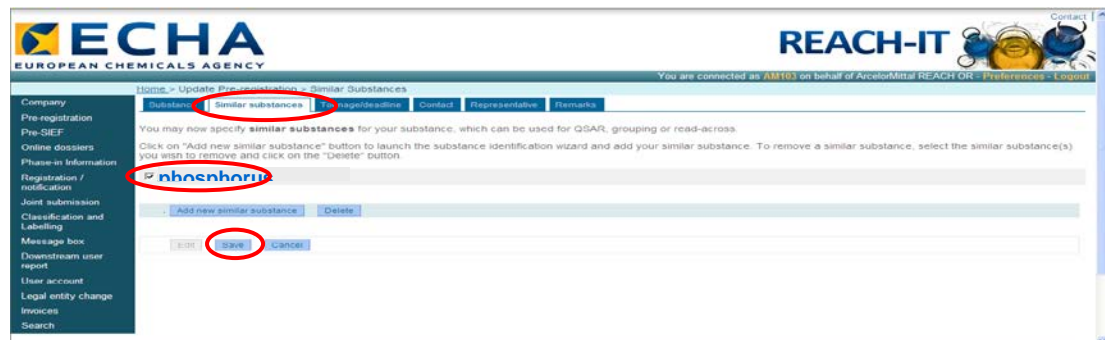
2. When you see your pre-registration, click on the [pre-registration number](#) [which will be in blue] to view the Update pre-registration page- see screen shot 3

Screen Shot 3



3. Click on the “Similar substances” tab. If you added Phosphorus as a similar substance at the time of pre-registration you will see a tick box for Phosphorus - see screen shot 4

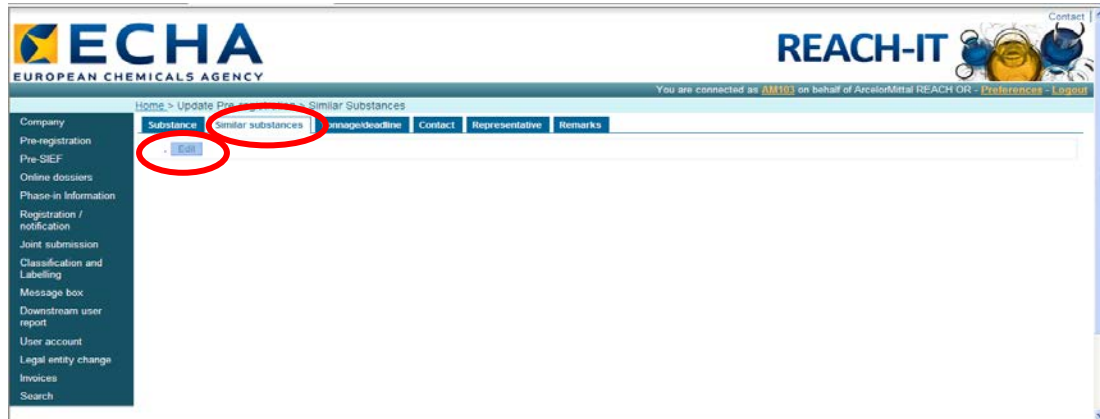
Screen Shot 4



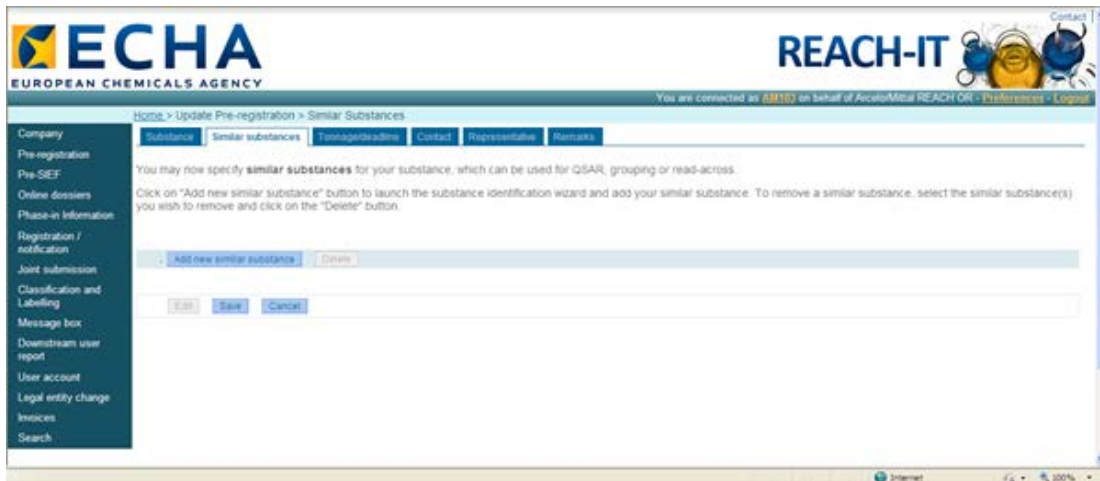
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- If you did not add phosphorus as a similar substance at the time of pre-registration, click on the Add new similar substance tab, click on “Edit” to add Phosphorus, and then click on “Add a new similar substance”.

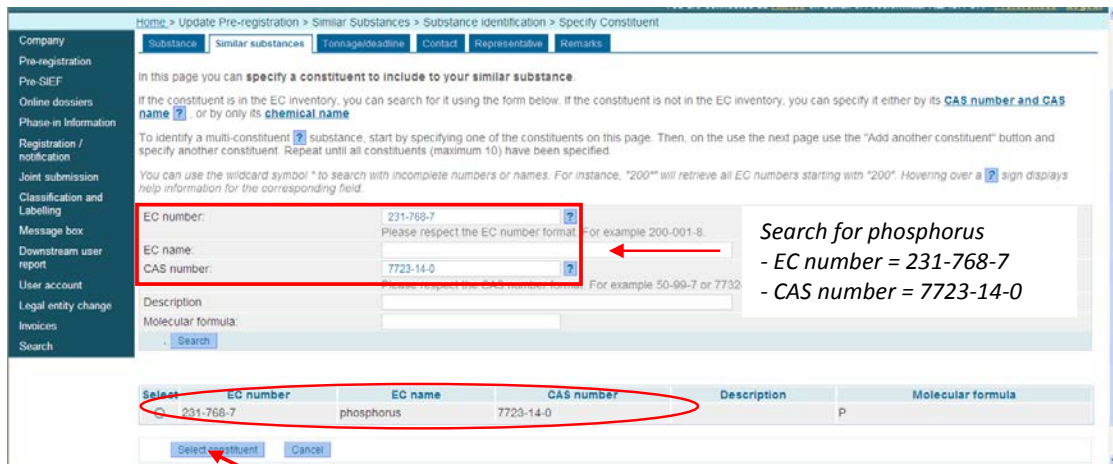
Screen Shot 5



Screen Shot 6



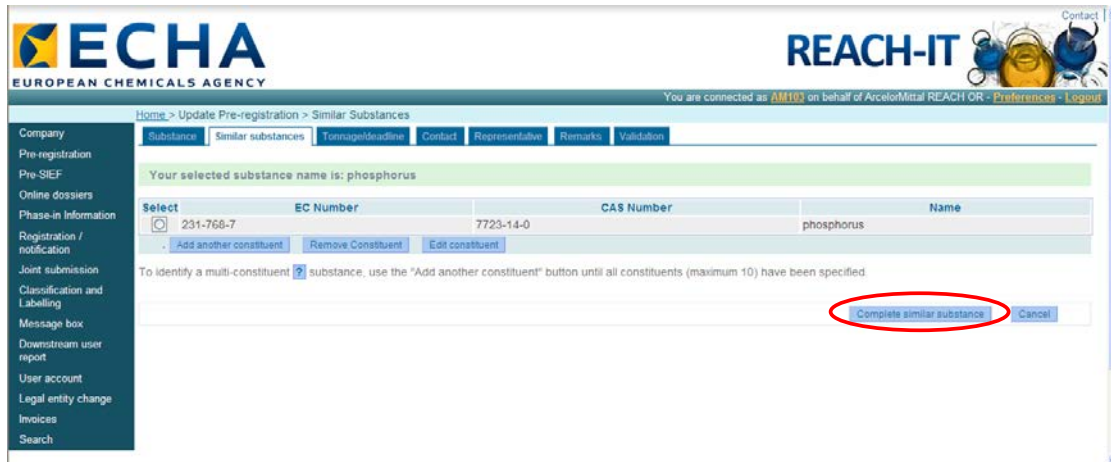
Screen Shot 7



Select phosphorus as constituent

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Screen Shot 8

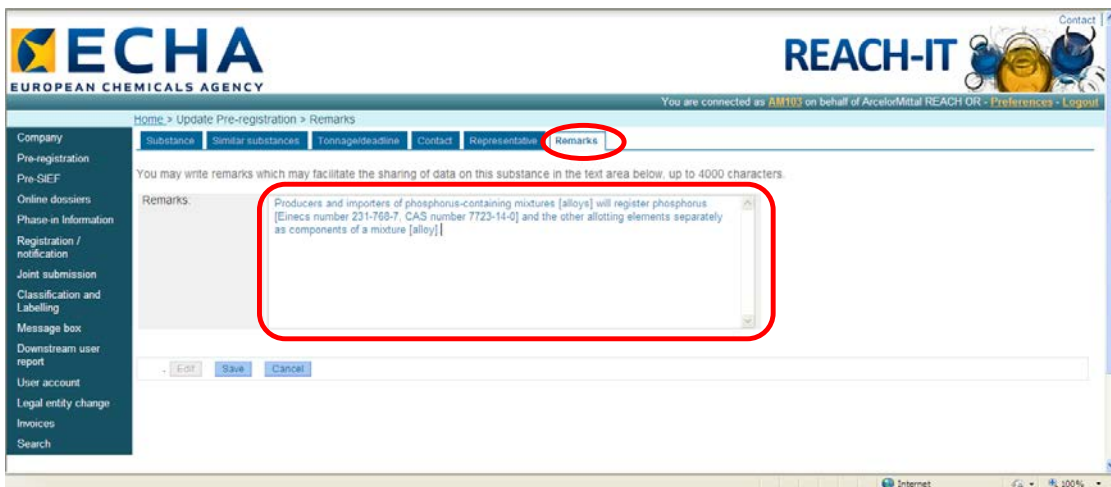


The screenshot shows the ECHA REACH-IT interface. The user is logged in as AM103 on behalf of ArcelorMittal REACH OR. The page is titled 'Update Pre-registration > Similar Substances'. The selected substance is phosphorus (EC Number 231-768-7, CAS Number 7723-14-0). A red circle highlights the 'Complete similar substances' button.

Click on the Remarks tab on the Update pre-registration page and add the following comment in the Remarks box- see screen shot 9:

“Producers and importers of phosphorus-containing mixtures [alloys] will register phosphorus [Einecs number 231-768-7, CAS number 7723-14-0] and the other allotting elements separately as components of a mixture [alloy].”

Screen Shot 9



The screenshot shows the ECHA REACH-IT interface. The user is logged in as AM103 on behalf of ArcelorMittal REACH OR. The page is titled 'Update Pre-registration > Remarks'. The 'Remarks' tab is selected. The text area contains the comment: "Producers and importers of phosphorus-containing mixtures [alloys] will register phosphorus [Einecs number 231-768-7, CAS number 7723-14-0] and the other allotting elements separately as components of a mixture [alloy]". A red circle highlights the 'Remarks' tab and the text area.

The REACH Boron Consortium, acting on behalf of PCC Rokita, the prospective Lead Registrant for phosphorus, will update the list of Phosphorus SIEF members to include pre-registrants for FeP, Fe₂P, etc. and will create a single email distribution list for the enlarged SIEF. No action by SIEF members is required in this respect.

When it comes to completing your IUCLID 5 dossier, in section 1.3 you should add your pre-registration number and a remark about why the identifiers [Einecs and CAS numbers] of the substance being registered are different to those used for pre-registration. This will be covered in the guidance document on completion of sections 1-3 of the IUCLID 5 Phosphorus dossier to be issued shortly.

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