

Chris Barrington

From: REACH Boron Consortium <sief=boron-consortium.org@createsend5.com> on behalf of REACH Boron Consortium <sief@boron-consortium.org>
Sent: 20 January 2013 10:06
To: Chris Barrington
Subject: REACH Registration of Phosphorus as component of an mixture [alloy] - Preview

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The Boron Consortium - the REACH consortium for BORON An initiative of the European steel industry

20 January 2013

SIEF Facilitation

The REACH Boron Consortium is acting on behalf of PCC Rokita, Lead Registrant for Phosphorus.

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Substance portfolio

As well as dealing with the full registration of Phosphorus, the REACH Boron Consortium is also dealing with the registration of Boron.

Substance: Phosphorus [EC number 231-768-7 CAS number 7723-14-0]

Attention: Members of the SIEF's for Phosphorus, iron phosphide [EC number 247-751-2] and di-iron phosphide [EC number 215-178-7]

Registration of Boron as a component of a mixture [alloy]

Members of the REACH Boron Consortium who are manufacturers or importers of phosphorus-containing alloys, such as ferro-phosphorus and master alloys, will register Phosphorus and the other component(s) of their alloys separately.

It is possible that some of you who pre-registered iron phosphide, di-iron phosphide and/or reaction masses of these two substances intended that these pre-registrations would cover phosphorus-containing alloys. The purpose of this email is to advise those of you that did so need to take action to ensure that you are in the correct SIEF and can join the correct Joint Submission.

If you did not also pre-register Phosphorus and the other components of your alloys [e.g. iron] separately, you will need to do the following:

- Migrate from your pre-registration SIEF to the Phosphorus SIEF by updating the pre-registration and selecting or adding Phosphorus as a similar substance.
- Submit an inquiry dossier to ECHA in order to be able to register the other component(s) of your alloy, e.g. iron.

We have prepared a guidance document dealing with this in more detail - this can be downloaded from the [Guidance page of our website](#) at www.boron-consortium.org. Please do not hesitate to contact us if you need further information.

Status of REACH registration of Phosphorus

Phosphorus was registered as an intermediate in 2010 by the P4 (White/Yellow) REACH Consortium, acting on behalf of PCC Rokita, Lead Registrant. Members of the REACH Boron Consortium determined that an

intermediate dossier would not be sufficient for the purpose of registration of Phosphorus as component of a special mixture [alloy] and it was therefore decided to upgrade the existing intermediate dossier to a full dossier specifically for this use.

We are working towards this objective and the Lead Registrant will be submitting its dossier by the deadline of May 30th 2013. For those interested in following progress, please refer to [the Phosphorus SIEF pages of our website](#) where we will post relevant documents from time to time.

Sameness of your alloy

For the purpose of section 1.2 of the IUCLID dossier, the substance purity of Phosphorus will be defined as >80% [w/w] and the typical concentration as 100% [w/w], i.e. pure elemental phosphorus. If your substance does not correspond to this description, please let us know immediately.

Co-registrants will be asked to attach a document containing the description and analysis of their alloys to section 1.4 of the IUCLID dossier. We have posted a document on the [Phosphorus Documents](#) page in the SIEF Members Area of our website with typical analysis of ferro-phosphorus and the known phosphorus-containing master alloys - please contact us immediately if the analysis of your alloys is significantly different.

Lead Registrant

PCC Rokita S.A. was Lead Registrant for the P4 [White/Yellow] Consortium's intermediate dossier. PCC Rokita is willing to continue as Lead Registrant for Phosphorus for the upgrade to a full registration dossier for the purpose of registration of Phosphorus as a component of a special mixture [alloy]. If you have any objection to PCC Rokita continuing as Lead Registrant for Phosphorus, please let us know immediately.

Availability of studies

If you have data or studies available which you consider would be helpful for the purposes of the upgrade of the Phosphorus dossier, please advise as soon as possible.

Letters of Access

We will be providing Letters of Access to the updated Phosphorus dossier and it is hoped that these will be available by the end of February 2013. Relevant information will be posted on the [Letters of Access page of our website](#).

It would be most helpful if you could let us know if you are considering purchase of a Letter of Access to the updated Phosphorus dossier.



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