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News Alert:

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Recommendations to Lead Registrants

New, practical recommendations are being made to try to help Lead Registrants ensure that Lead Dossiers are submitted in time.

Lead Registrants and SIEF members are interdependent and cooperation among SIEFs is essential for successful registration. However, working in a SIEF is challenging not least because of the need for large numbers of companies to agree on very complex issues.

Therefore, to try to ensure that Lead Dossiers are submitted in time, the Directors' Contact Group* (DCG) recommends that Lead Registrants:

1. Tell all SIEF members the date at which they intend to submit the Lead dossier.
2. Give all SIEF members a "cut-off-date" at which they will "freeze" their dossier and after which the following activities will stop:
 - a. accepting previously dormant members;
 - b. discussing the sameness of substance;
 - c. discussing operational rules;
 - d. identifying data gaps;
 - e. sharing existing data;
 - f. agreeing the classification and labelling of the substance;
 - g. finalising the Chemical Safety Report if done collectively.

Lead Registrants are responsible for setting the cut off date, but of course it needs to be set in the context of their obligation to ensure that all SIEF members have enough time to provide others with studies and information. The DCG recommends that Lead Registrants set the cut off date for any of the above activities at around two months before the planned submission date.

Lead Registrants are also responsible for setting the costs of sharing information. The DCG emphasises that Lead registrants are obliged to set them in a fair, transparent and non-discriminatory way.

Any information generated after the cut-off date can be included in an update of the dossier after it has been registered.

Further Information:

Substance Information Exchange Forum (SIEF) pages on ECHA's website:

http://echa.europa.eu/sief_en.asp

* ECHA, the European Commission and six industry associations (CEFIC, Eurométaux, REACH Alliance, Concawe, FECC and UEAPME) established the Directors' Contact Group in January 2010 to identify and address issues of concern to registrants, to establish a survey on the preparedness of industry and other actors for registration and to resolve the most important issues considered to be relevant to secure the supply of high volume substances to downstream users.