

DIRECTORS' CONTACT GROUP

DCG3/Communiqué/3/2014
1 October 2014

COMMUNIQUÉ

On 1 October 2014, the Directors' Contact Group (DCG) convened for its third meeting of this year.

As already highlighted by the communiqué on its meeting of 4 June 2014, the DCG has focused on the costs related to the mandatory data sharing needed to fulfil the information requirements of registration dossiers. These constitute one of the main cost factors for SMEs and other companies preparing for the 2018 REACH registration deadline.

The DCG sees its recommendations to be complementary to the support provided by ECHA.

At its meeting of 4 June 2014, the DCG already adopted two documents, namely

- A "Checklist to hire a good consultant, first edition", and
- A document on "Considerations to be made when joining an existing SIEF".

At its meeting of 1 October, the DCG adopted two further documents, namely

- A document outlining "Fair, transparent and non-discriminatory cost sharing in SIEFs", and
- "Recommendations on sound SIEF management".

The DCG agreed that these documents will also be published on ECHA's website. All DCG members will promote them using their respective communication channels.

With these four documents, the DCG provides orientation to companies preparing for the 2018 REACH registration deadline, and in particular to SMEs joining or forming SIEFs for the purpose of joint dossier submission as well as to lead registrants having to accommodate such companies. The DCG has aimed thereby to address the repeated requests for such orientation expressed by SMEs and by their representatives.

The two documents adopted on 1 October are issued as "first editions" with a view to accommodating comments from users in a possible second version. The DCG invites any such feedback to be given by 31 January 2015 (by e-mail: DCG-Secretariat@echa.europa.eu).

Readers of the two documents adopted on 1 October, however, should be aware that the orientation provided therein may be overcome by or complemented by Implementing Legislation being prepared by the European Commission to be enacted in 2015. Once it enters into force, the European Commission, ECHA and all DCG members will inform on any changes to its recommendations that this Implementing Legislation will require.