

Survey of 2013 SME registrants

Summary of results



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List of acronyms

BPR	Biocidal Products Regulation
Chesar	Chemical safety assessment and reporting tool
CLP	Classification, labelling and packaging
CSR	Chemical safety report
DCG	Directors' Contact Group
ECHA	European Chemicals Agency
EU	European Union
IUCLID	International Uniform Chemical Information Database
LoA	Letter of Access
MS	Member State
MSCA	Member State competent authority
OR	Only representative
REACH	Registration, evaluation, authorisation and restriction of chemicals
REACH-IT	The central IT system providing support for REACH
SIEF	Substance information exchange forum
SME	Small and medium-sized enterprise
ToW	Terms of Work
WP	Work Programme

Summary of results

Context and background

The European Chemicals Agency (ECHA) conducted this survey of “first-time small and medium sized registrants for the 2013 REACH registration deadline” as part of its preparations to adjust its assistance to registrants to identified needs, as part of the “2018 Registration Roadmap” that the Agency is establishing in accordance with its 2014 Work Programme. The Agency does not want to be second-guessing the experience of SMEs that have successfully submitted dossiers by May 2013 when designing its support and updating IT tools that it will provide to registrants for the 2018 deadline. The European Chemicals Agency (ECHA) expects SMEs and inexperienced companies to figure prominently within the overall number of dossier submitters for the 2018 REACH registration deadline.

ECHA deemed this experience of SMEs sufficiently useful to merit a detailed survey to solicit feedback on SIEF management from lead registrants as well as member registrants outlining their interaction with each other, with consultants and in making use of the support provided ECHA to which they were required to submit their dossiers.

For the 2010 and 2013 REACH registration deadlines, the amount of dossiers submitted by SMEs amounted to 14% and 20%, respectively. In this light, ECHA surveyed the experience of first-time 2013 SME registrants (i.e., companies submitting dossiers for the 2013 registration deadline without having ever appeared to ECHA as a registrant before and having declared themselves SMEs) in meeting a number of registration-related challenges – from operating in a SIEF to finding information and guidance to using the submission IT tools.

For this purpose, ECHA submitted a questionnaire to a total of 705 such registrants. ECHA received evidence that the questionnaire was successfully transmitted to 667 of these. 143 companies responded. The response rate of 21.4% provides for a sufficient pool of replies to be of statistical value, even for the questions broken down according to different cohorts, in particular the breakdown between lead registrants and SIEF member registrants.

The choice of questions was determined by their presumed usefulness to extrapolate the empirical data gained from the experience of first-time SME registrants to identify and address the challenges that similar companies preparing for the 2018 REACH registration deadline might face. ECHA sought such orientation to gear the design of ECHA's support to such companies towards their concrete needs.

Feedback - selection

The survey harvested numerous interesting insights of which only a few are selectively reflected in this summary:

- Industry and trade associations play an important role in raising awareness on the duty-holders' obligations; SMEs overwhelmingly have got their information from their industry associations as well as from ECHA's newsletter.
- Around 70 % of registrants did not experience difficulties related to SIEF management and its administration.
- SIEF communication is in almost all cases conducted in English, due to international setup of SIEFs.
- SIEFs are usually quite complex, with the involvement of in most cases more than ten participants which tends to raise tricky organisational challenges for otherwise competing companies.
- The mostly very frequent, but also very helpful communication in SIEFs results either in higher

administrative resource use within the companies or in external costs, as many companies rely on external consultants.

- Consultants undertook most of the work in providing data sets and chemical safety reports as well as in submitting dossiers via IUCLID.
- 62 of respondents indicated to have paid for data they did not require; however, they overwhelmingly refrained from entering into a data-related dispute.
- Only a minority of respondents actually highlighted problems of data access/cost-sharing. Overall, most registrants seem to have had a good experience in this regard.
- One third of respondents do not have a mechanism for updating the dossier – thus not living up to the purpose of REACH of benefiting from gathered information on the safe use of chemical substances.

The attached report allows for a more comprehensive analysis of aspects of small and medium-sized companies tackling the challenges of registering dossiers on chemical substances under the provision of the REACH Regulation, on related SIEF management and cost sharing.

Follow-up

ECHA's empirical survey of first-time SME registrants for the 2013 REACH registration deadline complements a series of studies established in 2013 on SME concerns and the (cost) burden they bear in complying with REACH¹. ECHA's data collected from "real" registrants' experience adds a further element of insight to these studies.

ECHA is making the results of this survey available to Member States' competent authorities and to national REACH helpdesks. It is further publishing this report on the ECHA website.

The attached report does not draw any conclusions itself. Its results are intended to provide valuable input to the analysis needed in the preparation of ECHA's "2018 Registration Roadmap" that is being elaborated according to the Agency's 2014 Work Programme² and to the work of the Directors' Contact Group (DCG) which adopted its third Terms of Work (ToW) at its meeting of 15 January 2014³.

¹ The European Commission's REACH Review
http://ec.europa.eu/enterprise/sectors/chemicals/documents/reach/review2012/index_en.htm

The Dutch study "Impact REACH op MKB"
http://www.euconf.eu/reach2013/pdf/presentations/eindrapport_panteia_ivam.pdf

The German "Abschlußbericht: REACH-Überprüfung 2012"
http://www.reach-clp-biozid-helpdesk.de/de/Downloads/Fachbeitraege/Abschlussbericht%20zum%20REACH%20Review%20Projekt%202012.pdf?_blob=publicationFile&v=2&src=asp-cu&typ=pdf&cid=2968

The European Parliament's report on "The Consequences of REACH on SMEs"
[http://www.europarl.europa.eu/RegData/etudes/note/join/2013/507486/IPOL-ITRE_NT\(2013\)507486_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/note/join/2013/507486/IPOL-ITRE_NT(2013)507486_EN.pdf)

EEF - The manufacturers' organisation
<http://www.eef.org.uk/reach/>

CEPS - Centre for European Policy Studies "REACH - a killer whale for SMEs?"
<http://www.ceps.be/book/reach-killer-whale-smes>

² http://www.echa.europa.eu/documents/10162/13608/final_mb_39_2013_wp_2014_en.pdf

³ http://www.echa.europa.eu/documents/10162/13559/dcg_mandate_en.pdf

1. Survey and evaluation methods

The survey (Annex I) was launched on 30 September and closed on 18 October. It was distributed to 705 SME registrants who successfully registered their substances for the 2013 registration deadline by personal email.

The survey contained 139 questions, although dynamic paging was used to create pathways depending on the roles of the respondent so that no individual recipient would receive all 139 questions. The pathways were split for lead registrants, member registrants and individual registrants.

Responses to the multiple choice questions have been analysed quantitatively with summaries and examples provided for the open questions, with further text mining used to demonstrate key threads running through the answers to the open field questions.

2. Results

143 responses were received for the 'Survey of 2013 SME registrants.' The response rate was 20.3%. However, from the initial mailing to the recipients we received 38 undeliverable messages which reduced the number of recipients to 667, leaving a total response rate of 21.4%.

The survey was split into several sections as follows:

- 1) Background
- 2) Awareness
- 3) Registration process
 - a. SIEFs and joint submissions
 - i. Lead registrants
 - ii. Member registrants
 - iii. Individual registrants
 - b. Data sharing
 - i. Member registrants
 - c. Cost sharing
 - i. Lead registrants
 - d. Submissions tools
 - e. Follow-up after registration
- 4) Support by ECHA, national helpdesks or other sources
- 5) Self-classification as SME
- 6) ECHA support

The results have been analysed using Webropol tools and Excel. A full outline of the results is attached in Annex I.

2.1 BACKGROUND

The respondents were asked about the size of their company in terms of number of employees; the number of persons working specifically on REACH, CLP and BPR administration within their company; their main activity regarding chemicals; the Member State in which they are located; and the Member State in which their main customers are located.

The majority of respondents stated that their company size was less than 10 employees (37.8%), closely followed by those with less than 50 employees (37.1%). Next came those with less than 100 employees (11.2%) and finally those with less than 250 employees (9.8%).

Six respondents (4.2%) failed to indicate their company size, and chose the “-Select-” option.

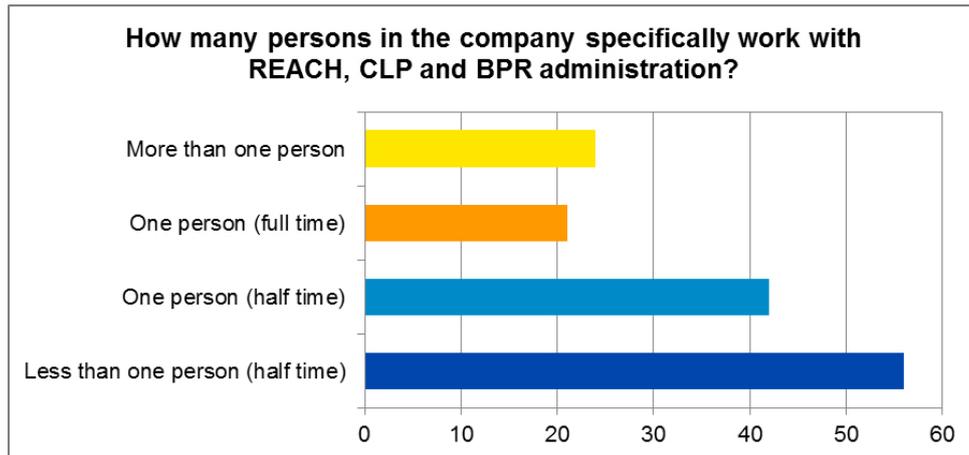
Having received some feedback by email on this question, there was a sense that only representatives felt that they could not answer this question successfully. The following statement is taken from an email correspondence with such feedback.

“We as Only Representative are larger than the SMEs we are representing. In the amount of employees only SME amount of employees could be selected. Therefore I could not select a correct answer and did not complete the survey.”



GRAPH 1: THE SIZE OF YOUR COMPANY – MEASURED BY EMPLOYEES ONLY – IS; N=141.

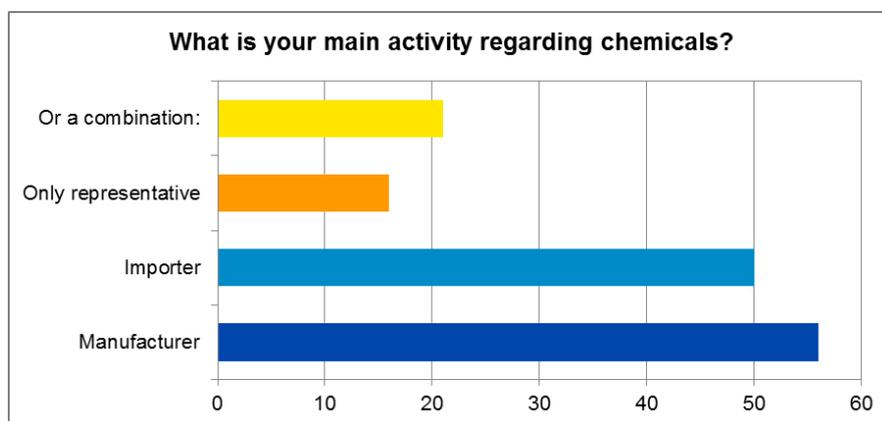
With regard to the number of persons working specifically on the administration of REACH, CLP and the BPR within their companies, the survey shows that the majority of respondents indicated that less than one person working half time was dedicated to work on REACH, CLP and BPR administration (39.2%), with one person working half time (29.4%), more than one person (16.9%) and one person full time (14.7%).



GRAPH 2: HOW MANY PERSONS IN THE COMPANY SPECIFICALLY WORK WITH REACH, CLP AND BPR ADMINISTRATION?, N=141.

When asked about their main activity regarding chemicals, the answers were more variable. The majority of respondents indicated that they were a manufacturer (39.2%). 35.0% of respondents were importers and 11.2% were only representatives. Those that mentioned they operated in a combination of roles accounted for 14.7%.

There were a number of open text answers describing in more detail what types of combination roles the recipients were operating in. These are included in the full questionnaire in Annex I.

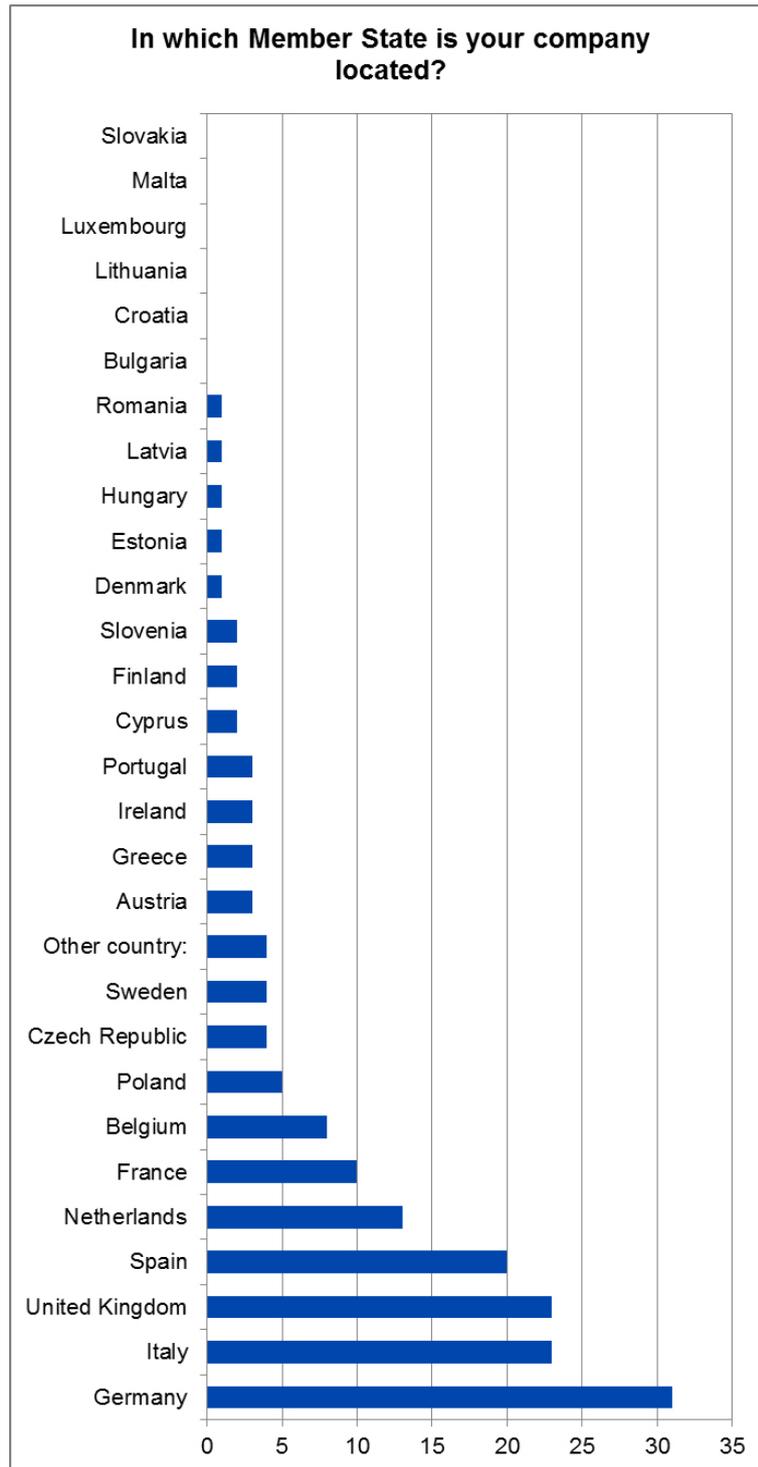


GRAPH 3: WHAT IS YOUR MAIN ACTIVITY REGARDING CHEMICALS?, N=141.

Respondents were then asked about the Member State in which their company was located. There were 143 recipients with 168 responses (i.e. some recipients being based in more than one location). In total, the companies were located in 25 different countries.

These were Germany (31 responses); the United Kingdom and Italy (23 each); Spain (20); the Netherlands (13); France (10); Belgium (8); Poland (5); the Czech Republic, Sweden and other countries (4 each); Austria, Greece, Ireland and Portugal (3 each); Cyprus, Finland and Slovenia (2 each); and Denmark, Estonia, Hungary, Latvia and Romania (1 each).

Norway (twice), Iceland and Switzerland were the other countries selected in the open field question.

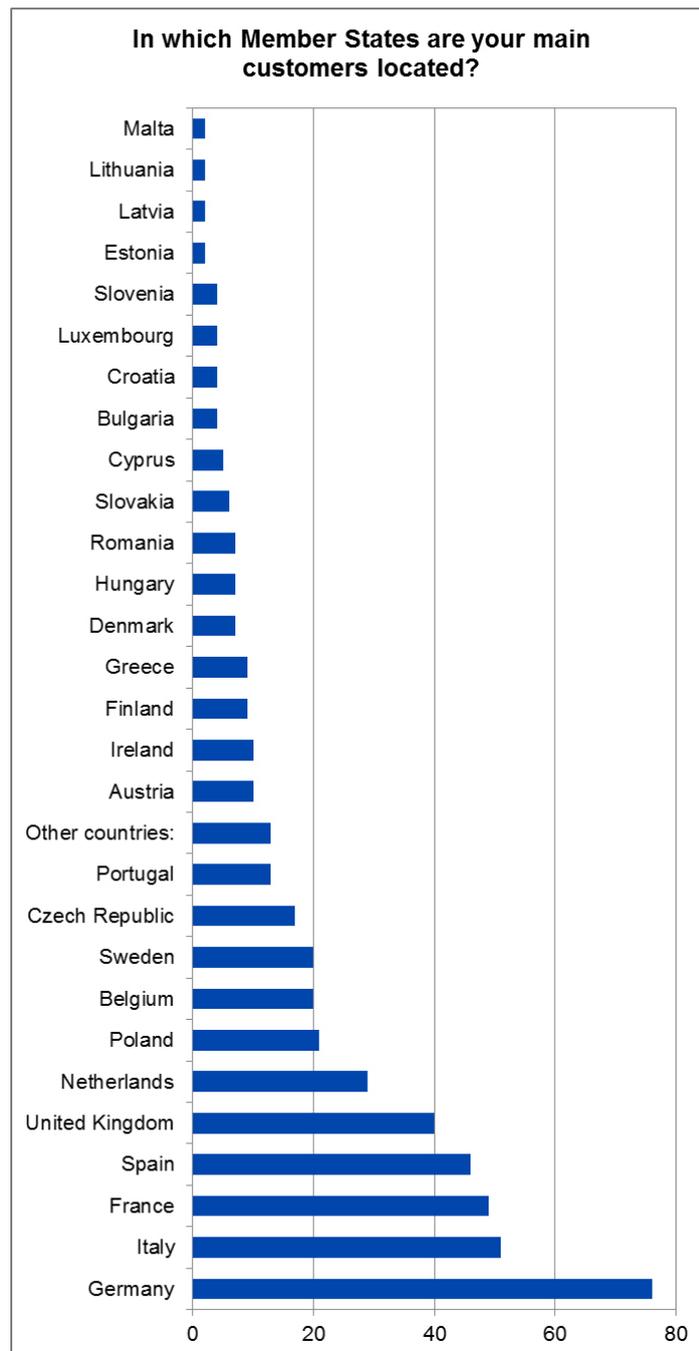


GRAPH 4: IN WHICH MEMBER STATE IS YOUR COMPANY LOCATED?, N=141 (N RESPONSES = 168).

In terms of the location of their main customers, the 143 recipients had 489 responses. The companies were located in 36 specified countries. There were also mentions in the open field question of "Non-EU" and "South America" which I have not included in the statistics here, as they are too unspecific.

The 36 specified countries were Germany (76 responses); Italy (51); France (49); Spain (46); the United Kingdom (40); the Netherlands (29); Poland (21); Belgium and Sweden (20 each); the Czech Republic (17); Portugal and other countries (13 each); Austria and Ireland (10 each); Finland and Greece (9 each); Denmark, Hungary and Romania (7 each); Slovakia (6); Cyprus (5); Bulgaria, Croatia, Luxembourg and Slovenia (4 each); and Estonia, Latvia, Lithuania and Malta (2 each).

The other countries were the United States of America and China (three times each); Norway (twice); Brazil, India, South Korea, Switzerland and Turkey (once each).



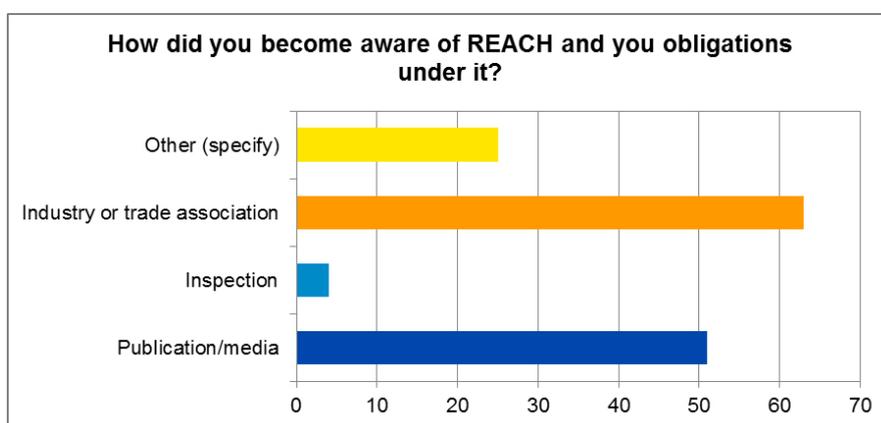
GRAPH 5: IN WHICH MEMBER STATE ARE YOUR MAIN CUSTOMERS LOCATED?, N=141 (N RESPONSES = 489).

2.2 AWARENESS

The respondents were asked questions about their awareness of REACH and their obligations under it, as well as ECHA's publications and whether they are using them to keep informed.

The majority of respondents answered that they became aware of REACH and their obligations under it from their industry or trade association (44.1%). 35.7% of recipients said that they became aware through publication/media, with a small minority stating that they became aware only through inspection (2.8%).

Those that indicated other (17.5%) were asked to specify the means through which they became aware. Some of those indicated include university lectures, ministries of labour, consultancies, updated legislation etc. A full breakdown is shown in Annex I along with the full results of the survey.



GRAPH 6: HOW DID YOU BECOME AWARE OF REACH AND YOUR OBLIGATIONS UNDER IT?, N=143.

For those that indicated a trade association (n=63), they were then asked which level of association and more specifically which association. The majority of the 63 recipients indicated a national association (58.7%), European associations (31.7%), regional (6.3%) and local (3.2%).

In terms of specifics, qualitative text analysis indicates the most commonly used items in the open field question: these were 'federchimica' (mentioned six times) and 'cefic' (four times) and 'fedequim' (three times).

federchimica cefic

business chemical fedequim assic feique industriale unione

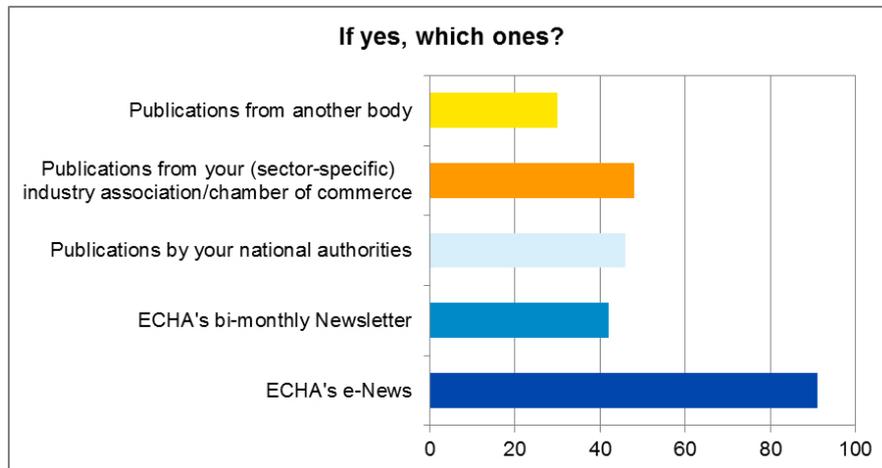
anfre arvan assocaition chemiehandel euromines fdquim handelskammer industrie

inorganic means norsk pigments plast slovenian uic-medef verband

TEXT ANALYSIS 1: WHICH ASSOCIATION?, N=63. (NAMES APPEARING IN LARGER FONTS INDICATE MOST COMMONLY MENTIONED IN THE OPEN-FIELD TEXTS)

2.2.1 Publications

In terms of publications, 88.1% of recipients indicated that they were keeping themselves updated on their REACH obligations through publications. When pressed to answer which publications, the majority of recipients indicated that they view ECHA's e-News (74.0%). The results of the other publications are outlined below.



GRAPH 7: IF YOU ANSWERED YES TO KEEPING UPDATED WITH PUBLICATIONS, WHICH ONES?, N=123.

The results of the open field question indicating publications by national authorities, publications by sector-specific industry associations/chambers of commerce, and publications from other bodies are available in Annex I.

The final questions in the awareness section focused on the nature of the publications and whether they were perceived to be SME-targeted and whether they were perceived to be understandable by SMEs.

The majority of recipients (77.1%) indicated that the publications were not specifically labelled as SME-targeted.

In terms of understandability, the following results were seen:

TABLE 1: HOW UNDERSTANDABLE ARE THE PUBLICATIONS?, N=123.

	Very understandable	Understandable	Somewhat understandable	Somewhat difficult to understand	Difficult to understand	Very difficult to understand	N/A	Total
ECHA's e-News	14	59	23	11	4	5	7	123
ECHA's bi-monthly Newsletter	11	32	13	5	4	4	16	85
Publications by national authorities	8	30	23	12	3	1	12	89
Publications from your (sector-specific) industry association/ chamber of commerce	15	39	14	8	0	1	13	90
Publications from another body	11	23	13	8	3	1	15	74
Total	59	183	86	44	14	12	63	461

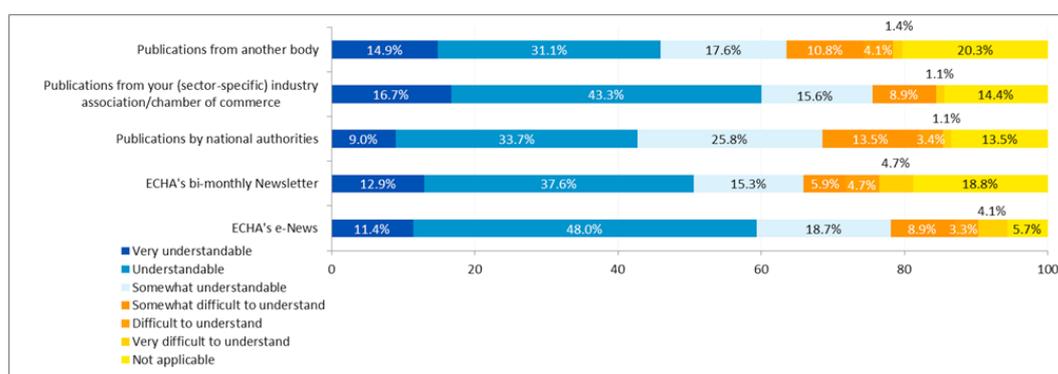
For ECHA's e-News: 82.8% of recipients who answered this question viewed the e-News as at least somewhat understandable. 17.2% felt that it was to some extent difficult to understand.

For ECHA's bi-monthly Newsletter: 81.2% of recipients who answered this question viewed the e-News as at least somewhat understandable. 18.8% felt that it was to some extent difficult to understand.

For publications by national authorities: 79.2% of recipients who answered this question viewed the e-News as at least somewhat understandable. 20.8% felt that it was to some extent difficult to understand.

For publications from industry associations/chambers of commerce: 88.3% of recipients who answered this question viewed the e-News as at least somewhat understandable. 11.7% felt that it was to some extent difficult to understand.

For publications from other bodies: 79.7% of recipients who answered this question viewed the e-News as at least somewhat understandable. 20.3% felt that it was to some extent difficult to understand.



GRAPH 8: HOW UNDERSTANDABLE ARE THE PUBLICATIONS? (PERCENTAGE FIGURES), N=123.

2.3 REGISTRATION PROCESS

The questions on the registration process were split into five sections: SIEFs and joint submissions; data sharing; cost sharing; submissions tools and follow-up after registration.

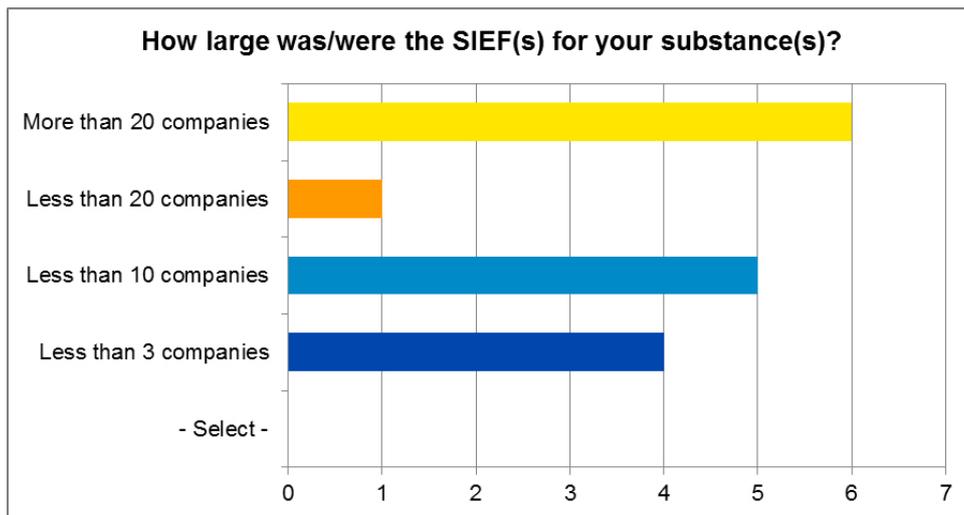
2.3.1 SIEFs and joint submissions

This section was divided into three sets of questions each targeted at a different set of audiences: lead registrants, member registrants and individual registrants.

The first question asked was aimed at finding which target audience the recipients belonged to. 109 respondents (76.2%) answered that they were member registrants. 16 respondents (11.2%) said that they were lead registrants and 18 respondents (12.6%) indicated that they were individual registrants and not part of a joint submission.

2.3.1.1 Lead registrants

The lead registrants were first asked how large the SIEF was for their substances. Six responded saying that the SIEF included more than 20 companies, one indicated that the SIEF had less than 20 companies, five said that the SIEF had less than 10 companies and four stated that the SIEF had less than three companies.

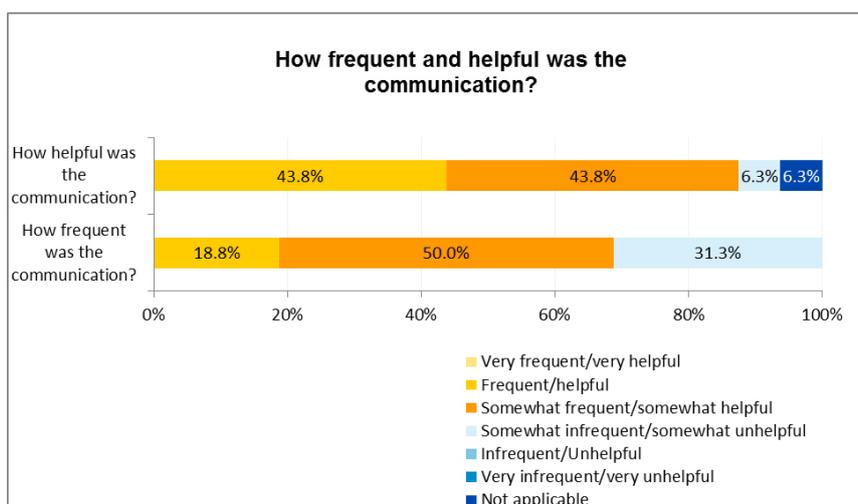


GRAPH 9: HOW LARGE WAS/WERE THE SIEF(S) FOR YOUR SUBSTANCE?, N=16.

11 of the 16 respondents (68.8%) indicated that there were no consortia involved and the same number of respondents also replied that they did not need to join an existing SIEF agreement. Furthermore, 14 of the 16 respondents (87.5%) indicated that they were able to fully understand the SIEF agreement.

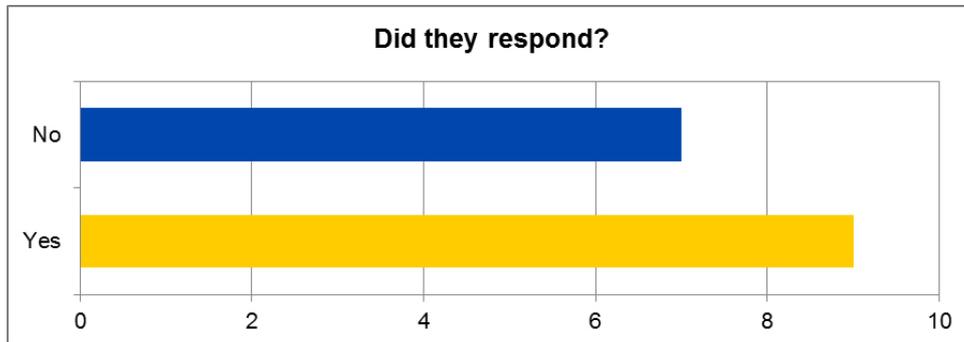
Questions were then asked regarding communication within the SIEF. 13 of the 16 respondents (81.3%) indicated that they managed the communication. They were then also asked what language was used for communication. The 16 respondents indicated that they all used English, with one respondent also selecting Polish as a dual language for communication.

In terms of frequency and helpfulness of communication, 11 of the 16 respondents (68.8%) indicated that the communication was at least somewhat frequent and only 1 respondent indicated that the communication was somewhat unhelpful, with 14 respondents stating that the communication was at least somewhat helpful (one respondent selected the not applicable option). 11 respondents (68.8%) indicated that the communication had continued post-submission.



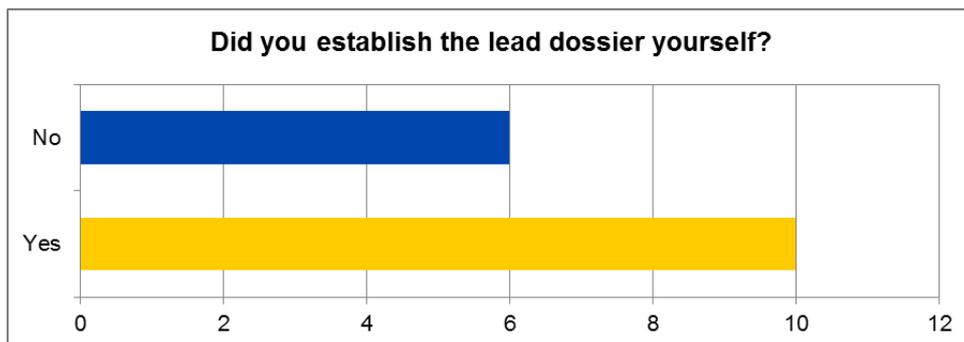
GRAPH 10: HOW FREQUENT AND HELPFUL WAS THE COMMUNICATION? (LEAD REGISTRANTS), N=16.

11 respondents (68.8%) also said that they had enough resources to dedicate to the lead registrant role. Each of the respondents also said that they had communicated with all SIEF members. However, seven respondents said that the SIEF members had not responded.



GRAPH 11: DID THE SIEF MEMBERS RESPOND?, N=16.

When asked whether they established the lead dossier themselves, 62.5% of the respondents responded that they had. This meant that six respondents had not.

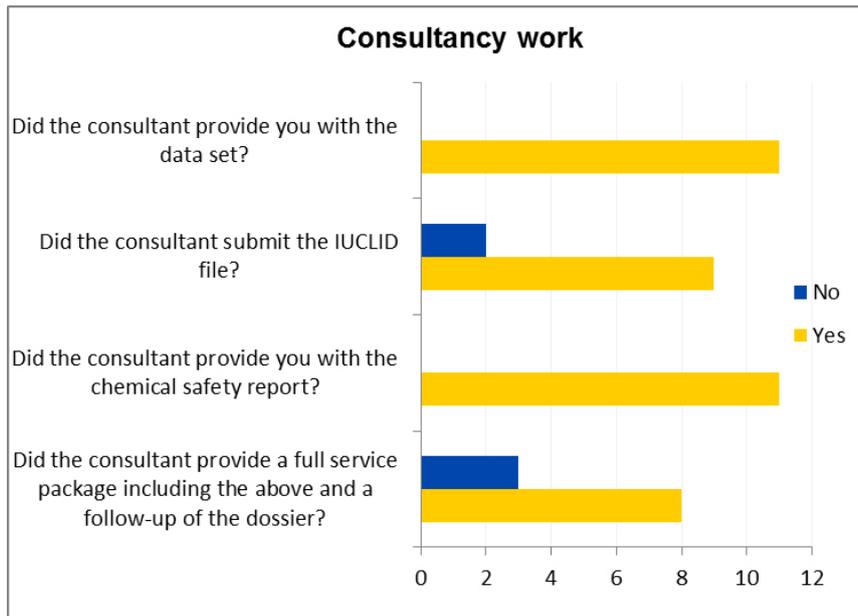


GRAPH 12: DID YOU ESTABLISH THE LEAD DOSSIER YOURSELF?, N=16.

In terms of dealing with difficulties in communicating in the selected working language, six respondents replied to the open field question. Four of the said respondents were not applicable (i.e. "this problem has never subsisted with who answered the emails", "that didn't happen" and "I did not face this problem").

The two responses where this problem did seem to be indicated wrote "A person who knows the language needed" and "Translation of pertinent documents".

Of the 16 lead registrants respondents, 11 (68.8%) indicated that they had used the services of a consultant for the main content of the IUCLID file work.

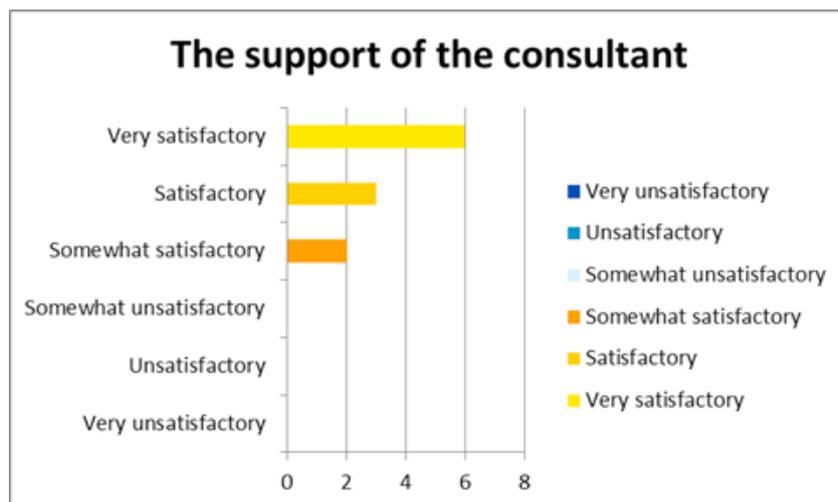


GRAPH 13: CONSULTANCY WORK, N=11.

Of the 11 respondents who used a consultant to carry out the main content of the IUCLID file work, each of them stated that the consultant had provided them with the data set and the chemical safety report.

Two respondents said that the consultant had not submitted the IUCLID file, and three respondents said that the consultant had not provided a full service package including the data set, chemical safety report, submission of the IUCLID file and follow-up of the dossier.

In terms of satisfaction levels, none of the 11 respondents felt dissatisfied with the support offered by the consultants. Indeed, 54.5% responded that they were very satisfied with the support offered.

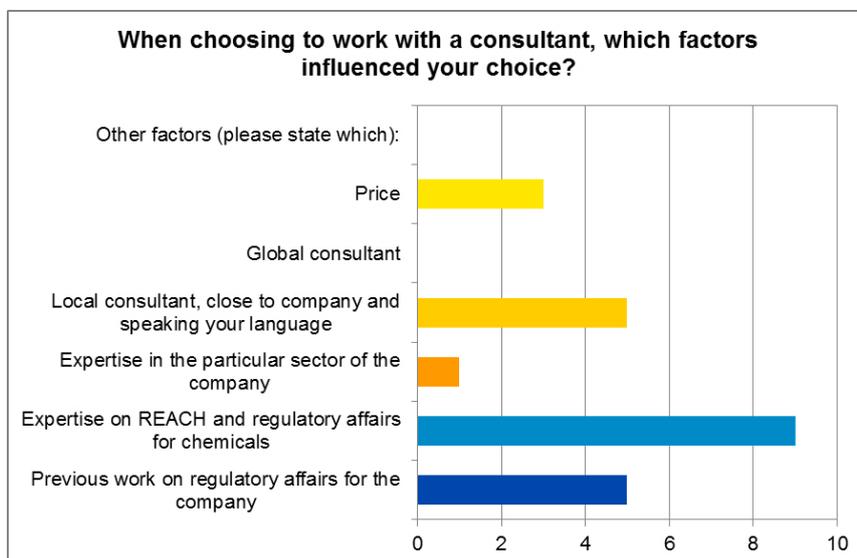


Potentially impairment

GRAPH 14: LEAD REGISTRANT SATISFACTION WITH CONSULTANCY WORK, N=11.

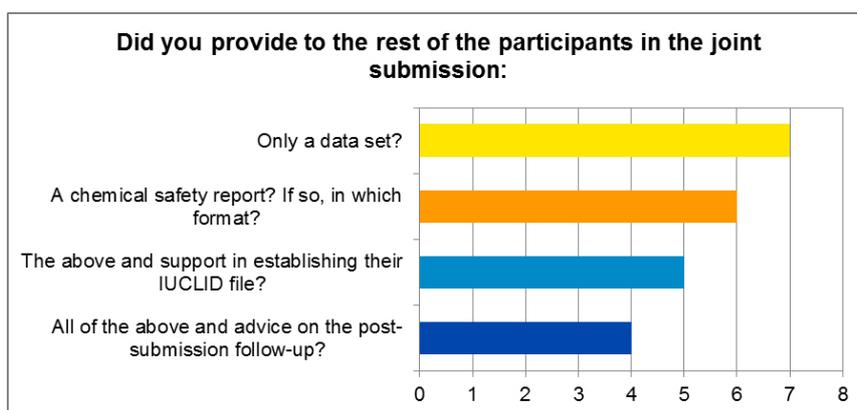
A number of factors were evident for the lead registrants' choice for using a consultant. These include

expertise on REACH and regulatory affairs for chemicals (39.1%); the consultant being local, close to the company and able to speak their language (21.7%); previous work of the consultant on regulatory affairs for the company (also 21.7%); price (13.0%) and expertise in the particular sector of the company (4.3%). No other factors were listed.



GRAPH 15: WHEN CHOOSING TO WORK WITH A CONSULTANT, WHICH FACTOR INFLUENCED YOUR CHOICE?, N=11, RESPONSES=23.

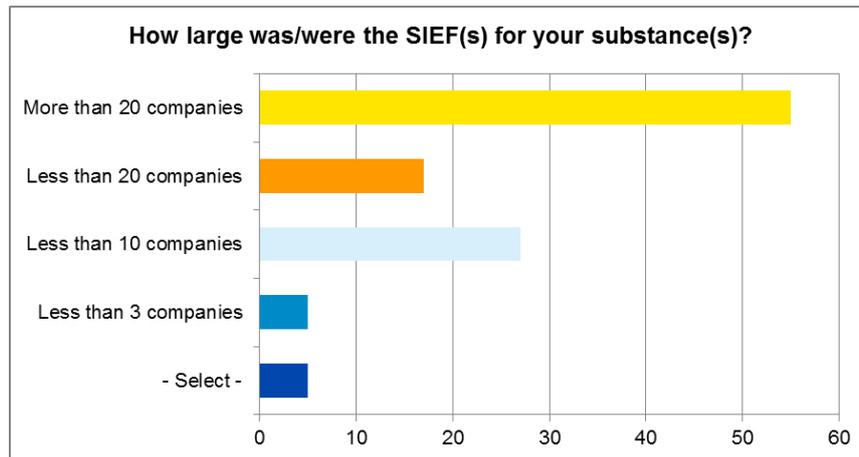
Finally for this section, the lead registrants were asked what they provided to the rest of the participants in the joint submission. A total of 22 responses were received from 16 respondents. 31.8% of the respondents indicated that they provided only the data set. 27.2% said that they provided a chemical safety report. Five of the six respondents provided the report in Word format, with one providing it as a pdf. 22.7% provided a data set, chemical safety report and support to establish the IUCLID file and 18.25 provided the data set, the chemical safety report, support to establish the IUCLID file and advice on the post-submission follow-up.



GRAPH 16: WHAT DID YOU PROVIDE TO THE REST OF THE PARTICIPANTS IN THE JOINT SUBMISSION? N=16, RESPONSES=22.

2.3.1.2 Member registrants

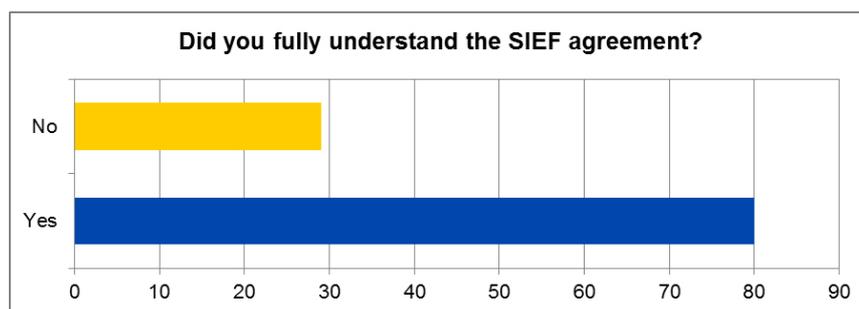
The member registrants (109 respondents) were asked about the size of their SIEF(s) for their substance(s). From the 109 responses, five were viewed as negligible as they selected the “-Select-” option. Of the remaining 104 responses, five (4.8%) said their SIEF was made up of less than three companies, 27 (26.0%) said it was made up of less than 10 companies, 17 (16.3%) indicated less than 20 companies, and 55 (52.9%) said more than 20 companies.



GRAPH 17: HOW LARGE WAS/WERE THE SIEF(S) FOR YOUR SUBSTANCE(S)? N=109.

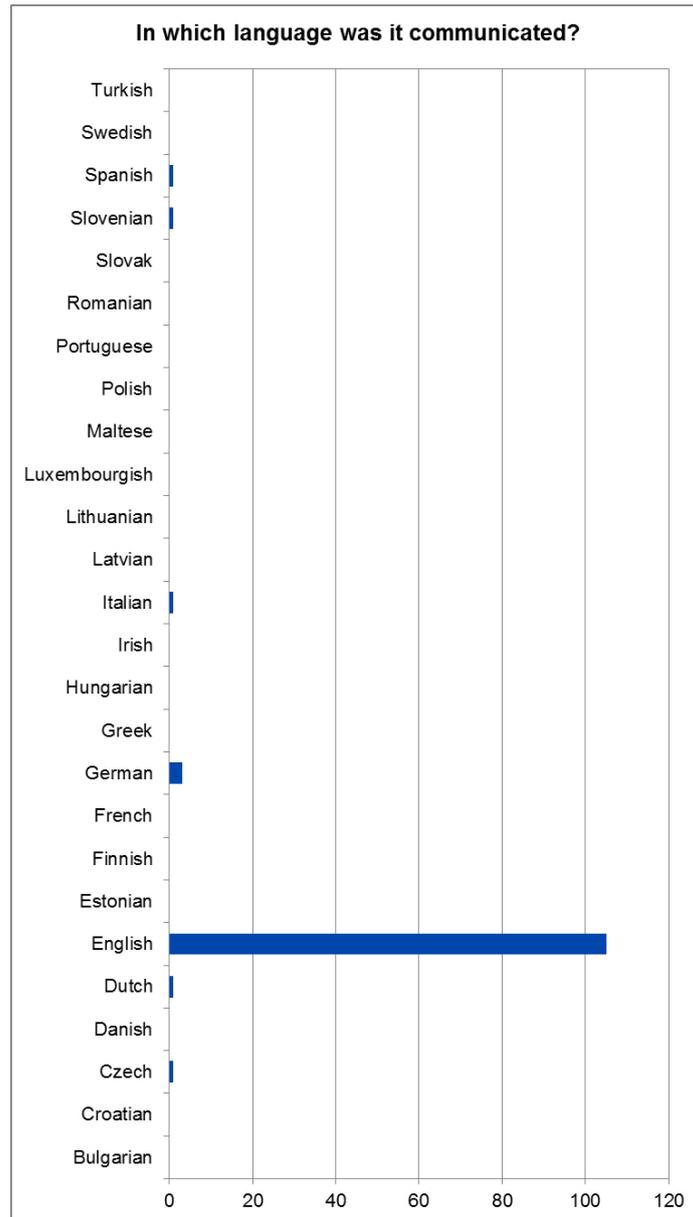
Of the 109 responses, 85 (78.0%) mentioned that a consortium/consortia were involved. Furthermore, 86 (78.9%) respondents said that they need to join an existing SIEF agreement, with 23 (21.1%) responding that they did not need to.

In terms of understanding the SIEF agreement, 80 (73.4%) respondents felt that they understood it fully.



GRAPH 18: DID YOU FULLY UNDERSTAND THE SIEF AGREEMENT? N=109.

From 101 respondents, the lead registrant was said to have managed the communication within the SIEF in 77 cases (76.2%). The language of the SIEF is broken down as shown in Graph 19.

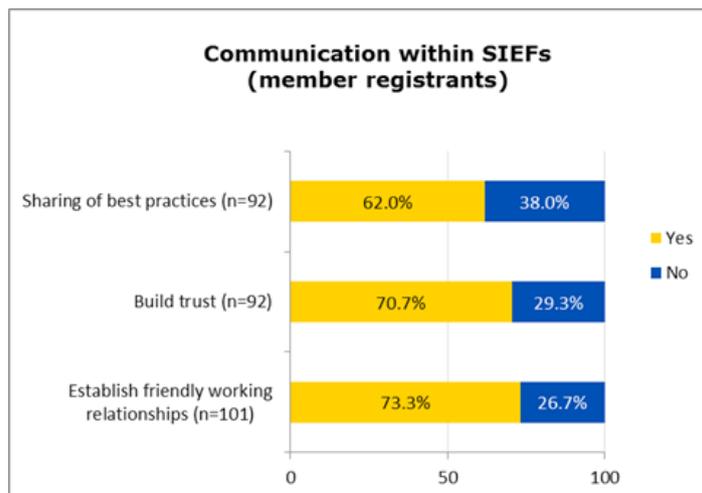


GRAPH 19: IN WHICH LANGUAGE WAS IT COMMUNICATED?, N=109 RESPONSES=113.

105 respondents said that English was the language of communication for the SIEF. Other languages included German (three responses); Czech, Dutch, Italian, Slovenian and Spanish (one response each).

Of those that communicated in a language other than the recipients’ mother tongues, 29 member registrants (32.2%) said that this had a negative impact on communication.

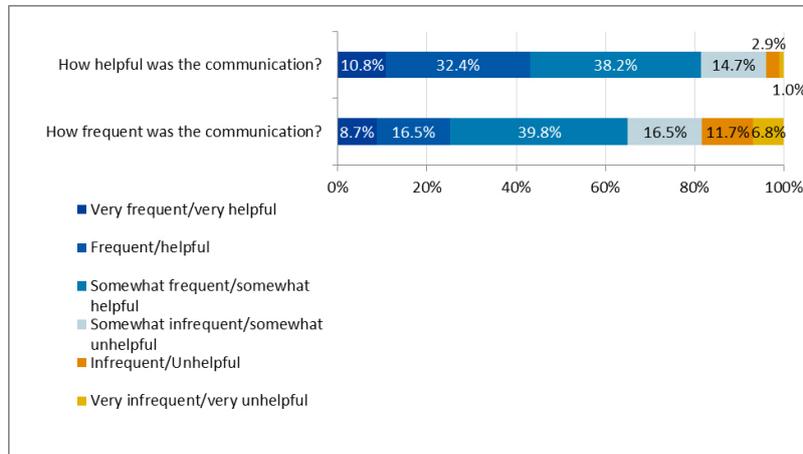
The majority of member registrants (74 of 101 respondents (73.3%)) felt that the communication had helped to establish friendly working relationships with the SIEFs and 65 out of 92 member registrants (70.7%) said that the communication within the SIEFs had built trust. 57 out of 92 member registrants (62.0%) claimed that the communication within the SIEFs had enabled best practices to be shared. There were also numerous open field comments, which can be seen in Annex I to this report.



GRAPH 20: COMMUNICATION PERSPECTIVES OF MEMBER REGISTRANTS (SEPARATE QUESTIONS COLLATED, NUMBER OF RESPONDENTS INDICATED IN GRAPH)

In terms of frequency and helpfulness of communication, 67 of the 103 member registrant respondents (65.0%) indicated that the communication was at least somewhat frequent. This was only slightly lower than the figure for the lead registrants.

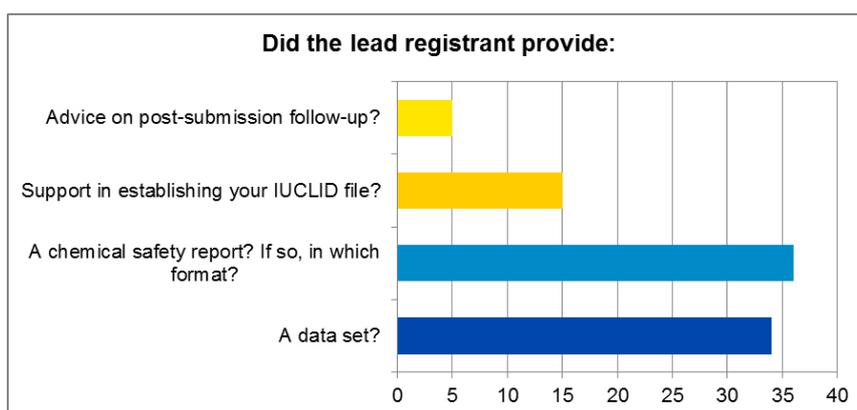
83 member registrant respondents (81.4%) felt that the communication was helpful to some extent. However, in contrast to the lead registrant respondents, the majority of member registrant respondents (61.2%) indicated that the communication had failed to continue post-submission.



GRAPH 21: HOW FREQUENT AND HELPFUL WAS THE COMMUNICATION? (MEMBER REGISTRANTS), N=104.

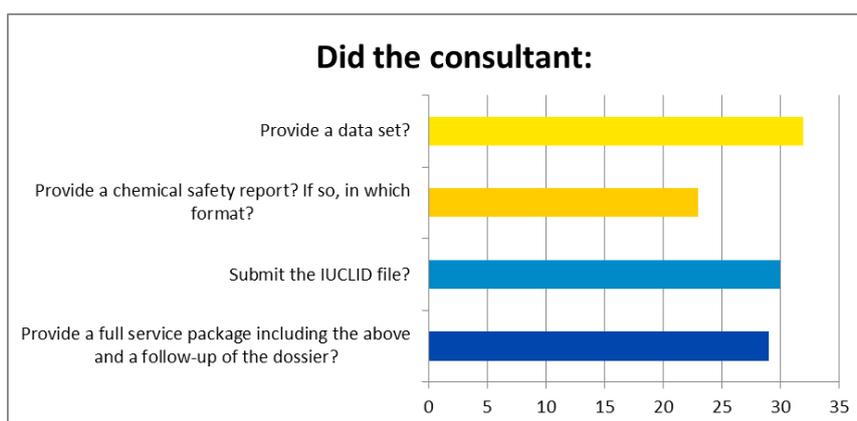
When asked about the source for the main content of the data set of their IUCLID files, 109 member registrants responded. Of this total, 24 (22.0%) created the main content themselves, 41 (37.6%) used a consultant and 44 (40.4%) said that the content had come from the lead registrant.

In terms of remarks regarding the lead registrant, 34 member registrants said that the lead registrant provided a data set; 36 member registrants said that the lead registrant provided a chemical safety report; 15 said that the lead registrants had provided support in establishing the IUCLID format; and only five member registrants said that they received advice from the lead registrant on post-submission follow-up.



GRAPH 22: WHAT DID THE LEAD REGISTRANT PROVIDE?, N=44.

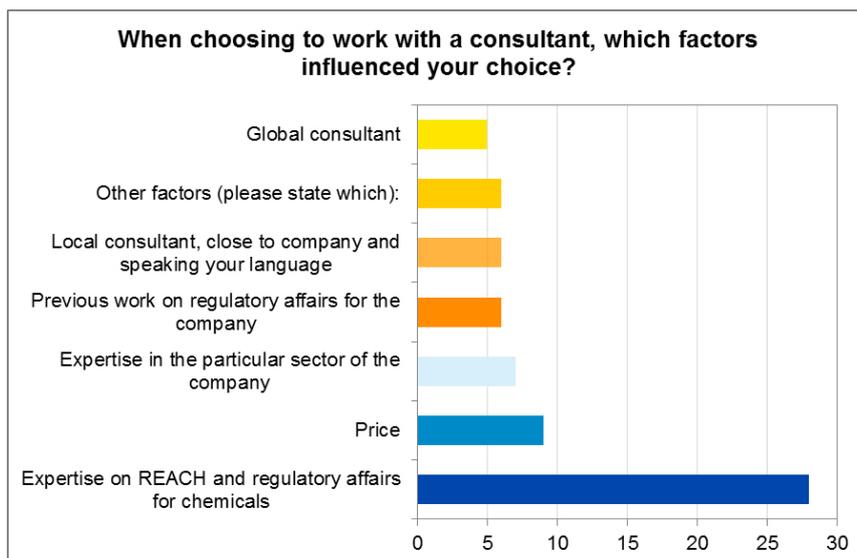
The member registrants who used a consultant indicated that the consultants had provided a data set in 32 cases; provided a chemical safety report in 23 cases; submitted the IUCLID file in 30 cases; and gave a full service package including all of the above and a follow-up on the dossier in 29 cases. In terms of the format of the chemical safety report, the majority were given either as a word document or in pdf format. A full breakdown is provided in Annex I.



GRAPH 23: WHAT DID THE CONSULTANT PROVIDE?, N=38.

In terms of satisfaction, the member registrants indicated that they were at least somewhat satisfied with the consultants' support in 97.3% of the cases. In fact, only one respondent indicated a level of somewhat dissatisfaction.

The reasons indicated by member registrants for choosing a consultant are displayed below in graph 24. It is apparent that the most chosen reason indicated by the member registrants was expertise of the consultants on REACH and regulatory affairs for chemicals. The other factors option was selected by six respondents, and the majority of these were statements indicating that the consultant was in some way linked to the lead registrant. A full breakdown is included in Annex I.



GRAPH 24: WHEN CHOOSING TO WORK WITH A CONSULTANT, WHICH FACTORS INFLUENCED YOUR CHOICE?, N=41.

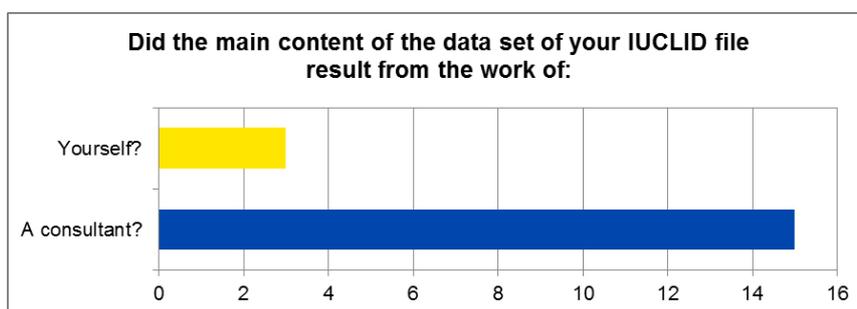
2.3.1.3 Individual registrants

The final batch of questions on SIEFs were answered by those who indicated that they were individual registrants (and therefore, not part of a joint submission).

Of the 17 respondents, eight individual registrants indicated that they had been aware of other companies who had registered their substance or were intending to do so.

Of these eight respondents, several reasons were given as to why they chose to register individually instead of as a part of a joint submission. These reasons included the cost, that it was not seen as necessary and that there were difficulties in dealing with consortiums. A full breakdown is provided in Annex I.

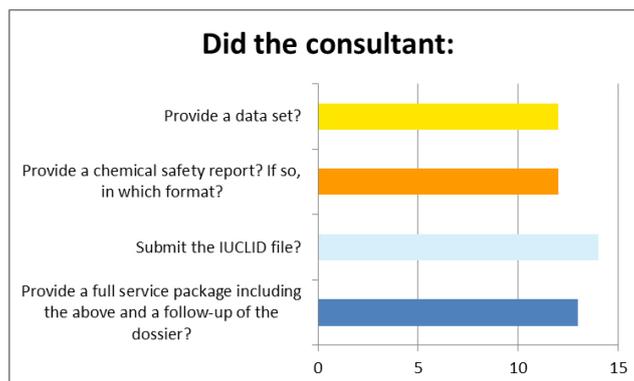
15 individual registrants said that they used a consultant for constructing the main content of the data set of the IUCLID file work. Three indicated that they had done this work themselves.



GRAPH 25: WHO CONSTRUCTED THE MAIN CONTENT OF THE DATA SET OF YOUR IUCLID FILE?, N=18.

12 individual registrants said that the consultant had provided a data set; the same number indicated that a chemical safety report had been provided by the consultant; 14 said that the consultant had submitted the

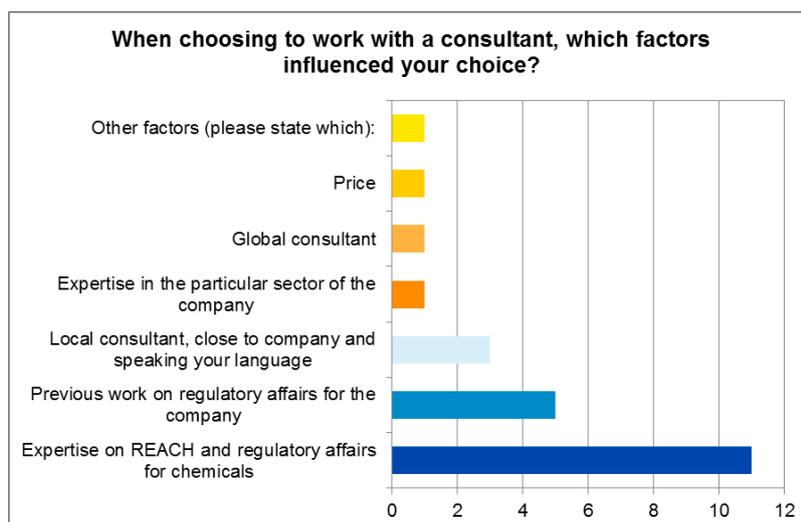
IUCLID file and 13 said that the consultant had given a full service package including the above and follow-up of the dossier.



GRAPH 26: WHAT DID THE CONSULTANT PROVIDE?, N=15.

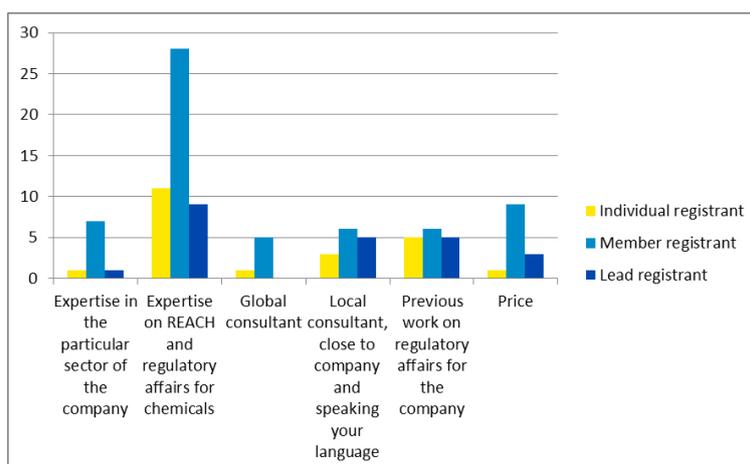
In terms of satisfaction with the support of the consultants, again the responses were positive with 93.3% indicating that they were at least somewhat satisfied. Only one individual registrant responded that they were somewhat dissatisfied.

The responses of the individual registrants in terms of their reasons for choosing to use a consultant indicated that the main reason was expertise on REACH and regulatory affairs for chemicals.



GRAPH 27: WHEN CHOOSING TO WORK WITH A CONSULTANT, WHICH FACTORS INFLUENCED YOUR CHOICE?, N=15.

Price does not seem to be as high a priority in choosing a consultant for the individual registrants as it was for the member registrants or the lead registrants. Comparisons between the answers provided for this question from each type of registrants is provided in graph 27.



GRAPH 28: COMPARISON OF REGISTRANTS' RESPONSES FOR CHOOSING CONSULTANTS.

For those individual registrants who collected the data set for the IUCLID file themselves, an open field question was posed on how they collected the data. Three responses were given, which included: "in house", "internal lab analysis (sic)" and "With help of ECHA".

2.3.2 Data sharing

The questions on data sharing were limited only to member registrants. The first question posed asked the member registrants whether they had difficulties in gaining a Letter of Access and/or token for the joint submission.

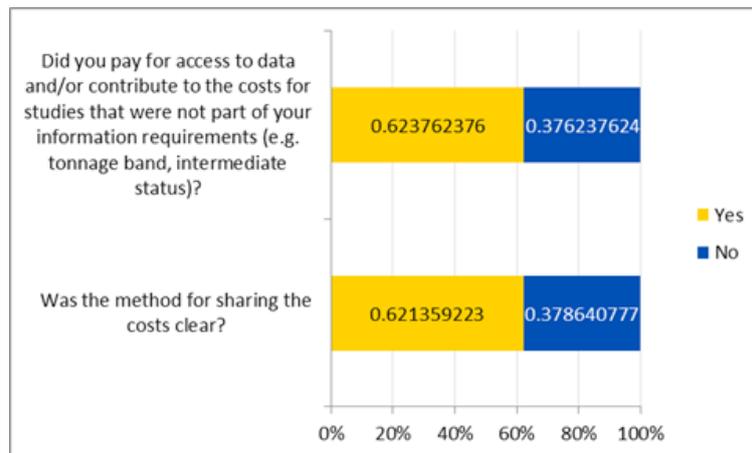
From 105 respondents, a minority of 17 (16.2%) claimed that they had difficulties. Of the 17 who had difficulties, further information was provided in an open field question. The most commonly occurring themes here were issues with receiving information from the lead registrant and cost. A full breakdown is provided in Annex I.

The member registrants were then asked whether they received access to the data in good time. Of the 104 responses, 93 member registrants (89.4%) indicated that they had.

The registrants were then posed questions on the fairness and transparency of the cost sharing within the SIEFs.

In terms of fairness, 62.4% of the respondents said that they had to pay for access to data and/or contribute to the costs of studies that were not part of their information requirements. There were then 40 written responses to the question on the division of costs, a full breakdown of which is in Annex I.

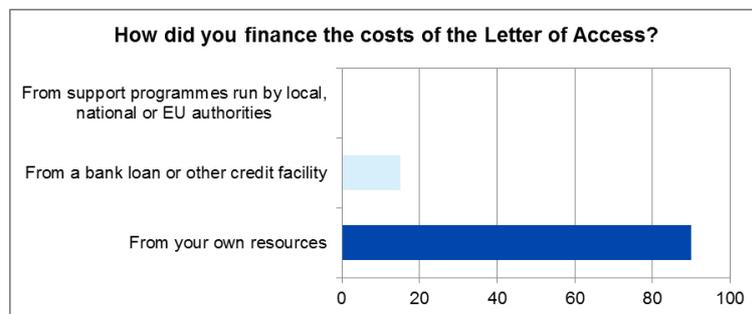
In terms of transparency, 62.1% of the respondents claimed that the method for sharing costs was clear to them. These figures are outlined in graph 28.



GRAPH 29: FAIRNESS AND TRANSPARENCY OF COST SHARING.

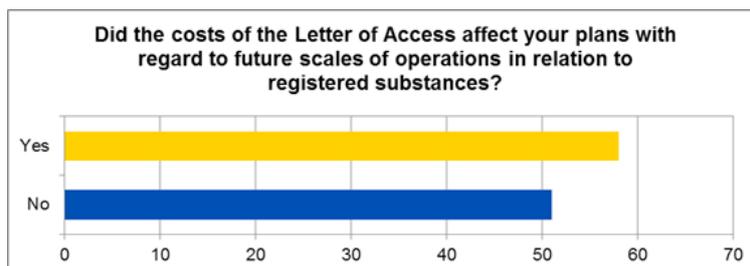
The respondents were then asked whether the invoice for the Letter of Access had been broken down into a useful and understandable form. 71.1% of respondents confirmed that it had been.

In terms of the costs of the Letter of Access, 60.6% of the member registrant respondents felt that the costs were disproportionate and unreasonable. 85.7% of respondents said that they financed the costs of the Letter of Access themselves, with 15 out of 105 (14.3%) needing take a bank loan or some other credit facility to finance the costs. No respondents indicated that they received support from programmes run by local, national or EU authorities.



GRAPH 30: HOW DID YOU FINANCE THE COSTS OF THE LETTER OF ACCESS?

The number of member registrants who indicated that the costs of the Letter of Access would affect their plans for future scales of operation in relation to registered substances was fairly balanced. 58 respondents claimed that the cost would affect and 51 claimed that it would not.

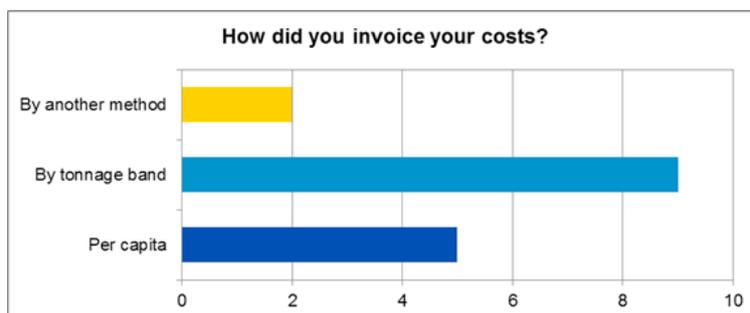


GRAPH 31: DID THE COSTS OF THE LETTER OF ACCESS AFFECT YOUR PLANS WITH REGARD TO FUTURE SCALES OF OPERATIONS IN RELATION TO REGISTERED SUBSTANCES?

2.3.3 Cost sharing

The questions on cost sharing were limited only to lead registrants. The first question posed was an open field question asking at which stage in the process was the Letter of Access/token for the joint submission shared with other SIEF members. The full breakdown of these responses can be found in Annex I.

The lead registrants were then asked how they invoiced their costs. The majority of the lead registrants (56.3%) did so by tonnage band. Five respondents broke the invoice down per capita.



GRAPH 32: HOW DID THE LEAD REGISTRANTS INVOICE THEIR COSTS?

The next question asked who designed the cost sharing model. Eight registrants responded that they designed their cost sharing model by themselves, with six respondents claiming it is based on someone else's design. When confirming by whose design, the lead registrants stated that, for example, they were: "Provided by te (sic) consultant", "REACH guidance on data sharing" and "Consortium design".

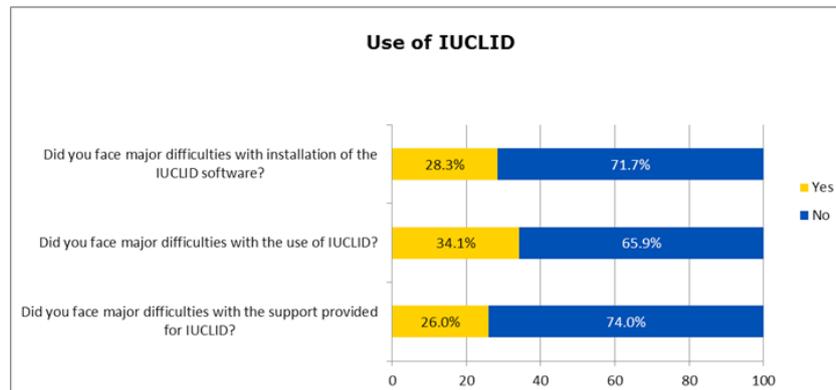
All of the 14 respondents felt that the cost sharing was fair, transparent and non-discriminatory. Three of the 14 respondents said that they had some form of difficulty in convincing members of the costs of the Letter of Access. These difficulties were exemplified in the written responses, a full breakdown for which is provided in Annex I.

All 15 respondents said that the invoice broke down the costs between providing the data set and administrative work in sufficient detail. When asked whether the breakdown also included an estimate of work to eventually update the dossier, only four out of 14 respondents (28.6%) answered positively.

2.3.4 Submission tools

The questions on submission tools were available for a wider target audience including all three types of registrants. The first question in this section focused on IUCLID and the registrants' ability to use the tool.

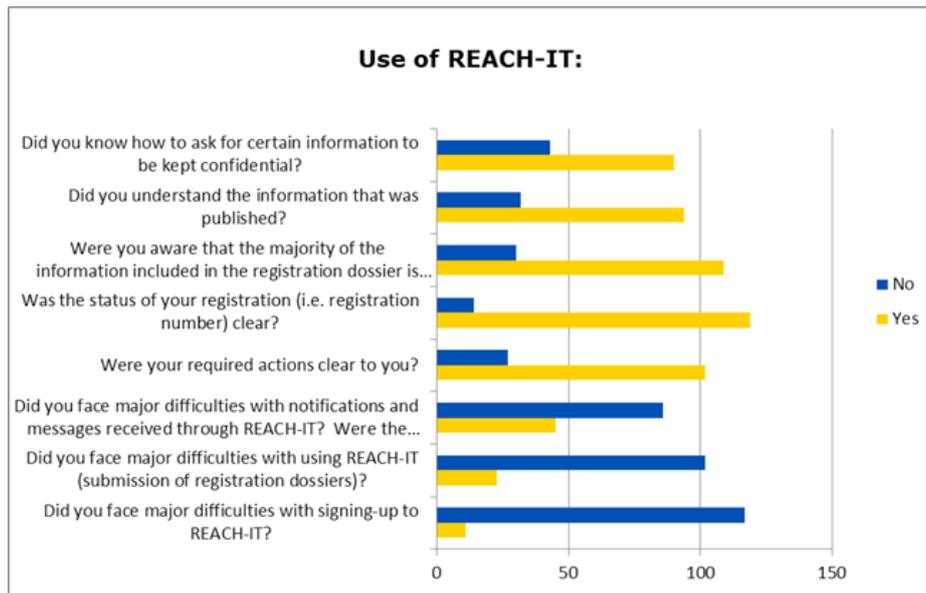
When asked whether they faced any difficulty with IUCLID, 71.7% of respondents said that they had no difficulty installing the software; 65.9% of respondents said that they faced no difficulty in using IUCLID; and 74.0% had no major difficulties in the support provided for IUCLID.



GRAPH 33: USE OF IUCLID

The second set of questions in this section focused on REACH-IT. Of 128 respondents, only 11 (8.6%) said that they had any problems with signing up to REACH-IT; only 23 of 125 respondents said that they had difficulties using REACH-IT; when asked if the invoice were easy to understand, 34.4% said that they were not. Furthermore, when asked if the required actions were clear to them, 20.9% said that they were not.

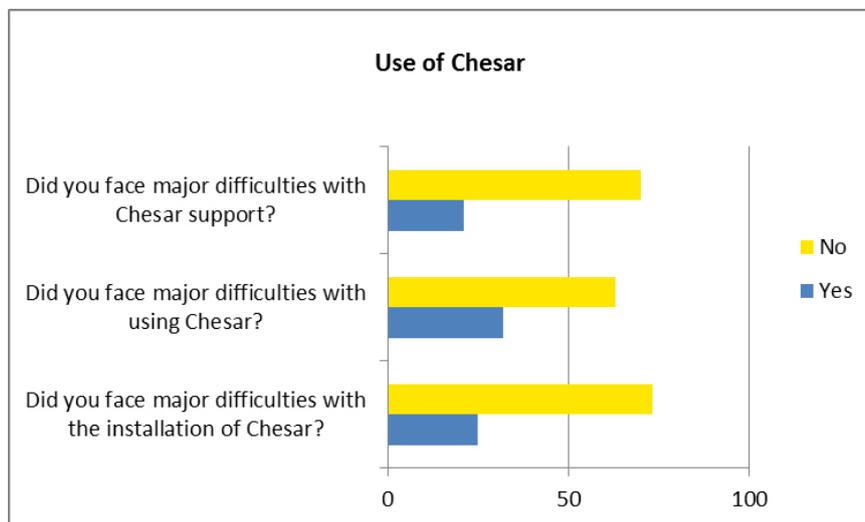
In terms of the status of the registration, 89.5% said that this had been clear and 78.4% said that they were aware that the majority of information in the registration dossier was available on the ECHA website. 74.6% also said that they were able to understand the information that was published. 67.7% of the respondents were also aware of how to ask for certain information to be kept confidential.



GRAPH 34: USE OF REACH-IT

The third set of questions in this section related to Chesar. The recipients were asked whether they faced difficulties with installation, use and support with Chesar.

In terms of installation, 25.5% of respondents said that they faced major difficulties; for using Chesar, 33.7% of the respondents had major difficulties and in terms of Chesar support, 23.1% of the respondents said that they had faced major difficulties.



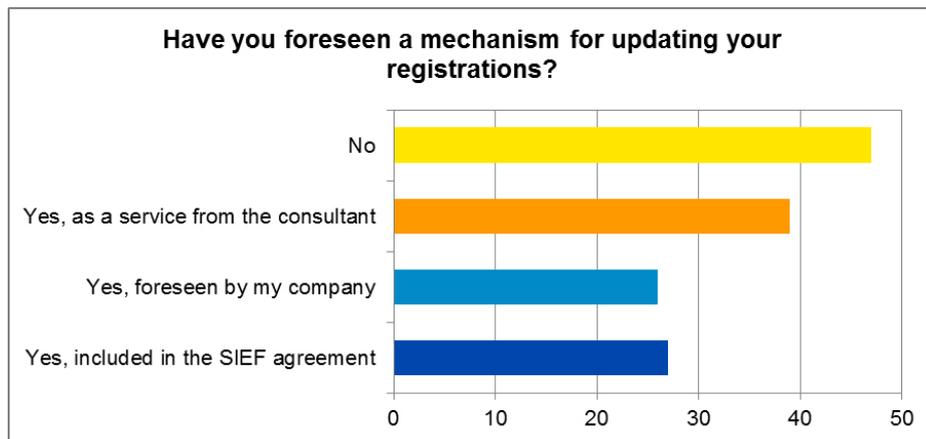
GRAPH 35: USE OF CHESAR

The final question in this section related to preparing safety data sheets. The recipients were asked whether the safety data sheets were prepared by themselves or whether this process was outsourced. Of the 128 responses, 73 (57.0%) said that they prepared the safety data sheets themselves. The remaining 55 (43.0%) told that they outsourced this process.

Of those that prepared the safety data sheets themselves, 13 respondents told that they used Chesar. The remaining respondents told that they used another tool. Numerous open field responses were received outlining which tools were used, and these are available in Annex I.

2.3.5 Follow-up after registration

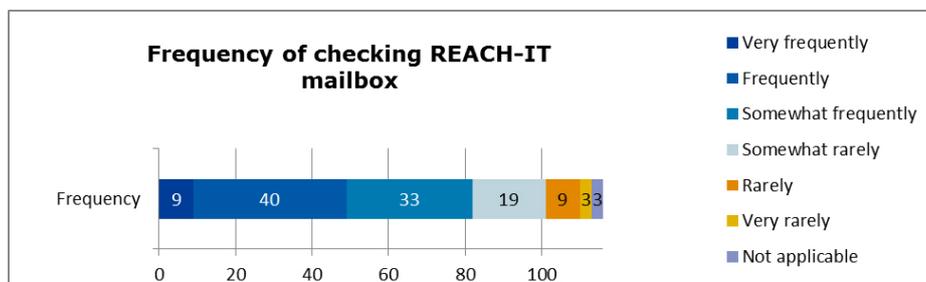
The recipients were asked whether they had foreseen a mechanism for updating their registrations. Of a total of 139 responses, 47 (33.8%) said that they had not foreseen a mechanism for updating their registrations; 39 respondents (28.1%) said that they had foreseen a mechanism as a service from the consultant; 26 respondents (18.7%) said that such a mechanism had been foreseen by their company; and 27 respondents (19.4%) said that such a mechanism was included in the SIEF agreement.



GRAPH 36: HAVE YOU FORESEEN A MECHANISM FOR UPDATING YOUR REGISTRATIONS?

The survey recipients were then asked whether they were monitoring the message sent to their REACH-IT account mailbox. 102 respondents (73.4%) said that they were with the remaining 37 respondents (26.6%) answering negatively. Of those that answered no, 24 respondents said that their consultant was monitoring the account mailbox on their behalf.

Those recipients that were monitoring their messages in their REACH-IT mailbox were asked how frequently they did so. 72.6% of the respondents answered that they monitored their REACH-IT account mailbox at least somewhat frequently.

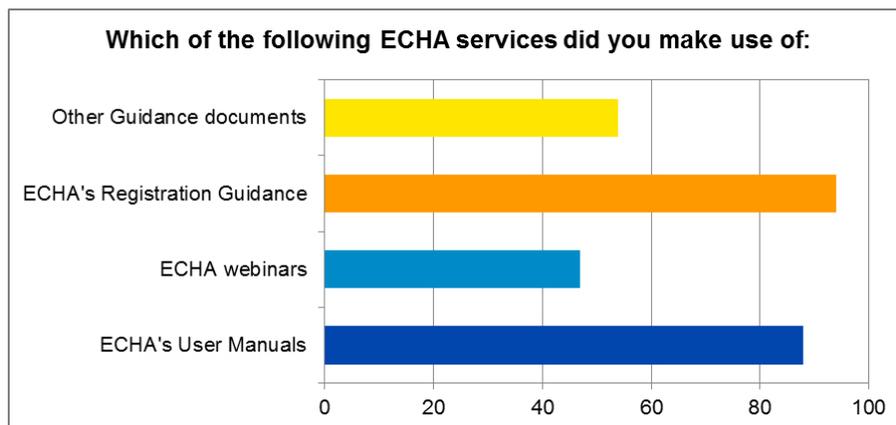


GRAPH 36: FREQUENCY OF CHECKING REACH-IT ACCOUNT MAILBOX

2.4 SUPPORT BY ECHA, NATIONAL HELPDESKS OR OTHER SOURCES

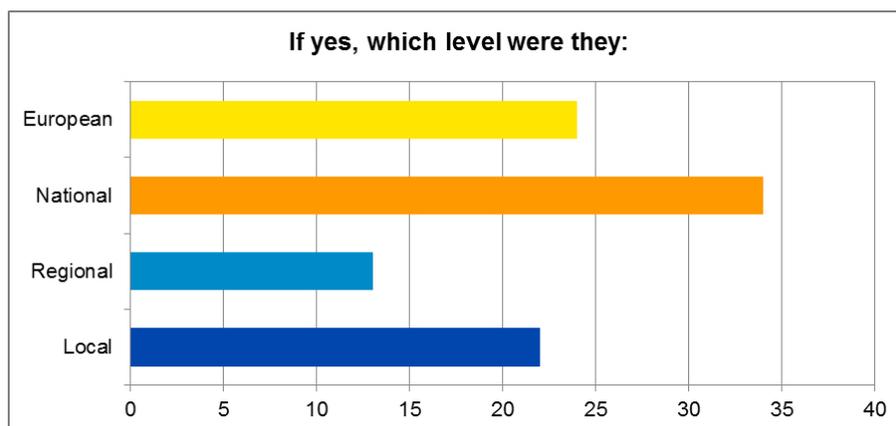
The respondents were asked questions about the support services that they had used during the registration process.

128 respondents gave 281 responses on the ECHA services that they had used. The most frequently used service indicated was ECHA's Registration Guidance with 94 responses (33.5%). The next most frequent were ECHA's User Manuals with 88 responses (31.3%). Other Guidance documents and ECHA's webinars got 54 (19.2%) and 47 (16.7%) responses, respectively.



GRAPH 38: WHICH OF THE FOLLOWING ECHA SERVICES DID YOU MAKE USE OF? N=128, RESPONSES=281

Respondents were then asked if they had attended any relevant conferences and at which level the conferences had been. 45.7% (63 respondents) had attended a conference that they deemed to be relevant. The most common level for relevant conferences was at national level (36.6%); followed by European level (25.8%); Local level (23.7%) and Regional level (13.9%).



GRAPH 39: IF YOU ATTENDED ANY RELEVANT CONFERENCES, WHICH LEVEL WERE THEY? N=66, RESPONSES=93

110 from 130 respondents (84.6%) said that they had made use of ECHA's guidance documents and practical guides to help them to understand the information requirements in detail.

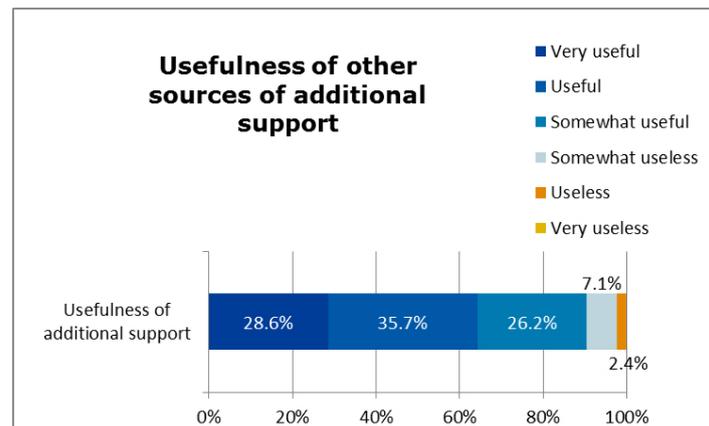
When asked whether they had contacted their national helpdesks for support, the answers were exactly split with 65 respondents saying that they had, and 65 also confirming that they had not. 54 open field responses were given describing the kind of support they had received from the national helpdesks and how well their requests were answered. A full breakdown of these responses is available in Annex I (see question 123).

A minority of 50 from 130 respondents (37.0%) said that they had contacted the ECHA Helpdesk for support.

42 open field responses were given describing the kind of support they had received from the ECHA Helpdesk and how well their requests were answered. A full breakdown of these responses is available in Annex I (see question 125).

In terms of additional support, 65 of 131 respondents (49.6%) said that they had sought support from additional sources to help identify their obligation. Some of those mentioned in the open field question include industry associations, regional self-help groups, Cefic and the consultants. A full breakdown is provided in Annex I (see question 127).

90.5% of the respondents said that they had found the additional support at least somewhat useful.

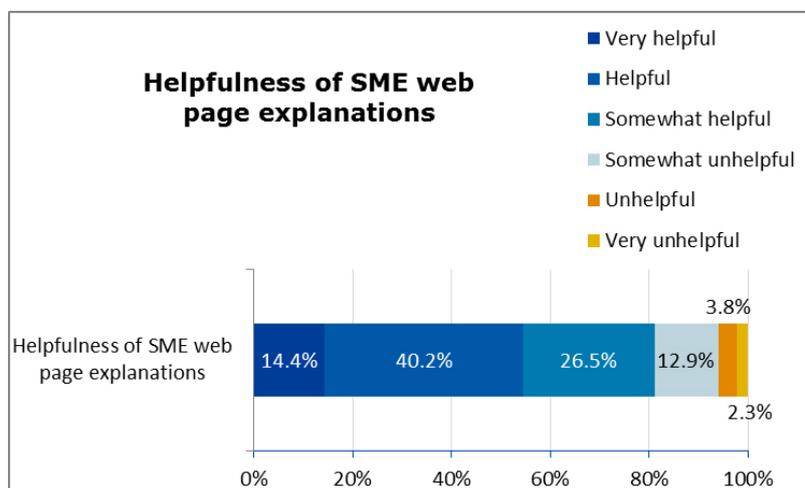


GRAPH 40: USEFULNESS OF OTHER SOURCES OF ADDITIONAL SUPPORT, N=93

The majority of respondents (64.7%) did not feel that any additional needs for information not covered by that provided so far by ECHA were necessary. Those respondents that did feel a need for support provided information in an open field. A full breakdown of these is available in Annex I (see question 130).

2.5 SELF-CLASSIFICATION AS SME

The responses from the survey give a clear indication that the SME registrants for 2013 found the SME web page explanations to be helpful. 81.1% of the respondents to the survey scored the helpfulness of the pages as at least somewhat helpful.



GRAPH 41: HELPFULNESS OF SME WEB PAGE EXPLANATIONS, N=132

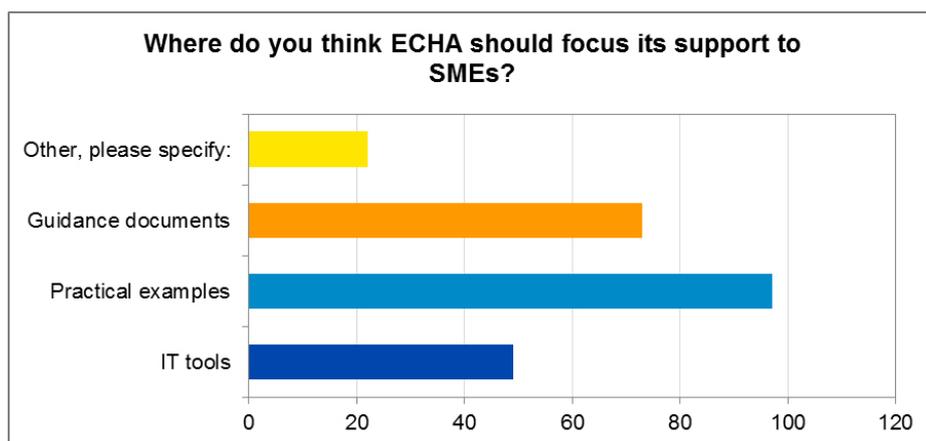
55.9% of 136 respondents did not use the fee calculator and the majority of SME registrants (78.7%) did not have difficulty in understanding which SME criteria their enterprise meets. Those that did indicate some difficulty gave open field responses which are available in Annex I (see question 134). Furthermore, the majority of respondents (63.4%) did not rely on the advice of a consultant to self-classify their enterprise as either a medium, small or micro enterprise.

50 responses were received to the open field question on whether the respondents faced difficulties in justifying their SME status. These are available in Annex I (see question 136).

2.6 ECHA SUPPORT

The final section of the survey and indeed this report, poses the question to SMEs on where ECHA should focus its support to help them in the future. There is a clear indication that the majority of the SMEs questioned would like ECHA to concentrate on providing practical examples in the future (40.1%). Improvement to the Guidance documents was also seen as an important support for SMEs with 73 responses (30.2%).

In terms of other areas of support, these include “Off the shelf solutions”, “promptly (sic) reaction if support is needed” and “Letters of access and preventing abuse” among others. A full breakdown of these is provided in Annex I (see question 137).

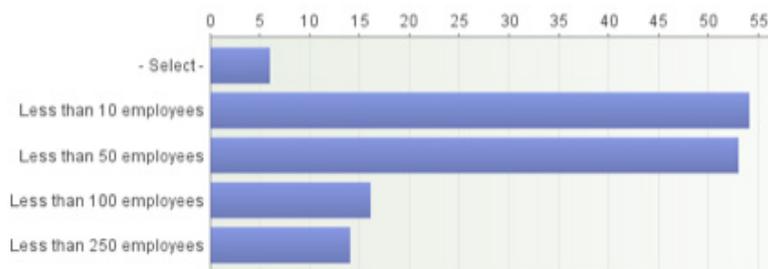


GRAPH 42: WHERE DO YOU THINK ECHA SHOULD FOCUS ITS SUPPORT TO SMES, N=131 RESPONSES=242

Annex I: Survey questionnaire

The information herein is derived directly from the online responses with no amendment nor editing carried out on any of the respondents' replies.

Successful 2013 SME registrants



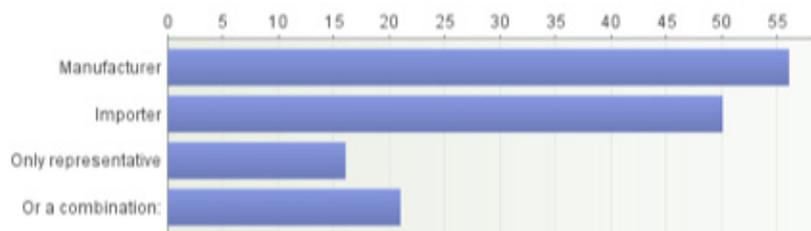
1. The size of your company - measured by employees only - is:

Number of respondents: 143



2. How many persons in the company specifically work with REACH, CLP and BPR administration?

Number of respondents: 143



3. What is your main activity regarding chemicals?

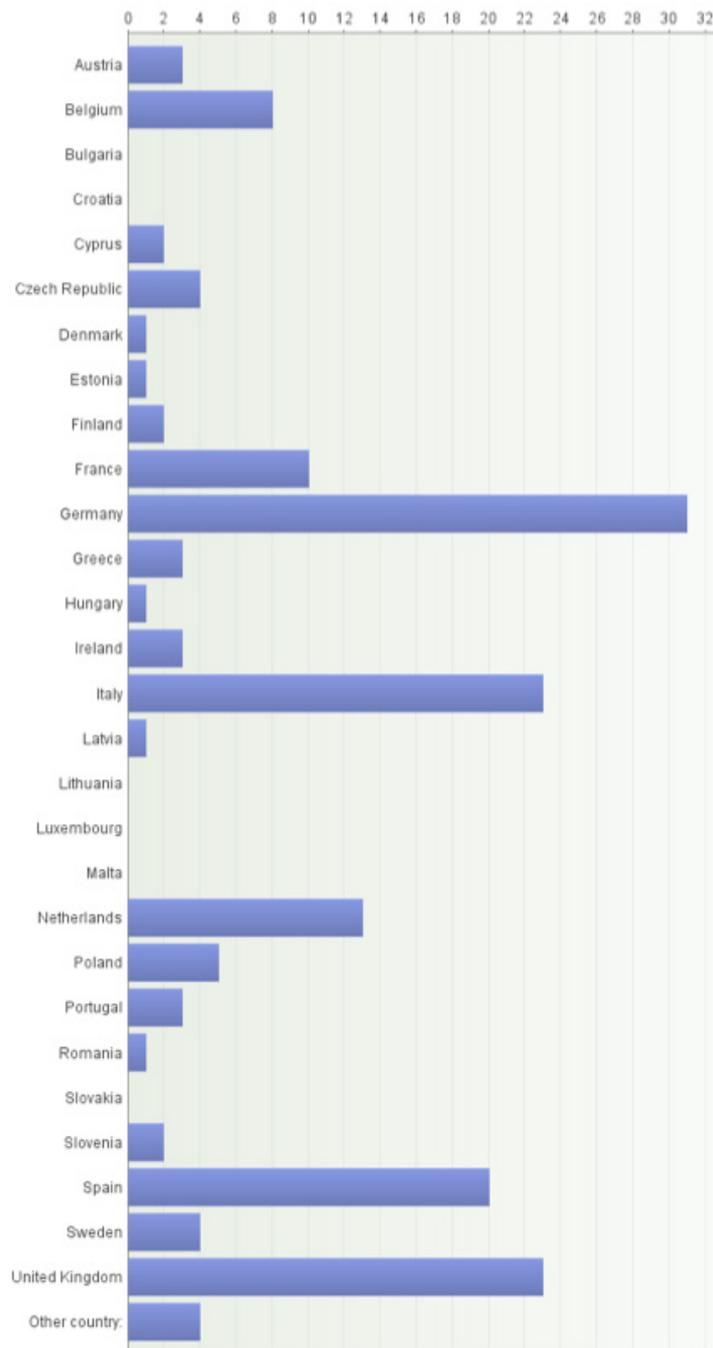
Number of respondents: 143

Open text answers: Or a combination:

- importer and toll production
- producer / importer
- of OR, Importer, Manufacturer.
- manufacturer, importer, OR
- importer and OR
- Representative and Consultant
- importer to manufacture end product
- Manufacturer & Importer
- distributor and manufacturer
- Importer & downstream user
- Importer and end user
- Importer and Only representative
- import and export
- Only representative + consultant
- Manufactur and downstream user
- Transshipment of fertilizers from railwayvagons into vessels
- Importer and Only Representative
- manufacturer and importer
- Downstream users
- Agent + O.R.
- Importer and representative

4. In which Member State is your company located?

Number of respondents: 143

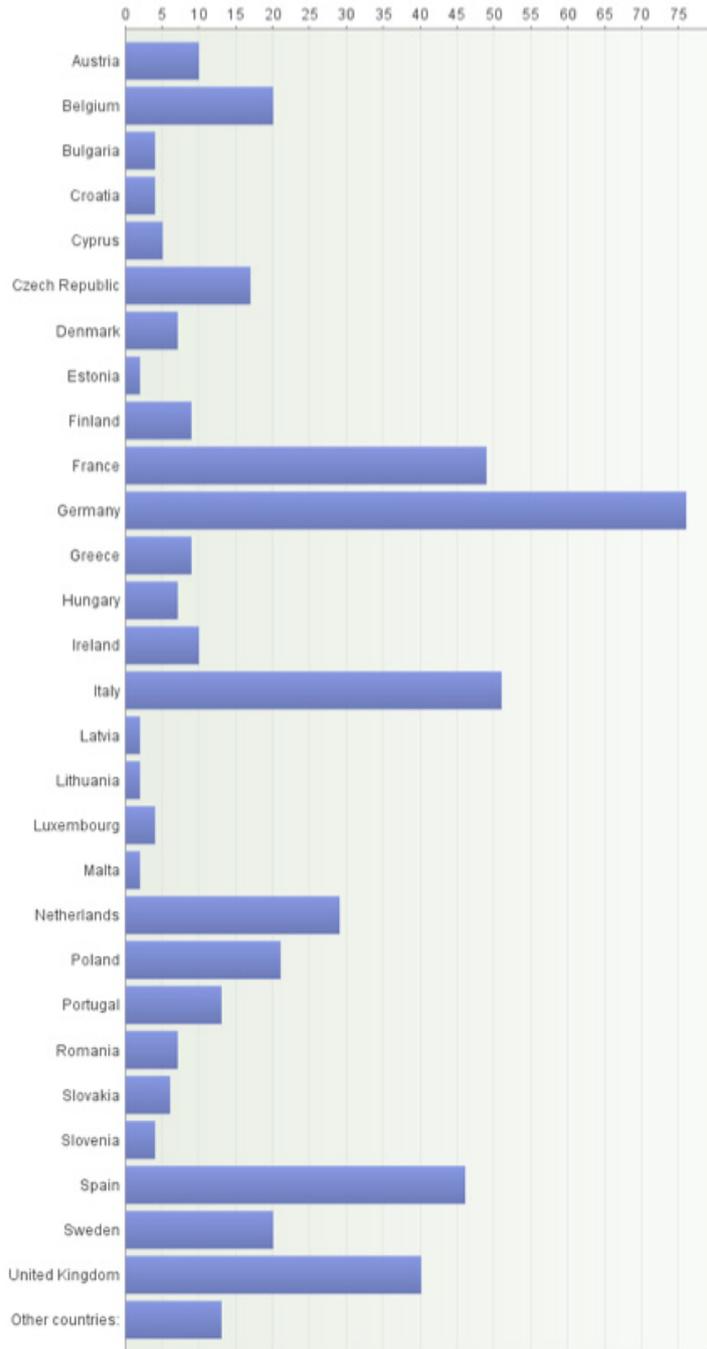


Open text answers: Other country:

- Norway
- Iceland
- Swiss
- Norway

5. In which Member States are your main customers located?

Number of respondents: 143



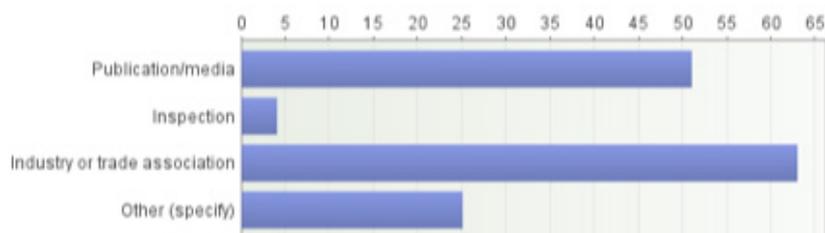
Open text answers: Other countries:

- Norway
- India, China etc
- SOUTH AMERICA
- USA

- USA
- Brazil, Switzerland, China (OR!)
- Norway
- China
- South Korea
- Non-EU
- Turkey
- USA

6. How did you become aware of REACH and you obligations under it?

Number of respondents: 143

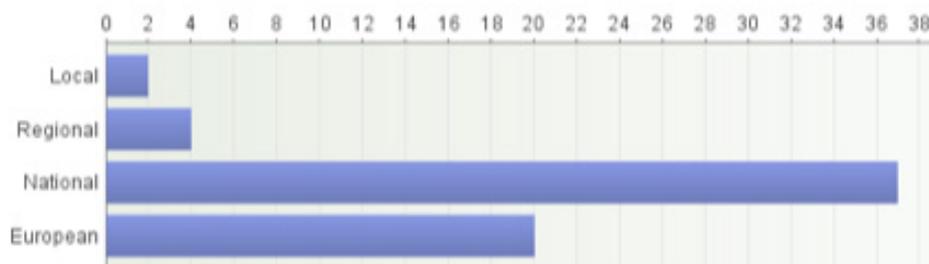


Open text answers: Other (specify)

- lecture at university
- Cefic and other consulting company websites.
- Seminar in 2002
- ministry -chemical department
- Cyprus Ministry of Labour
- Our personal activity of keeping updated about EU regulation, it started before 2006
- we are representative
- Consultant
- CONSULTING COMPANY
- self study
- in reg chem field since 2003
- Updating legislation
- have completed the PG certificate in REACH mgt
- Self study and also worked in EU sponsored projects in beginning of REACH
- SYNDICAT
- Director background in other regs e.g. ROHS, WEE & ERP
- Involved in REACH during my time with BP and chairman of FECC
- Ourself
- Latvian Ministry of Economy
- Colleagues (presumably via industry associations)
- customers
- Operate as regulatory consultancy offering Only Representative service
- We are a service provide, so we are aware of REACH since the White Paper was launched.

7. Which level of association?

Number of respondents: 63



8. Which one?

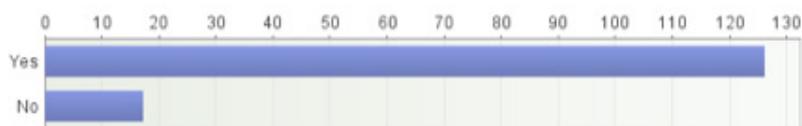
Number of respondents: 63

- EUROMINES
- ATC and UNITI
- PSXM
- Federchimica
- API
- CEFIC
- FCIO
- VCH
- ORO
- IFRA
- CEFIC
- EGCA
- CEFIC
- Associazione nazionale degli industriali distillatori
- CBA (Chemical Business Association)
- TÜV SÜD
- Chemicals
- Federchimica
- EFEO
- INORGANIC PIGMENTS CONSORTIUM
- Chemical
- Cefic
- UNIONE INDUSTRIALE DI PAVIA
- business partner
- IHK Industrie und Handelskammer
- TEGEWA
- Chemical Business Association (CBA)
- echa
- aqua española
- Plast och Kemiföretagen
- Federchimica
- FEDEQUIM
- EFEO

- FEDERCHIMICA
- ANFRE
- FEIQUE and AECQ
- BauA
- FEDEQUIM, FEIQUE
- ASSIC
- vnci
- UNIONE INDUSTRIALE
- FedeQuim
- EU
- What means assosociation ?
- VCI
- ETAD
- fdquim
- AIF
- -
- HSA
- Federchimica
- Arvan Srl
- UIC-MEDEF
- Slovenian chamber of commerce
- national
- ECGA
- Colipa
- FEDERCHIMICA
- UIC
- ASSIC
- ELGI
- Verband Chemiehandel
- Norsk Industri

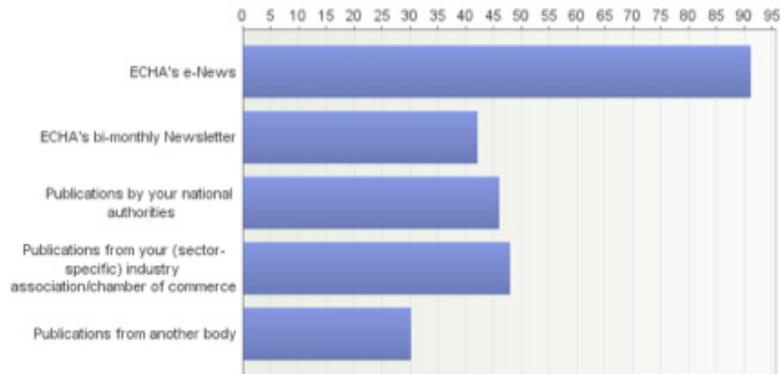
9. Are you keeping yourself updated on your REACH obligations through publications?

Number of respondents: 143



10. If yes, which ones?

Number of respondents: 124



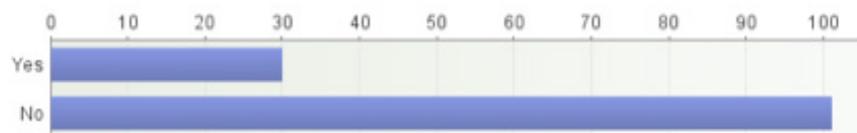
Open text answers: Publications by your national authorities

- web pages of ministry of industry
- FCIO
- HSE
- Diario da Republica
- Ministry of Health, Business Development Ministry
- Emails
- REACH helpdesk
- INERIS
- BAuA
- KEMI
- BauA homepage
- VCI and Deutsche Bauchemie
- Chemical Industry Association
- BAuA website
- WKO
- BAUA
- Biuro ds substancji i preparatów niebezpiecznych
- national helpdesk
- KEMI
- Open text answers: Publications from your (sector-specific) industry association/chamber of commerce
- UNITI
- ihk
- a numbe rof different bodies
- e-room, meetings
- federchimica
- UFCC
- UNIONE INDUSTRIALE DI PAVIA
- IHK
- TEGEWA
- CBA Update & regional update meetings
- Essencia
- UNIONE INDUSTRIALE

- Plast och Kemiföretagen
- Chemical Watch
- efeo circulars
- ANFRE
- FEDEQUIM, FEIQUE
- REACH Ready
- ORO, CEFIC etc.
- SCC
- CEFIC, Only Representative Organisation
- Open text answers: Publications from another body
- Cefic, CIRS, REACHLaw
- NGO's,
- reach ready
- Centro REACH , consultant for reach
- FORUM VERLAG
- Chemical Business Association
- Edilex
- REACH advisor
- Chemical Watch
- CENTRO REACH (ITALY)
- REACH READY
- Service providers
- mailing list of several website
- Reach Navigator
- The REACH Centre UK
- consultant
- Official Journals (Germany / EU)
- Sister company
- consulting company
- Chemical Watch
- online media

11. Are the publications labelled as SME-targeted?

Number of respondents: 131



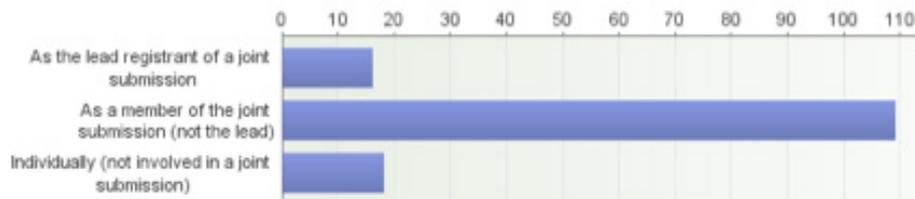
12. How understandable are the publications?

Number of respondents: 135

	Very understandable	Understandable	Somewhat understandable	Somewhat difficult to understand	Difficult to understand	Very difficult to understand	Not applicable	Total	Average
ECHA's e-News	14	59	23	11	4	5	7	123	2.8
ECHA's bi-monthly Newsletter	11	32	13	5	4	4	16	85	3.41
Publications by national authorities	8	30	23	12	3	1	12	89	3.26
Publications from your (sector-specific) industry association/chamber of commerce	15	39	14	8	0	1	13	90	2.93
Publications from another body	11	23	13	8	3	1	15	74	3.43
Total	59	183	86	44	14	12	63	461	3.17

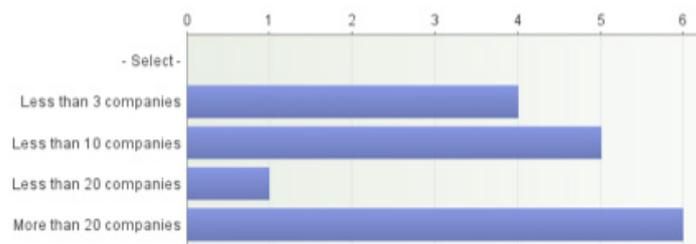
13. How did you mainly register your substance(s)?

Number of respondents: 143



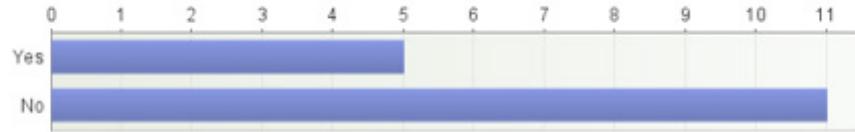
14. How large was/were the SIEF(s) for your substance(s)?

Number of respondents: 16



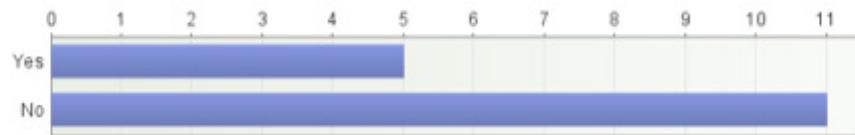
15. Was/were a consortium/consortia involved?

Number of respondents: 16



16. Did you need join (an) existing SIEF agreement(s)?

Number of respondents: 16



17. If no, were you part of the initial negotiations?

Number of respondents: 13



18. Did you fully understand the SIEF agreement?

Number of respondents: 16



19. If no, did you seek legal advice?

Number of respondents: 6



20. Was your legal advisor capable of representing your interests with regard to the SIEF agreement?

Number of respondents: 10



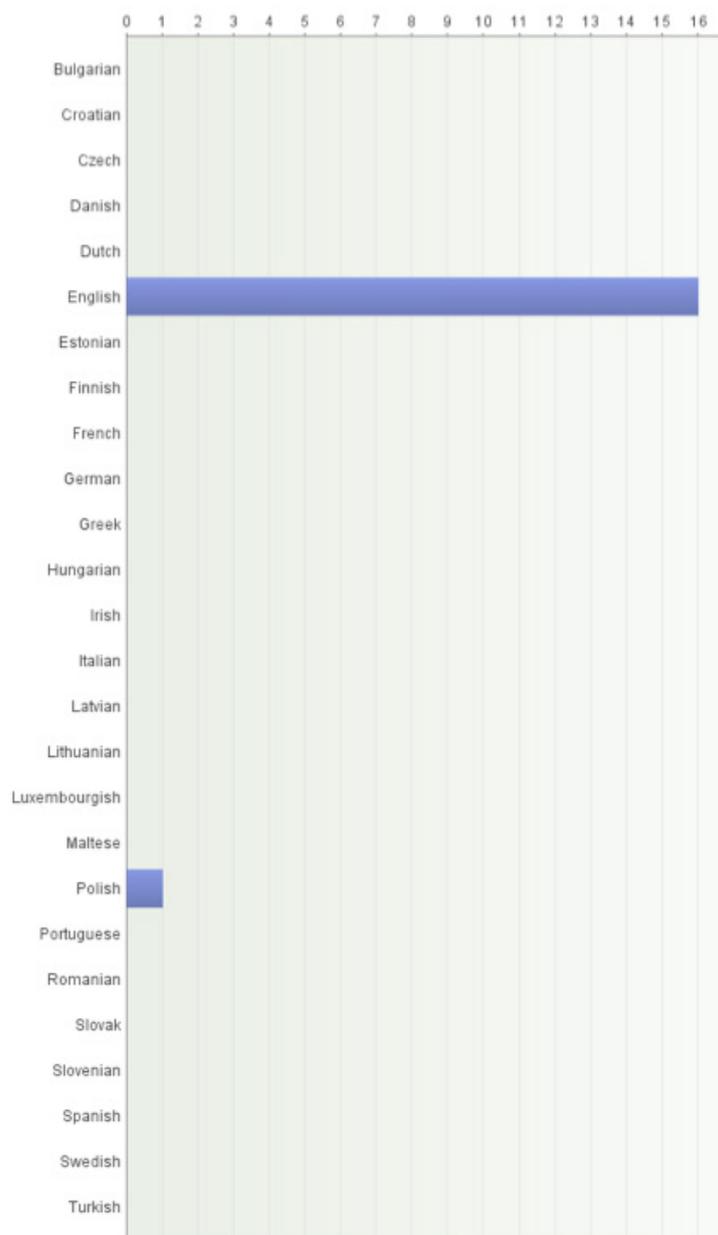
21. How did you communicate within the SIEF? Did you manage the communication?

Number of respondents: 16



22. In which language was it communicated?

Number of respondents: 16



23. How frequent was the communication?

Number of respondents: 16

	Very frequent	Frequent	Somewhat frequent	Somewhat infrequent	Infrequent	Very infrequent	Not applicable	Total	Average
Frequency of communication	0	3	8	5	0	0	0	16	3.13

24. How helpful was the communication?

Number of respondents: 16

	Very helpful	Helpful	Somewhat helpful	Somewhat unhelpful	Unhelpful	Very unhelpful	Not applicable	Total	Average
Helpfulness of communication	0	7	7	1	0	0	1	16	2.88

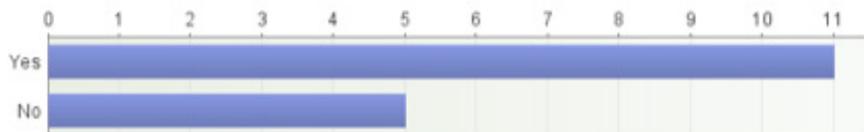
25. Has the communication continued post-submission?

Number of respondents: 16



26. Did you have enough resources to dedicate to your lead registrant role?

Number of respondents: 16



27. Did you communicate with all SIEF members?

Number of respondents: 16



28. Did they respond?

Number of respondents: 16



29. Did you establish the lead dossier yourself?

Number of respondents: 16



30. How did you deal with members who had difficulties communicating in the selected working language?

Number of respondents: 6

- A person who knows the language needed.
- That didn't happen.
- This problem has never subsisted with who answered the emails
- I did not face this problem.
- not applicable
- Translation of pertinent documents

31. Did the main content of the data set of your IUCLID file result from work of:

Number of respondents: 16



32. Did the consultant provide you with the data set?

Number of respondents: 11



33. Did the consultant provide you with the chemical safety report?

Number of respondents: 11



34. If so, in which format?

Number of respondents: 9

- Word
- IUCLID, pdf and word
- WORD
- pdf
- uclid
- word
- IUCLID AND PDF
- IUCLID file
- html and doc-formate

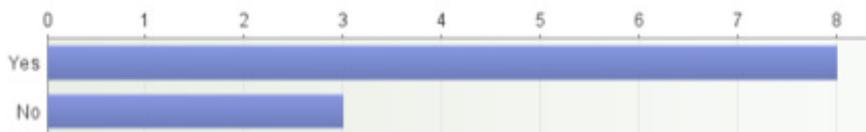
35. Did the consultant submit the IUCLID file?

Number of respondents: 11



36. Did the consultant provide a full service package including the above and a follow-up of the dossier?

Number of respondents: 11



37. How satisfactory would you consider the support of the consultant?

Number of respondents: 11



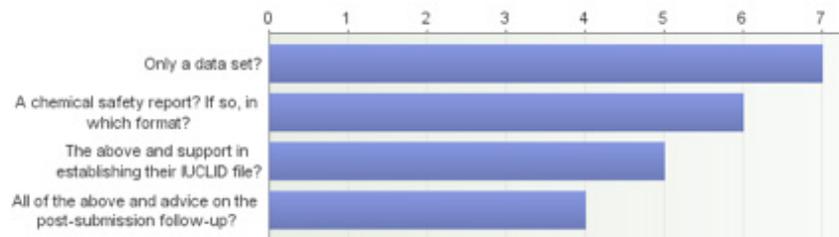
38. When choosing to work with a consultant, which factors influenced your choice?

Number of respondents: 11



39. Did you provide to the rest of the participants in the joint submission:

Number of respondents: 16

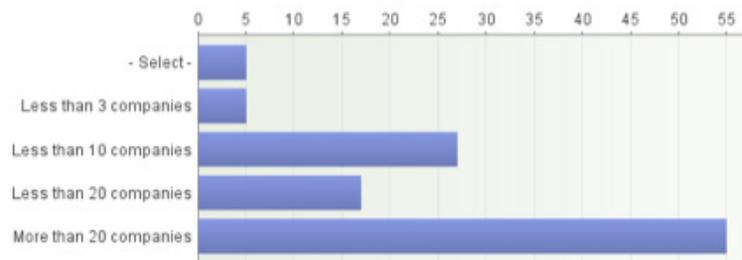


Open text answers: A chemical safety report? If so, in which format?

- word
- WORD
- WORD
- pdf
- word
- doc

40. How large was/were the SIEF(s) for your substance(s)?

Number of respondents: 109

**41. Was/were a consortium/consortia involved?**

Number of respondents: 109



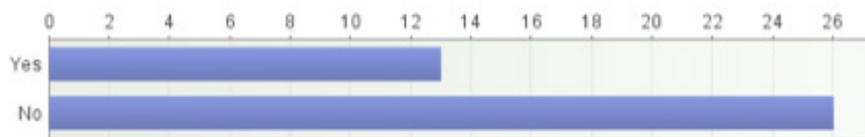
42. Did you need to join (an) existing SIEF agreement(s)?

Number of respondents: 109



43. If no, were you part of the initial negotiations?

Number of respondents: 39



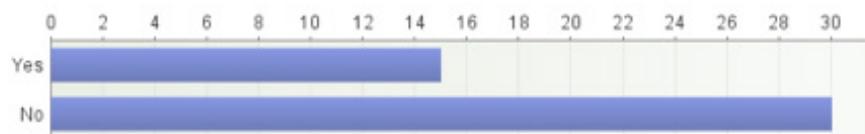
44. Did you fully understand the SIEF agreement?

Number of respondents: 109



45. If no, did you seek legal advice?

Number of respondents: 45



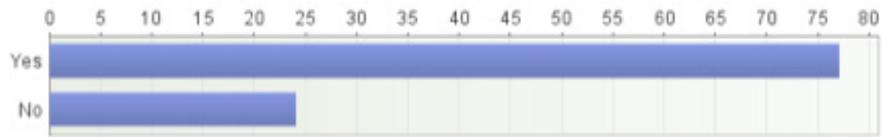
46. Was your legal advisor capable of representing your interests with regard to the SIEF agreement?

Number of respondents: 53



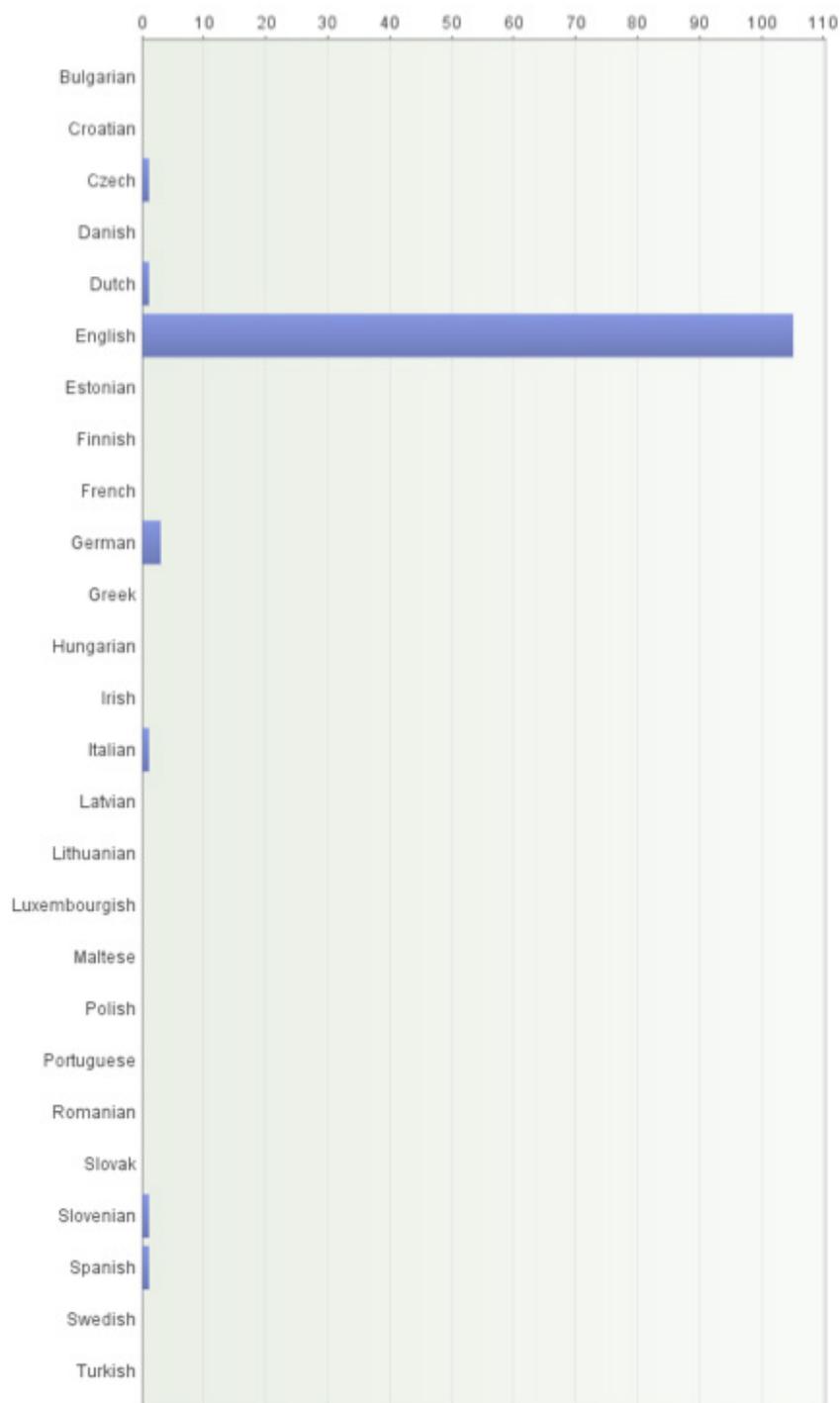
47. How did you communicate within the SIEF? Did the lead registrant manage the communication?

Number of respondents: 101



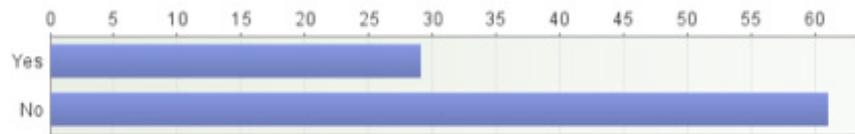
48. In which language was it communicated?

Number of respondents: 109



49. If they communicated in a language other than your mother tongue, did this negatively affect the communication?

Number of respondents: 90



50. Did the communication help to establish friendly working relationships?

Number of respondents: 101



51. Did the communication build trust?

Number of respondents: 92



52. Did the communication allow the sharing of best practices?

Number of respondents: 92



53. Please provide more detail on the above:

Number of respondents: 22

- This was a very formal and detached process.
- We were invited forming up a leadership group of registering several substances. However, the LR decided what the tests to be done and settle all the cost sharing structure before any communications.
- What do you mean with best practises?
We were not part of the initial SIEF/consortia besides our wish to do so.
- During the whole process for the pre-registration and join submission the exchanged e-mails and

correspondence were very helpful to understand the whole procedure.

- Sief Management of the two registrations faced by our company was correct from the formal point of view, we received all the communications, but it was impossible for us being part of the decision made after pre-sief. Our company couldn't hire someone specific for this kind of job, and even if we could, we had no chance of changing the decision taken from the bigger companies, during sief agreement's construction and sharing cost method decision.
- Not enough information provided regarding cost break down. Not clear and transparent.
- We belong to a Consortium that works very well. Within the Consortium we work with two Consultants: management one and a technical one. We are doing a lot of work to comply with REACH.
- As a Joint registrant there is hardly any control that LR decides and that too because of the company size compared to others
- Sometimes its easy to communicate but there are LRs with whom its difficult to communicate. Sometimes only online tool is used without having chance to communicate with lead about the cost. There are no negotiations possibilities. Everything is decided by the LR and no chance to see or evaluate the details.
- If the registrant is a big company, you have to follow and you have to pay a lot of money! If you want to continue to work, you have no choice.
- Most communication was done by an SFF or else a Consortium, rarely the LR. I have subsequently met some SFF's so would have a fairly good working relationship with them, however for other SFF's the data received was lacking and thus they became less responsive to mails.
- It was difficult to find out which company of the SIEF was the leader.
- Most of the times general information.
LR/service providers are mostly unhelpful when asked for clarification/details. Explaining of costs is seldom done!
- We pay 40000 € to receive the dossier, we are a little company and this has been a very expensive. The communication has been in a only direction, do you want you have to pay.
- for one of our registrations answers should read no; a very un-cooperative lead registrant
- SIEF/Consortium communications were made difficult at times due to discussing substance details and uses with competitors. Colleagues with technical, sales and contracts experience helped with SIEF agreements. The Directors signed them.
- Lead registrant was a large competitor. David & Goliath scenario.
- we payed only for it
- All companies involved are competitors
- N.A.
- we purchase Letters of Access through REACH IT,... I went through some info on SMEs,...I think clearer info on what is an SME would be useful.
- Please note that we are as a service provider Only Representative for various SMEs (but we also build lead dossiers for mostly EU based companies who register themselves).
For efficiency reasons, it appears to me that most lead dossiers were generated without involvement of other SIEF members. Most dossiers/ CSRs became available at a very late stage (a couple of weeks or less before 31 May 2013) forcing us to submit it for our customers with very little review opportunity and initiate a possible quality update with the lead registrant after the deadline.

54. How frequent was the communication?

Number of respondents: 104

	Very frequent	Frequent	Somewhat frequent	Somewhat infrequent	Infrequent	Very infrequent	Not applicable	Total	Average
Frequency of communication	9	17	41	17	12	7	1	104	3.3

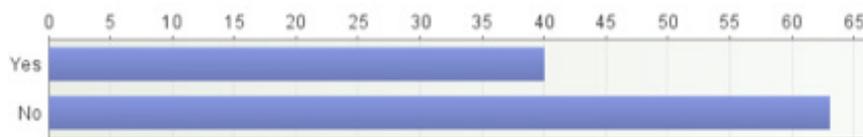
55. How helpful was the communication?

Number of respondents: 104

	Very helpful	Helpful	Somewhat helpful	Somewhat unhelpful	Unhelpful	Very unhelpful	Not applicable	Total	Average
Helpfulness of communication	11	33	39	15	3	1	2	104	2.78

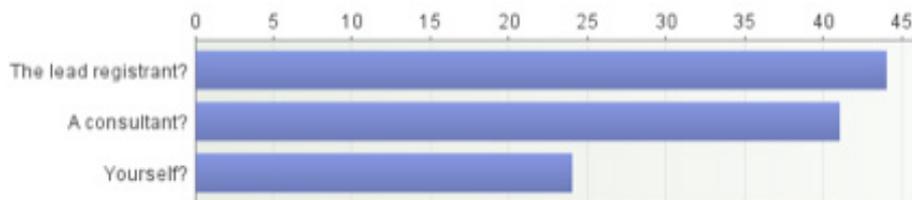
56. Has the communication continued post-submission?

Number of respondents: 103



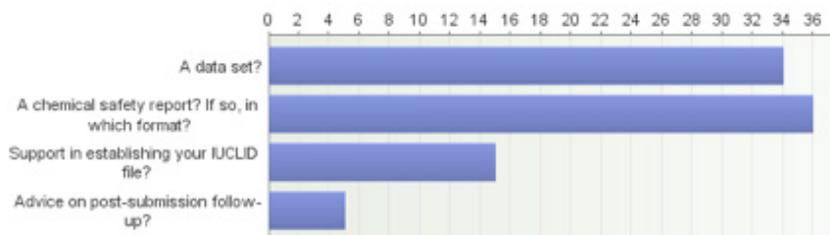
57. Did the main content of the data set of your IUCLID file result from work of:

Number of respondents: 109



58. Did the lead registrant provide:

Number of respondents: 44



Open text answers: A chemical safety report? If so, in which format?

- Word file
- dossier
- iuclid
- Doc.
- word document
- word and pdf
- Office Word
- pdf
- .doc
- pdf
- pdf.
- PDF
- Usually as a pdf which we could attache to the Dossier. In one case we did not receive a CSR, which was not good. Some Consortia e.g. CONCAWE advised on establishing the IUCLID file, but we knew what to do in-house anyway. In some cases there was post-submission follow-up advice provided, but this was a secondary issue - the main thing was to get the Dossier up in time.
- word
- word document
- MSoffice / word
- Word
- PDF
- doc
- summary
- Free format (analog to CHESAR)
- pdf
- MS Word
- pdf
- doc

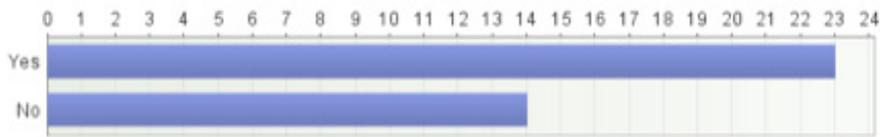
59. Did the consultant provide you with the data set?

Number of respondents: 36



60. Did the consultant provide you with the chemical safety report?

Number of respondents: 37



61. If so, in which format?

Number of respondents: 16

- i5z and pdf
- Word document
- MS Word
- digital
- Pdf format and Word file
- pdf format
- WORD document and/or PDF document
- HTML
- IUCLID
- Pdf
- The consultant acting for the Consortium provided the joint CSR in rtf format and a chesar file. For intermediate registrations we had to prepare our own dataset.
- word
- pdf and word
- pdf
- just filled in IUCLID as needed, didn't need CSR
- IUCLID

62. Did the consultant submit the IUCLID file?

Number of respondents: 38



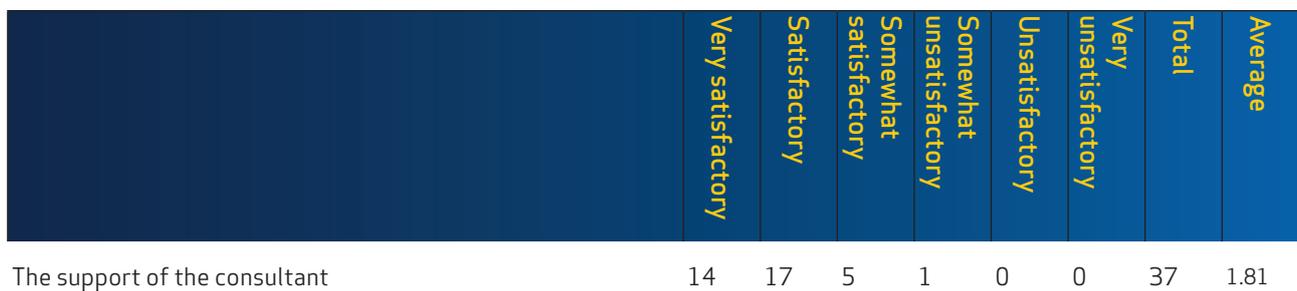
63. Did the consultant provide a full service package including the above and a follow-up of the dossier?

Number of respondents: 37



64. How satisfactory would you consider the support of the consultant?

Number of respondents: 37



65. When choosing to work with a consultant, which factors influenced your choice?

Number of respondents: 41

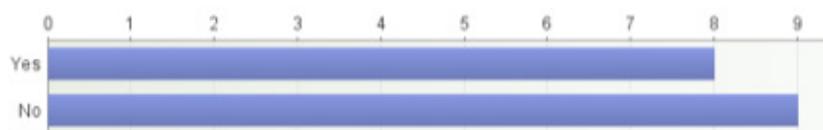


Open text answers: Other factors (please state which):

- this consultant was linked with the leader
- The consultant was for the consortium, so it was chosen among a group of submitants.
- Lack of knowlege in-house
- Consortium decision
- Consultant of the LR
- The Consortium chose before I joined.

66. Were you aware of any other companies having registered your substance or intending to do so?

Number of respondents: 17

**67. If yes, why did you decide to register individually instead of as part of a joint submission?**

Number of respondents: 8

- Cost
- It was not seen necessary.
- Because dealing with the zeolite consortium was extremely difficult they never responded to our requests and made life extremely difficult so much so that it appears a cartel is at work, and the exorbitant fees acted as a barrier to entry
- cost
- MORE EXPENSIVE
- UVCB substance
- We buy LOA. Cannot give an open check in consortium for registration. This whole REACH is a ridiculous system with only one clear purpose and that is a trade barrier.
- ALL OUR SUBSTANCES ARE PHARMACEUTICAL INTEREMEDIATES

68. Did the main content of the data set of your IUCLID file result from the work of:

Number of respondents: 18

**69. Did the consultant provide you with the data set?**

Number of respondents: 15



70. Did the consultant provide you with the chemical safety report?

Number of respondents: 15

**71. If so, in which format?**

Number of respondents: 7

- Word.
- excel
- PDF
- CLP
- pdf
- NOT APPLICABLE
- IUCLID

72. Did the consultant submit the IUCLID file?

Number of respondents: 15

**73. Did the consultant provide a full service package including the above and a follow-up of the dossier?**

Number of respondents: 15



74. How satisfactory would you consider the support of the consultant?

Number of respondents: 15

	Very satisfactory	Satisfactory	Somewhat satisfactory	Somewhat unsatisfactory	Unsatisfactory	Very unsatisfactory	Total	Average
The support of the consultant	6	7	1	1	0	0	15	1.8

75. When choosing to work with a consultant, which factors influenced your choice?

Number of respondents: 15



Open text answers: Other factors (please state which):

- speaking Swedish

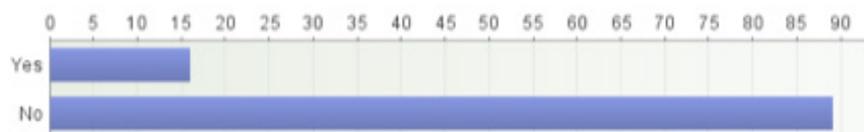
76. How did you collect the data necessary for your registration?

Number of respondents: 3

- in house
- internal lab analysis
- With help of ECHA

77. Did you have difficulties gaining a Letter of Access and/or token for the joint submission?

Number of respondents: 105



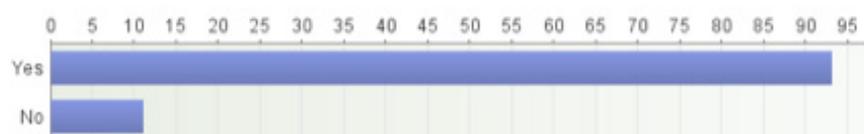
78. If yes, what type of difficulties?

Number of respondents: 17

- payment through bank / valeur dates
- We were very obliged to the LR. The staff were very helpful and they did the things and our life easier
- i felt as they were competitor, they make us pass an interview asking questions they should have ask, then make us wait until last minute, we had to write to echa
- costs for RRA
- Lead registrant was not forthcoming with the information
- language and formulation
- if we ask data sharing, the holder react slowly
- Sometimes the consortium manager is the middleman because which delay is done as he always give the option that they have not received the information from LR and LR is non contactable as consortium is managing everything
- A lot of administration and invoicing, but that is necessary.
- Price totally disproportionate to the level of business
- Economics
- very expensive
- cost of the loa
- Unable to contact some of the managers and delays in receiving response via email.
- Timing. A SIEF contract and LOA were provided at a very late stage (two weeks before the deadline), leaving little time for payment. The token was available only one week before the deadline, leaving no time for checking the dossier and CSR (which was submitted individually). Qualitative updates had to be arranged after the deadline.
- Lead not responding, lots of delay to get the token, letter of access expensive and not representative of actual costs
- ECONOMICAL DIFFICULTIES, TOO MUCH EXPENSIVE

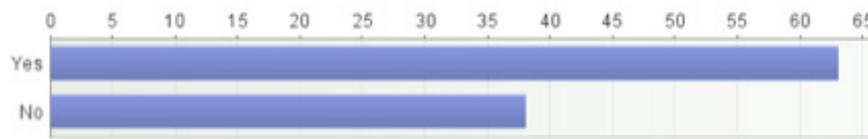
79. Did you get access to data in good time for your submission?

Number of respondents: 104



80. Fair? Did you pay for access to data and/or contribute to the costs for studies that were not part of your information requirements (e.g. tonnage band, intermediate status)?

Number of respondents: 101



81. Were the costs shared by SIEF members divided equally, according to tonnage bands, or in another way? If so, which other way?

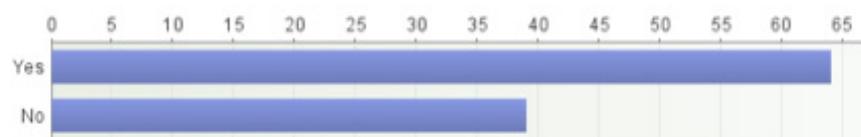
Number of respondents: 40

- According to tonnage band
- Don't know, not transparent
- They were divided equally, but as we were not asked to participate in the consortia from the beginning besides the fact that we would like to do so
- equally
- divided equally but still under discussion because the cost for a SME has much more impact than for a big company
- We do not understand why the price for Letter of Access for Silicon dioxide for 100 - 1000 t is 180 000 EUR.
- divided according to tonnage band
- according to tonnage bands
- hope is divided equally. We have been asked from LR to pay a certain amount for that joint submission on our category 100 up to 1000 tons. We trust them but we were expected to know more about the proportion of that payment between the registrants
- not sure
- tonnage bands
- According to number of co-registrants to be recalculated in June 2013
- The calculation method of sharing costs was decided, in our opinion, without possibility for the SME of influencing the decision of it. Therefore it resulted unfair. For further explanation please contact me, I'll be more than pleased to explain our position regarding calculation method and SIEF
- They didn't appear to be equal. When an additional registrant joined, the costs did not reduce by the expected amount.
- Other companies joined after the deadline so we paid a higher fee and are awaiting a refund which we cannot get till November. The stupid system rewarded late registration.
- tonnage bands
- Large companies who are the SIEF founders decide or the SIEF mgt companies appointed by big boys decide. No say for SME.
- I do not know
- we have been charged very high cost more than 10K Euros for the intermediate dossier without any data requirement for less than 1000tpa as well.
- equally
- Yes but for my point of view, it was not equal. Moreover, if our registration was for 2013, and if we didn't pay in 2000 (because the lead registrant introduced his dossier in 2000), we had the cost increase by 10% a year!!
- Yes the costs were divided equally, according to tonnage band.

- For CONCAWE it was €10k across the board, and while this was handy administratively, it meant that smaller companies pay more of their relevant income than large ones. Generally, costs were dependent on your tonnage band.
- According to tonnage bands
- equally. Too expensive for a small company like us.
- I do not know the cost of the other members
- yes equally, tonnage band
- equally according to tonnage bands
- Appear to be shared equally with the Consortium although we have not been provided with full accounting details only a summary.
- members can just claim to be 1-10 or 10-100 (if CSR is needed) and pay for LoA in that tonnage band - while they can submit in 100-1000 or 1000+ without the consortium or LR are able to follow. This is a real problem which has been seen several times - and only discovered by indirectly info!!!!!!!!!!!!!!
- zero transparency. Out of 72 SIEF members, only 3 registered in 2013. LR registered in 2010. Paid €28,000
- ??? we don't know
- Divided equally according to nr of participants (i.e. independently from ton. bands
- N.A.
- equally
- don't know
- Costs were shared by SIEF members that were registering in 2013. When more SIEF members join in for 2018, re-imbursment will be arranged. What was a bit rare is that an advanced payment had to be made for studies from the testing proposal. According to the SIEF facilitator this was based on experiences in 2010 when non-EU SIEF members did not pay for tests from the testing proposal when they were carried out, but profited from the addition of them to the joint dossier. With a small SIEF this leads to an unfair burden of cost for the lead registrant and members that do pay.
- divided by number of registrants, not taking into account SME status
- Within the consortia
- The cost was divided equally for the two biggest tonnage bands.

82. Transparent? Was the method for sharing the costs clear to you?

Number of respondents: 103



83. Was the invoice for your Letter of Access broken-down into a useful and understandable form?

Number of respondents: 97

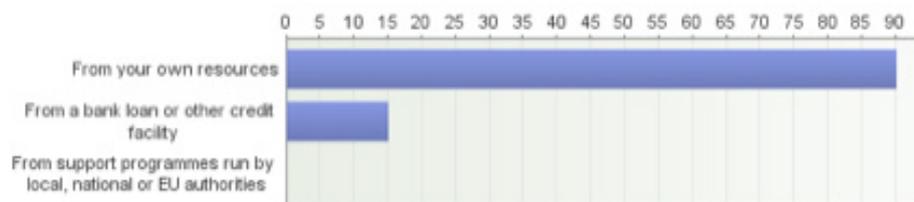


84. Do you consider the costs of the Letter of Access to be proportionate and reasonable?

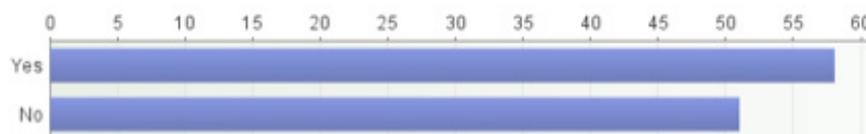
Number of respondents: 99

**85. How did you finance the costs of the Letter of Access?**

Number of respondents: 103

**86. Did the costs of the Letter of Access affect your plans with regard to future scales of operations in relation to registered substances?**

Number of respondents: 109

**87. If yes, in which way?**

Number of respondents: 46

- negatively
- Letter of Access for substances with low participation are very expensive. It is envisioned that for many Substances of 2018 Deadline, in which substances of niche use are registered the costs of Registration will be prohibiting.
- high costs inhibit sales of products
- We will not be able to register all our manufactured substances in the future.
- The LoA costing EU70K-90K each for several substances divided by 2 registrants, with <50mtpa market demands. The registration is giving around 30% burden on selling price.
- costs influence of the product price, the product price has to be increased
- We will check for the costs of LoA and afterwards decide to eventually reduce our import quantity.
- sort out some substances
- in commercial way
- Probably we will have to stop making some products
- We will not continue to import after 2018

- taking into consideration the present bad Economic situation and crisis in our Country that badly influence our purchasing power
 - some we will stop importing as it is too expensive
 - High cost meant we had to consider whether to continue sales and whether these would be profitable in the medium and long term.
 - Since it's not possible to establish the cost of registration in advance, it's not possible making a selection of key products, especially in our market (dyestuffs for textile). Moreover it's not possible to recover the cost of the registration on the sale price, because all our competitors are not reverting this cost on the sale price. Please contact for further information.
 - change tonnage band
 - Too costly for some products to continue.
 - But if the cost had been higher we would have pulled out of the market. We have been lucky that other substances have been registered by an OR so we have become a downstream user.
 - Profitability calculated on REACH registration cost
 - stop producing
 - Future will tell if our registration will allow us to maintain or increase our market share
 - This answer is only in case of some substances where expected sales for the non-EU manufacturers have not picked up, even though the REACH registration is done .
 - A risk, that the market/business/volume will keep steady, as we are in the trading business.
 - My raw material is more expensive, then I am less competitive on the market.
 - control the quantity imported
 - skip of several product
 - General stop of future investments and/or product developments
-
- We are Producer of dyestuffs for the textile industry in Europe. This industry is already sick, if we increase our prices, we don't help the sector!
 - This did not come into play with me as an OR, because while I paid the LOA on the company's behalf, I knew that I would receive the payback within 30 days so there wouldn't be too much of a lack of liquidity.
 - In some cases we would not import directly some substances because it is not worth the effort
 - Deletion of most of the products on the product range. Downsized the business
 - We work as OR for mostly chinese enterprises and have found that the relatively high prices for LoA are in fact a trade barrier. For most smaller chinese enterprises these costs can't be borne!
 - some products we will not buy anymore
 - Increase the cost of the final product
 - The Price affects the volume of imported substances
 - We have not completed our own letter of access purchases yet. Those done so far were paid by our contracting partner.
 - Change vendors to be within EU or to have ORs
 - cost for the products will increase
 - Cost of LoA might reduce our interest to file new registrations for our chemicals (mainly advance organic intermediates for production of Generics) , thus causing - in general terms - a reduction of suppliers, with the final result of less competition and an increase in selling prices of r.m with consequently higher prices in future of finished products .
 - The costs are too expensive for many SME enterprises. Many had to reconsider their registration of substances.
 - Implemented in the price.
 - We have to consider for which substance a registration is worthwhile
 - We cannot answer the last two mandatory questions as OR. As they were mandatory I filled in a best guess. Please note that in most cases the non-EU manufacturers pay directly. In some cases we transfer the money.
 - withdrawing from the market dozens of non-hazardous substances

- WE HAVE DELETED SOME PRODUCTS FROM OUR PRODUCT LIST.
- cost sharing with non-EU supplier
- The high price of the Letter of Access will surely decrease the competition in this industrial sector. We plan to increase our sales despite the fact that we had to increase price.

88. At which point in the process, did you provide a Letter of Access and/or token for the joint submission to other member registrants in your SIEF?

Number of respondents: 12

- approx 1 year before deadline
- After the invoice was paid.
- After signing the agreement and payment
- I haven't done it yet, it hasn't been requested, we expect some company to joint by 2018 deadline
- Once the Lead Registration had been obtained
- After finishing our registration
- When requested.
- At point of request
- At the moment we had not the necessity to send the token and the LoA for the substances registered in 2013.
for the specie registered in 2010 we had the necessity to send the LoA (without token) only one time
- After our LR dossier submission
- After submission/generation of the joint submission
- During finalisation of lead dossiers / CSRs

89. How did you invoice your costs?

Number of respondents: 15

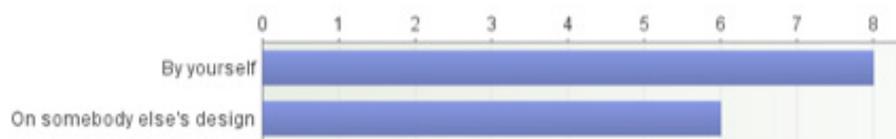


Open text answers: By another method

- costs not shared yet
- via consortium

90. How did you design the cost sharing model?

Number of respondents: 14



91. If it was somebody else's design, whose?

Number of respondents: 6

- not done yet
- We mixed up a few models.
- Provided by te consultant.
- Our industry standard
- REACH guidance on data sharing
- Consortium design

92. Are you of the view that you managed to make the cost sharing fair, transparent and non-discriminatory?

Number of respondents: 14



93. Did you have difficulties in convincing members on the cost of the Letter of Access?

Number of respondents: 14



94. If yes, what type of difficulties?

Number of respondents: 4

- Most of the members thought the registration was too expensive.
- I hasn't happen yet
- Usually potential members found the costs too high, even when they were actually rather low in comparison to other numbers which I have seen from other SIEFs. And despite explaining in detail and complete transparency why the costs were as they were (mostly higher than expected because the number of potential registrants was low)
- Too expensive

95. Did you invoice break down the costs between providing the data set and administrative work in sufficient detail?

Number of respondents: 15



96. Did it include an estimate of work to eventually update the dossier?

Number of respondents: 14



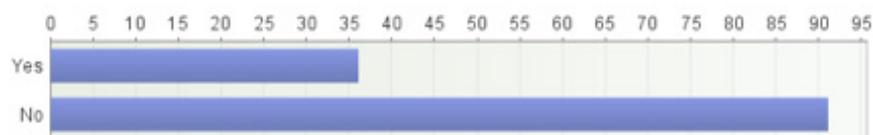
97. If you have an example of good cost sharing or a good invoicing model, please provide more detail to us.

Number of respondents: 1

- LOA is organised via the consortium and payments as well

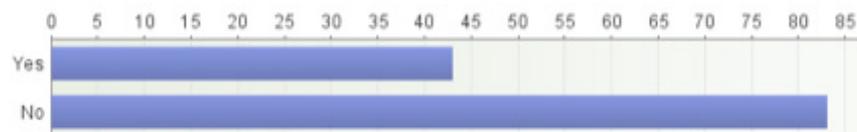
98. Information on chemical substances needs to be reported in IUCLID. Did you face major difficulties with installation of the IUCLID software?

Number of respondents: 127



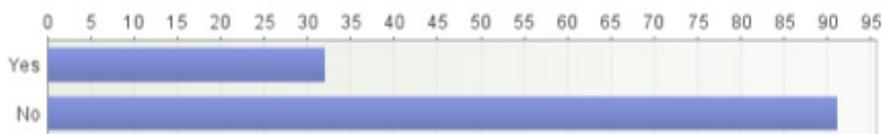
99. Did you face major difficulties with the use of IUCLID?

Number of respondents: 126

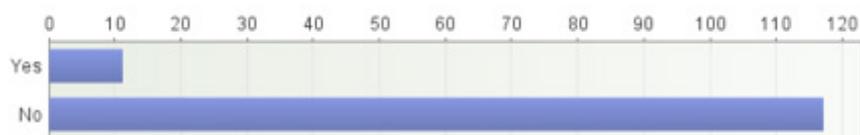


100. Did you face major difficulties with the support provided for IUCLID?

Number of respondents: 123

**101. Registration dossiers are submitted to ECHA using the REACH-IT portal. Did you face major difficulties with signing-up to REACH-IT?**

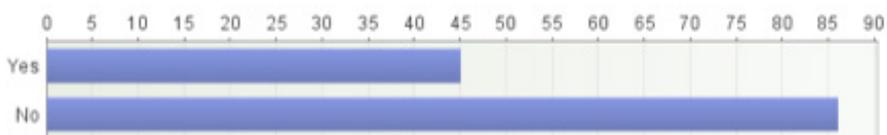
Number of respondents: 128

**102. Did you face major difficulties with using REACH-IT (submission of registration dossiers)?**

Number of respondents: 125

**103. Did you face major difficulties with notifications and messages received through REACH-IT? Were the invoices easy to identify/understand?**

Number of respondents: 131

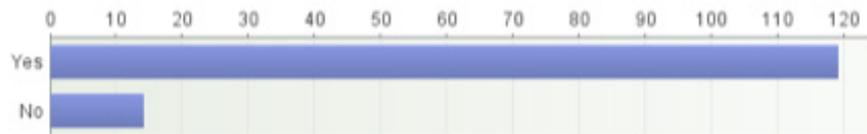
**104. Were your required actions clear to you?**

Number of respondents: 129

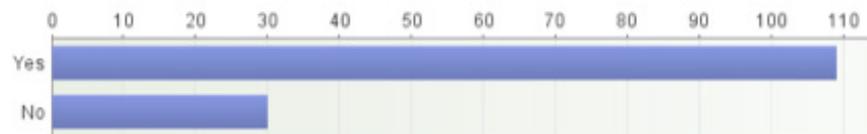


105. Was the status of your registration (i.e. registration number) clear?

Number of respondents: 133

**106. The majority of the information included in the registration dossier is published on the ECHA website. Were you aware of this?**

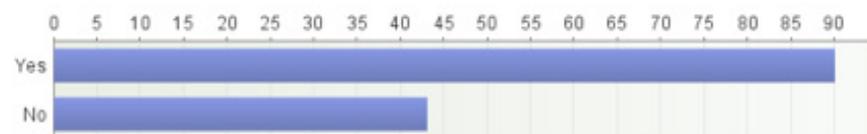
Number of respondents: 139

**107. Did you understand the information that was published?**

Number of respondents: 126

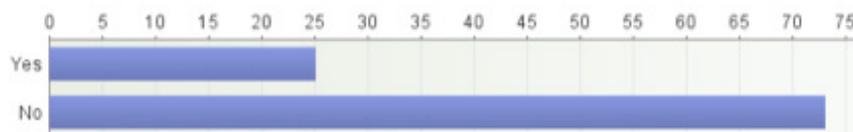
**108. Did you know how to ask for certain information to be kept confidential?**

Number of respondents: 133



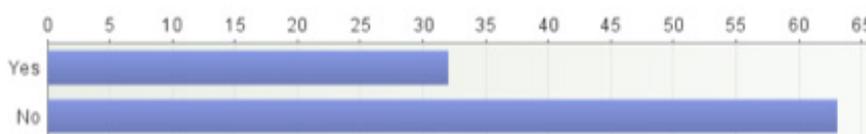
109. Chesar is a software developed by ECHA to assist companies in performing the chemical safety assessment, and prepare their chemical safety reports and exposure scenarios for communication in the supply chain. Did you face major difficulties with the installation of Chesar?

Number of respondents: 98



110. Did you face major difficulties with using Chesar?

Number of respondents: 95



111. Did you face major difficulties with Chesar support?

Number of respondents: 91



112. How do you prepare your safety data sheets?

Number of respondents: 128



113. If you do it yourself, do you use a tool?

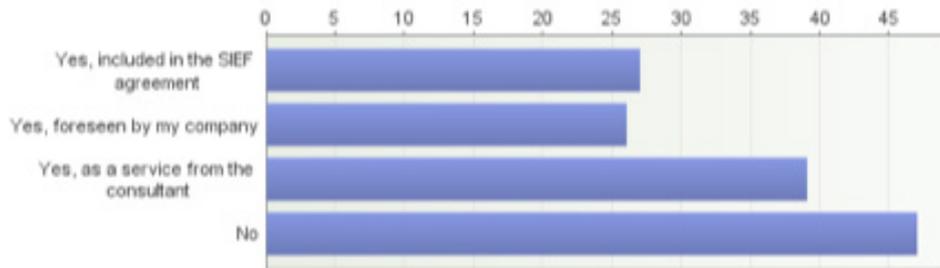
Number of respondents: 72

**Open text answers: Another tool, which one**

- VCI, own
- none
- ECETOC TRA - ART -
- myself
- no tool, only in word.
- ChemGes
- specialist SDS software
- Dibac
- Word
- GSM Navision
- Epy Software
- TII didn't need Chesar or CSR
- Envicon by EON
- InfoDyne
- purely in house cross checked with consultant
- Specialized Publications
- Safeware
- An specific approved program
- Not known
- ChemGes
- GEOWIN SDS
- Safeproduction
- EQGEST
- EUSHEET
- EPY PLUS
- NO TOOL
- -
- CHEMETER
- personally I never used Chesar
- Internal software
- Lycos Athena Advantage
- Lisam Éxess
- please tell what is chesar
- consultant or the supplier
- exess
- in-house preparation tool
- Word!
- The Wercs
- ChemGes

114. Have you foreseen a mechanism for updating your registrations?

Number of respondents: 139



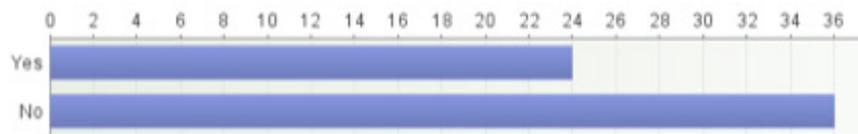
115. Are you monitoring the messages sent to your REACH-IT account mailbox?

Number of respondents: 139



116. If no, is the consultant monitoring this for you?

Number of respondents: 60



117. If yes, how frequently?

Number of respondents: 116

	Very frequently	Frequently	Somewhat frequently	Somewhat rarely	Rarely	Very rarely	Not applicable	Total	Average
Frequency	9	40	33	19	9	3	3	116	3

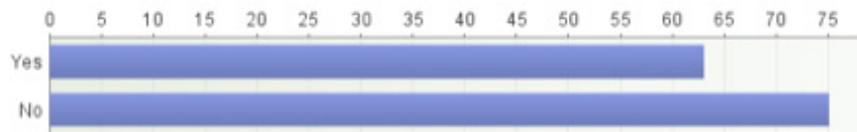
118. Which of the following ECHA services did you make use of:

Number of respondents: 128



119. Did you attend any relevant conference?

Number of respondents: 138



120. If yes, which level were they:

Number of respondents: 66



121. Did you make use of ECHA's Guidance documents and practical guides to understand the information requirements in detail?

Number of respondents: 130



122. Did you contact your national helpdesk for support?

Number of respondents: 130



123. If yes, describe what kind of support you received and how well the request was answered:

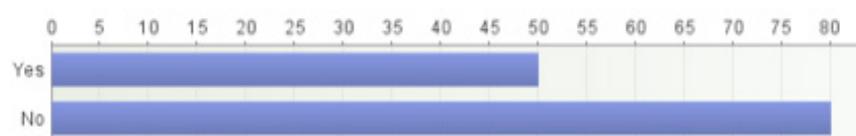
Number of respondents: 54

- Information on registration yes or no. Request was answered well.
- they told me to contact the echa helpdesk in helsinki
- Clarification of data status, the Belgium helpdesk gave great help on this.
- Question concerning identification of the substance. Answer was OK.
- Clarification of specific issues and they were handled efficiently
- We contacted the national reach helpdesk regarding the question of registration as OR and a change of non-EU manufacturer. We received an understandable answer. Further, we had a question regarding the required spectral data and also received a satisfying reply.
- I received a very personal support with telephone calls and even meetings at BAUA. The answers I got were very professional and helpful.
- About data sharing. We have no satisfactory answer.
- The answers weren't helpful and the response was slow.
- The answer was vague, unhelpful and late.
- ECHA explanations requirements, depends on the available employ has answered our specific questions at the certain day.
- From the first day we did our application for the pr-registration the National support team were very helpful till the end. We are very obliged. Thanks
- UK helpdesk has responded rapidly to queries and been as helpful as possible
- well answered
- Support with regards discrepancies with lead registrant. Some possible solutions given but not a clear path.
- It was only possible to contact them via email with an email response within 10 working days. The question was answered well but it would have been easier to talk to somebody.
- Basic support, answer not always to the point.
- Support to accomplish the final registration step inclusive of IUCLID filing
- I ask my national helpdesk by email on a registration exemption issue. The answer took more than 1 month to be received and was globally unsatisfactory as no answer to my specific was concretely provided.
- Very complicated alot of stuff difficult to understand
- requests for advice on continued registration as an importer
- I requested information on a registration we did in the past for a product. I received a answer that was not helpfull. explanation via an email was difficult and requested a phonecall to explain further. this was not possible and until now I still do not have a satisfactory answer.
- IUCLID filling questions, but they weren't enough prepered for answering.
- several times when I read the website, answer if helpful but not quick
- WE have contacted to understand our obligations within REACH
- INFORMATION IN MY LANGUAGE
- individual Support by phone/E-Mail

- FAQ
- good service
- Done by our consult
- problems with email and payments amount
- Request was on the lack of a CSR being included by the LR. Request was well answered.
- I have not received good support
- Sometimes it was not clear, neither in the template nor in the Guidance Documents, what information was to be included and the question was not very well answered.
- ECHA Helpdesk were excellent - so I never used the UK (Local) support
- German helpdesk answers the questions on the lowest possible detail level. The seldom refer to specific REACH articles but mainly give broad general answers like "Yes, your assumption is correct" "You should have taken care of that before".
- prompt support and clear answer
- Asked for clarification of several points concerning the procedure and additional information on regulations. Request was answered in 15-20 days. But still information needed to be more precise. Turned to consortium and lead registrant for more detailed information.
- The helpdesk was most of the time not able to answer our very specific question. Nevertheless, to then ask ECHA, we should have a written proof that the national helpdesk has been contacted first. This can take several weeks. This procedure is very long as we usually need a fast answer.
- To get a definitive answer about registration deadlines relating to registrations when moving from a PPORD and changing between tonnage bands. Answers seemed to be legal quotes of regulations and did not always clarify what we had to do.
- confusing information and answered in unclear fashion. Last contact was a few years ago and situation might have changes, but we outsource now as much as possible in order to comply with this ridiculous and money consuming system
- Questions about monomers in polymers - forwarded to ECHA
- specific registration requirements
- The Helpdesk it selfe hd some difficulties.
- Several questions regarding interpretation of Terms like uses in Food industry etc.
- Answers were mostly formal, Repetition of legal texts and far from reality.
- they didn't answer
- REACH registration, somewhat useful
- articles regulation, clarifications and details of ECHA guidance.
- Additional information, well answerd.
- Clarification of interpretation of the regulation.
- Confirmation of advice provided to specific clients
- any support
- Any question to ECHA must be asked to the helpdesk first. Answer is supposed to be made within 15 days, but is sometimes answered by phone only, several months later. Answer can be 'don't know, contact ECHA'
- Contact very early in the process. Was not satisfied.
- It was provided a reference to the End User Manual.

124. Did you contact the ECHA Helpdesk for support?

Number of respondents: 130



125. If yes, describe what kind of support you received and how well the request was answered:

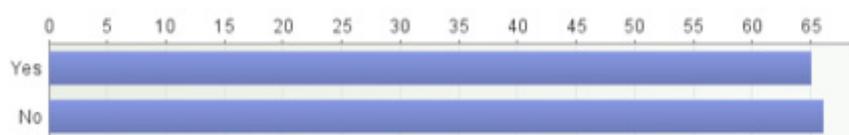
Number of respondents: 42

- IT Issues
- Help in setting up IUCLID, Password recovery
- submission for registration dossier
- We are accessing ECHA helpdesk for an inquiry, and I am sure ECHA helpdesk will provide excellent help on this very soon.
- Good support although in some cases it took a while to get a response.
- The answers weren't helpful and the response was slow.
- The answer was clear, to the point and timely.
- Many times we had problems with our password and the access to our account. The support team solved the problems immediately.
- well answered
- I received very little written support but I had a good telephone conversation with a member of ECHA that help me to establish the way to carry on. ECHA's help with the dispute was polite but not concise and fully helpful.
- password request
- Complicated issues. Answers always helpful. Sometimes second round of mail required.
- password assistance
- With the above request I also addressed this to the ECHA Helpdesk, simple answer go to the national helpdesk.
- Not my company directly but the Consortium consultant.
- REACH-IT account lock up etc
- WE asked for clarification on a missing dossier. The question was answered rather quickly, but the update of the ECHA website was much delayed.
- somewhat helpful
- WE have contacted to understand our obligations within REACH
- late and not clear, so that I had to ask again and again
- by email, answer was too late
- invoice's change
- Done by our consultant
- The support has almost always been great
- We have some problems with the extension of the file. We had filled in the template in version 5.5. but the dossier had to be uploaded in version 5.4.1 (if not, error) and during the migration of the data some of them were lost because of incompatibilities between versions and we had to fill in all of them again.
- ECHA Helpdesk were excellent. The only good thing in a tortuous process.
- Mostly unblocked accounts
Also problems with IUCLID account and invoice payments. Very good service, the answers were quick and precise.
- our token had expired and we had to ask for a new one. Response was quick
- technical, sufficient
- The request concerned the technical side of dossier submitting. The person on the other side was very helpful and polite.
- Support about invoicing or dossier submission failed. The answer was very fast (even sometimes by phone) and very helpful
- Cannot remember what the details were.
- standard answers without any help
- I did not hear anything but the problem was solved (EC inventory name had to be updated).
- Delay of the national helpdesk

- Question regarding Registration of “other rectants” in polymers as intermediates.
- The answer was: we don’t know either, please use your best knowledge!!!
- REACH Registration. somewhat useful
- Understanding the currentstatus of our registration and clarifying of queries
- Confirmation of conclusions on how to achievbe acceptance of co-registration dossier for complicated multi-constituent substance where information from the lead registrant was lacking
- Technical support on submission. Requests were well answered in a timely manner.
- Answer generally within the announced deadline, with specific details (IUCLID, ...).
- They contacted me when the dossier were rejected and helped me to get it through.

126. Did you use other sources of additional support (industry associations, chambers of commerce etc.) to identify your obligations?

Number of respondents: 131



127. If yes, please state what sources and describe the kind of support received.

Number of respondents: 48

- ATC, UNITI, REACH Centrum
- About Everything
- Industry associations
- FCIO for every purpose
- VCH,
- IHK
- rech ready
- Cyprus Ministry of Commerce
- Industry association
- CBA has been very useful in explaining procedures and identifying problems and timescales
- registration proeedure
- Our consortium DyeStaff
- Chemical manufacturers self help group
- The REACH Ready consultant company based in the UK
- Chemical Business Association. We are members and they answered several queries very well. It was also useful to be able to discuss the query over the phone.
- API for advices
- EFEO, UFCC
- INORGANIC PIGMENTS CONSORTIUM
- Own Consultants
- The Consortium
- Chemical Business assco -UK
- Reach-Ready (CIA) UK
- industry associations
- we empolyee another professional people
- TEGEWA, VCI

- CBA websites & technical assistance and support from staff.
- Regional self help group
- FEDERCHIMICA (general support on different argumentations)
- FEIQUE and AECC
- We have contacted with other registrants of our substance to interchange information about what was supposed to be asked in the template.
- There are a lot of confused companies trying to the correct thing under REACH. The letters of access system is open to abuse by large industry players and needs to be addressed, especially for SME's.
- ORO organisation for Only Representatives, meetings and communications
- FEDEQUIM, FEIQUE.
They supported us in how to make MSDS according to REACH and labelled according to GLP.
- industry associations, data
- Industry association

- industry association - CEFIC guides
- Consultant
- REACH Ready (UK CIA) was used most to get a second opinion about specific questions when the requirement was not clear from the guidance. Consultants were very helpful although sometimes we ended up with several opinions but not a conclusive answer.
- industry associations,
- standard answers
- ETAD - pigment industry, where we have formed consortia and discussed how to handle issues
- - Exchange of experience within ORO
- CC, industry association (ferroalloys)
- industry associations
- FEDERCHIMICA - CENTRO REACH
- CEFIC (use descriptors, SpERCs)
- UIC, Ingrecos
- CONSULENZE
- Verband Chemiehandel Köln

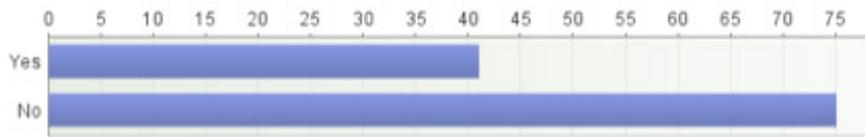
128. How useful did you find the support provided?

Number of respondents: 93

	Very useful	Useful	Somewhat useful	Somewhat useless	Useless	Very useless	Not applicable	Total	Average
Usefulness of support	24	30	22	6	2	0	9	93	2.66

129. Do you feel that there are additional needs for information not covered by the information provided so far by ECHA?

Number of respondents: 116



130. Please give more information on any additional needs:

Number of respondents: 29

- The general public should be more aware of the whole process
- The legal text is somewhat difficult to understand, the systematic approach is not clear, it is also not clear how to use the specific software(s). There is no KISS principle behind it - it seems to be the opposite: the more complex the better (for consultants)
- We are in need of money !
- More videos on IUCLID training - how to input i5z. IUCLID file into IUCLUD for preparation of dossier.
- I think it would be helpful if we had an individual contact person at ECHA, so that the correspondence with the Agency would not be anonymous as it is for the moment.
- just easier
- we believe that you should made the whole procedure easier and undertsandable
- The IUCLID software is difficult for occasional users to understand and use. It is very difficult to work our how to complete submissions and the sequence in which tokens, and data need to be entered.
- It is very difficult to get more help from because it is based on very specific cases.
- More detailed examples on exemptions cases.
A guidance for specific case of distributors/importers which can sell the same product for different applications (food, pharma, industry)
- support, negotiation leading role in disputes between lead registrant and registrants who need to join. Especially check on fairness in cost charing
- ECHA needs to have mechanism for ORs where their non-co-operative principals (non-EU manufacturers) become liability for OR.
These manufacturers may have refused to pay any compensation for OR services or they may have refused to give their export data or may not be complying with SDS and CLP obligations. Even if OR has deactivated such pre-registrations on REACH-IT these companies can use the PR numbers till 2018. National helpdesk also can NOT help as there is no clear guidance from ECHA
- Nothing specific but guidance documents are very large and hard to read when sometimes only a basic level of information is required to answer a query. The FAQ system is good but the question & answers sometimes lead to fresh questions that are not listed thus no further forward.
- time of refunding the costs
- How are registered companies being looked after. It is apparent non registered companies are importing goods without registration.
- Sometimes we did not know wthat information was supposed to be included in the template.
- Information is excellent, there is simply too much of it. Each time I had a query on registration I was send a large document to read, usually over 100-150 pages. This is too time consuming for an SME with limited resources. it needs to be simplified.
- Human contact
- The hardest item was in relation to the CSR ie there is a large gap between the basic level of information

and the guidance that seems to be aimed at experts. How do we become experts? Somehow we need to bridge that gap between now and 2018.

- System is too complex and too money and time consuming unless registration and notification is done on a frequent bases or by specialized individuals, but too complex and unclear for individuals who has to (pre) register or notify only a few times/year. Than you are forced to use consultant against high cost.
- ES - nobody knows how to handle and solve our obligations on this issue
- What can be done if SIEF members disregard the rules, e.g. establishing themselves as LR's or registering substances without consent?
- The entire REACH process is complex and time-consuming; that means an heavy cost for smaller producers and their O.R. One of the reasons is f.i. that a consultant is required to support the registration and follow it up.
- The guidelines in the End user manual for IUCLID are too general.
- Lead registrants must be made to understand that the CSR (and other necessary information) for a highly complicated multi-constituent substance cannot be provided to co-registrants two days before the registration deadline
- clear, overview step by step checklists, guides in 1-3 pages as a workflow
- Please provide more details on how to identify non-EU companies' size and also please consider if translation needs to be carried out in EU, those small manufacturers outside EU will have to carry out heavy burden!!!!!!
- Direct link to the SME page on the frontpage of ECHA website! How to be sure to buy a fair LoA, having all information in national language (including this questionnaire!), helpdesk for tox/ecotox questions, more examples on how to proceed in difference cases, guidance in a nutshell on what/how/when to do when Lead registrant / co-registrant urgently needed, how to treat borderline cases, better worded questionnaire and more space for comments (like this one!! it does not look serious), more consideration for SME
- More guidance about "Life cycle description" would be helpful.

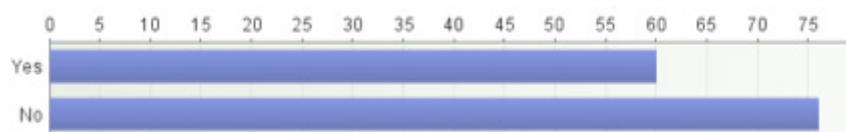
131. With regard to the registration fee, how helpful were the explanations given to you on ECHA's "small and medium-sized enterprises" web page?

Number of respondents: 135

	Very helpful	Helpful	Somewhat helpful	Somewhat unhelpful	Unhelpful	Very unhelpful	Not applicable	Total	Average
Helpfulness of SME web page explanations	19	53	35	17	5	3	3	135	2.68

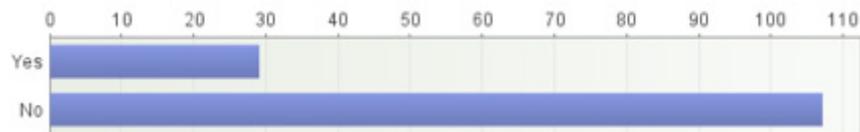
132. Did you use the fee calculator?

Number of respondents: 136



133. Did you have difficulties understanding which SME criteria your enterprise meets?

Number of respondents: 136



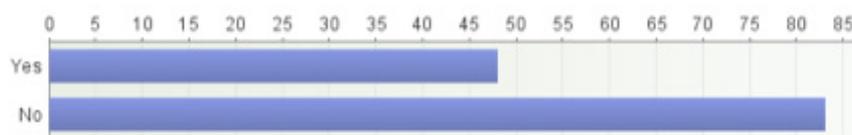
134. If so, why?

Number of respondents: 17

- too complex
- The main problem is the less available time for ECHAS demands
- Cause the dimension of the company changed from 2006, time of pre-registration.
- in some cases we act as an OR, but the definition of SME under 2003/361/EC is within scope of EU, we feel confused how can such a SME criteria apply to enterprises outside of EU.
- De descriptions of SME goes very specific and gets highly complicated
- I am no accountant, I had to take advice with my accounting department to clearly define what criteria my company really met
- The economic part wasn't understandable
- It was difficult to determine what accounts has to be checked, because in our case, we are a group of companies.
- Our company situation is complicated.
- Difficulties with the integrated financials.
- Linked enterprises item.
- If you are a small manufacturer of chemicals within EU and must register in this legal entity - why is the size of the company then determined on the whole company and not just the legal entity which has the mandatory registration need? (we are not allowed to do the registrations as manufacturers in the main company - but the size is determined from the main company anyway. This is not logical or understandable)
- For our Clients (= non-EU companies!) it is impossible to understand the Terms of the European SME Definition, as it is based on Tax/Accounting rules they are not Aware of.
- info isn't clear
- Some content of the criteria has not been well explained and not took non-EU area into account. We could not find supportive document in public which is doing help for non-EU registrant although these companies are being charged the same as EU companies.
- More example needed, more explanations required (link companies)
- We are three different legal entities but it was hard to know if we should merge the three local sites or not.

135. Did you rely on the advice of a consultant to self-classify your enterprise as either a medium, small or micro enterprise?

Number of respondents: 131



136. Did you have formal or administrative difficulties in justifying your SME status?

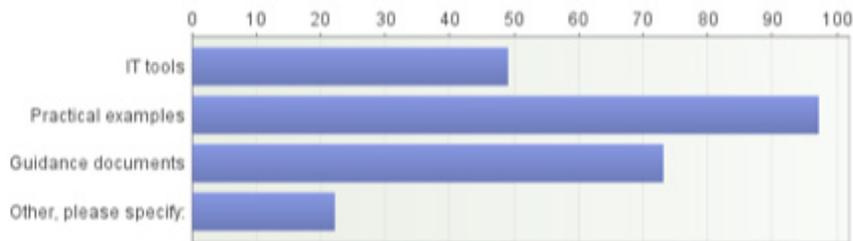
Number of respondents: 50

- No, everything is very clear
- Our situation is quite simple
- yes
- As it is also depending on the balance you can only use the official approved balances. So in case that you are growing or declining you might have greater variations if you are borderline at a criteria. So how to decide?
- no
- no
- No
- no
- No
- No.
- no
- not
- No
- No, but couldn't agree on the influence of the turnover of our partner companies on our turnover.
- NO
- no
- Yes, accounts department had to do it for me and they also struggle
- No.
- No.
- No
- No
- short time
- The cost burden on an SME has been massive, but now the whole process is being ignored at the European ports, who is responsible for controlling imports without a REACH status
- no
- no
- No.
- Being an OR we ask the manufacturer their yearly export volumes and more importantly the audited accounts.
- no
- No.
- NO
- No, just annoyed at providing information on more than one occasion
- Yes I had. The difficulty is connected to the complexity of the company that is an holding that has some

- other companies outside EU
- None. the definitions are clear and easy to understand.
- As we work as OR for chinese enterprises it is sometimes difficult to translate the necessary provisions like "balance sheet" to the chinese counterpart.
- No, I haven't.
- formal or administrative difficulties
- No
- we have used the Belgian tool developed to establish the SME status
- No
- No
- Difficulties in obtaining historical documents that sufficiently proved company ownership (when our SME status for 2010 was checked).
- yes
- Yes - we claimed to be SME based on last two years results and number of people. However ECHA rejected this and informed us that we had to include the mother company as well. Maybe we are stupid but it is not fair to get a 21,000€ control fee for this!!!!!!!!!!!!!!
- no
- Not yet.
- Companies find it very difficult to provide proof of the number of employees at the time of submission.
- no, once I understood the criteria, we are medium...
- NO
- Yes
- When ECHA checks the SME status: Three weeks is a very short time frame to reply. As soon as the reply is sent there is a message that it will be investigated and then no feedback anymore for months... Some of our non-EU customers cannot provide a document confirming the headcount that is authorised by a competent authority (as requested by ECHA during the check) as such documents do not exist everywhere.
- no

137. Where do you think ECHA should focus its support to SMEs?

Number of respondents: 131



Open text answers: Other, please specify:

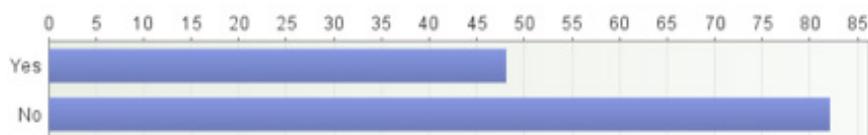
- Off the shelf solutions
- make it simpler
- simplify processes wherever possible
- identification of substance
- all areas
- individual support with non changing contact persons
- The guidanc and systems are written by and for regular REACH practioners and the concepts may be

understood by them but for occasional users are extremely opaque. Please listen to CBA who understand our problems.

- ECHA should be the owner of data and should take part in the management of SIEF and decision making in SIEF, in order to guarantee the SME
- promptly reaction if support is necessary
- protect them from illegal imports
- workshops and meetings
- Letters of access and preventing abuse.
- ECHA is complicated and bureacratic
- Web training tailored for SMEs
- LoA costs
- Get rid of the REACH system and simplify. Has developed into a civil servant hobby and income vehicle.
- explain the sence of ECHA!
- More flexibility in interpretation of legal terms!
- helpdesk
- keep the helpdesk well available for them
- help in tox/ecotox, financial help, more consideration for SME
- Replace IUCLID to a more userfriendly software

138. Would you be interested in collaborating further with ECHA on this topic?

Number of respondents: 130



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