

GROUP A

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- How to organise a joint exposure scenario building process among registrants of the same substances.
- How to organise submission of the Chemical Safety Report (CSR).
- **Objectives:**
 - (i) Identify procedural solutions & management solutions that enable generation & maintenance of one consistent (or set of consistent) CSR(s)
 - (ii) To identify areas for further work

How to make a plan for exposure scenario development in a SIEF/Consortium/SLT.

- Take the ES from as much as possible from publicly available data, e.g. from a sector group
- Tier1 Exposure assessment should be drafted by scientists, TIER2, if needed, via exposure data
- Use Descriptors were helpful in developing ES

How to ensure CBI while generating useful data for environmental assessment @ the same time.

- CBI info can be circumvented by using public available info
- Use a trustee
- In Envi Risk Assessment CBI is crucial: tonnage level and number of sites. Can be solved by worst case approach

Pros & Cons for

i) “joint CSR” &

ii) separate “CSRs” (based on joint CSA or distribute CSA)

- *Making a joint CSR*
- Prepare a “core” CSR jointly and leave SIEF members to add their confidential uses
- Remark: increased knowledge of coreregistrants is necessary

- *Submitting a joint CSR*
- There are no pro’s for joint submitting

Pros & Cons for

i) “joint CSR” &

ii) separate “CSRs” (based on joint CSA or distribute CSA)

- *Remarks*

- Uses could mostly be linked to ES
- Collecting use information went well
- Indication for joint ES or individual scenario is welcomed (especially for Annex XIV)

How to enable “joint” updating after registration.

- Use consultant contracts till 2018
- Communicate in advance how the process for updating will be organised

Clarify role of the lead registrant & SIEF members

(what added value doesn't the SIEF bring)

- consortia members are responsible for uses and exposure data
- SIEF is there to share data and interest for registration is limited to LoA

Additional observations (if appropriate)

- ***Question:***
- ***Is it possible to change a joint submission into a separate individual submission after registration***



WARNING

REACH is not over yet !

.....as a matter of fact.....

It is just beginning !!!