

#### Hot topics in industry: frequently raised issues during 2010 and solutions

LR wokshop, 2-3 February 2012, Helsinki



**Mercedes Viñas** 

Manager Chemical Regulation, Cefic





#### SIEFs 2010: hot topics and solutions

#### Identified challenges 2013

Key messages to take home



Issue: It was sometimes difficult to form SIEF and kick-off the work:

- There is a 'difficult' SFF that is blocking the process and creating confusion → Recommendation to bypass. Model letter available in Guidance for LR on Cefic website.



There is a large number of companies in my SIEF. How to sort out those that are actually interested in registering?

→ Survey: 4 codes & cluster them in groups: lead/active/passive/dormant. Communication can then be targeted to each group

- Do I need to form a consortium? What is the difference between consortium and SIEF?
- → Two options: consortium vs SIEF leadership team, depending on the size of the SIEF and number of lead companies. Such organised cooperation helps, consider to form one



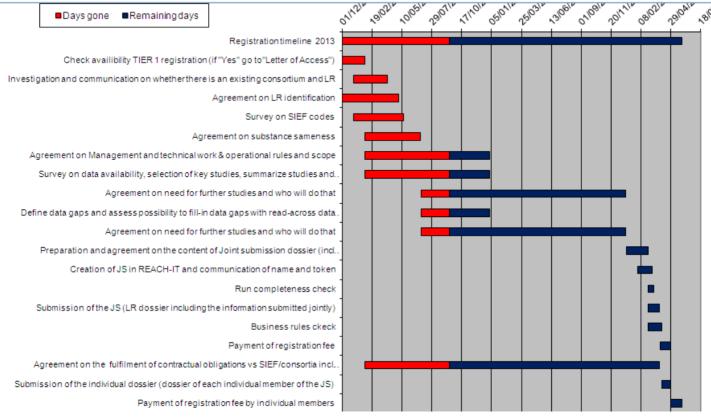
- How to ensure that all SIEF members are informed? What is the key information to share?
  - → Early, clear, transparent, and regular communication to all SIEF members: Sameness, C&L, Data availability, LR vote, Progress status, Joint/separate CSR,...
- LR concerns on lack of resources/ competences to manage it all
- → SIEF Management can be done by LR or outsourced to service providers e.g. ReachCentrum



6

#### How to ensure all SIEF members are aware of deadlines and follow progress

→ Project plan eg Cefic's Gantt chart with main tasks/ timeline





How to ensure that costs are transparent, fair and nondiscriminatory

- Appropriate explanation of cost sharing system (model letter available in Guidance for LR on Cefic website)
- Pay for the data you need (tonnage band, intermediate...)
- Explain cost sharing system and what the costs cover: e.g.
  SIEF management, preparation of IUCLID dossier, RSS, etc.

→ Recommendation to use SIEF agreement + Letter of access

→ Cefic published notes on transparency and fair cost sharing, and on Letters of access



- Life' after registration: is the work done once you get a registration number?
- → Include provisions for post-registration activities in the SIEF agreements which may require discussion in SIEFs e.g.:
  - Dossier evaluation
    - Outcome of testing proposals
    - Request for further information due to compliance check
  - New / Updated ECHA guidance
  - New uses in case of joint CSR



How to organise information flow on uses in the supply chain?

- $\rightarrow$  Top-down communication preferred (but needs early information from suppliers to reassure DUs)
- → Registration deadline is not 'the end of the world' if a use is missing : possibility to update registration adding new use(s). DU right does not end 12 months before reg deadline
- $\rightarrow$ No need to ask coverage of the usual applications : already known from current SDS, included in associations' mappings, etc.
- →Keep your SC informed as much as possible
- →Guidance and model letters under preparation

#### **Challenges after 2010**



• How to handle newcomers in 2010 SIEFs:

Transparent SIEF communication including clear cost sharing rules will facilitate their integration

→ SIEF agreement remains key

# **Challenges after 2010**



# 2013 SIEFs will look different

- Fewer substances will be handled in consortia
- More SMEs will require registrations
- SIEF management challenges mentioned earlier will become even more important
- Substances are likely to be data poor
- Less experienced Lead Registrants to manage SIEFs → higher risk for abuse?





- Importance of raising 'REACH consciousness' among companies for 2013: some companies may not be aware that they need to register → role for authorities, associations, ECHA, Commission...
- Work is NOT over when purchasing a letter of access
- Having good contracts in place is key → use available models
- Use communication: top-down preferred but keep SC reassured





- Keep regular and efficient SIEF communication
- Fair and transparent cost sharing
- Make use of available standards
- 2013 SIEFs:
- check if the substance was already registered in 2010 and contact LR/consortium
- If not registered yet, consider forming consortium/SIEF leadership team









# Thank you for your attention! <u>www.cefic.org</u>