

SMEs and REACH

Lead Registrant Workshop 2 February 2012

Alexis Quintana-Sáinz



Agenda

SME definition and advantages

SME verification

Guidance and support

Key messages

SME definition and advantages

Discounts

Definition

Important to have in mind













Fees from the Fee Regulation by company size or way of submission

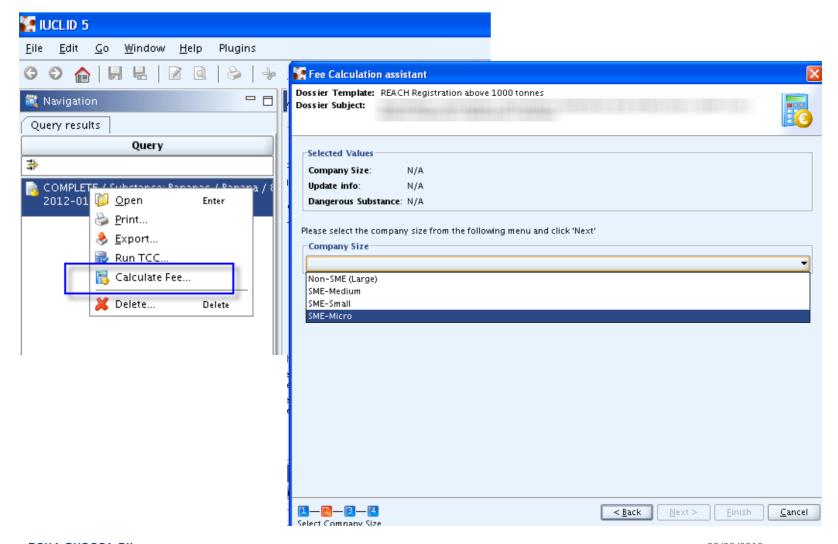
Large	Medium	Small	Micro
100%	70%	40%	10%

Individual	Joint
100%	70%

Up to 92.5 % discount



Fee calculation plug-in in IUCLID





Definition of SMEs

 SME means micro, small or medium-sized enterprises as defined in the Comission Recommendation of 6 May 2003

Enterprise category	Headcount	Turnover or Balance sheet total	
Medium-sized	< 250	≤ € 50 million	≤ € 43 million
Small	< 50	≤ € 10 million	≤ € 10 million
Micro	< 10	≤ € 2 million	≤ € 2million



Important to have in mind



 Ownership, voting rights and relationships with other companies contribute to determining a company size.



 Only Representatives (ORs) should make sure that the registration is in line with the size of the company represented.

SME verification

Why?

How?

What?





Why ECHA verifies the correctness of the SME status?

- REACH fees depend on the size of the company
- To guarantee fair competition
- Need to ensure that the SME reduced fees are applied correctly



How does ECHA verify the SME status?

- Companies who have already registered as SME and have benefited from the reduction
- ECHA asks companies to provide financial/ business information
- Verify the correctness
- Real status is larger than status in REACH-IT→ top up invoice + administrative charge



What to do if you pre-registered incorrectly as a smaller company?

Change your company status in REACH-IT

Home

→ Company

→ View



- Provided you have not yet registered a substance, there is no need to contact ECHA.
- In case you realise your mistake after registration, consult ECHA's SME webpage for instructions.

Guidance and support





Guidance and support (1/3)

- Communication within the SIFF
 - Language barriers
 - Keep everyone in the loop
 - Inform the members well in advance about the costs
 - ECHA process for Data sharing disputes (last resort)
- Compliance checks and SIEF agreements
 - Agreement for post registrations activities

ECHA.EUROPA.EU 02/02/2012

13



Guidance and support (2/3)

- Getting the knowledge:
 - Guidance in a nutshell: Registration data and dossier handling http://www.echa.eu/documents/10162/17224/nutshell_guidance_registration_en.pdf
 - FCHA manuals
 - FCHA webinars
- Preparing the dossier
 - Own resources
 - Supporting organisations
 - Your lead
 - Consultants
 - Trade organisations
 - National helpdesk
 - ECHA helpdesk



Guidance and support (3/3)

- SMEs dedicated information at the ECHA website: http://www.echa.eu/web/guest/support
- Flectronic SMF test:

http://ec.europa.eu/research/sme-techweb/index_en.cfm



ECHA.EUROPA.EU 02/02/2012

15

Key messages

- SMEs benefit from reduced fees under REACH
- Verify the correctness of your company size in REACH-LT.
- If queries: contact your National Helpdesk or ECHA Helpdesk
- If you are a lead registrant please be sensitive to the needs of smaller companies
- Use the tools:
 - Fee calculation plug-in (IUCLID)
 - SME-test



Useful links

- Guidance in a nutshell: Registration data and dossier handling: http://www.echa.eu/documents/10162/17224/nutshell_guidance_registration_en.pdf
- How to do a registration as a member of a joint submission: http://www.echa.eu/documents/10162/17250/pg_9_reg_member_s ubm_rev11_en.pdf
- RFACH-IT Manuals:

http://www.echa.eu/web/guest/support/dossier-submission-tools/reach-it

- ECHA Helpdesk contact: <u>http://www.echa.eu/web/guest/contact</u>
- SMEs dedicated information at the ECHA website: http://www.echa.eu/web/guest/support
- Flectronic SMF test:

http://ec.europa.eu/research/sme-techweb/index_en.cfm

ECHA.EUROPA.EU 02/02/2012

17



Thank You!

Alexis Quintana-Sáinz alexis.quintana-sainz@echa.europa.eu

