



Chemical Business Association

EFFECTIVE SIEF MANAGEMENT

GENERAL SME VIEWS

REACH registration is achievable...

- It is not an easy process
- Need to prepare early to register in time
- Key challenges/concerns
 - Registration and cost to business
 - SIEF formation and work
 - Workload and internal resources



THE \$64,000 QUESTION

DOES ONE SIEF FIT ALL?

NO

Based on years of experience
and evidence

Gained over numerous
registrations



COMMONALITY DOES EXIST...

ALL SIEF's HAVE TO:

Collect data

- With which to register substance

Share data

- 'One Substance, One Registration' principle

Communicate

- Internally and externally

Manage

- Process from 'Cradle to Grave'



EFFECTIVE MANAGEMENT IS ESSENTIAL

**TO BE FAIR,
TRANSPARENT AND NON-
DISCRIMINATORY**

- Too many cases where this concept does not seem to have been followed
 - Costs “out of control”
 - Lack of communication
 - “Dictatorship” / “Closed Shop”



DATA SHARING DISPUTES

ECHA STATISTICS As of 30/01/2015

	TOTAL	FOR	AGAINST
2010	7	3	4
2011	2	0	2
2012	1	0	1
2013	11	6	5
2014	5	3	2
2015	1	0	1
	27	12	15



DATA SHARING DISPUTES

Lack of

- Cost breakdown
- Cost sharing mechanism
- Explanation of costs

Failure to

- Communicate timely
- Reply

Price

- Not independent of tonnage band
- Calculation mechanism
- Must buy CSR with LoA
- Unjustified annual increase of LoA

Unilateral approach on

- Data gathering
- Dossier preparation

TRANSPARENCY

LETTERS OF ACCESS

- Identification of contents
 - Breakdown/Catalogue of end points included
 - Is CSR/CSA included?
 - Testing proposal costs
- What can they be used for?
 - REACH only...



TRANSPARENCY

DATA SHARING

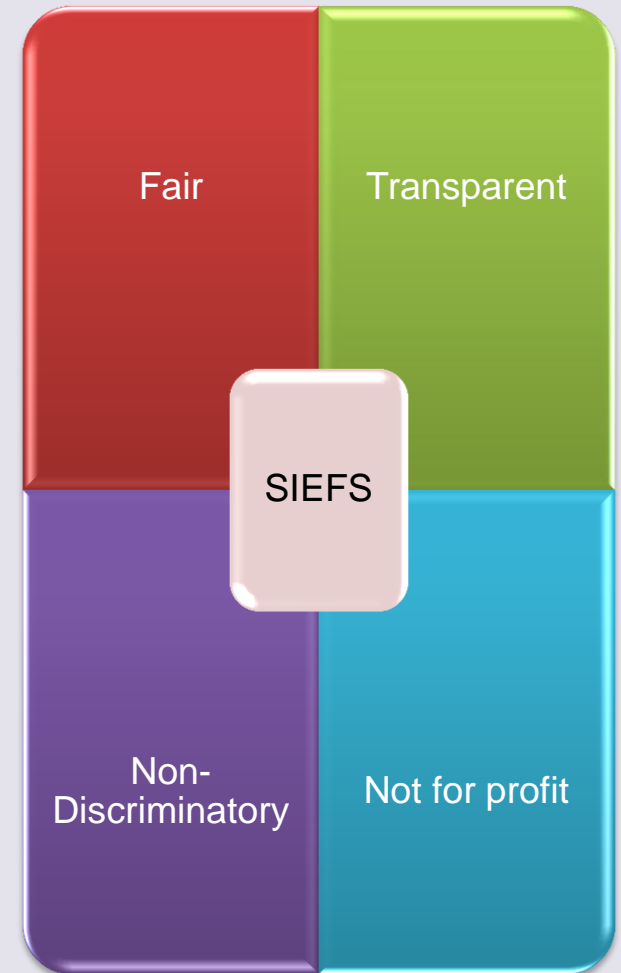
- LoA costs
 - Invoices itemised
 - Study costs
 - Reasonable administrative costs
 - Costs shared proportionately
 - 2018 registrant should not pay for 2010/2013 exclusive work



TRANSPARENCY

SIEF AGREEMENTS

- Clear and concise
 - Avoid legal traps and pitfalls
 - Address future costs
- Methodology detailed
 - Cost sharing;
 - Decision making
- Sensible disclosure rules
- Publically available
 - To allow prospective registrants to view easily



NON-DISCRIMINATORY

ASSIGNMENT OF COSTS

- Based on tonnage band
 - Only pay for what is necessary
- Based on 'Cheapest' financial option for registrant
 - Variable cost structure
 - Open dialogue at enquiry stage
 - "Not just sell them what they asked for"
- No automatic fee increases
 - Data does not increase in value...
- 'Not for Profit'
 - Reimbursement mechanism; or
 - Reserve fund...



COMMUNICATIONS

INTERNAL & EXTERNAL

- **Timely**
 - Within an agreed timeline
 - “Holding” email
 - Regular updates
- **Targeted**
 - “Reply all” discouraged
- **Website based**
 - Open area
 - Members area



NOT ALL SIEF's ARE CREATED EQUAL

BUT

- Principles of management are the same
- SIEF's **should not** be “Secret Societies”
 - Many need to be more ‘open’
 - Honest communication is KEY
 - Sows ‘seeds of mistrust’ and industry, as a whole, suffers
- We all want the same thing...
 - Protect the citizens of the EU





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