



**ECHA Stakeholders' day**  
**From pre-SIEFs to SIEFs, feedback from industry**  
**27 May 2009**



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# The reality on 2 December 2008

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- **Industry made it, wonderful !**
- **The day after**
  - **2.800.000 pre-registrations**
  - **How will we handle this?**

# Who's who in the SIEF?

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- **SIEF status 4 coding**
  - **Leading**
  - **Involved**
  - **Passive**
  - **Dormant**
- **Objective: get an organiser and find out who has the intention to register and who wants to be active in making the registration dossier**
- **Recommendation: those not having the intention to register, don't react and in that case you remain dormant**

# Getting started

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- **Sending out the questionnaire**
  - **SIEF Formation Facilitator (SFF)**
    - **Not giving any rights**
    - **Not only chemical companies ticked this box**
- **Difficult start**
  - **Problems of getting access to the pre-SIEF participants via REACH-IT**
  - **No unique system for the communication in the SIEF, hence not harmonised**
    - **ReachLink and others offer this possibility**

# Getting started

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- **SFF not always active**
- **SFF does not always have the intention to register**
- **SFF can be by-passed outside of the REACH-IT system**
  - **Recommendation to communicate this publicly**
  - **Include this agreed « lead registrant » in the comment fields in REACH-IT and to the functional e-mail adress of ECHA**
- **Document all activities !**

# Getting started

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- **Little reaction so far**
  - **Awareness?**
    - **Only 50% of all companies in EU belong to a trade association**
    - **Many SMEs with less knowledge of REACH**
    - **Information campaign needed**
      - **ECHA**
      - **National helpdesks**
  - **No real intention to register**
    - **Only recyclers**
  - **Looking out who will take the initiative**

# Substance sameness

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- REACH Centrum developed Substance Identity Profile (SIP) available on Cefic website
- [SIP template final.xls](#)
- Is the very beginning of the SIEF activity
- Result can be
  - Split
  - Merge
  - Change
- Don't forget the guidance on substance identity
- Use the EC number or number given by ECHA
- Use the IUPAC name

# Registration dossier testing

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- 13 dossiers were prepared by Industry
  - Technical Completeness Check (TCC)
  - Compliance check } manual
- None of the dossiers passed the completeness check
  - Incomplete or missing information
  - Business rules were not followed
  - Justification missing
- TCC tool expected Q4 2009
  - Should prevent industry from mistakes
- Business rules are now available

# Upcoming issues

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- **Financing the SIEF costs**
  - **Fair, transparent and non-discriminatory**
  - **No time to lose**
- **Liability of the lead registrant**
  - **How to integrate in the contract**
- **Legal entities change management**

# CSA/CSR/ES

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- **Not mandatory to be done in the SIEF**
- **Cefic recommends to do this as much as possible but take care of confidential applications**
- **If not in the SIEF then to be prepared at company level**
  - **Take care of the short time frame**
  - **Probably most underestimated part of REACH**
- **Supporting industry activities**
  - **Generic Exposure Scenarios**
  - **Libraries**
  - **Supply Chain Communication: top-down is recommended to avoid gridlock**

# Timing introduction registration dossier

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- **Cefic chart on SIEF timing: Lead registrant submits before 01/06/10 in order to be sure that also joint submitters have their registration number before the deadline**
- **Lead registrant submitting before 01/10/10 must allow to do the joint submissions in time because registrants can continue to manufacture or import during the periods in Art 21 § 1**
- **Industry suggests to allow joint submissions immediately after the submission of the lead registrant without waiting for completion**

# Classification and Labelling inventory

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- **Transferred from REACH to Classification, Labelling and Packaging Regulation (CLP)**
  - **Substances subject to registration**
  - **Substances within the scope of CLP and classified as dangerous**
- **To be done before 01/12/10**
- **Art 40 allows a joint notification**
- **A bulk notification is an absolute necessity**
- **Challenge : How to come to harmonised classification (for substances not to be registered before 01/12/10)**

# Warnings for 2010

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- **The pre-registration was extremely simple**
- **Registration dossiers will be extremely big**
- **At the same time the notifications for the classification and labelling inventory**
- **A real hotline will be more than necessary to help the companies**
- **Already nowadays companies have more and more difficult and precise questions and the answers are coming late and are not always very helpful**



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**Thanks for your attention**