

Conclusions

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Helpful quotes of the day

“Dare to share”

“Would you be a Lead Registrant?

It’s not a pain free but a positive experience”

“Be early, be early, be early!!!”

Lead Registrant status (Sept 9)



- 1648 SIEFs active or in progress (12% of total)
 - 28 new yesterday
- 472 legal entities informed to ECHA
 - Of which 398 intend to register in 2010
- 22 countries out of 27 are represented
 - plus Liechtenstein, Iceland, Norway, Switzerland
- 1229 substances indicated for the 2010 registration deadline
 - 103 for 2013
 - 112 for 2018
 - 203 substances still no deadline (please update)

The clock
is ticking

The big challenge for SIEFs



- This is a marathon, not a sprint
- SIEFs are crucial to the success of REACH
- Essential if we are to minimise unnecessary testing and costs to industry
- Getting started and keeping going is a challenge

**The clock
is ticking**

General challenges mentioned today

- Administrative burden
- Legal aspects
- Communication aspects
 - Monster SIEFs
- Invoicing and payment
- Substance sameness
- Data exchange
- Do not forget dormant companies
- ...

Recommendations for SIEF operating rules

- Establish operating rules (e.g. dealing with confidentiality and competition laws)
- Rules governing data sharing and joint submission (e.g. obligations of LR and non-LR)
- Payment of compensation
- Ownership of data
- Agreement on cost sharing principles
- Limiting liability

Recommendations for SIEFs in general

- Consistency is key across within and across SIEFs
- Communicate and publish openly and freely – keep it simple
 - SIEF report web pages, newsletter
- Streamline admin work, use existing templates
 - E.g. Substance Identification Profile
- Generate high quality registration dossiers
- Use reliable service and tools – possibly refinement needed
- Be in time

Challenges to ECHA (1)

- Be clear about why dossiers fail
- No late changes to guidance
- TCC tool ready soon – and then no updates
- Deal with unhelpful external consultants
- Respond to Cefic's round-table top ten issues
- Add LR box in REACH-IT (or SFF/LR)

Challenges to ECHA (2)

- Update guidance on substances that are exempt
- Give enough time for industry to correct dossiers
- Facilitate use of read-across
- Finalise asap use descriptors guidance
- Tell downstream users of the deadline for informing LRs on uses
- One C&L dossier per substance
- ECHA aware of cases where >1 LR: emphasis on solving the potential issue prior to submitting JS dossier
 - If more than 1 candidate, ensure communication to decide best LR for the SIEF
 - Re-emphasize need to submit one joint dossier per substance

LR management



- No direct involvement of ECHA
- Support from ECHA for LRs registered with us
 - LR nomination form and publication of weekly updates
 - Webinars program to start in October: update will posted on dedicated ECHA website
 - Database created on “Key Issues for LRs and Best Practices for SIEFs” using the web form available at:
<https://comments.echa.europa.eu/comments/SIEFBestPractices.aspx>
 - LR Forum, platform of exchange provided by ECHA to lead registrants to “discuss” SIEF-related issues and promote best practice for successful SIEFs : <http://lr.echa.europa.eu>

Thank you

- Particularly the speakers
 - Taken the lead
 - Been willing to share your experience
- You are all to be congratulated – you have “stepped up to the plate”
- Together we’re edging closer to the achievement of REACH’s key aim
 - Protecting human health and the environment

And finally...

- Keep the momentum going – December 2010 is not so far away and is going to be a “tough” year
- Don’t let inactive SIEF members slow you down
- Use the Lead Registrant Forum – you are the experts on being a Lead Registrant, not ECHA
- Let us know of your successes so that we can spread the good practice