



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

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# Agenda

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- SIEFs 2010: hot topics and solutions
- Identified challenges 2013
- Key messages to take home



# Hot topics and solutions

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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.*
- Companies are reluctant to take on LR role because of unclear liabilities → *SIEF agreement clarifies LR responsibilities*



# Hot topics and solutions

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- 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*



# Hot topics and solutions

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- 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*



# Hot topics and solutions

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

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





# Hot topics and solutions

- How to ensure that costs are transparent, fair and non-discriminatory
  - *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*



# Hot topics and solutions

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- '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



# Hot topics and solutions

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

- 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
- 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

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- 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

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## 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?



# Key messages:

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- **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



# Key messages:

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- **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

***START NOW!!***



Thank you for your attention!  
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