

Feedback from ECHA on pre-SIEFs

Meeting with CEFIC
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pre-registration state-of-play

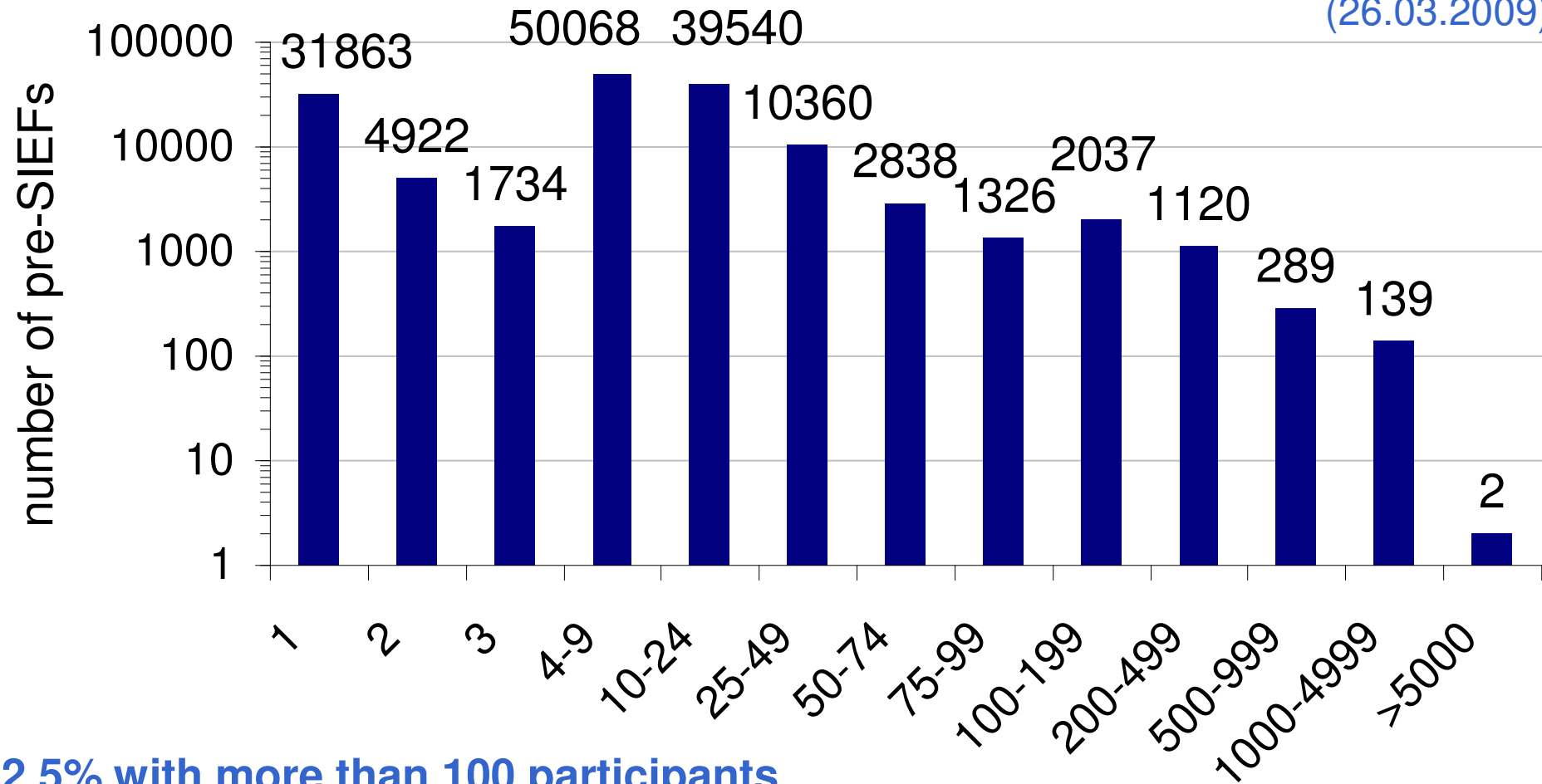


At the end of the pre-registration period:

- 65,000 companies signed up in REACH-IT (85% as SME)
- 2,750,000 pre-registrations received
- 146,000 different substances pre-registered
 - Complete EC inventory
 - 17,000 identified by CAS numbers
 - 9,500 identified by chemical names
 - 14,500 multi-constituent substances (*Reaction mass*)

pre-SIEF state-of-play

total = 146,333 pre-SIEFs
(26.03.2009)



2.5% with more than 100 participants

number of participants in a pre-SIEF

next step: from pre-SIEF to SIEF **ECHA** European Chemicals Agency

- Contact information of all participants in a pre-SIEF
 - available in REACH-IT
 - for meeting legal obligations **only**
- SIEF formation under industry responsibility
 - happens outside of REACH-IT
 - companies have to decide “sameness” of substances
 - if same substances: companies form one SIEF
 - if not: companies should seek to form / join another SIEF
 - Use the **list of pre-registered substances** to find other possible SIEFs
 - Use the **“Similar to” tab in REACH-IT pre-registration** to get access to pre-SIEF contact information

list of pre-registered substances **ECHA** European Chemicals Agency

- Complete list published on 19 December 2008
 - Substances identified by CAS number: correct CAS names provided by CAS added to the list
 - translations done of non-English chemical names
- Updated list published 27 March 2009
 - Substances identified by chemical name: missing EC numbers or CAS numbers added if it could be found (not all of them will be identified due to mistakes in the chemical names and/or poor substance identification)
 - new features:
 - Added provisional “list” numbers, to cover substances without an EC number, for easier registration
 - More download possibilities

pre-registered substances

- approach to change requests
 - no modifications in REACH-IT by ECHA
 - substance identity cannot be changed by pre-registrants
- approach to find another SIEF
 - in case of (spelling) errors: update pre-registration and use the “Similar to” box to enter the correct name
 - can view pre-SIEF of correct substance
 - can view contact details
 - can contact pre-SIEF members (outside REACH-IT)
 - in case of multi-constituent substances: can already view the pre-SIEFs of all constituents
- first-time manufacturers or importers pre-registering join pre-SIEF: 3,600 late pre-registrations so far

SIEF formation facilitator (SFF)



- role created to initiate discussions after pre-registration
- happens in REACH-IT
- volunteer – SFF may decide to stop at any moment
- not formally recognised in REACH – no obligation to use a SFF for forming a SIEF

SIEF formation facilitator (SFF)



	all pre-registrations		2010 deadline	
pre-SIEF size	Substances	Facilitated	Substances	Facilitated
1	31940	2%	3636	2%
2	4931	2%	608	3%
3	1737	4%	321	5%
4-9	50068	29%	2147	22%
10-24	39541	60%	30932	57%
25-49	10359	71%	9868	73%
50-74	2841	82%	2811	82%
75-99	1325	86%	1317	86%
100-199	2038	88%	2029	88%
200-499	1122	91%	1122	91%
500-999	288	95%	288	95%
1000-4999	141	99%	141	99%
5000+	2	100%	2	100%
TOTAL	146333	36%	55222	58%

effect of SFF News alert

pre-SIEF size	Substances	Facilitated	Facilitated
100-5000+	3591	3232	90%

before the SFF News alert:

- 48% of the facilitators for the big pre-SIEFs are 4 consultants

after the SFF News alert:

- 2 of the 4 consultants have resigned as SFF for a significant number of pre-SIEFs
- 5th consultant (mega-pre-registrant) has emerged as SFF:
 - 18% of big facilitated pre-SIEFs and
 - 80% of medium facilitated pre-SIEFs (10-99 participants)
- 48% of the facilitators for the big pre-SIEFs are 5 consultants

lead registrant

- all SIEFs must select a lead registrant
- mandatory role in REACH but no rules specified for electing the lead registrant
- SFF does not necessarily become the lead registrant
- functional mailbox in ECHA to indicate the lead:
lead-registrant@echa.europa.eu
- lead registrant notified to ECHA functional mailbox for **32 substances** since mid-February

Thank you for your attention

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