

SIEF Facilitation for Petroleum Substances

REACH Lead Registrants Workshop
Brussels

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L Kistenbruegger, CONCAWE

concaawe

3 facts on petroleum substances

- **572 substances can in principle be produced by various refinery processes; they are also known as “petroleum substances”**
- **Petroleum substances, except sulphur, are UVCBs**
- **Grouping of petroleum substances in categories has already been applied in the context of the Existing Substances Regulation (EEC) 793/93**

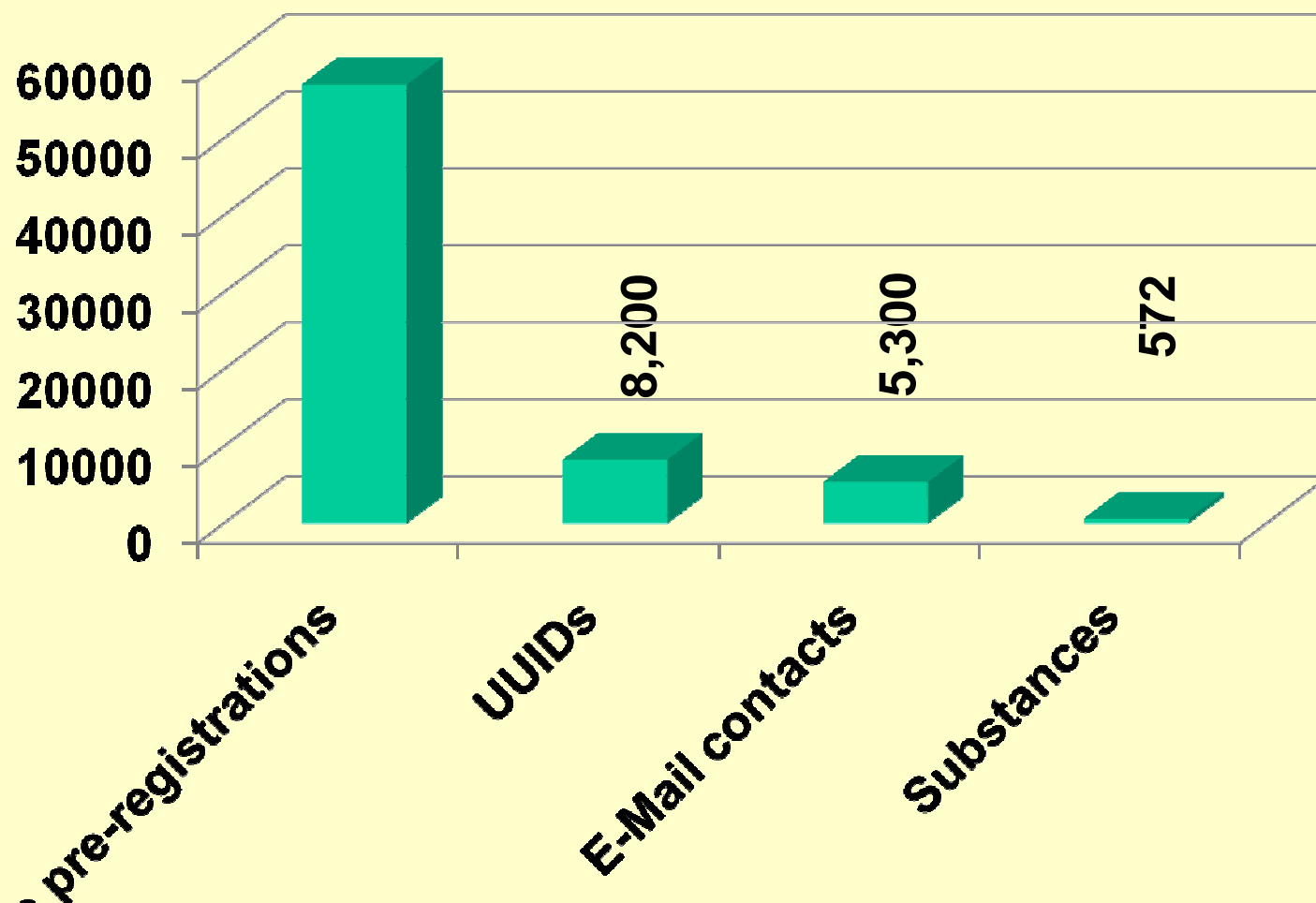
- **CONCAWE is the Oil Companies' European association for health, safety and environment in refining and distribution, 100% funded by its members**
 - **CONCAWE carries out research in the areas of**
 - **Automotive Emissions and Fuels Quality**
 - **Air, Water and Soil Quality**
 - **Waste**
 - **Safety, inc. pipelines**
 - **Refinery Technology Support**
 - **Health Science**
 - **Product Safety**
- and supporting its members in the implementation of legislation (e.g. REACH, IPPC)**
- **CONCAWE members represent approximately 100% of the European refining capacity**

- **CONCAWE has been assigned Third Party Representative (TPR) by the Legal Entities of its member companies**
- **Through its role as TPR CONCAWE has volunteered to act as SIEF Formation Facilitator for petroleum substances and sulphur**
- **CONCAWE is preparing**
 - **the common elements of Registration Dossiers for joint submission (sections 4 to 13 of IUCLID5)**
 - **C&L**
- **CONCAWE will offer these common elements to all non-member registrants under a licence agreement**

“Super-SIEFs”

- Petroleum substances have been grouped in 20 categories (sulphur is obviously being treated as a single substance)
- The SIEFs for substances of the same category have been merged → “Super-SIEFs”
- The common elements of the registration dossiers are being developed – in line with the IUCLID5 guidance for UVCBs – for each category
- Nonetheless, as a matter of principle, each substance will have to be registered individually → up to 572 Lead Registrants required

Initial SIEF Facilitation Task

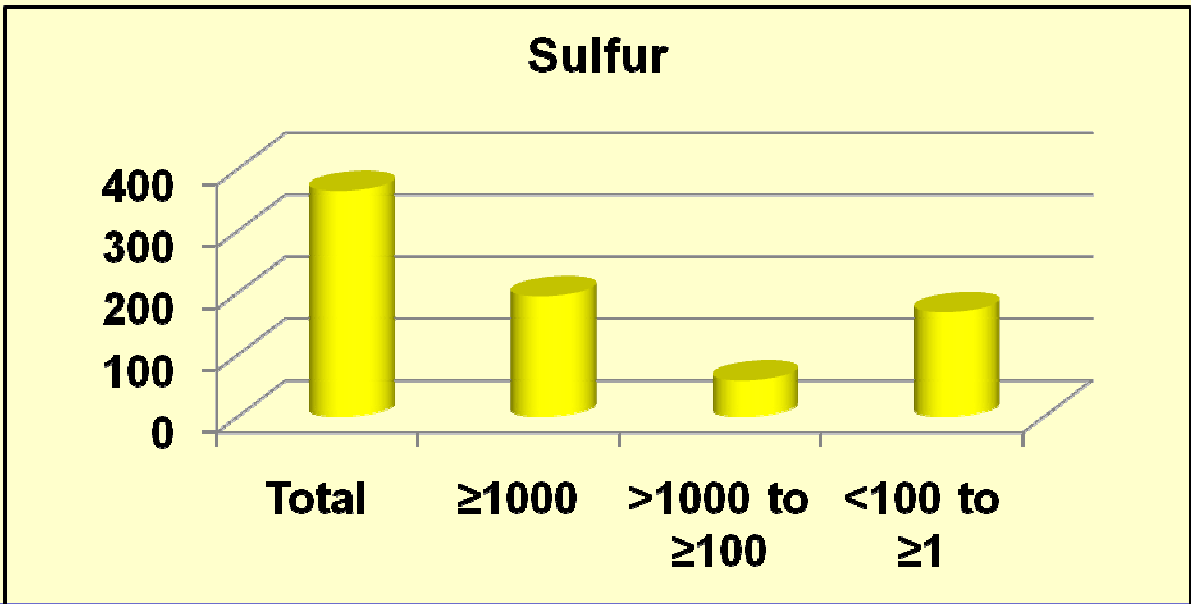
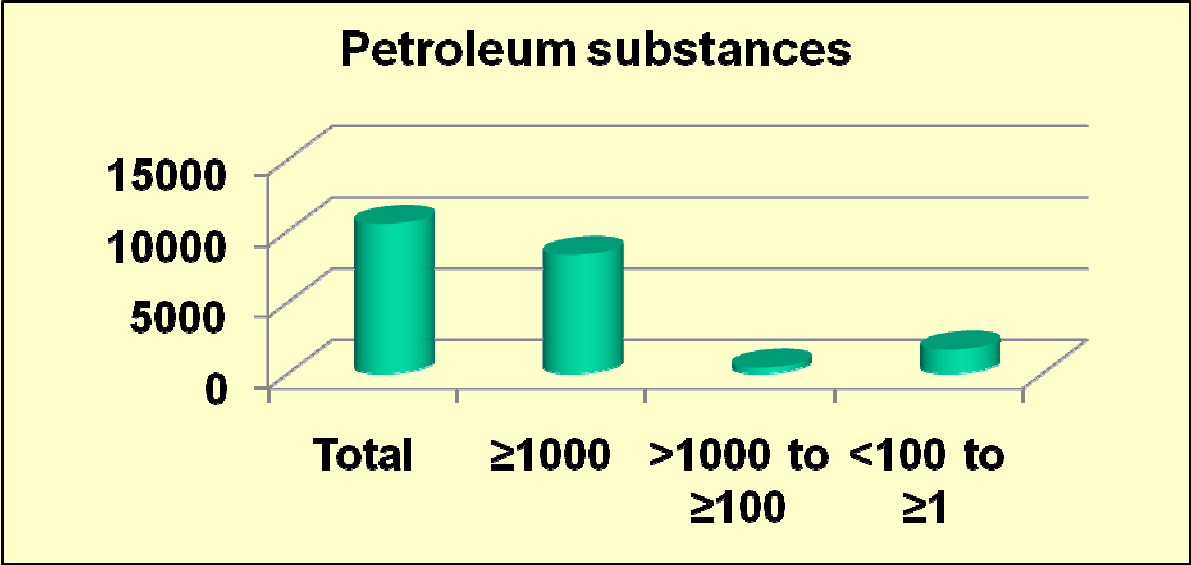


Is it possible that all these pre-registrations will be pursued?
 How many of them were made as a precaution?
 Are there other motives for pre-registration, e.g. of a commercial nature?

First SIEF Facilitation action

- **Comprehensive “initial communication” to all pre-registrants**
- **Survey to establish which pre-registrations are intended to be followed up by registrations and if so by which registration deadline**

Response to Survey



Confirmed intention to register:

appr. 20%



■ Identification:

572 substances

<p>Member companies acting as LRs:</p> <p>up to 292</p>	<p>Non-member companies acting as LRs:</p> <p>up to 380</p>	<p>No registration, no LR:</p> <p>tbd</p>	<p>Exempt from registration</p> <p>:</p> <p>?</p>
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Work in progress

■ Limited role:

- Limited to submitting the common elements of the registration dossier
- No SIEF facilitation – CONCAWE will continue as SFF

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- ☹️ **Significant effort → costs of SIEF facilitation**
 - ☹️ **Pre-registrants wishing to “keep their options open”**
 - ☹️ **Requests for consultancy (e.g. interpretation of REACH requirements, obligations of importers, preparations)**
 - ☹️ **Commercial firms with access to full SIEF composition making misleading offers for SIEF facilitation**
 - 😊 **Interest in joint submission**
 - 😊 **Very few cases of language barriers**