

3rd meeting of the Directors Contact Group on Registration under REACH

Summary: More steps towards the smooth registration of chemicals

The Directors Contact Group on Registration made good progress at their meeting of 8 April. They agreed on concrete measures, notably around the functioning of SIEFs, that will help companies to meet the first deadline of 30 November 2010 for registration of chemicals under REACH. In parallel, they also progressed in the assessment of the overall preparedness of industry to meet this deadline, responding to the concern of the secured supply of high-volume substances to downstream users.

More information about the outcome of the meeting

In practice, the Group has identified 27 issues which they are tackling. For the majority of them, solutions are already identified and being implemented, or suggested for discussion, and the Group maintains the deadline of 1 June for solutions to the remaining issues. The Group recognised that considerable work remains to be done.

At their earlier meetings, the Group had prioritised seven of these issues as deserving particular attention, according to criteria they agreed: these issues were deemed more complex, or having widespread impact on industry, or potential "show-stoppers" preventing registration. For three of these seven prioritised issues, the Group has agreed on solutions at this meeting. These are:

- the practical functioning of SIEFs, such as agreement on operational rules, the selection of data and on the chemical safety report, especially if it is going to be submitted jointly, and how to handle "late wakers" in the SIEFs. The Group recommends a practical approach to such issues based on open communication i.e. that Lead Registrants must communicate to SIEF members their planning for submission of a registration dossiers. Then agreement must be found on a date after which discussions are frozen and further changes to the dossiers can only be considered for later updates after submission..
- support to SMEs working in SIEFs and consortia. The Commission will write to the MS to encourage them to use all available structures to provide support to SMEs and in particular to ensure that national helpdesks are adequately resourced.
- what to do about substances for which it is suspected that there is no manufacturing taking place within the EU, and for which it could be difficult to find a volunteer to take the Lead Registrant role. The Group has developed an approach based on raising awareness in industry of potential problems so that the market can react.

In parallel, the Group is also monitoring the overall preparedness of companies as to meeting the 2010 registration deadlines. To this end they are conducting surveys to get a more accurate estimate of the number of substances that can be expected to be registered by 30 November 2010. The purpose is two-fold: on the one hand, it will allow a better overview of the situation in light of concerns from all industry related to the secured supply of high-volume (i.e. > 1,000 tonnes) substances. On the other hand, an accurate figure is essential for ECHA's operational and financial contingency planning.

Based on current information, the Group would expect around 4,400 substances to be registered by the 2010 deadline. The industry associations will call on Lead Registrants to identify themselves to ECHA as soon as possible to reduce the uncertainty. ECHA will publish the list of substances expected for registration in 2010 and will provide specific information to allow a downstream user to assess whether there is a risk to continued supply of a particular substance.

Therefore the Group made good progress in the task they were mandated to: monitor the overall preparedness of companies as to meeting the 2010 registration deadline; identifying and resolving priority issues of concern in meeting obligations relevant to the registration deadline, as well as for a secured supply of high-volume substances to downstream users. This achievement can be recognized, knowing that the Group was set up hardly more than two months ago. The Group also noted the excellent co-operation between all parties.

The next meeting of the Group is planned for 6 May. The Group will continue to report on its progress after each of their meeting.

Background

The Group has been set up in order to enhance progress towards the first registration deadline under REACH, namely to accelerate the process of formation and operation of the SIEFs.

The Group comprises director-level representatives of the Commission, ECHA and 6 industry associations representing most companies having to register chemicals by this first deadline, or representing SMEs.

The Group met for the first time in February, where they agreed on the scope of their work as well as on criteria for prioritisation of issues. Subsequently, they worked very fast on the identification of the issues and the implementation of solutions to them.

30 November 2010 is the deadline under REACH for registration of highest volume chemicals, as well as known particularly hazardous substances. Manufacturers and importers have to document their management of risk of chemicals in their registration files to be able to continue their production and marketing.

To prepare their dossier, companies will need to share data with others in a Substance Information Exchange Forum (SIEF). SIEFs bring together businesses registering the same substance so they can share data on it. This reduces costs, avoids duplication of animal testing, and allows SMEs to benefit from data gathered by bigger companies, which should be exchanged for a fair price.