



## SIEF activities

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- ▶ Why is CONCAWE involved in SIEFs
- ▶ Overview of SIEF activities
- ▶ What it takes for SIEFs to be efficient
- ▶ A few statistics on SIEF activities

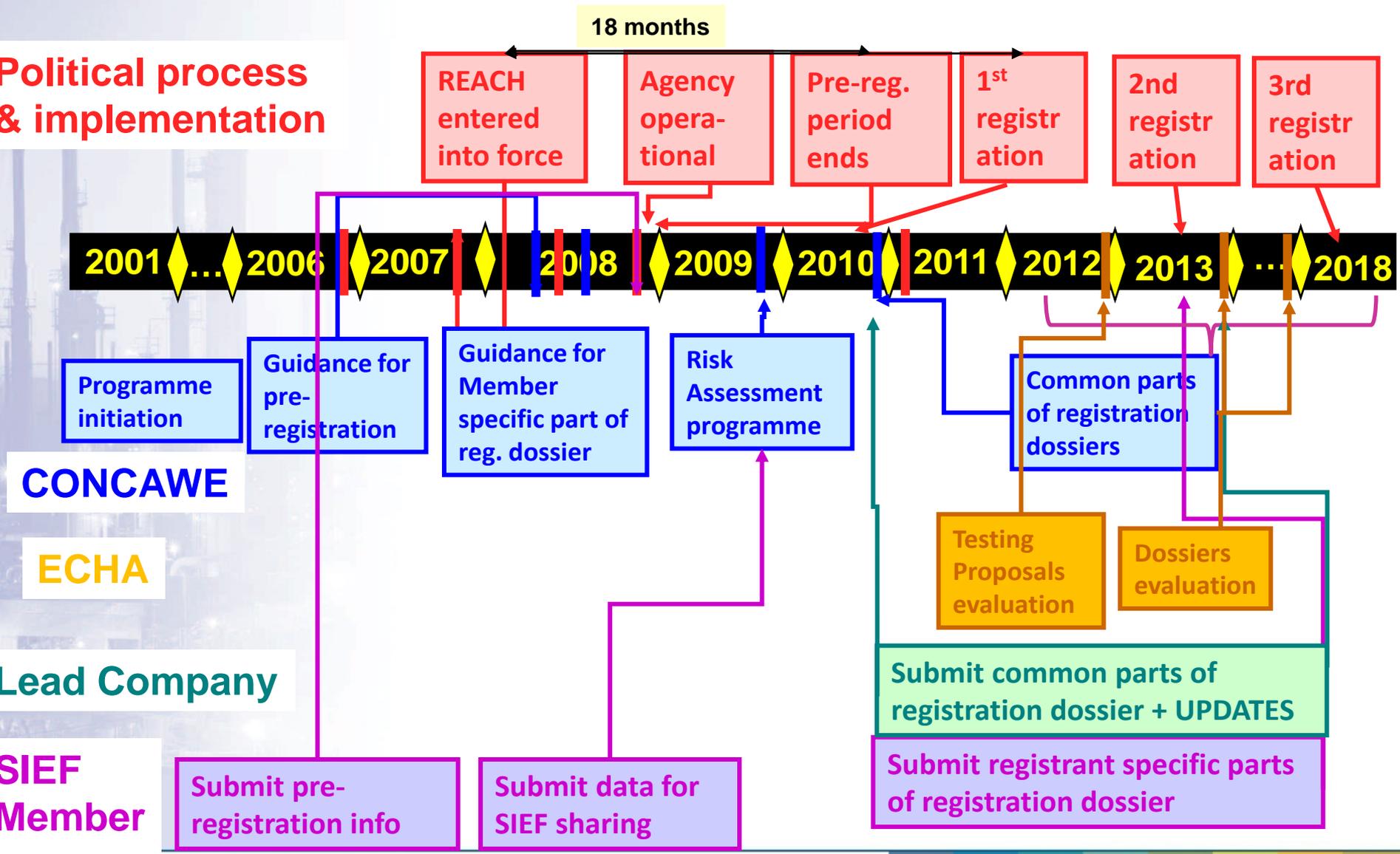
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- ▶ According to REACH, all pre-registrants of the same substance de facto belong to the **same SIEF** (Substance Information Exchange Forum)
- ▶ SIEF are there to help exchange information on the phase-in substances and to **share data and costs among registrants** and owners of information on substances
- ▶ Thanks to its unique position in the oil industry, CONCAWE took the role of **SIEF Formation Facilitator** for all Petroleum Substances and was mandated to organise the granting of access to its Risk Assessment work and know how relevant to REACH registration.
- ▶ Access to its registration dossiers is granted to all registrants under a **Licence Agreement** and - for non-members - against a fee. Members pay this as part of their membership contributions to cover their own activities.
- ▶ CONCAWE as SFF is also in charge of the organisation of the **mandatory Joint Submission** of registrations.



## Political process & implementation



CONCAWE organises the management of the SIEFs according to a tailored operating model, in which:

- ▶ Communication with co-registrants is taken care of by the Secretariat SIEF Team
- ▶ Lead Registrants have a restricted – yet critical – role in maintaining the Joint Registrations compliant with REACH: they are in the front line to communicate with ECHA, not CONCAWE.

A contractual framework has been set-up to support this organisation:

- ▶ Licence Agreement for members and non-members
- ▶ SIEF Facilitation Service Terms & Conditions
- ▶ Lead Registrant Agreement
- ▶ Data sharing agreement



- ✓ This ensures that **roles and obligations** of all parties are clear.
- ✓ **Liabilities** are limited – yet not inexistent !



How does CONCAWE carry-out its SIEF role:

- ▶ CONCAWE and its members carry out the work necessary to **submit & maintain compliant REACH Registrations** for all registrants of petroleum substances & sulphur, both members and non-members, present and future.
- ▶ Such work is conducted to CONCAWE's high standards of **scientific integrity** at the **lowest possible total cost** that is consistent with this quality standard.
- ▶ Having minimised the cost to all SIEF participants, CONCAWE seeks to **recover from non-members a share of these costs** in a manner that is fair, transparent, non-discriminatory, consistent with the Regulation and its not-for-profit mandate.



- ▶ Receiving requests from non-members to **access CONCAWE dossier** common parts for their substances/legal entities
- ▶ Preparing individual **Licence Agreements** after having checked the identity of the registrant and the substances to be registered
- ▶ Issuing invoices and collecting **payment** before granting access to files and guidance/information for preparing the registration
- ▶ Ensuring timely provision of **tokens** to new registrants for joining the JSO created by Lead Registrants
- ▶ Acting as focal point for all **requests from co-registrants** concerning their substances, their registration, and the evaluation of dossiers by ECHA
- ▶ Collecting cost information and data necessary to support the calculation of **fair and non-discriminatory fees** charged to non-members
- ▶ **Reporting** to members on the above activities regularly



## SIEFs will remain operational until at least 2018

- ▶ **New market entrants** may need to register
- ▶ Upcoming **registration deadlines** end May 2013 and in 2018
- ▶ **Dossier updates** required by ECHA as a result of its evaluations
- ▶ **Lead Registrants** need to remain active for future co-registrations
- ▶ Hundreds of Petroleum Substances **not yet registered** are expected to be registered by 2018



CONCAWE developed several tools to support large-scale registration activities:

- ▶ SIEF Communication platform
- ▶ Web Ordering Tool & back office (accounting, invoicing)
- ▶ LRA Acceptance Web Page
- ▶ LR Web Site and LR Messenger



Hundreds of users have their own specific profile for each of these tools, based on their registration needs and licensed rights.



CONCAWE provides co- and Lead registrants (Members or non-members) with continuous and critical information for maintaining their registrations compliant:

- ▶ Regular Newsletters
- ▶ Instructions for submitting dossiers updates
- ▶ How to respond to ECHA letters
- ▶ Request for data on their registered substances



CONCAWE also communicates with pre-registrants regularly to ensure they do not "miss" the SIEF train!



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## Managing Petroleum Substances SIEFs means:

- ▶ **21** Newsletters shared with SIEF members
- ▶ **60** updated dossiers made available
- ▶ **202** Lead Registrants and Joint Submissions
- ▶ Over **450** active users of SIEF.space
- ▶ Almost **700** Web Orders received since 2010
- ▶ About **1,300** licences granted to non-members
- ▶ Almost **2,000** invoices raised since 2010
- ▶ Over **4,500** active registrations
- ▶ More than **5,000** contracts concluded
- ▶ Over **50,000** pre-registrations in REACH IT

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It also means:



- ▶ **Hundreds** of e-mails to respond to every week (5 different user mailboxes set up)
- ▶ A **small** team: 4 persons representing about 2 "FTE" since 2011, interacting with hundreds of registrants
- ▶ Several **millions** Euros recovered from non-members (about 25% of costs incurred by CONCAWE) since 2010 through selling of:
  - Licences for getting access to the dossier & the updates: fee of around 10K€ per substance per legal entity for the "base" licence
  - Subscription to the "SIEF service": annual fee of 300€ per substance per legal entity



- ▶ CONCAWE cannot help the industry in its REACH compliance efforts without **YOUR help**
- ▶ Too many registrants continue to think that “REACH is over” and have decreased – if not suppressed – their resources dedicated to REACH. **REACH continues!**
- ▶ Recovering costs incurred for future dossier updates (testing proposals) will present a **significant challenge** as amounts may become more significant (e.g. testing proposals)
- ▶ Lead Registrants may not have realized the **criticality of their role** when taking it. They should now comprehend the importance of being reactive and on the spot in responding to requests from ECHA and from the SIEF team. It is about their regulatory compliance!
- ▶ Fears of “dissidents”, legal actions or language barriers in **dealing with pre-registrants** have not materialized. We should nevertheless remain alert as the potential is there.

