

## Fe Salts: Q & A

1. Where can one find the SIPs for these substances?  
*The SIPs of AIFe substances are published on the SIEFreach site of a specific substance ([www.siefreach.com](http://www.siefreach.com)) > login > MySIEFs).*
2. Will the slides of this webconference be made available afterwards and where? Where can we get the cost sharing excel files?  
*The material presented in the webinar of March 2nd, including the excel file on cost sharing, will be published on the REACHCentrum AIFe site ([www.reachcentrum.eu](http://www.reachcentrum.eu)) > Consortium Management > Aluminium and iron salts) as well as on the SIEFreach public site ([www.siefreach.com](http://www.siefreach.com)) > Public SIEF information).*
3. We didn't find the recommendations for test methods. Are they already available?  
*A document describing the recommended test methods for characterizing the substance identity (spectra) and composition (analytics) is already available on the SIEFreach site of each specific substance, and will be published soon both on the SIEFreach public site and on the REACHCentrum AIFe site.*
4. What is Kemira's SIEF tool? SIEFReach?  
*SIEFreach is the tool that is used currently for the SIEF communication in the AIFe Consortium. A new tool is going to be launched early April, and the pre-SIEF members will be informed about this.*
5. Can we have access to the reports and the Position papers?  
*The scientific reports and position papers are in principle prepared and owned by the Members of the Consortium. Selected information, such as the Test Method Recommendation and Registration Approach for Aluminium Salts will be published for the SIEF members.*
6. Does the letter of access include a model of eSDS (extended Safety Data Sheet) including ESs (exposure scenarios). Or will you provide the information of CSR and every company will have to prepare their own eSDS?  
*The Letter of Access will contain an html copy of the IUCLID 5 Joint Submission and a word document of the CSR with the identified generic uses, including their ESs. That information can be applied by each company preparing their own company-specific e-SDSs. Also the chapter 13 of the Joint Submission may contain useful information for the e-SDS.*
7. Iron Platform had a similar issue with PNEC in the preparation of iron dossier; did you exchange on this with the Iron Platform consortium?  
*Yes, the approach to PNEC was already discussed with that group.*
8. If a company signs the SuperSIEF Agreement, then is the company obliged to pay something if he decides not to register?  
*The SuperSIEF Agreement grants access to the Joint Submission, CSR (including generic ESs of common uses) and Letter of Access (LoA) for all 5 iron salts with a unique one-off payment. Each company can then register the Fe salts they are interested in. This was proposed as the most efficient and economic way of generating the Registration Dossiers. After signing a SuperSIEF agreement, the company will receive an invoice, after which the LoA and other documents will be provided. ECHA will charge the registration fee separately for each submitted registration.*

9. You mentioned earlier in the LoA description that the LoA would not enable the company to see the dossier: in the next steps slide you talk about distribution of the IUCLID 5 file as html. Please clarify: thank you.  
*Please see the answer to question 6. LoA would not enable the SIEF member to see the information owned and generated in the Consortium, but would allow access to the IUCLID 5 study summaries (in html format) and chemical safety report.(as a Word document).*
10. Are the costs for the “letter of access” per company and \_per substance\_ or are there all five substances included in the 18.600 Euro?  
*The registration dossiers and the joint CSR for all five substances are included in this sum, if a SIEF member is one company and one Legal Entity (LE). Additional Legal Entities pay each 6,258 Euros.*
11. Will the costs of the letter of access fall 2013 and 2018 due to a tonnage band of less than 1000 t/a?  
*For the right to refer to the studies, costs would depend on the tonnage band. For the IUCLID 5 dossiers, the costs may be different, but on the other hand the administrative costs will be raised due to longer maintenance.*
12. When can we expect identified uses?  
*An initial draft was published on the Consortium website already in October 2009. They are currently under review, to include the feedback received from Downstream Users by 1.12.2009.*
13. What is the cost for OR (Only Representative) if he is a representative for several LEs?  
*A separate submission and thus a separate LoA and SIEF Agreement will be needed for each non-EU manufacturer they represent. If the non-EU manufacturing sites are part of the same Company (Corporation) X, they would be considered as different Legal Entities (LE 1 / LE2...) so on top of the 18,600 € (1 company and 1 Legal entity), an additional 6,258 Euros would have to be paid for each extra LE. If the non-EU manufacturing sites are from different Companies X, Y, Z), the O.R. would have to pay 18,600 € per Company (if just one LE per Company).*
14. In the LoA cost derivation of 18,600, I missed the link between the 6,258 costs and the 18,600 € - can you clarify?  
*Firstly, administrative costs are 6,258 Euros (per Legal Entity). Secondly, estimated costs for studies (either performed or currently running) is 2,357 Euros . Thirdly, pre-consortium preparation costs and contingency costs are 10,000 Euros. Altogether, these three cost items sum up to 18,600 Euros.*
15. Will you please list the ALFE Consortium at [http://chemicalwatch.com/REACH\\_consortia](http://chemicalwatch.com/REACH_consortia) to ensure all possible LEs are receiving communications? The website contains links and contact info to a large number of consortia (no cost to us for listing).  
*Yes, our information can be sent there for addition.*
16. Will 1 SIEF Reach access be enough for 1 company including several LEs and substances?  
*Basically one administrator is enough for one company, but the User permissions (various options: User, Expert, Observer, Data Holder and Free) are always created separately for each substance.*
17. For an OR, could you explain the difference of LE and company? Do you look OR as a company or LE?  
*An OR (Only Representative) is a natural or legal person established within the EU, who registers an imported substance on behalf of one or more non-EU manufacturers. A LE (Legal Entity) is a natural or legal person established within the EU registering a substance. A company is a group of related legal entities (e.g. belonging to the same Corporation but not recognized by the REACH regulation) submitting separate registrations. An OR can be considered as a special case of an*

*importer. In case of several non-EU-manufacturers, a separate REACH registration needs to be submitted for each of them. Please see [ECHA FAQ](#) for legal clarifications.*

*In order to comply with the "fair, transparent and non discriminatory" principles of REACH, the SIEF rules for the ORs are in principal similar than for the LEs:*

*if the non-EU manufacturing sites are part of the same Company X, they would be considered as different Legal Entities (LE 1 / LE2...) so on top of the 18,600 € (1 company and 1 Legal entity), an additional 6,258 Euros would have to be paid for each extra LE.*

*If the non-EU manufacturing sites are from different Companies X, Y, Z), the OR would have to pay 18,600 € per Company (as if just one LE per Company).*

18. If I want to register two substances included in this consortium I will pay only one invoice of 18,600 Euros and the letter of access will "cover" both?

*Yes, all the Fe salts Registration Dossiers will be covered as long as the LoA is granted to one company and one LE.*