

REACH: SIEF MANAGEMENT FOR REGISTRATION OF THE SUBSTANCE(CAS N°, EINECS N° and name)

Date:.....

Dear Madam, Dear Sir,

My company(***name of the company***) is a member of the pre-SIEF for substance(***CAS n°, EINECS n° and name***) for which you have also submitted a pre-registration.

We are writing this letter in the role of the SIEF Formation Facilitator (SFF).

The aim of this letter is to prepare an inventory of the foreseen activity level for each of participants within this SIEF.

Efficient communication and planning is essential to organise the SIEF. To start the organisation of the SIEF, we would like to ask you to fill in the attached questionnaire and return it in electronic form (not by fax or mail). In view of the urgency in moving this forward, it is important that we receive the questionnaire ***[within 2 weeks after the sending of the letter but no later than 1st of March 2009 if the earliest registration deadline in the SIEF is 30 November 2010].***

In case you want to assume dormant status (SIEF code 4) there is no need to reply, because those not responding before the deadline above will be given by default a dormant status.

Sincerely

Name & contact details of the company sending the letter



Explanatory Note

Introduction:

The key goal of a SIEF is to facilitate data exchange on the same substance, as well as to agree on classification and labelling.

With difficulty to organise and manage the 2.7 million pre-registrations and 150.000 pre-SIEFs, there is an urgent need for a simplified and harmonised approach to SIEF management. Cefic is proposing a methodology on how to manage the activities to be undertaken by the SIEF participants in a very short time frame.

The following approach is suggested as a possible way forward:

SIEF roles

Companies that have pre-registered a substance do not always have the same interest with regard to the upcoming registration process. Some companies have a unique product, not produced by anyone else; others are leaders in the market or are (very) small players. Some are (re-)importers or Downstream Users who had to pre-register because the substance of interest was not yet registered by anyone higher in the supply chain.

SIEF leadership

In order to be able to manage a large number of (pre)-SIEF participants and to ensure timely completion before the Registration deadline, a SIEF Leadership Team (SLT) is advised to be formed in order to manage the SIEF on a day-to-day basis. The SLT, consisting of a very limited number of SIEF members, could consist of the SIEF Formation Facilitator (SFF), the Lead Registrant and a few other key members.

The SLT will have the mandate to take decisions, assign resources (money and consultants) and will monitor, control and report on progress, resources and agreed deliverables.

The SLT will also handle general management issues such as: setting up agreements with consultants and laboratories, manage financials such as sending invoices, book-keeping, tracking invoices, etc.

Coding of SIEFs

In order to achieve an efficient registration and communication process, we would like to have some information from you in order to classify the pre-registrants into 4 different SIEF Codes:

1. Leading

This pre-registration concerns a substance of high strategic importance and your company has adequate resource to (co)-lead.

Your company (co)-leads the SIEF with the cooperation of a few others.

Your company assumes responsibilities as a leader and will be active in the SIEF Leadership Team (SLT).

2. Involved

This pre-registration concerns a substance of strategic importance, but your company cannot commit resource to lead.

Level of activity may vary as appropriate from being consulted to being actively involved and helping the SIEF leader in technical discussions.

You want to be regularly updated.

3. Passive

This pre-registration concerns a substance of lower strategic importance.

You expect other players to take the lead.

You want to minimize use of your resources and will simply pay the invoice for the data needed for your registration and any additional management compensation according to cost sharing system agreed in the entire SIEF.

4. Dormant

For formal reasons you had to pre-register:

Re-imports, monomers of imported polymers, recycling, articles with intended release

- You have no intention to register

- You do **not** want to be involved nor pay an invoice

- You may deactivate your membership after your supplier has registered

We are aware that there are many important aspects to be considered when working effectively in a SIEF (such as: managing the registration time line, cost sharing of testing costs and SIEF management costs, liability issues for the lead registrant, etc..).

Cefic is about to issue further guidance on these topics In the meantime, Cefic has prepared this current communication to address the urgent need to start the organisation of the SIEF.

From:
SFF details:

To: pre-registrant for the SIEF:
CAS number:
EC number
Substance name
LE name:
LE Contact:

Deadline is within 2 weeks after the sending of the letter but no later than 1st of March 2009 if the earliest registration deadline in the SIEF is 30 November 2010. Assignment of SIEF codes is not static and may change over time. No assignment of code will mean default code 4 (please note that these codes can be changed at any time by contacting the SFF).

SIEF Code	Position	My position (please indicate the appropriate cell)
1 Leading	This is a substance of high strategic importance for my company and I have available resource to (co) lead and drive registration to completion	<input type="checkbox"/>
2 Involved	My company is registering and may be actively involved. My company will receive a SIEF progress report, an invoice* and an invitation to comment	<input type="checkbox"/>
3 Passive	My company has the intention to register this substance. My company will receive a SIEF progress report and an invoice*	<input type="checkbox"/>
4 Dormant	My company has no intention to register nor to spend money. My company will receive no communications and no invoice (besides mandatory data sharing).	<input type="checkbox"/>

* Invoice will include the data needed for the corresponding registration and any additional management compensation according to cost sharing system agreed in the entire SIEF.