

Department for Environment, Food and Rural Affairs

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REACH Implementation - You need your SIEF, and your SIEF needs you!

The EU REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulation's pre-registration period ended in December last year, and in January this year the next stage of REACH implementation began. This is the formation of Substance Information Exchange Fora, or SIEFs. If you pre-registered a substance with the European Chemicals Agency (ECHA), you will find yourself a member of the SIEF for that substance. REACH places the responsibility on industry to organise and run SIEFs, and does not give national regulatory authorities or ECHA a role in this process. However, they can offer general advice and suggestions on what might constitute best practice.

SIEFs serve an important function in providing the mechanism for companies to prepare for registration of their substances. The first task of SIEF Members is to agree on the sameness of the substance they have pre-registered (because many of the same or similar substances have been pre-registered under differing names). This will allow them to share information on the properties of the substances and contribute to the joint dossiers of information each SIEF will prepare for all its members to refer to when completing their individual registrations. Being a member of a SIEF brings additional benefits, such as reduced registration fees, and shared costs of preparing the information dossier (which you would otherwise have to bear fully to complete a registration outside a SIEF), including the costs of any further testing that may be necessary to fill gaps in the information needed for the dossier.

A wide range of companies are likely to be represented in each SIEF, from large ones dealing with thousands of tonnes of a substance per year, to small ones dealing with only a few tens of tonnes. The extent to which you participate in a SIEF is a business decision for you to make and will depend on several things. What is the strategic importance of the substance to your company? Factors such as annual production or import volume of a substance should be considered. The first registration deadline of 1 December 2010 is for substances manufactured or imported at quantities 1,000 tonnes or more per year and those that have a particular severe classification to man or the environment. For these substances there is a lot to be done in preparing for the deadline – so if you are in that category, you may want to be quite an active participant to ensure you have all the necessary information to complete your registration in time.

But regardless of your registration deadline, you need to be informed about the process to be able to take these decisions. You should be clear, when participating in a SIEF that you should only do what you need to do to fulfil your REACH duties, for example you only need to gain access to data for your particular tonnage band, and the registration deadline that will apply to you will be based on your tonnage (it is possible that others within the same SIEF are required to submit a dossier before you).

When getting involved in SIEFs, you will need to agree with the other members whether a SIEF Formation Facilitator (SFF) is needed, who it should be, and who is going to take on the required Lead Registrant (LR) role to oversee preparation of the joint information dossier for the SIEF. You will need to be wary of self-appointed SFFs and LRs that may contact you, and check whether their appointment has the agreement of the other SIEF members and that you are happy with this appointment. You should also ensure that you are happy with any costs associated with the running of a SIEF before you commit to them.

It is important to reach agreement with the other SIEF members on how the costs of data sharing and any additional testing will be apportioned within your SIEF, and you should also remember that it is mandatory to share any existing animal test data on your substance with the other SIEF members, so that the tests are not repeated.

Getting a better understanding of what's involved in SIEF participation will help to put your business in a much better position to complete the substance registration process on time, and take advantage of the reduced costs available in doing so. The UK REACH Competent Authority (provided by the Health and Safety Executive) has a website (www.hse.gov.uk/reach) with useful information about SIEFs at <http://www.hse.gov.uk/reach/resources/17sief.pdf>. There is also other useful information on the website about the REACH registration process.

The Competent Authority also runs a national Helpdesk to provide information and advice on the application of REACH and its obligations. The Helpdesk can be contacted at ukreachca@hse.gsi.gov.uk, but remember that because the regulatory authorities have no legal role in SIEFs, it can only offer general suggestions, and not detailed and specific advice on how to operate within a particular SIEF. That remains a business decision for each company involved. Additional SIEF guidance can also be found on the ECHA website at http://echa.europa.eu/sief_en.asp, and in their main guidance document on data sharing at http://guidance.echa.europa.eu/docs/guidance_document/data_sharing_en.pdf.

European Chemicals Team
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