From: EHS Assistant <EHSAssistant@eurometaux.be>
Subject: **FOR INFO: Feedback on recent exchanges with ECHA / Next meeting**
Date: 7 Apr 2014 17:15:55 GMT+02:00
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▶ 2 Attachments, 6,4 MB

To the REACH Intermediates Taskforce

Dear All,

We hope you are doing fine.

Please find herewith some feedback on recent exchanges we had with ECHA and some information on the proposed next meeting of the REACH Intermediates Task Force.

Recent contacts with ECHA:

The ECHA SID unit re-contacted EM last week, to make sure both sides have a clear understanding of what will be submitted in April with regard to SID content and possible changes. As you may recall, further to the January meeting and after the site visit, ECHA asked industry to ensure that the UVCBs descriptions in the dossiers would be detailed enough to demonstrate group sameness despite (large) existing constituents variability. Additionally, they asked to double check whether a splitting of registrations to refine grouping of UVCBs might be appropriate and to then let them know of possible cases where splitting is foreseen. The reason for asking this is that a change in SID triggers a change in fees etc. and they wanted to know if some specific support solutions had to be set up.
ECHA proposed to have a conference call to further discuss this and make sure that the recommendations provided in January were well understood. They also had some specific questions on Precious Metals examples. Based on these examples and the very clear and precise explanations from Caroline, ECHA got a better understanding on existing groups but also understood the big efforts consortia are (still) facing in ensuring and justifying substance sameness. ECHA also grasps the difficulty in working on possible grouping refinements to better fulfill the regulatory requirement while remaining 'realistic' (i.e. subgrouping to the level of single company UVCB submission is certainly not a solution!!) It was clearly explained that more details/explanations on substance sameness (more than were available in the 2010 dossiers) and on possible later splitting (after April submission) will be well reported in the CSRs.
ECHA was satisfied with the transparency/clarity of information received during the call and does not expect any further information. They will now wait for the dossiers (including the explanations) that will be submitted.

We also pointed out during the call that we were having technical issues during dossier submission. We agreed to set up a direct call with experts from the computational unit and managed to solve the few burning issues that lead to failure in the submission. Based on ECHA's indications, Aggie prepared a ILA guidance on submission, which she kindly proposed to share with the Task Force (available in the attachment: please note that there are a few specific ILA indications, such as separating CSR Part A and CSR Part B, that might be different from your experience).

Thanks a lot to Aggie, Katia, Katrien and Caroline for the very intense work here!

Next meeting of the taskforce:

With regard to the next meeting, we would like to thank those who already filled in the doodle. Based on available information there are two dates that seem convenient for most people, the Friday 9th and Friday 16th. Friday 9 would be convenient for those participating in the REACH Forum as well (taking place on May 8th), but we would need to alert you that it's the EU-Seafood week and apparently hotels in Brussels are fully booked (if needed, we could send you the link for the Brussels Bed & Breakfast site). For those who did not respond yet, could you please confirm your preference for the 9 or the 16th asap? Thanks

The provisional agenda of the meeting will cover the following topics:

1. Debrief on April Registration, focused on learning lessons and pending issues that may still require a short-term fix:

a. on dossier content: e.g. how short-term actions agreed with ECHA have been translated into the dossiers, common introductions to specific chapters and placeholders & recall of important recommendations received from ECHA on SID, assessment justification and rationales.

b. Practical aspects on submission: issues and submission tips/fees

c. Drafting of the internal guidance

2. Next steps:

a. Decisions agreed with ECHA on mid-term actions from industry (roadmap) and report on already initiated actions as Setac 2014 (presentation of the iUVCB methodology)

b. Decisions agreed with ECHA on long term actions from industry (roadmap) and initiated actions

Please do not hesitate to come back to us, should you have additional topics you would like to discuss!

Have a nice evening
Kind regards
Vio and Fè


Part A – Arti….doc (1,6 MB)

Part B – Artic…doc (4,8 MB)