



REACH SIEF workshop
Eurometaux experience

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Identification of problems experienced in SIEF (I)

☞ Problems that were reported are:

- ✓ Problems related to the SFF' willingness to deselect the SFF box:
- ✓ The ECHA communication clarifying the legal status of the SFF and the request to notify the lead registrant will only forward the problem and it is unclear how ECHA intends to go ahead with that.
- ✓ People within the pre-SIEF having pre-registered at considerably higher tonnage band than realistic on basis of market knowledge. **Difficulties to contact them as the pre-SIEF data do no longer contain an indication of the tonnage.**

Substance	EC N°	CAS N°	Max Tonnage	Deadline Registration for i2a members	ECHA Registration deadline
Antimony Metal	231-146-5	7440-36-0	> 1000	30-Nov-10	2010
Diantimony trioxide	215-175-0	1309-64-4	> 1000	30-Nov-10	2010
Sodium hexahydroxoantimonate	251-735-0	33908-66-6 or 12507-68-5	> 1000	30-Nov-10	2010
Diantimonytris(ethylene glycolate)	249-820-2	29736-75-2	100 - < 1000	31-May-13	2010
Antimony triacetate	230-043-2	6923-52-0	100 - < 1000	31-May-13	2010
Antimony trisulfide	215-713-4	1345-04-6	10 - < 100	31-May-18	2010
Antimony trichloride	233-47-2	10025-91-9	10 - < 100	31-May-18	2010
Diantimony pentoxide	215-237-7	1314-60-9	10 - < 100	31-May-18	2010
Sodium antimonate (A)	239-670-6	15432-85-6	10 - < 100	31-May-18	2010
Antimony pentachloride	231-601-8	7647-18-9	1 - < 10	31-May-18	2010
Antimony potassium tartrate	234-293-3	28300-74-5 or 11071-15-1	10 - < 100	31-May-18	2018
Antimony telluride	215-480-9	1327-50-0	1 - < 10	31-May-18	2010

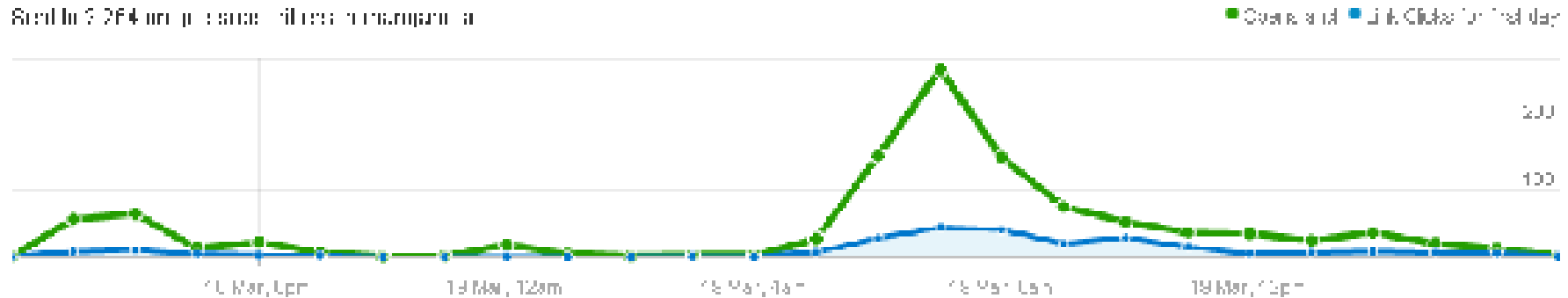
How to change the pre-SIEF, example

- A company has pre-registered molybdenum trioxide
- They now realised they should have pre-registered, molybdenum disulphide roasted (technical grade molybdenum trioxide oxide)
- How to deal with the change of SIEF and specifically in function of the later registration and the non-presence in the pre-SIEF. How will this be dealt with?

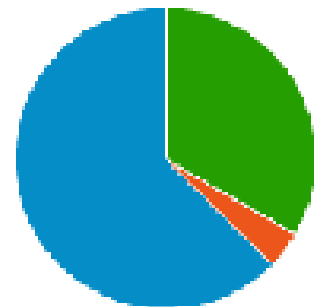
Pre-registration of manganese

Sent Mar 10, 2019 at 5:40PM

Sent to 2,264 unique people (includes bounces)



Campaign Overview



- 756** Unique opens
1/3 total opens to date
- 92** Bounced
4.00% couldn't be delivered
- 1,416** Unopened
Don't rates are only estimates

- 34.81%** of all recipients opened the email
- 38.89%** clicked a link (294 people)
- 0.64%** unsubscribed (14 people)
- 1** person marked as spam (0.05%)

Links Clicked

294

people clicked

(Clicking was a 38.89% click rate)

508

total clicks

Made by 294 people

1.73

clicks per person

Average of all those who clicked

462

didn't click

That's 61.11% of those who heard

AN AVERAGE OF 55% OF PRE-SIEF COMMUNICATIONS TO PRE-REGISTRANTS ARE NOT EVEN OPENED!

	Opens	Clicks	Bounces	Unsubscribes	Complaints
1 Molybdenum Metal - SIEF initial email Sent to 1,453 on Wed, 12 Jan 2009 at 4:50 pm Full results View campaign	64.44% 700	36.39% 209	3.92% 57	1.88% 26	0%
2 Sodium molybdate - SIEF initial email Sent to 338 on Tue, 13 Jan 2009 at 2:42 pm Full results View campaign	55.96% 185	30.6% 71	3.25% 11	0.61% 2	0%
3 Pure molybdenum trioxide - SIEF initial email Sent to 222 on Tue, 13 Jan 2009 at 2:00 pm Full results View campaign	54.37% 185	44.05% 74	4.04% 13	0.32% 1	0%
4 Molybdenum dioxide - SIEF initial email Sent to 92 on Wed, 11 Jan 2009 at 11:43 am Full results View campaign	37.5% 33	24.24% 8	4.39% 4	0%	0%
5 Calcium molybdate - SIEF initial email Sent to 84 on Wed, 11 Jan 2009 at 11:43 am Full results View campaign	38.74% 31	32.79% 10	5.95% 5	1.77% 1	0%
6 Iron molybdate - SIEF initial email Sent to 25 on Wed, 14 Jan 2009 at 11:53 am Full results View campaign	50.43% 7	42.88% 3	8% 2	0%	0%
7 Ferromolybdenum slags - SIEF initial email Sent to 34 on Wed, 14 Jan 2009 at 11:53 am Full results View campaign	59.39% 10	50.77% 1	2.94% 1	0%	0%
8 Roasted molybdenite concentrate - SIEF initial email Sent to 114 on Wed, 14 Jan 2009 at 0:16 pm Full results View campaign	45.85% 52	42.31% 22	2.53% 3	0%	0%
Average across all Registrations	44.77%	36.33%	4.39%	0.51%	0%

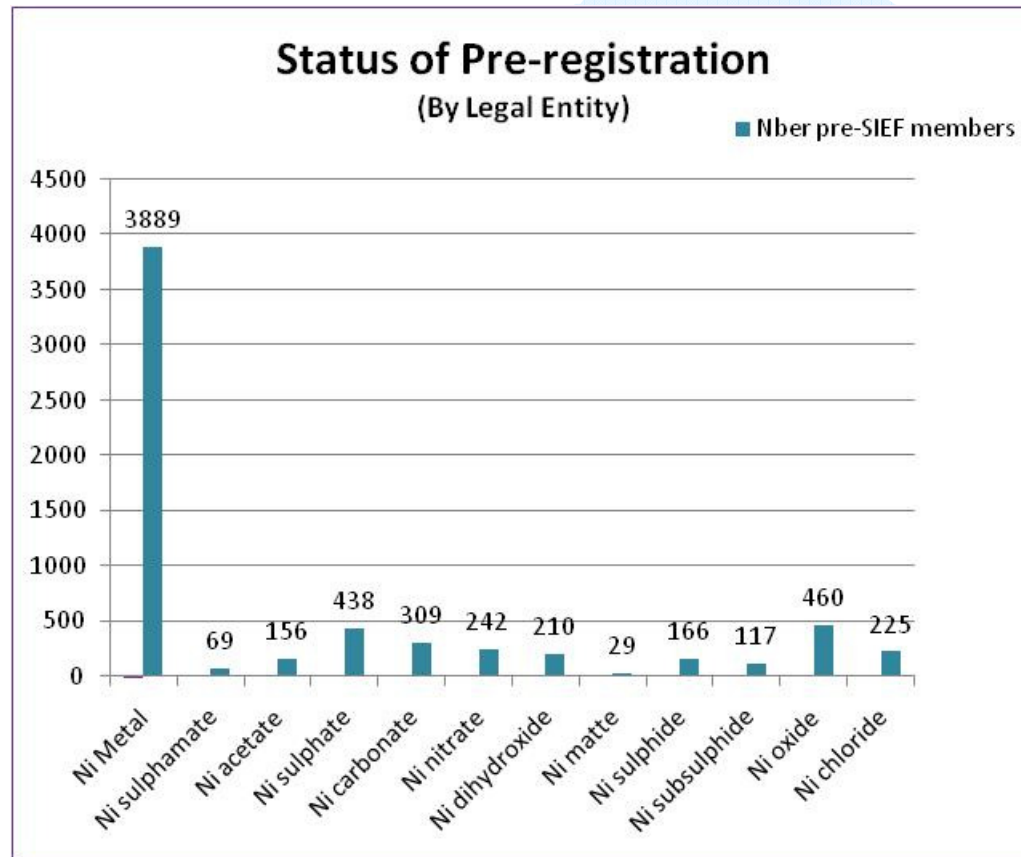


Pre-SIEF issues
Nickel Case

France Capon-Hugo Waeterschoot





Communication in pre-SIEFs



Pre-SIEF members: 6310 !

Communication strategy

- ★  **Tier 1:** presenting consortia activities for each substance included
- ★  **Tier 2:** checking of **sameness** and status of the pre-SIEFs members (dormant, passive...) in a survey with the aim to form the **SIEF**

IT-Tool develop by Molybdenum Consortium and used by most of the metals Consortia

Communication – Tier 1 (1)

Having trouble viewing this email? [Click here](#) to see it in your browser.



This email was sent to [email address suppressed].
Please [click here](#) to stop receiving further emails from the Nickel Consortia regarding .

Nickel REACH Consortium (Ni Cs)

An initiative of the Nickel Institute

11 February 2009

Pre-SIEF Facilitation

The Ni REACH Consortia is acting for VALE INCO as the pre-SIEF Facilitator for this substance, in the SIEF, a Nickel REACH Consortium member company is prepared to act as Lead Registrant.

Ni Consortium Pre-SIEF Facilitator contacts:

France Capon/
Jeroen Vanhecke
Nickel Consortium Secretariat

Email:
REACH@euronickel.org

Substance:

You have received this email because you REACH Pre-Registered with ECHA for .

If you pre-registered for more than one nickel substance, you will receive a separate E-mail from us for each substance where Ni Cs is acting as Pre-SIEF Facilitator in the name of its members.

Please be aware that the ECHA xml download file, for use by Pre-SIEF members, only contains one email address per pre-registrant.

The purpose of the REACH Pre-SIEF is to agree substance 'sameness' between the pre-registrants

REACH Substance Sameness Survey

Kindly note that **you will receive a second E-mail from the Nickel Consortium about in a few days.**

It will contain a link for you to complete and submit a short Pre-SIEF Survey that will be your participation in the 'Substance Sameness' discussion.

www.nickelconsortia.org

Ni Cs substance portfolio

[Click here to view the Ni Cs substance portfolio](#)

WHAT TO DO NOW

1. [Click here](#) to learn more about your participation in the Pre-SIEF 'Substance Sameness' discussion for . As required by the European Chemicals Agency, this is the obligatory first step before SIEF formation.
2. Read the brief summary below about the Nickel Consortium

Three nickel REACH consortia have been launched at a symbolic kick-off event in Brussels on 23 January 2007. The overall purpose of the Consortia is to provide a means for nickel manufacturers and importers to comply with REACH requirements, for example by data sharing and joint submission of the Registration dossier. The Consortium is comprised of the major EU and non-EU manufacturers, importers (including traders) and their respective Affiliates, with a membership of 31 companies to-date.

Ni Cs is:

- Focused on preparation of the Registration dossier including the CSR
- Working to develop read-across approaches based on sound science, develop hazard classification and labeling proposals, identify and evaluate downstream uses (and exposure scenarios) in preparation of the CSR
- Committed to make access to the Registration Dossier available to Registrants on fair, reasonable and non-discriminatory terms.

Less than two short years remain between now and the first REACH Registration deadline for substances in the > 1000 tonnes tonnage band, so it is important to organize and commence Pre-SIEF and SIEF activities promptly.

REACH registration for specified Nickel substances

March 2009

12



Communication – Tier 1 (2)

Home ▶ Pre-SIEF ▶ Nickel Metal

Nickel Metal

Welcome to the pre-SIEF page for **Nickel metal**.
(EC Name: Nickel/EINECS: 231-111-4)

Please proceed to:

- [Read the Ni Cs introductory letter](#)
- [View the Description of Ni metal](#)

The sole purpose of the Pre-SIEF is to agree substances 'sameness'. All pre-registrants for Nickel chloride will receive an e-mail with a link for you to participate in the 'Substance Sameness' discussion. Your participation will be in the form of completing and submitting a short Pre-SIEF Survey.

Recommended Reading

Recommended background reading before completing the Pre-SIEF Survey:

- [ECHA Factsheet on Substance ID](#)
- [ECHA Guidance on Substance ID](#)
- [Eurometaux Factsheet on Substance Identification for REACH](#)
- [CEFIC Guidance on Working Together in a REACH SIEF](#)

The Nickel Consortium is acting as Pre-SIEF facilitator for VALE INCO who indicated their willingness at Pre-Registration to conduct this activity for this substance.

[Nickel Chloride](#)

[Nickel Metal](#)

[Nickel Nitrate](#)

[Nickel Sulphate](#)

[Nickel \(hydroxy\)carbonate](#)

[Nickel oxide](#)

[Nickel dihydroxide](#)

[Nickel Sulphamate](#)

[Nickel Acetate](#)

[Nickel Sulfide](#)

[Nickel Sub-sulfide](#)

[Nickel matte](#)

[Nickel sinter oxide](#)

[Nickel carbonate](#)

[REACH National Helpdesk contacts](#)

 EuroMetaux

Visit the REACH Metals Gateway on:
www.reach-metals.eu

Statistics-Tier 1

blue spark *

Overview

Create/Send

Manage Subscribers

Reports

Reports > Campaign Snapshot

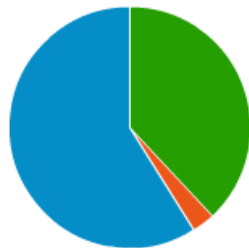
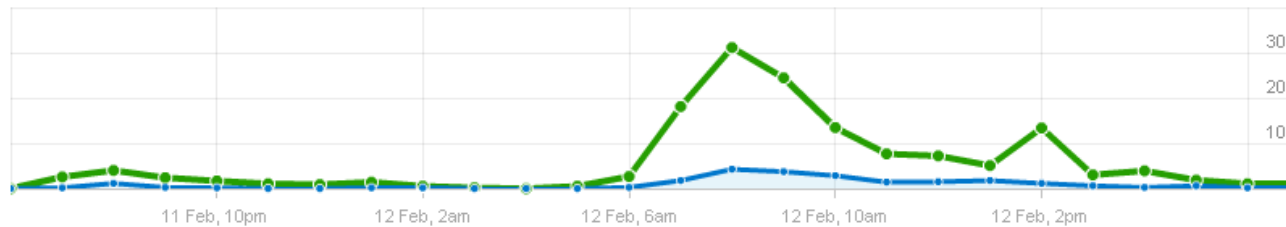
Pre-SIEF initial email - Nickel metal

Sent on 11 Feb 2009 to 2,558 unique subscribers in Nickel metal

View campaign

Export report

● Opens and ● Link Clicks for first day ([see all time](#))



973 **Unique opens**
3,054 total opens to date

78 **Bounced**
3.05% couldn't be delivered

1,507 **Not Opened**
Open rates are [only estimates](#)

39.23% of all recipients [opened so far](#)

28.67% [clicked a link](#) (279 people)

0.81% [unsubscribed](#) (20 people)

0 people marked it as spam (0%)



Communication-Tier 2 (1)

Having trouble viewing this email? [Click here](#) to see it in your browser.



This email was sent to [email address suppressed].
Please [click here](#) to stop receiving further emails from the Nickel Consortia regarding .

Nickel REACH Consortium (Ni Cs)

An initiative of the Nickel Institute

25 February 2009



Background information

[Link to NiCs Pre-SIEF website page](#)

Ni Consortium Pre-SIEF Facilitator contacts:

France Capon/
Jeroen Vanhecke
Nickel Consortium Secretariat

Email:
REACH@euronickel.org

Tel:
 + 32 2 290 32 09 

www.nickelconsortia.org

Substance:

Dear Pre-Registrant,

As advised to you in our previous E-mail, the Nickel Consortium is acting as REACH Pre-SIEF Facilitator for this substance. The purpose of the pre-SIEF phase is to agree on "**sameness of substance**" prior to the formation of the SIEF (Substance Information Exchange Forum).

What to do NOW: Substance Sameness Survey

Your participation in the REACH Pre-SIEF phase is to complete and submit a brief 'Substance Sameness Survey'.

[Please click here to complete the Survey for .](#)

The first section of the Survey further explains its purpose. You can move backwards and forwards within the Questionnaire as you answer the twelve questions.

The deadline for submission of Surveys is **Friday 13 March 2009**.

Ni Cs substance portfolio

[Click here to view the Ni Cs substance portfolio](#)

The next step

The content of the individual surveys will be kept confidential by the Pre-SIEF Facilitator who will evaluate and group the responses as follows:

Pre-Registrants that can agree that they have the same substance will then pass into the Substance Information Exchange Forum (SIEF) for this substance, where the data-sharing dialogue begins.

Pre-registrants that consider they do not have the same substance will be grouped together by the Pre-SIEF Facilitator for further discussion and potential entry into sub-SIEFs or another SIEF.

We look forward to your **prompt completion and submission of the Survey**, in order to proceed as soon as possible with the SIEF formation, which is where the main data-sharing, dossier preparation and classification discussions will take place in order to achieve timely REACH Registration which starts in 2010 (depending upon your tonnage band).

France Capon/Jeroen Vanhecke
Nickel Consortium Secretariat

REACH registration for specified Nickel substances



March 2009

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Statistics-Tier 2

blue spark *

Overview Create/Send Manage Subscribers Reports

Reports > Campaign Snapshot

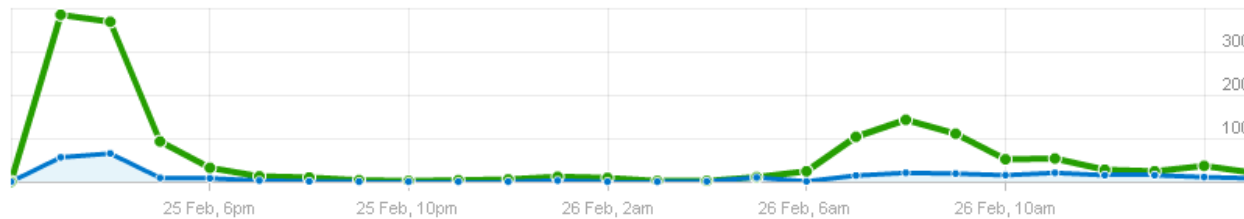
REACH Pre-SIEF Substance Sameness Survey - Nickel metal

Sent on 25 Feb 2009 to 2,538 unique subscribers in Nickel metal

View campaign

Export report

● Opens and ● Link Clicks for first day (see all time)



■ **968 Unique opens**
3,033 total opens to date

■ **90 Bounced**
3.55% couldn't be delivered

■ **1,480 Not Opened**
Open rates are [only estimates](#)

39.54% of all recipients [opened so far](#)

42.56% [clicked a link](#) (412 people)

0.45% [unsubscribed](#) (11 people)

0 people marked it as spam (0%)



The survey (1)

- ☞ This 2nd email = link to the **survey** itself.
- ☞ **13 questions** = get as detailed as possible **profile** of pre-registrants
 - ✓ Sameness check, status (dormant, passive, active, very active), role in REACH (Manufacturer, Importer...), available information (effects and exposure data)...

The survey (2)

Sent to you by the Nickel Consortium as Pre-SIEF Facilitator

The aim of this Survey is two-fold:

- 1) To check the sameness of substance, which is the purpose of the Pre-SIEF phase of the REACH registration process.
- 2) To understand the different levels of interest amongst Pre-Registrants in the REACH Registration process. This is necessary in order to develop effective, transparent and cost-effective working practices within the SIEF, and to develop dossier cost formulations for different levels of access, that will minimize the burden for all SIEF members.

If you are an Only Representative (OR), or a company with several legal entities that has pre-registered, please complete a SEPARATE survey for each company/organization you represent.

The closing date for responses to this Survey is ** FRIDAY 13 MARCH 2009 **

Add Question Here

Edit Question Move Copy Delete

***1. Please provide your contact details below:**

Your contact name:

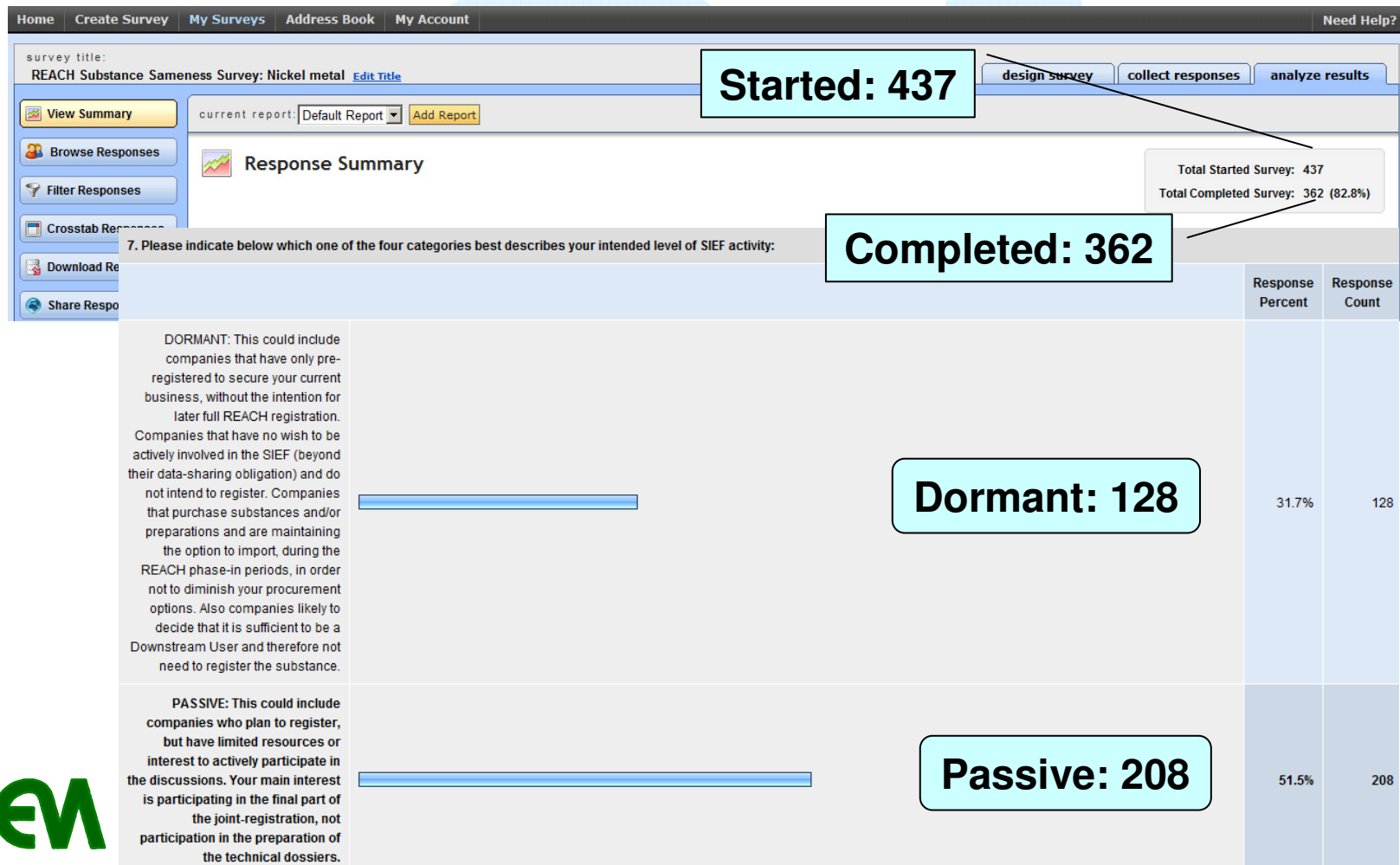
Company name:

Email Address:

Company phone number:



The Survey (3)



Other issues

★
★
★
★
★
★
★
★
★
★

☞ Difficulties to establish links between OR and non-EU Manufacturers:

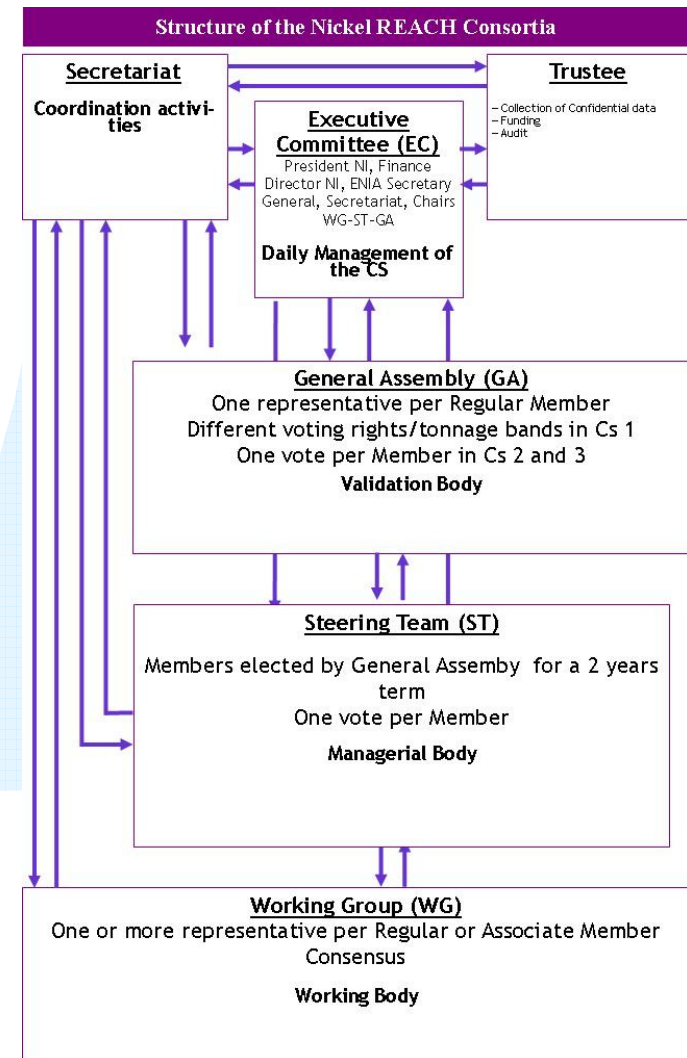
- ✓ Two potential interlocutors for the same Registration

☞ Fake SIEF Facilitator:

- ✓ In some cases: e-mail sent by different Consortia but no reply received!

Other issues

☞ **Restructuring** Consortia organisation – need for a more complex structure to ensure workability of the consortium



Conclusions

- Nickel REACH Consortia represents a **responsible industry**
- **Long experience in the Consortia management** in the EU Risk Assessment
- **Good collaboration with the Authorities**
- **Willingness to comply** with REACH by the required deadline
- Important **practical issues** linked to non-responding pre-SIEF members