

October 18th 2009

**SIEF Progress and Status for Copper “Intermediates” covered
by the REACH Copper Consortium**

The Members of the REACH Copper Consortium have identified a series of Intermediates co-produced out of both the smelting/refining and the downstream fabrication processes of copper - see REACH Articles 18 and 19 on requirements for Intermediates.

On behalf of the SIEF Facilitator for “Copper Anode” the European Copper Institute (ECI) is authorised to communicate this information to all participants in the SIEFs for the EINECS numbers listed below:

ECI Ref	Intermediate	SIEF Facilitator
B15	Cupro, Copper processing (EC 919-583-6)	Metallo-Chimique N.V.

The Substance Information Exchange Forum (SIEF) provides the mechanism for all legal entities, who have pre-registered a substance, to organise themselves in compiling the technical parts of the appropriate registration dossier.

This activity is separate to the REACH Copper Consortium, managed by ECI, which has been formed by the copper industry for this specific purpose. Members of the Consortium have full access to technical information derived from substance identification, speciation, data collection and studies carried out for the purpose of registration.

Within the context of a SIEF addressing an Intermediate, with a tonnage >1,000 T/yr, the main activities are:

- Election of the Lead Registrant
- Agreement on information to be jointly submitted:
 - Information generated to meet the requirements of Article 18.3 on physico-chemical, human health and environment properties
 - Hazard classification and labelling information if the Intermediate is put on the market
- Data sharing

Election of Lead Registrant

Following the end of the pre-registration phase, ECI communicated, via the contact addresses provided to ECHA by the pre-registrants of for each of the substances represented by the EINECS numbers listed above, a proposal that the Lead Registrant be the same as the SIEF Facilitator.

ECI received no objections to this proposal.

Click here to see the June 2009 letter from the Lead Registrant confirming its appointment to ECHA.

Compilation and Submission of Dossiers

A Joint Registration dossier, satisfying the REACH Regulation for Intermediates, is being prepared in consultation with the interested Members of the REACH Copper Consortium. It will be submitted by the Lead Registrant in summer 2010 and all Consortium Members will refer to it when submitting their own registration dossiers.

The dossier is being prepared under the bases of phase-in On-Site Isolated Intermediates manufactured or used on site under strictly controlled conditions and Transported Isolated Intermediates manufactured under strictly controlled conditions or confirmed by the user to the manufacturer to be used under strictly controlled conditions.

Part of the Consortium's work is to provide a platform for its Members to address the specific requirements for Strictly Controlled Conditions.

Access to Dossiers for non-Consortium Members

Any SIEF member will be able to purchase a '**Letter of Access**' (LoA) from the Consortium that grants permission to refer to the Dossier for the specific purpose of its REACH registration for the Intermediate listed above.

The LoA is intended primarily for companies whose registration tonnages require them to register in the 2011-2018 timeframe.

Companies purchasing a LoA will be provided with generic information to help them comply with the registration process and classification requirements for an Intermediate under Strictly Controlled Conditions.

The LoA will not provide support from the Copper Consortium, or from the European Copper Institute, on issues regarding individual registration compilation and submission. This service can only be obtained via full Consortium membership.

The cost of a LoA will be determined in February 2010, once the full cost of the registration dossier is more clearly known. It will be at a discount to full membership, given the reduced data requirements for the smaller tonnage bands. The terms will also meet the requirements of fairness and reasonableness.

For those requiring permission to refer to the Joint Dossier, prior to the first Registration deadline of December 2010, a LoA can be made available, but at the same cost as full membership in the Consortium.

In case of questions, please contact reach@eurocopper.org