



March 19<sup>th</sup> 2009

Dear Pre-Registrant:

Pre-SIEF: Iron

The Iron Platform is acting for Rio Tinto plc as the **Pre-SIEF Facilitator** for Iron [EINECS No. 231-096-4].

A member company of the Iron Platform is also prepared to undertake the obligations of Lead Registrant for Iron for the purposes of preparing and submitting the Registration Dossier, and where agreed the Chemical Safety Report [CSR], pursuant to REACH Article 11.

The Iron Platform came into operation on November 1<sup>st</sup> 2008 for the sole purpose of assisting the various iron industries to comply with REACH. It is an initiative of the International Pig Iron Association and others. The Consortium is comprised of major EU manufacturers, major non-EU manufacturers, EU importers and traders and their respective Affiliates.

The Iron Platform and its members are focused on generating and compiling necessary data for the Registration Dossier (see below). The Iron Platform has already dedicated substantial financial and personnel resources to this effort and is advancing well in this respect. Its members are committed to achieving submission of the Registration Dossier for Iron before the first registration deadline of 1 December 2010.

The Iron Platform is undertaking to compile and assess all relevant existing studies and data necessary to prepare the Registration Dossier for Iron. We will, on behalf of the SIEF facilitator, collect information from the SIEF members as well as from sources outside the SIEF.

The Iron Platform, in conjunction with Eurofer, the trade association for European steel companies, is currently conducting a Phys-Chem, Environmental Toxicity and Human Health Toxicity gap analysis for iron and iron substances and will move forward to generate data to fill the gaps where appropriate. We are also working to develop read-across approaches, develop hazard classification and labelling proposals, identify and evaluate downstream uses [and exposure scenarios], and prepare the CSRs. We are providing human resources and administrative support to coordinate these efforts. Finally, the Consortium is well versed in the SIEF obligations, and has been developing strategies and systems to manage the SIEF process.

#### Access to the Registration Dossier

We will ensure that all Iron SIEF members intending to REACH Register have timely access to the Registration Dossier for that substance to enable them to register with ECHA by the earliest deadline. In complying with REACH, we seek to balance sound science with responsible resource management. We are committed to make available access to the Registration Dossier on fair, reasonable and non-discriminatory terms.

The Iron Platform is an initiative of the International Pig Iron Association [IPIA].

[www.iron-consortium.org](http://www.iron-consortium.org) [www.pigiron.org.uk](http://www.pigiron.org.uk)

The Iron Platform, its Consultants and IPIA accept no liability whatsoever with regard to the content, accuracy or use of information contained in this document. The information it contains does not constitute any legal advice.



Interested companies will have two basic options to obtain the necessary access to information:

- eligible SIEF members are welcome to join the Iron Platform. We are keen to encourage all companies able to provide resources and expertise and contribute to the development of the Registration Dossier to join and participate in the Consortium meetings and Technical Working Groups.
- SIEF members who do not wish to undertake the obligations associated with Consortium membership and choose not to join the Consortium will be able to obtain the Registration Dossier via a Letter of Access.

#### Next Steps

The first task is to move ahead with the Pre-SIEF activity i.e. to agree “sameness of substance.” You have received an E-mail with a link to a brief Pre-SIEF Questionnaire for you to complete and submit. After evaluation of the Questionnaire responses, the Iron Platform will then facilitate:

- the grouping together of all those pre-registrants that consider they do have the same substance - who will enter the SIEF for that substance;
- the grouping together of those pre-registrants that consider they do not have the same substance, for further discussion and potential entry into sub-SIEFs or another SIEF.

We will also contact you again shortly with more details about:

- the option to join the Iron Platform;
- the option not to join the Iron Platform, remain in the SIEF and fulfil your REACH Registration obligations by means of a Letter of Access to the Registration Dossier on fair, reasonable and non-discriminatory terms.

Yours sincerely,

**Chris Barrington**

R.C.A. Barrington  
Iron Platform Secretariat  
E-mail: [sief@iron-consortium.org](mailto:sief@iron-consortium.org)  
Website: [www.iron-consortium.org](http://www.iron-consortium.org)