



From: ILVA S.P.A. – Viale Certosa 249 – 20151 Milan-ITALY

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**To pre-registrant for the SIEF:**

CAS number: **65996-66-9**

EC number: **265-997-9**

Substance name: **IRON SINTER**

L.E. name: *please fill in the name of your company*

L.E. contact: *please fill in the name contact details*

Role under REACH for the substance(s) concerned: *please specify your role under REACH (tick one box)*

- Manufacturer
- Importer
- Downstream User
- Only Representative
- Third Party Representative

**SIEF Code:** *please select your intended SIEF code.*

**Assignment of SIEF codes is not static and may change over time**  
**No assignment of code will mean default code 4 (please note that these codes can be changed at any time by contacting the SFF). Please see Explanatory Note for more information.**

<b>SIEF Code</b>	<b>Position</b>	<b>My position</b> <i>(please tick one box)</i>
1 Leading	This is a substance of high strategic importance for my company and I have available resource to (co) lead and drive registration to completion.	<input type="checkbox"/>
2 Involved	My company is registering and may be actively involved. My company will receive a SIEF progress report, an invoice and an invitation to comment.	<input type="checkbox"/>
3 Passive	My company has the intention to register this substance. My company will receive a SIEF progress report and an invoice.	<input type="checkbox"/>
4 Dormant	My company has no intention to register nor to spend money. My company will receive no communications and no invoice (besides mandatory data sharing).	<input type="checkbox"/>

Additional information and comments : **(if any)**

Deadline for replying is February 20<sup>th</sup> 2009. Your compliance will be appreciated, thank you.



## **Explanatory Note (source: CEFIC)**

### Introduction:

The key goal of a SIEF is to facilitate data exchange on the same substance, and to agree on classification and labelling. As it will be extremely difficult to organise and manage the 2.6 million pre-registrations and 140.000 pre-SIEFs, there is an urgent need for a simplified and harmonised approach to SIEF management. Cefic is proposing a methodology on how to manage the activities to be undertaken by the SIEF participants in a very short time frame.

The following approach is suggested as a possible way forward:

### SIEF roles

Companies that have pre-registered a substance do not always have the same interest with regard to the upcoming registration process. Some companies have a unique product, not produced by anyone else; others are leaders in the market or are (very) small players. Some are (re-)importers or Downstream Users who had to pre-register because the substance of interest was not yet registered by anyone higher in the supply chain.

### SIEF leadership

In order to be able to manage a large number of (pre)-SIEF participants and to ensure timely completion before the Registration deadline, a SIEF Leadership Team (SLT) is advised to be formed in order to manage the SIEF on a day-to-day basis. The SLT, consisting of a very limited number of SIEF members, could consist of the SIEF Formation Facilitator (SFF), the Lead Registrant and a few other key members.

The SLT will have the mandate to take decisions, assign resources (money and consultants) and will monitor, control and report on progress, resources and agreed deliverables.

The SLT will also handle general management issues such as: setting up agreements with consultants and laboratories, manage financials such as sending invoices, book-keeping, tracking invoices, etc.

### Coding of SIEFs

In order to achieve an efficient registration and communication process, we would like to have some information from you in order to classify the pre-registrants into 4 different SIEF Codes:

#### **1. Leading**

This pre-registration concerns a substance of high strategic importance and your company has adequate resource to (co)-lead.

Your company (co)-leads the SIEF with the cooperation of a few others.

Your company assumes responsibilities as a leader and will be active in the SIEF Leadership Team (SLT).

#### **2. Involved**

This pre-registration concerns a substance of strategic importance, but your company cannot commit resource to lead.

Level of activity may vary as appropriate from being consulted to being actively involved and helping the SIEF leader in technical discussions. You want to be regularly updated.

#### **3. Passive**

This pre-registration concerns a substance of lower strategic importance.

You expect other players to take the lead.

You want to minimize use of your resources and will simply pay the invoice.

#### **4. Dormant** For formal reasons you had to pre-register:

Re-imports, monomers of imported polymers, recycling, articles with intended release

- You have no intention to register

- You do **not** want to be involved nor pay an invoice

- You may deactivate your membership after your supplier has registered

We are aware that there are many important aspects to be considered when working effectively in a SIEF (such as: managing the registration time line, cost sharing of testing costs and SIEF management costs, liability issues for the lead registrant, etc..). Cefic is about to issue further guidance on these topics. In the meantime, Cefic has prepared this current communication to address the urgent need to start the organisation of the SIEF.