

Al Salts: Q & A

1. As letter of access includes chapter 2 of IUCLID dossier, does every registrant have to insert the data on identification of the substance into their own dossier? Or should the registrant insert the data on identification of its own substance (I mean its impurity profile, eventual spectra, etc...as required by Annex VI of REACH)?
Yes, every registrant needs to provide their chapters 1 (, 2) and 3, including the identification data, including necessary attachments.
2. Would you kindly send SIPs for Al and Iron Sulphate via e-mail.
It has been decided in the SIEF Management in Kemira that the SIPs, as well as other SIEF related material, are to be published on a public website with limited access in order to reduce the email traffic. Unfortunately, the documents will not be sent to any individual pre-SIEF member in order to guarantee the equal treatment of members in the (pre-)SIEF.
3. Regarding aluminium sulphate: are all of current members included in the range of analysed main parameters?
The current proposal is based on "a representative pure sample". The mono-constituent substance should cover at least 80 % of the sample. It is up to each registrant now to do their own analytics on the identity, including any impurities which may affect the classification and labeling. More surveys are foreseen to fine tune the selection of the correct SIEF by each registrant.
4. When our company will have to choose the correct SIEF online tool?
SIEFreach is the tool currently used by the AIFe Consortium for the SIEF communication. A new tool will be launched later in the spring 2010, and the pre-SIEF members will be informed about this.
5. What is the cost of entering SuperSIEF?
24,261 Euros for a Company having one Legal Entity for 2010 submission. For this cost, the right to refer all the Al salts of the SuperSIEF and the key studies will be granted.
6. I have a doubt about the LoA, when do we have to fill in our LoA and send it when and for who?
Before acquiring the Letter of Access (LoA), a SIEF agreement needs to be signed. When the agreement has been signed, the consortium will send the invoices to SIEF members. Upon receipt of payments the LoA together with the token, IUCLID 5 dossier and chemical safety report will be delivered.
7. How will the uses of downstream users implemented in the registration dossier?
An initial draft was published on the Consortium website already in October 2009. They are currently under review, to include the feedback received from downstream users by 1.12.2009.
8. Can we obtain a copy of the presentation?
The material presented in the AIFe webinar March 2-3 will be published on the REACHcentrum AIFe site (www.reachcentrum.eu > Consortium Management > Aluminium and iron salts), as well as on the SIEFreach public site (www.siefreach.com > login > MySIEFs).
9. Did you mention aluminium chloride anhydrous?
No, it is excluded from this SuperSIEF.
10. Do we have to submit an individual dossier?
Members of a joint submission need to fill in the chapters 1 (, 2) and 3 in the IUCLID 5.2 dossier and submit their own individual dossiers to ECHA. They will be connected to the Joint Submission by a token which will be provided by the Consortium with the Letter of Access, and which a member of the Joint Submission shall refer to in his/her own dossier.

11. How about cooperation with the AlCl₃ anhydrous consortium?
Please contact the Consortium administrative manager (are@reachcentrum.eu).
12. Can you say something about the C&L labelling issue (Dutch authorities)?
Please contact the Incopa Sector Group of CEFIC.
13. What is the range of main parameters in case of aluminium sulphate? We mean sameness, impurity, rest sulphuric acid content.
Please see the Substance Impurity Profile to be published on SIEF reach system. The ranges should be as large as necessary describing the hypothetic dry form of the substance, keeping in mind the 80% minimum rule for mono-constituent substances. Each registrant need to do the analytical verification of their own substance, including any additives or impurities their substance may contain.
14. Is there any IT system that allows us to verify the content of the dossier?
The dossier prepared by the Lead Registrant will go through a Technical Completeness Check which is done with the IUCLID 5 tool provided by ECHA. Each member that has acquired a Letter of Access will receive a registration dataset in html form.
15. Is the CSR included in the letter of access cost?
Yes, for the common identified uses already published on the Consortium website, including and generic exposure scenarios as a Word document.
16. Is the CSR included in the letter of access cost of 24,000 Euros?
Yes, as a Word document.
17. What the role of SuperSIEF? What the different between SIEF and SuperSIEF?
A Substance Information Exchange Forum (SIEF) groups together all companies that have pre-registered the same substance in REACH-IT (Art. 29 of the REACH Regulation). The aim of the SIEF is to prepare a Joint Submission which is to be submitted to ECHA. The Super-SIEF groups together soluble aluminium substances having similar physicochemical, toxicological and ecotoxicological properties (a common group or category, as defined by Annex XI of the REACH). Ideally, this enables the registrants to fully utilize all the existing data and avoid any unnecessary testing for a group of substances having similar properties.
18. Can you tell me if we can get access to the Aluminium salts SIEFReach tool without having to pay so we can see the SIP info?
The SIPs will be published on the substance specific section of the SIEFReach tool. There are various user options: User, Expert, Observer, Data Holder and Free granting various access levels.
19. How much is the fee for the SIEFReach?
Depending on the User option, from 0 to 300 Euros per substance.
20. The draft of the SIP is available on public site of SIEFReach?
Please see answer to question 19.
21. Can you put the SIP on the REACH Consortium page?
Due to the nature of the information, the SIPs will not be published on public sites with unlimited access.
22. Will the new SIEF tool be free of charge or will it cost as well?
Using the new SIEF tool will be free of charge for the (pre-)SIEF members.

23. We are a medium sized company +1000 t/a year. How much will we have to pay for the registration?

A fee for the Letter of Access for Aluminium salts covered will be 24,261 Euros per one Company and one Legal Entity for 2010 submission. Each registrant will additionally have to pay a registration fee to ECHA. The fees are published in the [Fee Regulation](#) (EC) No 340/2008.

24. You said there is 400 euro discount for SMEs?

There is no dossier opening fee added in the cost of LoA, therefore the price is the same for SME and non-SME, no 400€ discount as mentioned during the webinar. Regarding the [Fee Regulation](#), there are several discount possibilities depending on the Joint or single submission or the size of the enterprise.