

Is the Action Plan only open to Cefic member companies?

The Action Plan is a voluntary initiative from Cefic, intended to support the efforts that European chemical companies deploy for the review/improvement of REACH registration dossiers.

It is primarily intended as a service to Cefic member companies and the member companies of Cefic member/associate federations. Cefic will invite those companies to sign a Declaration of Intent to state their intention to take steps to review their respective REACH registration dossiers, provide further information where appropriate, and keep Cefic informed of dossier reviews. Cefic will collate the feedback from signatories and make progress reports publicly available on an annual basis.

Other companies will be able to view the information made publicly available on our website and may - at their own discretion and risk - use it to state their intention to review/improve their REACH registration dossiers and organise their own voluntary activities at company level.

However, access to Cefic activities organised in the context of the Action Plan will be limited to Cefic members. Also, Cefic will only report about the progress made by its member companies and member companies of Cefic Member/Associate Federations.

Which companies have already joined the Action Plan?

All companies represented on the Cefic Board have joined this Action Plan. The list of all Board members can be found here <https://cefic.org/about-us/organization/>

Cefic is committed to transparency. As a result, we will publish the names of the companies that have signed the Declaration of Intent on our website.

How do companies sign up to the Action Plan?

By signing the Declaration of Intent and sending it to Sylvie Lemoine, Cefic Executive Director Product Stewardship syl@cefic.be, a company states its intention to take steps to review its registration dossiers in the context of the Action Plan.

After signing the Declaration of Intent, a company is expected to develop a Company Implementation Plan and start activities towards dossier review/improvement using the guiding principles provided in the Action Plan as a starting point. Companies willing to review/improve their dossiers will, in many cases, have to coordinate the work with consortia or SIEFs, as applicable.

By signing the Declaration of Intent, a company will also be responsible for submitting to Cefic, by 31 January of each year, starting in 2020, reports on their dossier review/improvement activities according to the defined KPIs. A template has been developed for the purpose of standard KPI reporting. The reports will cover activities from 1 January to 31 December of each year.

What kind of reporting does a company need to do?

Companies will be responsible for submitting to Cefic, by 31 January of each year, starting in 2020, reports on their dossier improvement activities according to the KPIs defined in the Action Plan:

- Number of individual dossiers re-evaluated by each company
- Number of substances re-evaluated by each company

Companies can also report the number of registration dossiers re-evaluated by consortia or SIEFs, optionally.

The reports will cover activities from 1 January to 31 December of each year.

Cefic will aggregate the data from the annual company reports by 28 February of each year and publish on its website **aggregated and anonymised** progress reports on behalf of the sector by 31 March of each year, starting in 2020.

Will Cefic publish the names of its members who decided not to join the Action Plan?

No, only the names of companies of Cefic member companies and the member companies of Cefic member/associate federations who sign the Declaration of Intent will be disclosed.

Can companies having joint REACH registrations with a consortium of other companies participate in this initiative?

Yes. In this case they will need to discuss it with the lead registrant/other registrants to agree on how they will share the workload and – where applicable - cost of updates. For consortia covering multiple substances/dossiers, they will also have to agree on substances to be prioritised for review/improvement. The decision will have to be made by the consortium steering committee (or equivalent decision-making body).

How do I prioritise the dossiers I should start with?

The Action Plan advises on guiding principles for prioritising the re-evaluation work that are in line with ECHA's own priority for Dossier Evaluation, e.g. high-volume substances (> 100 tonnes/ year), Substance with dispersive uses, dossiers relying on read-across or categories for fulfilling data requirements, etc. We hope to have a clear picture of ECHA's own priority substances (or groups of substances) at the end of 2019, when ECHA publishes more information on their Integrated Regulatory Strategy and the "chemical

universe” [mapping](#) therein, including the list of (groups of) substances that will be potential candidates for Compliance Check and/or substance evaluation.

What are the next milestones for Action Plan this year?

In the next few months, we will be raising awareness among our Cefic company members beyond Board member companies. We will also encourage members of Cefic Member/Associate Federations (i.e. national associations from 30 countries) to promote the initiative with their own company members at national level and encourage those companies to join the initiative.

Our objective is to engage as many companies as possible in this voluntary programme. We also plan to launch a pilot project together with ECHA and a few volunteer companies to identify improvement needs for (a group of) substances in these companies’ portfolios. The objective of this pilot project is to produce a series of case studies that would generate common learning or practical guidance (e.g. examples of successful testing strategies or waiving justifications) and hence be useful for all REACH registrants.

We also intend to organise one expert workshop this year, as foreseen under the Cefic-ECHA Cooperation Agreement.

By the end of 2019, signatory companies are expected to develop a Company Implementation Plan to decide which dossiers they are going to review/improve.

If I have questions about this Action Plan, whom shall I contact?

Please contact Mariana Barros, Cefic REACH Manager mfb@cefic.be