

**Dissemination – Industry perspective
ECHA's Fourth Stakeholders' Day
Helsinki, 19 May 2010**



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Initiatives from the chemical industry



- ETP SusChem



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is ticking**

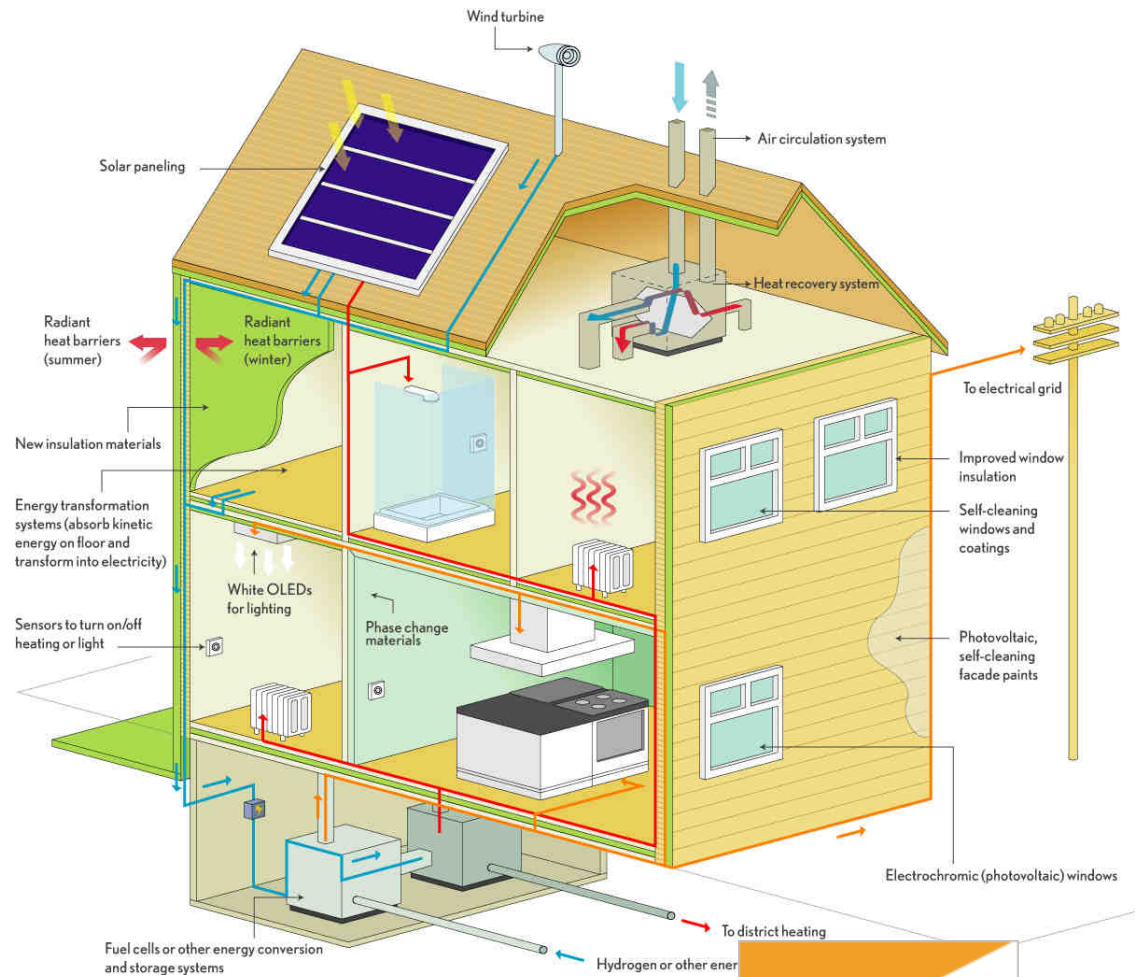
The smart energy home



New materials for

- Innovative energy conversion, management and storage systems (fuel cells, thin film solar cells, small biorefineries, biogas, ...)
- Photovoltaic, self cleaning facade paints
- White OLEDs for lighting
- Thermal insulation (e.g. nanofoams)

...



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Innovation needs confidentiality



- The issue of confidentiality is a very serious one because of the **limited remedies a posteriori** if confidential information is published
- Companies should take into consideration the future dissemination of information when preparing the registration dossiers i.e. NOW! →important **awareness raising**
- The availability of the **dissemination plug-in** and the **fee calculator** will facilitate this work. This should be available well in advance of the big wave of submissions

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Criteria of confidential information



- **Known to a limited number of people** (even if the number is not very limited, an open publication to a wide audience may cause damage)
- **Disclosure may cause serious harm to the registrant or third parties** (damage to third parties need careful consideration because of limited chances to intervene)
- **Not readily accessible** to a broad public
- **The information has value because it is secret**
- **It has been subject to protection by the registrant**, protection measures highly dependent on the points above

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Industry's understanding



- Claims accepted under the **old regime** will be maintained
- If claim is rejected, the registrant will be contacted and given a **second chance** to update the claim. **Sufficient time** will be given (in some cases, this will entail new SIEF discussions which may take time)
- Distinction must be made between the **dissemination** (purpose to enhance safe use by general public) and **access to documents** (entities with more particular interests)

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Industry's understanding



- Confidentiality claims must remain **reasonable**, and not become long legal documents e.g. 'mini' market analysis
- **Format** of the dissemination website must be fit for purpose: easy to use with understandable information to the general public

Industry's understanding



- Documented self-declarations by the registrant should be sufficient
- ECHA's role is **limited** to the verification that there is a reasonably justified confidentiality claim
- The status of the dissemination may be **revisited** after the first registration deadline (ECHA report + workshop in Q1 2011?)

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Final remarks



- The assessment of confidentiality claims should be done in a **transparent** way following well-established **criteria** agreed by all stakeholders.
- Industry is open to provide **examples** of confidentiality claims. Limited available examples so far due to on-going SIEF discussions.
- Cefic is committed to facilitate access to information on safe use in line with the Chemical industry's engagement to Global Product Strategy

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Information on chemicals available to the public – GPS Safety Summary



- Compilation of relevant risk characterization and risk management information in an easily understandable format and language
- To be communicated to employees, downstream customers, the public and other interested parties
- Regional flexibility will apply in the content of the GPS Safety Summary, it is up to the company to define the relevant information and layout but should include some basic elements
- Currently more than 1000 GPS Safety Summaries are already available on company websites
- The GPS Safety Summary does not replace required technical communication documents such as the Safety Data Sheet (SDS)





Thanks for your attention