

acetylsREACH



Letter of Access

The Acetyls REACH Consortia consists of most European manufacturers and some leading non-EU manufacturers of ACETIC ACID, ACETIC ANHYDRIDE and VINYL ACETATE (VAM). The 3 consortia are engaged in developing the dossiers for submission to ECHA before November 30th 2010.

The purpose of this communication is only to provide some information and does not represent any contract or binding agreement. It seeks to explain, in simple terms, what access rights may be available.

The 3 Acetyls REACH Consortia are committed to sharing costs in a fair, non-discriminatory, and transparent basis. Therefore the costs which will be fixed by the consortia for letters of access are similarly intended to strike a fair balance, in a non-discriminatory and transparent way.

SIEF members as potential registrants have an acknowledged interest in understanding the cost for a Letter of Access to the joint registration dossier for ACETIC ACID or ACETIC ANHYDRIDE or VINYL ACETATE.

The consortia are currently identifying the cost of Letters of Access to the registration dossiers including:-

- The access to the Joint Registration Dossier.
- The access to the studies and data included in the Joint Registration Dossier.
- The access to the Chemical Safety Assessment, Chemical Safety Report and the Guidance on Safe Use included in the Joint Registration Dossier.

The 3 Consortia intend to obtain full access rights to individual reports so as to allow completion of the full joint registration dossiers required for REACH registration.

Dossier sections that are required to be submitted by each registrant individually will not be covered under the Letters of Access.

All registrants will need to verify whether they have an individual need to include additional uses and scenarios not covered by the joint registration dossier.

Costs

At this stage, the question of the cost for a Letter of Access to either ACETIC ACID or ACETIC ANHYDRIDE or VINYL ACETATE cannot be answered. There are many reasons for this including the current state of the technical information on several cost-relevant factors such as data completeness, read-across options and the costs of access to published data. The cost for a Letter of Access share per registrant will depend on the relevant volume band as well as on the number of registrants per volume band.

It is expected that by March 2010, we may be in a position to assess costs-to-date and then estimate costs to be incurred before the final registration date of November 30th 2010.

If this position changes, it will be communicated to the ACETIC ACID or ACETIC ANHYDRIDE or VINYL ACETATE SIEF by the most appropriate means.

December 2009.