

# Information on REACH Consortia

## Copper

June 2020

General Information	
<b>Name of commodity</b>	European Copper Institute (ECI)
<b>Name of consortium/consortia</b>	<ul style="list-style-type: none"> <li>REACH Copper Consortium at <a href="mailto:reach@copperalliance.eu">reach@copperalliance.eu</a></li> <li>ECI is cooperating closely with the third party leading a separate consortium for copper compounds (contact Carol Mackie at <a href="mailto:cmackie@regcs.co.uk">cmackie@regcs.co.uk</a>)</li> </ul>
<b>Officially launched</b>	26 February 2008
<b>Scope (e.g. substances)</b>	Consortium covers primary and secondary copper metal, copper slags sold as a product, and a well defined series of by-products (Intermediates) produced during the smelting, refining and semi-fabricating processes. Details at - <a href="https://reach-copper-consortium.eu/">https://reach-copper-consortium.eu/</a>
<b>Number of members</b>	30 members, plus > 150 Letters of Access customers
<b>Minimum fee for consortium</b>	<p>Membership fee covers:</p> <ul style="list-style-type: none"> <li>historical costs of ECI's Voluntary Risk Assessment (03-07)</li> <li>generic research and analysis (08-20)</li> <li>substance/intermediate specific research (08-20)</li> </ul> <p>Letter of Access fee provides rights to refer to the relevant Joint Submission dossier. Fees are tonnage based, subject to minimum. Details on website. Smaller tonnage band registrations, now until 2018, are most economically served via a Letter of Access (not full membership)</p>
<b>Brief description of membership profile (e.g. manufacturers, ORs, companies per legal entity etc.)</b>	<p>Any REACH registrant (producer or importer) can join. Some members are Only Representatives for non-EU producers. Membership is company-based (can cover rights for multiple affiliates)</p> <p>Letters of Access provide restricted rights, plus reduced support. They are sufficient for registration purposes, as well as to obtain legitimate access for exemption provided by Article 2.7 d)</p>



Status and Comments	
<b>Major review of agreement and structure</b>	<p>Agreement initiated in November 2007, with minor updates to reflect changes in substance identification (last update March 2020). Letter of Access agreement updated in January 2011 and again, in October 2016, to reflect January 2016 EU Implementing Regulation on data-sharing. License to Use agreement to grant data access for purposes of read-across and registration/evaluation in other jurisdictions (eg K-REACH)</p>
<b>“OR” and “importers” in consortium</b>	See above
<b>Technical work</b>	<p>Full registration dossier for copper metal. 90% of work done in Voluntary Risk Assessment (VRA). Classification and Labelling proposals, plus the exposure section of Chemical Safety Report, were updated and re-submitted in November 2014. Yearly update submissions have been completed since 2017.</p> <p>Full registration dossier of final slags as products has been updated in 2019.</p> <p>Following December 2010 ECHA guidance on Strictly Controlled Conditions, the registration strategy for Intermediates was revised. Included “sameness” discussions to define composition scope; proposals for classification &amp; labelling; read-across strategy and review of risk management measures at individual member sites. Dossiers were fully updated in April 2014 and have been further updated since 2018 to improve the substance identity information (SIP)</p> <p>Since 2018, the Consortium committed to the work programme under MISA. Dossier updates are being completed in the frame of this programme.</p>
<b>Pre-existence of RA</b>	Yes, see above
<b>Collection of data from DU</b>	Yes, see above
<b>Pre-registration</b>	ECI provided members with guidance (i.e. “templates” in do/don’t format) on how to pre-register substances falling within scope.
<b>SIEF</b>  <b>Has one of your members ticked the “SIEF facilitator” box?</b>  <b>Proposed lead registrant</b>	<p>Consortium identified “Lead Registrants” from amongst its members and requested them to act as “SIEF-facilitators”.</p> <p>ECI followed the pre-SIEF process (the one for copper had &gt; 4,000 entries). Likely registrants of copper metal were identified and contacted directly.</p> <p>ECI has made information available to potential registrants via its public website, this Eurometaux gateway and messages on the REACH IT home pages of the Lead Registrants.</p>



<b>Contacts with other consortia for exchange of data</b>	With zinc, lead, nickel and several others for classification of Intermediates. With Eurometaux, as ECHA Stakeholder Observer, for representation, best practice transfer on methodologies, downstream user communications, etc.
<b>Upcoming meetings</b>	Annual General Assembly
<b>Other comments (if relevant)</b>	

