



Date: January 2009

Dear Pre-Registrant,

As informed to you by e-mail, the **International Antimony Association (i2a)** is acting on behalf of its members who are offering to be the pre-SIEF Facilitator and/or Lead Registrant for the 13 antimony compounds housed in i2a. The complete list of covered antimony compounds (including CAS and EINECS numbers) can be found on: <http://www.iaoia.org/antimony.htm>

i2a is comprised of EU manufacturers, non-EU manufacturers, EU importers and traders, and their respective Affiliates, with a membership of 34 companies to-date.

The **mission** of the International Antimony Association (i2a) is to conduct studies and to disseminate information concerning the safety and benefits of antimony compounds, by way of giving access to data, sharing and providing information on the content of data, for the benefit of producers and importers of antimony compounds world-wide regarding environmental, health and safety regulations of these antimony compounds. REACH regulatory issues, the conduct of studies and data gathering for REACH purposes in view of joint registration are a priority for i2a.

i2a will help its members **prepare and submit the Registration Dossier**, and where agreed the Chemical Safety Report (CSR), pursuant to REACH Article 11. i2a already dedicated substantial financial and personnel resources to this effort, and is advancing well in this respect. Its members are committed to achieving submission of the Registration Dossiers for most of the Sb compounds before the first registration deadline of 1 December 2010.

i2a is undertaking to compile and assess all relevant existing studies and data (including the complete EU Risk Assessment Report on antimony trioxide) necessary to prepare the REACH dossiers. We will, as SIEF Facilitator, collect information from the SIEF members as well as from sources outside the SIEF.

i2a already conducted data gap analyses and will generate data to fill the gaps where appropriate. We are also working to develop read-across approaches, develop hazard classification and labeling proposals, identify and evaluate downstream uses and exposure scenarios and prepare the CSRs. i2a is providing human resources and administrative support to coordinate these efforts. Finally, i2a is well versed in the SIEF obligations, and has been developing strategies and systems to **manage the SIEF process**.

Access to the Registration Dossier

i2a will ensure that all SIEF members of the 13 antimony compounds housed in i2a and intending to REACH register have timely access to the Registration Dossier for the substance they have expressed interest in to enable to register them with ECHA by the required deadline. In complying with REACH, we are seeking to balance sound science with responsible resource management. We are committed to make available access to the Registration Dossiers on fair, transparent and non-discriminatory terms:

- Interested companies that plan to register are encouraged **to join i2a**. This will provide companies full access to all information and data developed by the antimony association. It is expected that joining i2a will be the most cost effective option for the active companies to comply with their REACH requirements. The i2a membership fee highly depends on the number of companies intending to register/join i2a as the i2a cost matrix is built up in such a way that all companies in the same tonnage bands (see <http://www.iaoia.org/Membership.htm>) will have paid the same amount of money by the end of 2012, whether they joined already in 2000 or in 2009. i2a is a non-profit association. The more members join to pay for the REACH work, the less everybody pays.
- Companies in the less than 10 Tonnes volume band will be given the opportunity to obtain the Registration Dossier via **a letter of access**. i2a is currently assessing the likely cost for access to the Registration Dossier via such a letter of access.

Next step

The next step is to move ahead with the pre-SIEF activity i.e to **agree 'sameness'** of our substances. You will soon receive an e-mail with a link to a brief pre-SIEF questionnaire for you to complete and submit.

After evaluation of the questionnaire responses, i2a will then facilitate:

- The grouping together of all these pre-registrants that consider they DO have the same substance, and they will enter into the SIEF for a particular antimony compound.
- The grouping together of those pre-registrants that consider they DO NOT have the same substance, for further discussion and potential entry into sub-SIEFs or another SIEF.

Further details on the current i2a members and how to join i2a can be found on <http://www.iaoia.org/Membership.htm>)

With kind regards.

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