



April 29/30, 2014
HBCDD: a joint application of 13
companies in practice

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Turning our REACH expertise into practical help for industry

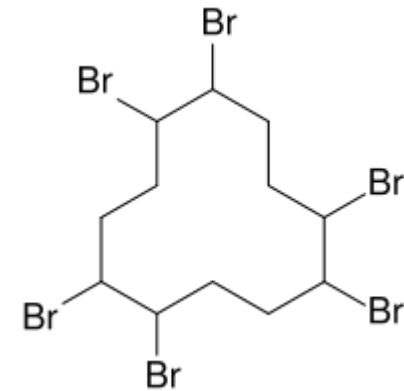
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Who is who 2014

Leo Appelman
Managing Director



Workshops & Trainings

IT development Support

Accounting
Legal
PR, Marketing
Office Management

REACH solutions and beyond : **Specialised Project Managers**

HBCDD consortium - introduction



Hexabromocyclododecane (HBCDD) on Annex XIV with a sunset date 21/08/2015 and deadline for submitting application for authorization 21/02/2014

Registrants of HBCDD decided NOT to apply for an Authorisation

Expandable Polystyrene (EPS) producers joined forces seeking a “bridging period” for authorization

Consortium set up early 2013
EPS producers in the consortium represent over 50% of the EU market

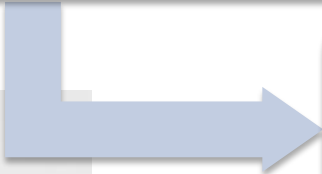


In case of joint application, the analysis, scientific as well as economic, could cover the impact of non-use and continued use scenario for the majority of the EU market

HBCDD consortium – process/1



Early 2013 a consortium of downstream users was established (for application dossier ready by November 2013)



At the start neutral position on type of application: Joint or single
?



-Data collection for the AoA and SEA via a trustee (ReachCentrum) to guarantee no disclosure of CBI.

Agreement of definitions of use for which authorization is needed

Data collection showed:
- All within the Exposure scenario's described
- Not any CBI
- Alternatives in common
- All data could be anonymized

HBCDD consortium – process/2

Early in the preparation of the application a Pre-Submission Information Session (PSIS) was arranged

A focal point at ECHA was helpful in any follow-up question from the PSIS

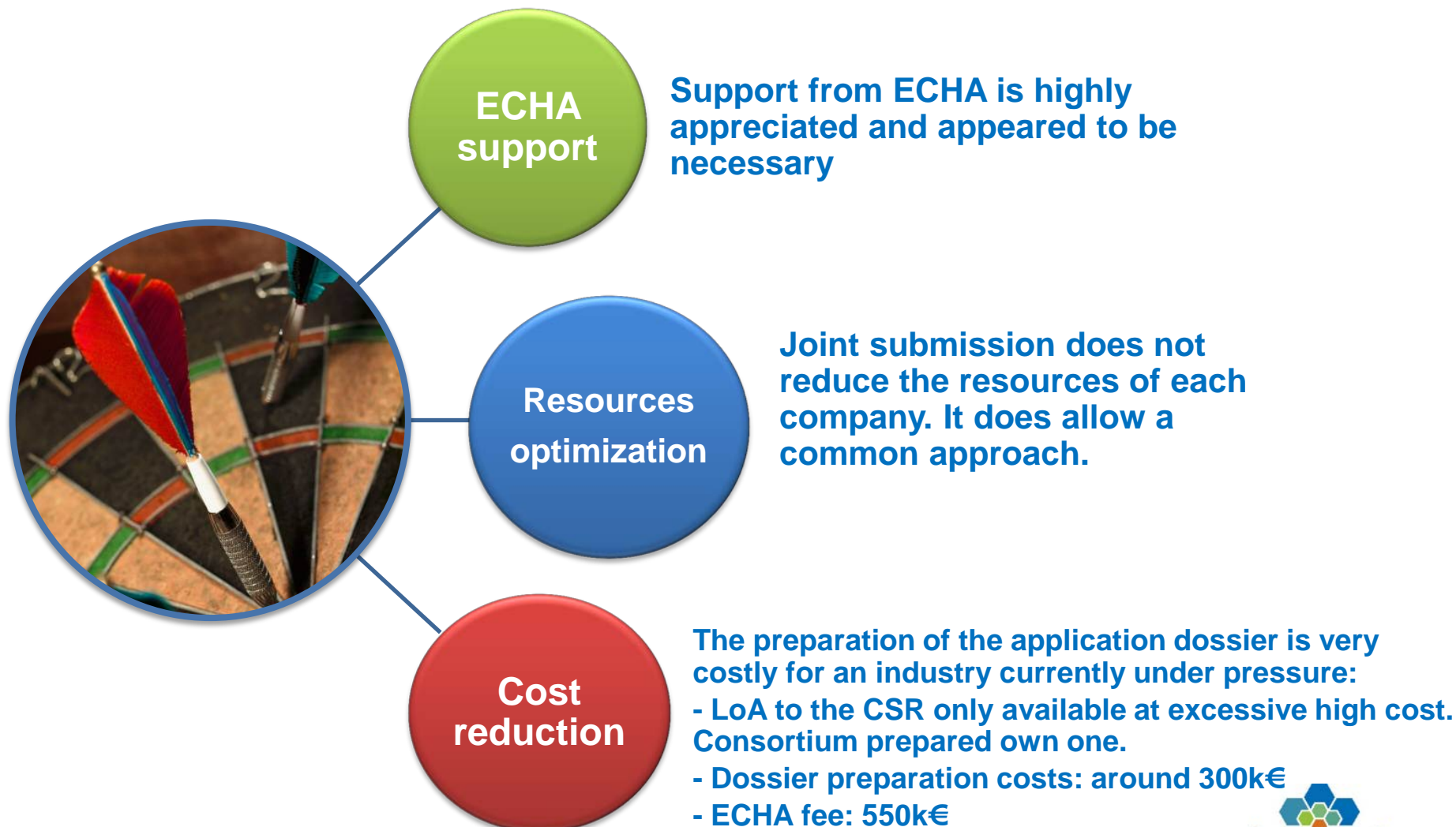
Halfway the dossier preparation decision was taken for a joint application

Finished dossier has been Peer reviewed

Actual joint submission is a sequence of steps (cannot be done in one go)

During the actual submission the cooperation of ECHA was highly appreciated

HBCDD consortium – key lessons





THANK YOU!

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