

## APPENDIX 6. FUNDING PRINCIPLES FOR NICKEL REACH CONSORTIA

### APPENDIX 6.1. FUNDING PRINCIPLES FOR ALL NICKEL REACH CONSORTIA

#### Generic principles

This appendix on *Funding principles for Cost allocation under REACH for the Nickel REACH Consortium* sets forward the principles for cost allocation based on the provisions foreseen in REACH, in further elaboration of the generic guidance provided by the Nickel REACH Consortium as can be consulted on [www.nickelconsortia.org](http://www.nickelconsortia.org) or can be provided by the Secretariat upon request.

**Cost allocation for the Nickel REACH Consortia should be *fair, transparent and non-discriminatory* as stated by REACH. The overall cost allocation scheme should therefore be “*proportionate to the costs made, or to be made under the Regulation*”.**

The appendix further describes per Consortium what costs may be expected under REACH. It provides, on the basis of experience with metal risk assessments, some generic allocation scheme/rules based on identifiable cost drivers for the registration of dossier under REACH.

Some cost division keys are based on average annual volumes manufactured or imported into EU for last three years. If a Regular Member entering a new market with no existing average annual volume for the last three years, the definition art. 3.30. of REACH will be followed and the volume will be the volume manufactured or imported into EU per calendar year.

The Steering team will define cost allocations for individual Consortia Members.

#### Simplifications and cost reductions:

The cost allocation/funding principles for the Nickel REACH Consortia can be further simplified and significant cost reduction will be achieved along the development of the testing and data gathering planning process, based on the following principles:

1. *Maximal use of the agreed Nickel Risk Assessment data set by investing in appropriate read across.*
2. *Companies being member of the Nickel Institute in 2007 and for the entire time of the REACH registration phase will be allowed to use the “existing Nickel Risk Assessment data set”.*
3. *Extensive and structural cost savings can be achieved by cooperative exposure data gathering and effects testing programs with other Commodity sectors.*
4. *“Swap effects data files” between respective Commodity Consortia to provide Ni manufacturers with other required metal files on a “quid-pro-quo” basis*

The Steering Team can decide on further simplifications and cost reductions.

**APPENDIX 6.2.**

**FUNDING PRINCIPLES FOR NICKEL REACH CONSORTIUM 1**

Cost drivers and cost division key for registration under Nickel REACH Consortium 1

<b>TYPE OF COSTS</b>	<b>DRIVERS</b>
<i>Generic administrative costs</i>	Number of Regular Members <b>Cost Division Key:</b> <i>fixed annual fee to be paid by each Regular Member independent if involved in one or more Registration Dossier</i>
<i>Generic costs for preparation/compilation of Registration Dossier</i>	Number of Registration Dossiers <b>Cost Division Key:</b> <i>fee to be paid by each Regular Member per Registration Dossier</i>
<i>Costs associated with effects assessment</i>	Volume driven for registration of substances* <b>Cost Division Key:</b> <i>Substance dependant variable fee, based on average annual <u>volume manufactured in or imported into EU for last 3 preceding years</u></i>
<i>Costs associated with Local Exposure assessments</i>	Number of sites to be assessed for manufacturers only <b>Cost Division Key:</b> <i>Chemical Safety Report (CSR) dependant variable fee, based on average annual <u>volume manufactured into EU for last 3 preceding years</u></i>
<i>Costs associated with Regional/Continental exposure assessment</i>	Volume and number of uses driven <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured in or imported into EU for last 3 preceding years</u></i>
<i>Registration submission fees</i>	Need to be paid by each legal entity separately and will not be included in the Consortium Agreement

---

\* If a substance of Consortium 1 is used as an intermediate, the Steering Team will decide fair cost allocation rules

Cost drivers and cost division key for registration under Nickel REACH Consortium 2

TYPE OF COSTS	DRIVERS
<i>Generic administrative costs</i>	Number of Regular Members <b>Cost Division Key:</b> <i>fixed annual fee to be paid by each Regular Member independent if involved in one or more Registration Dossier</i>
<i>Generic costs for preparation/compilation of Registration Dossier</i>	Number of Registration Dossiers <b>Cost Division Key:</b> <i>fee to be paid by each Regular Member per Registration Dossier</i>
<i>Costs associated with effects assessment</i>	Volume driven for registration of substances* <b>Cost Division Key:</b> <i>Substance dependant variable fee, based on average annual <u>volume manufactured in or imported into EU for last 3 preceding years</u></i>
<i>Costs associated with Local Exposure assessments</i>	Number of sites to be assessed for manufacturers only * <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured into EU for last 3 preceding years</u></i>
<i>Costs associated with Regional/Continental exposure assessment</i>	Volume and number of uses driven <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured in or imported into EU for last 3 preceding years</u></i>
<i>Registration submission fees</i>	Need to be paid by each legal entity separately and will not be included in the Consortium Agreement

---

\* If a substance of Consortium 2 is used as an intermediate, the Steering Team will decide fair cost allocation rules

## APPENDIX 6.4.

## FUNDING PRINCIPLES FOR NICKEL REACH CONSORTIUM 3

Cost drivers for registration of complex substances, including intermediates and special preparations under REACH Consortium 3

<b>TYPE OF COSTS (not all costs are relevant for all materials covered by Consortium 3)</b>	<b>DRIVERS</b>
<i>Generic administrative costs</i>	Number of Regular Members <b>Cost Division Key:</b> <i>fixed annual fee to be paid by each Regular Member independent if involved in one or more Registration Dossier</i>
<i>Generic costs for preparation/compilation of Registration Dossier</i>	Number of Registration Dossiers <b>Cost Division Key:</b> <i>fee to be paid by each Regular Member per Registration Dossier</i>
<i>Costs associated with effects assessment (limited for intermediates)</i>	Volume driven <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured in or imported</u> into EU for last 3 preceding years</i>
<i>Costs associated with Local Exposure assessments (not relevant for intermediates and special preparations)</i>	Number of sites to be assessed for manufacturers only <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured</u> into EU for last 3 preceding years</i>
<i>Costs associated with Regional/Continental exposure assessment (not relevant for intermediates and special preparations)</i>	Mostly volume driven (number of DU sectors, product applications, material flow analysis, ...) <b>Cost Division Key:</b> <i>CSR dependant variable fee, based on average annual <u>volume manufactured in or imported</u> into EU for last 3 preceding years</i>
<i>Registration submission fees (not relevant for special preparations)</i>	Need to be paid by each legal entity separately and will not be included in the Consortium Agreement