



What is a consortium, and how do I proceed if my company should wish to join one? What advantages and risks are involved?

Any foundry that appears as an importer because it directly procures a substance (e.g. ferromolybdenum, nickel or pig iron) from outside the EU in a relevant quantity range will be obliged to register the substance in question with the ECHA ('Agency'). This obligation to register does not apply to the substances listed in Annex IV and V of the REACH regulation. A change that is of some importance to the foundry industry was introduced when these annexes were reviewed, for graphite C and carbon, which were originally exempt from the obligation to register, are now covered by it.

Joining a consortium offers an opportunity to register a certain substance together with other registrants. Unlike a substance information exchange forum (SIEF), in which membership is normally obligatory for potential registrants, a consortium is a voluntary (!) association of several entities wishing to register a specific substance, the objective being to generate a joint registration dossier for submission.

All registrants may take advantage of the option to form a consortium. More importantly, it is not necessary to have participated in an SIEF to join a consortium later on. Theoretically, it is even possible to form two or more consortiums for one and the same substance. The only condition for forming a consortium is that the substance should be identical, including its degree of purity and its impurities.

All consortiums have their own internet pages giving information about membership. Like others, the consortiums use EINECS and CAS numbers to identify substances together with – as a safeguard against confusion – their chemical structural formulas by which they can be identified unambiguously.

We recommend using the REACH metals gateway page (<http://www.reach-metals.eu/>) which contains a list from which substances can be selected to access the relevant consortium.

Examples of existing consortiums

There is the 'molybdenum consortium'

(<http://www.molybdenumconsortium.org/>)

which, among other things, handles the registration of ferromolybdenum (EINECS: 304-589-8 / CAS 94277-04-0 / no structural formula specified as yet). The minimum charge for membership amounts to US\$ 15,000 per annum plus a so-called delay surcharge of 50%. Further information will be forwarded by email together with an invitation to join once the contact form has been completed.

(<http://www.molybdenumconsortium.org/Default.asp?Page=59>).

'Nickel consortia'

http://www.nickelconsortia.org/index.cfm/ci_id/16326/la_id/index.cfm?ci_id=16332

Members of the so-called 'consortium 1' include potential registrants of nickel metal (EINECS: 231-111-4 / CAS: 7440-02-0 / structural formula: Ni).

The text of the contract maybe viewed and downloaded at

http://www.nickelconsortia.org/index.cfm/ci_id/16581/la_id/1/document/1/re_id/0/fil

[e/Funding_Principles.pdf](#). Your contacts are Jeroen Vanhecke (vanhecke@euronickel.org) and France Capon (capon@euronickel.org).

'Iron Platform'

Pig iron (structural formula: Fe / EINECS: 265-998-4 / CAS: 65996-67-0) that is relevant to the foundry industry will be registered by the so-called iron platform. Your contact is Chris Barrington, ipia@pigiron.org.uk.

Problems/drawbacks of a consortium

As the pillar that supports a consortium is cooperation among competitors, its formation and activities are struggle to some extent by organisational and legal problems, the latter mainly relating to antitrust legislation. Consequently, each enterprise must consider its individual situation before deciding whether or not to join a consortium. Specifically, the fact that dues are staggered and rebates granted to small, micro, and medium-sized enterprises should be taken into consideration when deciding whether or not membership in a consortium is economical.