



Dear SIEF Member.

Proposal to act as Lead Registrant and SIEF Formation Facilitator for Aluminium oxide, CAS No. 1344-28-1, EINECS No. 215-691-6.

By this letter, RioTintoAlcan would like to advise all SIEF members for Aluminium oxide that we are prepared to undertake the obligations of Lead Registrant and to act as the SIEF Formation Facilitator for Aluminium oxide, for purposes of preparing and submitting the Registration Dossier, and where agreed the Chemical Safety Report (CSR), pursuant to REACH Article 11.

Duties of SIEF Formation Facilitator/Lead Registrant

The Lead Registrant and SIEF Formation Facilitator practically should be the same company. They must undertake a wide range of tasks in order to effectively achieve joint submission of the Registration Dossier (and potentially the CSR). The most important tasks involve organising the acquisition and, where not available, generation of the necessary technical data to prepare the Registration Dossier. Other important duties include establishing mechanisms for co-operation among the participants in the SIEF, organising the exchange of data, facilitating agreement on classification and labelling of Aluminium oxide, channelling communications with other SIEFs (for read across), ensuring the smooth absorption of new entrants into the SIEF and taking responsibility for the joint submission of the Registration Dossier (and if appropriate the CSR) to ECHA. The Lead Registrant must also act as the primary point of contact with ECHA in regard to the Registration Dossier. All this should be done without compensation to the Lead Registrant.

RioTintoAlcan role in Registration

RioTintoAlcan is a major producer of Aluminium oxide and has a strong interest in ensuring proper registration of the substance based on the best available science and we are a member of the Aluminium REACH Consortium. The Aluminium REACH Consortium is heavily involved in generating necessary data for the Registration Dossier (see below). RioTintoAlcan has dedicated substantial personnel and financial resources to this effort and have already participated in the first phases of developing the necessary technical information on Aluminium oxide. We are committed to submit the Registration Dossier for Aluminium oxide before its registration deadline of 1 December 2010.

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Aluminium REACH consortium

The Aluminium REACH Consortium was formed by cooperation between the European Aluminium Association and the International Aluminium Institute in 2005 for the sole purpose of assisting industry to comply with REACH. The secretariat for the Consortium is with the European Aluminium Association. The Consortium is comprised of the major EU manufacturers, major non-EU manufacturers, EU importers and their respective affiliates. The Consortium is undertaking to compile and assess all relevant existing studies and data necessary to prepare the Registration Dossier for Aluminium oxide and will be collecting information from the SIEF members as well as sources outside the SIEF and is at present working to generate data to complete the classification and risk assessment needed for the REACH registration dossier. We are also working to identify and evaluate downstream uses and exposure scenarios, and prepare the CSRs. The Consortium is providing human resources and administrative support as necessary to coordinate these efforts. Finally, the Consortium has been involved in developing best practices to help manage SIEF obligations in order to achieve these aims.

Access to the Registration Dossier

RioTintoAlcan and the Consortium will ensure that all Aluminium SIEF members have access to the Registration Dossier for Aluminium oxide to enable them to register with ECHA by the earliest 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 Dossier on fair, reasonable and non-discriminatory terms. Interested companies will have two basic options to obtain the necessary access to information.

- Companies wishing to provide resources and expertise to contribute to the development of the Registration Dossier as well as participating in the Consortium meetings and technical working groups may consider joining the Consortium. The Consortium is open to admitting new members and consortium agreements and details of membership costs can be found on the REACH section of the EAA web site: www.aluminium.org
- SIEF members who do not want to undertake the obligations associated with Consortium membership and choose not to join the Consortium will be able to obtain the Registration Dossier via a Letter of Access. This option may be preferred by companies that simply want to refer to the Registration Dossier in order to continue trading on the market without much specific involvement. The cost for this option is a one time payment to the Consortium of USD 2000 for companies importing less than 1000 t/year and USD 5000 for companies importing more than 1000 t/year. Please note that companies choosing this option will only get a letter of access to the registration file and a SDS for use



towards their customers. They will not get any access to study reports, risk assessment or the Chemical Safety Report.

Future communication and enquiry on company status

We will within the next two-three weeks send you a short web based enquiry in order to establish your company's interest in SIEF participation and Consortium membership. Please fill this in and submit to the Consortium secretariat. If you would like any further information on the Consortium or the current status of the development of the Registration Dossier, you can also contact the secretariat at aluminiumREACH@eaa.be

Sincerely,

Hugh Porteous
RioTintoAlcan

Eirik Nordheim
Aluminium REACH Consortium