

Cobalt REACH Consortium: Funding Structure for Sharing of REACH-Related Costs

V4.3– January 2018

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Cobalt REACH Consortium: Funding Structure for Sharing of REACH-Related Costs

(v4.3 – January 2018)

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INTRODUCTION

Scope and Purpose

This document describes the different **types of cost** incurred in relation to compliance with REACH and explains the various funding drivers for each of these costs and presents the Consortium Steering Group decisions on the **cost-sharing mechanisms** for dividing up the REACH budgets. This document can be used to obtain approximate **estimates of the costs** that may be incurred by registrants of cobalt and cobalt compounds, as well as indicative costs for Associate members or other downstream users participating in joint projects with the Consortium.

It is important to note that the budgets for the Consortia are regularly updated and approved by the Steering Group on an on-going basis, depending on submission requirements, so any figures quoted may be considered as indicative only.

General Funding Principles

Some general funding principles are laid out in the Cobalt REACH Consortium Agreements (Section 9.3):

“The Consortium Members shall bear the Consortium expenses jointly as follows: administrative expenses incurred by the Consortium shall be allocated to all Regular and Associate Members in accordance with shares to be determined by the Steering Group in a fair, transparent and non-discriminatory proportion. When a service or an activity only benefits certain Consortium Members, the expense of that service/activity shall be paid for only by the Consortium Members benefiting from such service/ activity.

“Without prejudice to paragraph 1 of this article, Regular Members shall only share the costs of those Studies and/ or Information which are required by the REACH Regulation for the registration of each of their Consortium Substances according to their tonnage band and type of substance (e.g. intermediate) and which they do not already legitimately possess.

“Associate Members shall contribute to the Consortium expenses in a fair, transparent and non-discriminatory proportion determined by the Steering Group.”

Article 6.1.2 of the Cobalt REACH Consortium Agreements foresees that “within the Steering Group, Regular Members shall take the necessary decisions relating to the Consortium and its objectives and shall [...] deal with [...] management of financial resources of the Consortium, including budget, funding collection and accounts [as well as] allocation of Consortium expenses to the Consortium Members pursuant to the Funding Principles.”.

It must be stressed that some testing not specifically required by REACH will be necessary in order to employ read-across techniques, and these costs will be passed along as appropriate.

Lastly, in January 2016 the EU Commission adopted Implementing Regulation (EU) 2016/9 on joint submission of data and data-sharing in accordance with the REACH Regulation, which describes requirements for fairness, non-discrimination and transparency in the data-sharing and cost-sharing process for purposes of REACH registration. Specifically, among other things, the Implementing

Regulation requires that registrants of the same substance only share the costs of information they are obliged to submit to the Agency to satisfy the registration requirements (including administrative costs); that a reimbursement mechanism is put into place; and that the registrants should make every effort to reach an agreement on the sharing of the information. Therefore, the Secretariat will make reasonable efforts to ensure that such principles are adhered to when applying the requirements set out in this document.

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PART I – Regular Members of the Consortium

1.1 Cost Types

For the purposes of defining a funding structure, the REACH-related budgets have been divided into several ‘types of cost’.

A. Administration, Management and General Studies

The management of the REACH Consortia requires a budget for general administrative costs, including office costs, the employment of a REACH Manager and Support staff, and access to the CDI’s resources. (This is covered under the Administration/Management costs and General Science costs). Expenses incurred, include travel, meeting rooms, legal costs relating to the development of the Consortia Agreements and management of the Consortia and activities towards the recruitment of additional staff.

The Consortium conducts a range of general studies on cobalt and cobalt compounds. The General science costs include the costs for Technical management by the Secretariat staff, costs for studies by Scientific Consultants, and costs for joint projects conducted with the metals industry. The Consortium is also involved in advocacy activities and additional studies relating to the REACH Authorisation process.

While some data on background levels of cobalt in the environment and on sources of diffuse emissions have already been generated by the CDI’s HS&E Committee, further work has been required to perform an environmental exposure assessment on the regional and continental levels, to characterise risks to consumers and risks related to indirect exposure via environment. (This is covered under the General science costs). This category may also include the assessment of local exposure at downstream user manufacturing sites, which is required for the generation of Exposure Scenarios. The exposure to consumers and to the environment at the regional/continental level may be expected to be proportionately higher for larger-volume substances.

B. Dossier Preparation

The preparation of the technical dossiers (IUCLID files) for the registration of cobalt and cobalt compounds requires significant input from the CoRC Support staff, and the CDI’s technical resources, including the Technical Managers and the Toxicologists. (As noted above, this is covered under the General science costs).

In addition, it is necessary to retain scientific consultants to develop and maintain the dossier files and the Chemical Safety Assessments (i.e. Exposure Scenarios and Chemical Safety Reports). (This is covered under the Dossier science costs). These costs may be considered to be proportionate to the number of substances to be assessed, although substances falling in the higher tonnage bands entail more work than the smaller-volume substances.

Along with the preparation of the Registration dossiers, continued maintenance and updates of the dossier will be required for cobalt and the cobalt substances involving further annual work by the Consultants, and continued input from the Secretarial staff.

C. Local Exposure Assessment

The assessment of exposure at a local level will require access to technical consultancy for the definition of workplaces, analysis of environmental emission and occupational exposure monitoring data, and risk characterisation (the current work is covered under the General science costs, as noted above). The Steering Group decided that for simplification, from 2012 these costs will depend on the overall cobalt tonnage and this cost fraction will be incorporated into General Costs (A), while maintaining a fair approach to the cost-shares. For costs incurred up until the end of 2011 the magnitude of these costs was dependant on the number of individual sites in the EU (covered under the Local exposure costs).

D. Effects Assessment

A significant amount of further scientific research is required to fill the data gaps relating to the information required by REACH annexes VII to X. (This is covered under the Effects science costs). This work is expected to incur a substantial proportion of the costs relating to REACH registration.

The information requirements for effects assessment are significantly greater for substances falling in higher tonnage bands than those for lower-volume substances.

It must be stressed that some testing not specifically required by REACH will be necessary in order to employ read-across techniques, and these costs will be passed along as appropriate.

For substances considered as intermediates and produced and used under strictly controlled conditions, there are minimal testing requirements only for those that are 'transported' and manufactured/imported in quantities over 1000 tonnes per year.

For multi-constituent substances containing cobalt substance(s), the cost-shares are based on the main constituent(s) cobalt substance only, as detailed in the information provided by the member company, as applicable.

E. CDI's HS&E data

Since 2000 the CDI's Strategic Research Programme has generated a significant proportion of the scientific information required to compile a registration dossier for cobalt and cobalt compounds. (This is covered under CDI HS&E data costs). Regular members of the REACH Consortia that are not also members of the CDI will need to make a contribution for access to the historical HS&E data (collected from 2000 to 2009). The CDI has since developed new data that the Consortium members and other Co-registrants will need to purchase, once this new data has been added into the Registration dossier updates.

1.2 Additional Cost Considerations

Company Data

Some companies have indicated that they possess relevant effects data on cobalt or cobalt compounds. Providing these data would reduce the overall costs of REACH compliance for the industry as a whole. The Regular Members of the consortia for which the information is relevant will need to make a contribution to reimbursing the expenses incurred by the company in possession of the data. Since the data may be required by a subset of Consortium Regular Members the reimbursement will need to be arranged on a case-by-case basis and will not be further discussed in this document.

Late entry fee – Advantage Compensation

Late entry fee (i.e. ‘advantage compensation’) is applied onto the joining fee of new members joining the Consortium after 1st January 2009 in order to more fairly balance the costs incurred by initial Consortium Members. The advantage compensation payment is calculated as a monthly compounding percentage (e.g. 5% per month) applied to applicable Consortium membership costs for the number of months elapsed since the consortia were formed (i.e. since 1st November 2007). There is also a 25% surcharge applied for any new member joining the consortium after 1st July 2009 who asks to add a new substance, a new use or a higher substance tonnage band.

How these charges would be credited is a further point for discussion by the Consortium Steering Group – for example, should all Regular Members benefit from the revenue, due to the potential impact on the total workload, or should the revenue be credited only to the companies registering those substances in which the late entrant has an interest? This may be a decision best made on a case-by-case basis, when the impact of an additional registrant can be better assessed. This item will therefore not be further discussed in this document.

Minimum Charge

Members who temporarily interrupt or permanently discontinue production or the import/export of a particular cobalt substance, but who have an active Registration or still intend to register that substance under REACH, will incur a minimum CoRC fee. This annual fee will be calculated based on the declared tonnage (three-year average). In cases where annual tonnage is not declared, this annual fee will be calculated as being equivalent to the Generic cost applicable for the maximum tonnage band corresponding to the company’s registration, for each year, as relevant. In summary, a company cannot declare an annual zero tonnage level, whilst maintaining their substance portfolio.

Withdrawal from the Consortium

Advance notice (minimum 6 months) in writing is required if a member wishes to withdraw from the Consortium. Fees continue to apply relative to all the services and data provided up until the effective date of withdrawal, (which is established as the date six months from the

letter of formal notification of withdrawal) and further charges may apply until the end of the same calendar year (e.g. testing costs).

The relevant Consortium retains the right to check with the European Chemicals Agency ('ECHA') whether a company which discontinued production and/or withdrew from the Consortium remains registered with ECHA. When such company is not charged any fees by CoRC for ongoing updates of the Registration Dossier, CoRC may notify ECHA that such company does not have legitimate rights to CoRC data unless a determined fee is paid.

Projections/Estimates of Consortium Cost-shares

Approximate projections/estimates of cost shares for Consortium members and prospective members may be prepared on request to the Secretariat. The actual final costs will be dependent on study requirements, budget updates and any new joiners, so members should be aware that estimates cannot be exact. Any under- or over-payment will be taken into account and applied to the next invoice due.

Reimbursements/Retroactive Adjustments

The Secretariat examines the Consortium Budgets against the incurred costs on a regular (e.g. annual or biennial) basis, in order to determine the overall liabilities. From this exercise a surplus against budgeted costs may become apparent should some projects come in under-budget. Where projects come in under budget, the liabilities adjustments allow for these cost savings to be credited back and reapportioned to the appropriate members, where it is placed onto their accounts as future credit. However, the liabilities adjustments can also show where members have not been invoiced fully, and where a deficit on account has occurred over the allotted time period (e.g. due to increased substance portfolios, higher tonnage band etc.). In this situation, the members account will require a supplementary payment to bring the company's account up to date.

Cobalt Tonnage Letter Update

Members are required to provide the Secretariat (CDI as trustee) with an annual update on their current usage, manufacture or import volumes of each cobalt-containing substance. The information provided via the Tonnage Letter Template is used to update the calculations and forms the basis for the invoices to all members accordingly each year. It is important that the updates are accurate, complete and timely, to enable fair and efficient production of invoices for all members.

Audits

The cost-sharing calculations and invoices generated by the CoRC Secretariat are audited by an independent third party on an annual basis to ensure accuracy and fairness of the Consortium accounts. The typical cost for the annual audit is included within the admin/management budget. Any additional requests for audit services will be billed to the requesting company.

Fee for Registration

Each legal entity is required to register with the ECHA in advance of the REACH registration deadline relating to the substance tonnage band(s), and a registration fee will be payable to ECHA. A reduced registration fee applies for small and medium sized enterprises (SME's), and further reductions for members of a joint submission. However, this item is relevant to individual member companies and will not be further discussed in this document.

1.3 Cost-Sharing Mechanisms

The budget for each of the types of cost described above is driven by a different set of parameters, for example the company's annual tonnage, the number of companies, numbers of substances to be registered or tonnage involved. Therefore, each of the types of cost will be subject to a separately defined cost-sharing mechanism.

At the first meeting of the Consortium Steering Group on 12th December 2007, it was agreed to adopt the funding structure provisionally agreed by the Pre-Consortium Steering Group. Modifications to the original mechanism were agreed at the Consortium Steering Group meeting on 23rd June 2011. The agreed new mechanism maintains the previous cost-sharing structure but now incorporates the Local Exposure Assessment costs into Generic/Management costs. Further modifications to the original mechanism were agreed at the Consortium Steering Group meeting on 10th November 2016. The relevant types of cost and the agreed cost-sharing mechanisms are outlined in Scheme 1.

Budget	Type of Cost	Cost-Sharing Basis	Cost Mechanism
Budget #1	A1 • Consortia Admin and Management	Subscription Fees – Total Annual Tonnage	Factor 1 - Tonnage
Budget #2	A2 • General Studies • Technical Management • Advocacy Activities • Authorisation Activities	GEN – Total Annual Tonnage GEN – AUT – Total Annual Tonnage	Factor 1 - Tonnage
Budget #2	C1 • Local Exposure Assessment (Historic) C2 • Local Exposure Assessment (Current)	Historic LOC – Number of Sites Current LOC – Annual Tonnage	Factor 1 - Tonnage
Budget #2	B1 • Dossiers • Restriction – Related Activities	DOS – Substance RES – Substance	Factor 2 – Substance/Band
Budget #3	D1 • Effects Testing • Future Testing	EFF – Number of Substances and Tonnage Band	Factor 2 – Substance/Band
Budget #3	D2 • Data Purchasing (e.g. HPV Data – Green)	DAT – Data Purchase HPV – Substance/Band	Separate Calculation
Budget #4	E1 • CDI HS&E Data (Historic) • CDI HS&E Data (Current)	CDI – Historic (£/t) CDI – Update (£/t)	Separate Calculation

Scheme 1: Outline of types of cost and cost-sharing mechanisms

A. Administration, Management and General Studies

A1. Administration and Management

These costs represent the Annual Subscription fees (SUBs). The contribution made by each company will be weighted based on the total tonnage of cobalt manufactured or imported into Europe. Note this is the cobalt tonnage that is relevant for REACH registration. This tonnage would include substance and intermediate tonnage, as well as tonnage of all the legal entities and affiliates of the Regular Member present in the EU and being registered for REACH. The cost will be determined according to units of cobalt content.

Taking the total tonnage of cobalt units produced and imported into Europe (currently estimated at around 50,000 tonnes) the generic administration costs are currently anticipated to be in the range of €6.99 per tonne per year for nine years. Since 2009, this annual cost has ranged from €4.4 to €6 per year per tonne of cobalt contained.

A2. General Studies and Technical Management

The costs for general studies, technical management, authorisation related activities and non-local exposure assessment are included within the overall General science costs (GEN, GEN-AUT, LOC). The Science costs are invoiced to the Regular members on an as needed basis, as project work is approved. The general Science costs are shared on the basis of annual cobalt tonnage. The estimated costs include costs for technical management as well as costs associated with SIEFs (Substance Information Exchange Forum) communications and related activities. From 2011 the costs associated with advocacy activities and additional technical work due to Authorisation (i.e. Candidate Listing of cobalt compounds and related processes) are incorporated into General Studies (GEN-AUT). From 2012 Local Exposure Assessments costs are also incorporated into General Studies (LOC) – see section C.

Taking the total tonnage of cobalt units produced and imported into Europe (currently estimated at around 50,000 tonnes) the General Studies and Technical Management costs are currently anticipated to be in the range of €13.5 per tonne per year for nine years. Since 2009, this annual cost has ranged from €5.5 to €18 per year per tonne of cobalt contained.

B. Dossier Preparation

The costs associated with preparation and maintenance of the registration dossiers, and for refinement of the Exposure Scenarios, are included in the Dossier costs (DOS, RES). The Dossier costs were initially divided equally between the substances to be registered via the Consortia, and then shared equally between the companies registering each substance. From 2016, the cost-shares for Dossier preparation are calculated according to the REACH tonnage band under which each company intends to register the substance. The current DOS cost-shares are now based on the same cost-share calculations as those for Effects Assessments.

The costs relating to the preparation of the substance registration dossiers was originally estimated to be around €60,000 per substance (based on preliminary proposals from consultants). Additional costs also apply for technical management of the dossier preparation by the Secretariat staff. Based on costs from 2007 to 2016, the typical share of dossier costs ranges from a minimum of €900, to over €40,000 depending on the cobalt substance, and the number of companies (i.e. co-Registrants) participating in the cost-sharing.

Since 2013, the Consortium has been involved in advocacy activities and technical studies relating to potential Restrictions on certain cobalt substances. For example, this work has involved survey activities for new data collection and refinements to the Exposure scenarios. The costs associated with the Restriction-related activities (RES) are incorporated into the cost sharing mechanism of the dossier preparation and are shared in the same manner.

The Consortium is involved in Joint studies with ITIA (International Tungsten Industry Association). This work is partly funded by CoRC. The costs relating to tungsten or hardmetal studies (WCo) are shared equally by the BLUE Consortium Members, on a dossier basis between the companies who are registering this substance (Cobalt).

C. Local Exposure Assessment

The sharing of costs for assessment of local exposures (LOC) was initially based on the number of EU manufacturing sites operated by each company and its affiliates in the EU. From 2012 the cost for generic local exposure assessment are calculated based on total tonnage of cobalt manufactured or imported into Europe; and these (LOC) costs have been incorporated into the General Studies costs.

The sharing of costs for assessment of exposures at downstream users' facilities will be shared by manufacturers and importers of the substances on the basis of tonnage, as outlined under Cost Type A (general tonnage).

One requirement for considering a substance to be an intermediate is that the manufacturer confirms that the substance is only produced and used under strictly controlled conditions, and that emissions and resulting exposure are minimised. Therefore, it is not necessary to perform an exposure assessment at sites on which only intermediates are manufactured, and the companies involved will not be required to contribute to these costs.

The costs for performing an assessment of occupational and environmental exposure at the level of local production sites has not yet been established and will depend heavily upon the number of European sites in each sector. However, as an indication of the costs of this part of the assessment, an original estimate of the total cost of a full assessment of a specific sector could be in the €50,000-€100,000 range.

At the Steering Group Meeting held in November 2018, it was agreed that the Historic costs for LOC (2007 to 2011), would also be calculated as a 'general' cost based on total annual tonnage

of cobalt manufactured and imported into Europe and therefore the LOC costs are incorporated along with the costs for General Studies and Technical Management Costs.

D. Effects Assessment

The cost for the generation of effects data for a cobalt substance (EFF), and for data purchased for specific cobalt compounds (DAT, HPV), and the costs relating to the generation of data on the effects of the cobalt ion, will be shared according to the REACH tonnage band under which each company intends to register the substance. For a Regular Member and its legal entities and affiliates, the relevant tonnage band would be the highest of their tonnage bands (i.e. the tonnage band does not relate to the aggregated tonnage).

In cases where read-across techniques are applied for a target substance, the cost applicable for the relevant tests carried out on the source substance will be shared equally between the source and target substances. This cost would then be shared between the interested companies on the basis outlined in the preceding paragraph. It must be stressed that some testing not specifically required by REACH will be necessary in order to employ read-across techniques, and these costs will be passed along as appropriate.

For Intermediates (under strictly controlled conditions), there would be no contribution to costs except where the intermediates are transported and manufactured/imported in quantities greater than 1000 tonnes per year. In such cases the companies concerned share the costs for generation of effects data, equivalent to those required by Annex VII of REACH.

The Consortium members have agreed that in many cases, full substance dossiers will be submitted for intermediates (i.e. on-site isolated and isolated transported intermediates): therefore, the substance-related costs will apply in these cases. These Consortium members have separately identified those intermediates produced under strictly-controlled conditions, and the minimal testing requirements (and associated lower costs) will apply in this situation.

Based on the companies which have so far expressed an interest in each cobalt substance, and the CDI's 'best guess' on the possible application of read-across, the indicative total costs for companies registering in each tonnage band may be approximately as set out in the Historic Effects Costs shown in the Illustrative Examples in the Appendix.

As an example, for substances where there are many companies sharing the cost, such as Cobalt metal the typical Effects costs would be on the order of €2,000 for the lowest tonnage band (1-10 tpa), and €8,000 for the higher tonnage band (1000+tpa). Whereas for a substance where there are fewer companies sharing the costs, the maximum costs for the Effects costs can be higher and could range between €14,000 for (1-10 tpa), and €70,000 (for 1000+ tpa). Note these examples are based on costs from 2007 to 2016.

For the Effects-related testwork studies involving a Read-Across strategy, the cost-sharing approach involves the calculation of a weighted cost-share for each company, which is estimated by the Secretariat according to their number of cobalt substances and the tonnage band. An example of this read-across approach to sharing of Effects testwork is shown in Appendix 1.

E. CDI HS&E data

The members of the CDI (industry trade association) have contributed a substantial amount of funding at varying rates in preparation for REACH (i.e. from 2000 to 2008). Adding the contributions towards each of the successive HS&E budgets, it is possible to estimate that each CDI member company has paid around £74.21 per tonne of cobalt units. For the calculations that have been used, please see Appendix 1 – Illustrative examples.

In order to access the historic HS&E data that are made available to the Regular Members of the Consortia and other co-registrants, any non-CDI member should make an equivalent payment of £74.21 (€85.34) per tonne of cobalt units, which would be channelled back to the CDI's HS&E budget. Note that a lower cost of £63.15 (€72.63) per tonne of cobalt units applies for Intermediates. For the Consortium members (that are not CDI members) this lower cost only applies for Intermediates produced under strictly-controlled conditions.

The CDI has since developed new data that the Consortium members and other Co-registrants will need to purchase, once this new data has been added into the Registration dossier updates. The recent CDI HS&E data purchase costs are £20.91 (€24.05) per tonne of cobalt units, for non-CDI members, with there being a lower cost of £19.48 (€22.41) per tonne of cobalt units that applies for Intermediates.

These rates apply for CDI HS&E data up to 2008, and the CDI has since developed new data that the Consortium members and other Co-registrants will need to purchase, once this new data has been added into the Registration dossier updates.

Illustrative Examples

A fictional industry was invented in order to give a semi-quantitative estimate of the impact of the proposed funding structure on companies of small, medium and large size with interests in fewer or more substances. The agreed cost-sharing mechanisms described above have been applied to this fictional industry, and for the resulting allocation of costs, please see Appendix 1 – Illustrative examples.

PART II – Co-Registrant Companies choosing the Letter of Access (LoA) Option

Companies that are interested in ‘data ownership’ and active participation in the preparation of the Registration dossiers are encouraged to join the Consortia. The Letter of Access (LoA) option may be preferred by companies with fewer cobalt substances in the lower tonnage bands. The cost-sharing aspects, and also knowing that a group of qualified persons will take the lead in preparing the dossier, should provide good incentive for these companies to choose the Letter of Access option.

The LoA option does not involve ownership of data or studies produced or obtained by the Consortia, and it does not allow the company to view or to use these data/studies. The LoA grants the company the right to refer to the dossier as a Co-registrant as required by REACH Article 10(a).

2.1 Cost Types

A. Administration, Management and General Studies

The management of the REACH Consortia requires a budget for general administrative costs, including a REACH manager, support staff, access to CDI resources and is inclusive of office facilities. These management costs are referred to in Part I – Regular Members 1.1 Cost Types. Companies taking the LoA option pay an equivalent cost-share of the Administration, Management and general studies costs, as well as the Non-local Exposure related costs.

B. Dossier Preparation

The preparation of technical dossiers (IUCLID files) for the registration of cobalt and cobalt compounds requires significant input from the CoRC Staff, the CDI’s Technical resources, and Consultants. These dossier costs are referred to in Part I – Regular Members 1.1 Cost Types. Companies requiring access to data by purchasing the LoA are considered co-registrants and pay an equivalent cost-share of the Dossier related costs. This includes the historic costs [2007 – 2014] and the current dossier costs incurred up to the date of the LoA purchase.

For avoidance of doubt, the Secretariat will make reasonable efforts to ensure that companies in the tonnage band of 1-10 tpa requesting LoAs are not required to pay for studies which are not necessary for registration.

C. Local Exposure Assessment

The assessment of exposure at a local level will require access to technical consultancy for the definition of workplaces, analysis of environmental emission and occupational exposure monitoring data, and risk characterisation. These local exposure assessment costs are referred to in Part I – Regular Members 1.1 Cost Types. Companies taking the LoA option are co-registrants and pay an equivalent cost-share of the Local Exposure related costs.

D. Effects Assessment

A significant amount of further scientific research is required to fill the data gaps relating to the information required by REACH Annexes VII to X. This work is expected to incur a substantial proportion of the costs relating to REACH registration. These effects assessment costs are referred to in Part I – Regular Members 1.1 Cost Types. Companies taking the LoA option are co-registrants and pay an equivalent cost-share of the Effects related costs.

E. CDI HS&E data

Since 2000 the CDI's Strategic Research Programme has generated a significant proportion of the scientific information required to compile a registration dossier for cobalt and cobalt compounds. Letter of Access companies will also need to make a contribution for access to the historical HS&E data that has been used in the dossiers.

2.2 Cost and Payment Structure

The cost structure for the Letter of Access option is based on the same funding principles as those used by the Consortia, and includes the following steps:

- i. Deposit or advance payment to account which depends on the overall tonnage band;
- ii. Costing to be determined later as the actual costs will be better known closer to the Registration date, as will the total number of co-registrants;
- iii. Settling of Accounts with full payments to be made for each individual substance closer to the time of Registration of the respective substance;
- iv. Costs for on-going maintenance of the registration dossiers; and
- v. Adjustment of Accounts (noting there is a possibility for refunds as well as extra costs), at a later date.

The company is asked to pay their deposit according to their aggregated tonnage of cobalt substances (expressed as cobalt contained) and not for each substance separately; meaning that one deposit would cover separate Letters of Access for several cobalt substances. As noted above, the subsequent payment(s) would be made closer to the applicable registration date in each case.

A company can estimate the approximate costs for registering a cobalt substance using the same cost-categories and funding principles, as outlined in Part I – Regular Members.

It is important to note that the cost of the Letter of Access will be a function of the number of companies participating and therefore the greater the number of companies taking a Letter of Access, the lower the individual cost will become.

The founding members of the Consortia financed the establishment of the Consortia in 2007. Since that time the Consortia members pay the Annual Subscription Fees which cover the annual administration and management costs, as well as their share of the Science costs for the studies and test work, as these costs are incurred. Therefore, companies that intend to be Co-Registrants by requesting a Letter of Access (instead of joining the Consortia) will benefit from this initial investment and financial support provided by the Consortium members, as well as from the time value of their

own money (not spent) over the time periods. The Letter of Access option is therefore considered to be a 'lighter' option for potential Co-Registrants, where companies have the right to refer to the data but do not have the ownership of the data. The LoA option does not require the LoA companies to participate in any meetings, or other Consortium activities throughout the year unlike the Regular Members who can be heavily involved with the consortia activities and work programme of the Consortium.

All the costs relating to the management and preparation of the Registration dossier for a cobalt Consortia substance will be shared on a fair, transparent and non-discriminatory basis by all the Co-Registrants. The cost-sharing principles that apply are based on tonnage, number of substances, and substance tonnage bands, and have been outlined in Part I of this document.

The cost-sharing mechanism (described in Part 1) and the resulting allocation of costs are illustrated in Appendix 1.

It should be noted that Science costs have been estimated separately for cobalt compounds that will be registered as a substance versus as an intermediate (under strictly controlled conditions).

Following the initial deposit and full payment of applicable science costs prior to registration, the LoA companies pay an annual cost-share for the ongoing maintenance of the dossier, and the ongoing testing for their cobalt substance(s). All payments for Letter of Access companies are made annually and in arrears. This should be compared to that of Regular Members of the Consortium, who pay annually in advance according to the approved annual Consortium budgets.

2.3 Additional Cost Considerations

Minimal Charge

Letter of Access companies who temporarily interrupt or permanently discontinue production or import/export of a particular substance but who have registered or still intend to register that substance under REACH will incur a minimum annual fee. This fee will be equivalent to the Generic cost applicable for the maximum tonnage band for that substance, as relevant.

Cobalt Tonnage Letter Update

Letter of Access companies are not required to update the Secretariat on an annual basis on their current usage, manufacture or import volumes of each cobalt-containing substance. However, the responsibility is on the company to inform the Secretariat of any changes in volumes, or substances declared within the relevant Appendix to the Letter of Access Agreement. It is also the responsibility of each company to update their registration dossier with ECHA in case of increase in tonnage bands and to identify whether the right to refer to data relevant for the company's larger tonnage band has been granted by CoRC.

Audits

The cost-sharing calculations and invoices generated by CoRC are audited by an independent third party on an annual basis to ensure accuracy and fairness of the Consortium accounts. The typical cost

for the annual audit is included within the admin/management budget. The LoA companies pay an equivalent cost-share of the budget. Any additional requests for audit services will be billed to the requesting company.

Projections/Estimates of Cost-shares

Approximate projections/estimates of cost shares for the LoA company may be prepared on request to the Secretariat. The actual final costs will be dependent on study requirements, budget updates and any new joiners, so companies should be aware that estimates cannot be exact. Any under- or over-payment will be taken into account and applied to the next invoice due.

Reimbursements/Retroactive Adjustments

The Secretariat examines the Consortium Budgets against the incurred costs on a regular (e.g. annual or biennial) basis, in order to determine the overall liabilities. From this exercise a surplus against budgeted costs may become apparent should some projects come in under-budget. Where projects come in under budget, the liabilities adjustments allow for these cost savings to be credited back and reapportioned to the appropriate members, where it is placed onto their accounts as future credit. However, the liabilities adjustments can also show where members have not been invoiced fully, and where a deficit on account has occurred over the allotted time period (e.g. due to increased substance portfolios, higher tonnage band etc.). In this situation, the members account will require a supplementary payment to bring the company's account up to date.

2.4 Cost Sharing Mechanisms

The cost sharing mechanism for Letter of Access companies are the same as for those of Regular members. For further information see section 1.3 Cost Sharing Mechanisms for Regular Members.

The exception is the Advantage Compensation Payment that is made by late entrants to the Consortium only. Please note the companies taking the LoA option cannot request that the Consortium increases the dossier tonnage band, or adds a new use, for a cobalt substance. Such requests can only be made by Consortium member companies as the associated costs for the changes to the Consortium work programme will need to be invoiced and collected in advance of the requested work being carried out.

A Company taking the LoA option can apply to become a Consortium member, for example, if interested in data ownership. In such cases, the Advantage Compensation payment will be required, and will be considered to apply from 2007 until the date of the signing the LoA agreement. Note the Advantage Compensation is applied onto the annual cost-shares of the Administration and Management costs for this time period.

Consortium members can also choose to withdraw from active Consortium membership and can switch into the LoA agreement instead, as a lighter option for co-registrants.

PART III – Associate Members of the Consortium

In principle, the burden for the registration of substances, and the development of Exposure Scenarios for their manufacture and use, rests upon the manufacturers and importers. However, there may be some instances where it would be appropriate for downstream users of substances to contribute to the work of the Consortia.

Downstream users of Cobalt compounds are welcome to join the Consortium as Associate members, for the purpose of data sharing, and for the participation in the Consortium activities. However, Associate membership is not a requirement for participation and for co-funding of Consortium studies/projects.

3.1 Cost Types

For the purposes of defining a funding structure, the REACH-related budgets have been divided into several ‘types of cost’.

A. Administration, Management and General Studies

The management of the REACH Consortia, the General Studies, the environmental exposure assessment on the regional and continental levels, and the characterisation of risks to consumers and risks related to indirect exposure via the environment, will be funded by Regular Members of the Consortia and the Letter of Access companies (i.e. the co-registrants).

B. Dossier Preparation

The preparation of the technical dossiers and the drafting of the Chemical Safety Assessments will be funded by the Regular Members of the Consortia and the Letter of Access companies.

C. Local Exposure Assessment

The assessment of exposure at a local level will require access to technical consultancy for the definition of workplaces, analysis of environmental emission and occupational exposure data and risk characterisation. (This is covered under Budget 1 – Management Costs). While the initial work, including the development of generic Exposure Scenarios, will be funded by Regular Members and Letter of Access companies, the downstream user industries may determine that it is necessary to carry out additional work at the local level, in order to refine the Exposure Scenarios. In this case, the Associate Members of the Consortia (and any other involved downstream user companies) may need to make a contribution to the costs of the additional work.

The magnitude of these costs will depend on the number of facilities, and the total tonnage and the number of cobalt substances that are manufactured or imported.

An example of a Joint Project cost structure is shown below:

- (i) project co-ordination fee (e.g. €1,000);
- (ii) the company's respective cost-share of the project (i.e. as calculated by the Secretariat); and
- (iii) specific costs/expenses related to site visits to the company by the Consultants.

Such cases of joint cost-sharing are calculated separately for specific projects, and the proposed (bespoke) cost-share mechanism is reviewed with the Consortium Steering Group and agreed amongst the participating Companies. For example, the Steering Group may decide to pay a certain percentage of the total project cost; and the participating DU companies then agree to co-fund the remaining portion of the project costs.

D. Effects Assessment

Any further scientific research that is required to fill the data gaps relating to the information required by REACH annexes VII to X will be funded by Regular Member and Letter of Access companies (i.e. the co-registrants).

E. CDI HS&E Data

Associate Members of the Cobalt REACH Consortia will not need to access the historical CDI HS&E data.

3.2 Additional Cost Considerations

Authorisation and Restriction Projects

Some DU companies may participate in these additional studies conducted by the Consortium and may be asked to contribute to the cost-sharing in these cases. This is arranged on a case-by-case basis and will not be discussed further in this document.

Company Data

Some companies have indicated that they possess relevant effects data on cobalt or cobalt compounds. Providing these data would reduce the overall costs of REACH compliance for the industry as a whole. The members of the Consortia for which the information is relevant will need to make a contribution to reimbursing the expenses incurred by the company in possession of the data. Since the data may be required by a subset of Consortium members the reimbursement will need to be arranged on a case-by-case basis and will not be further discussed in this document.

Late entrance fee

Since there are no general management fees for existing Associate Members, there will be no late entrance fee for the Associate Members.

PART IV – Licence to Use

In some instances, companies (Consortium members and non-members) may request the use of REACH data collected by CoRC for purpose of read-across, or for purposes other than REACH (i.e. use of the data outside of the EU). For this purpose, a Licence to Use (LtU) agreement will be required. Four possible cases have been outlined, however it is expected that each case will be slightly unique, and so each case will need to be specifically prepared for each company using the appropriate version of the LtU agreement.

- Case A – Use of CoRC data for read-across to another cobalt substance not covered by the Consortium for purpose of REACH registration.
- Case B – Use of CoRC data in the EU for other purposes besides REACH.
- Case C – Use of the CoRC data in non-EU jurisdictions for registrations or authorisations (e.g. Korea REACH, China, etc.) by Consortium members.
- Case D – Request from a third party to use (purchase) CoRC data for use in the EU, or for a non-EU registrations or authorisation (e.g. Korea, China, etc).

External companies, including holders of LoAs, will need to contact the Secretariat to discuss their case, and to initiate the process for an LtU. Interested companies will need to provide a letter to the Secretariat outlining their intentions and request for use of CoRC data.

For Consortium members, who already have ownership of the CoRC data, the procedure and some general principles are laid out in the Consortium Agreement. In summary, Consortium member Companies may use the existing studies and any new studies for purposes other than REACH, and for compliance with laws and regulations in other non-EU jurisdictions, provided prior authorisation has been obtained from the Steering Group, and provided such studies will not appear in the public domain.

The Consortium Member Company will still require an LtU to cover their case; however, the applicable costs will consider current data ownership. There may be additional fees and costs, depending on their (non-EU) tonnage for the Cobalt substance(s).

4.1 Cost and Payment Structure

A. Current Members

For current members, the cost structure for the Licence to Use (LtU) option is based on the same funding principles as those used by the Consortia, and includes the following steps:

- i. Administration fee;
- ii. Purchase Cost (to be determined on a case by case basis);
- iii. Incremental costs to be paid (if tonnage bands for non-EU use are greater than existing EU data needs).
- iv. Cost for data updates (as required/requested).

For Consortium members wanting to use CoRC data in non-EU jurisdictions, the company will need to declare its non-EU tonnage to the Secretariat (CDI as trustee) and the additional payment will be calculated based on this incremental tonnage.

There will be an administration fee to cover the time for the Secretariat staff to prepare the LtU agreement, to discuss the technical requirements (e.g. request for read-across), and to calculate the applicable data costs. Legal costs will be charged as an extra cost-share where required. Costs for future data updates will also be extra and will be calculated at the time of the request.

Please be advised that the Consortium has developed specific approaches to read-across, which will need to be considered for any read-across to other (cobalt containing) substances that are not covered by the Consortium.

For External companies wanting to use CoRC data in non-EU jurisdictions, the company will need to declare its non-EU tonnage to the Secretariat (CDI as trustee) and the appropriate payment will be calculated based on this tonnage.

Each request for an LtU will be considered on a case-by-case basis. All requests will be outlined by the Secretariat and notified to the Steering Group (or Executive Committee), then discussed in a generic (non-confidential) manner to obtain the necessary approval to proceed with the preparation of the LtU Agreement.

B. Non-Members/External

For External companies (Non-members), including holders of LoAs, the cost structure for the Licence to Use (LtU) option is based on the same funding principles as those used by the Consortia, and includes the following steps:

- i. Administration fee;
- ii. Purchase Cost (to be determined on a case by case basis);
- iii. Cost for data updates (as required/requested).

For non-member/external companies that wish to purchase a Licence to Use Agreement, the full historic costs for the respective tonnage band data will be required to be purchased with the same funding principle as a Regular member. The Secretariat will need to calculate the applicable costs on a case by case basis, according to substance(s).

The administration fee will be €2,000 (minimum) or 20% of the data purchase cost, whichever cost is higher. This fee covers the time for the Secretariat staff to prepare the LtU agreement, to discuss the technical requirements (e.g. request for read-across), and to calculate the applicable data costs. Legal costs will be charged as an extra cost-share where required. Costs for future data updates will also be extra and will be calculated at the time of the request.

Please be advised that the Consortium has developed specific approaches to read-across, which will need to be considered by those companies (or other Consortia) that make requests to purchase data on Cobalt Consortium substances, which would then be used to read-across to other (cobalt containing) substances.

Each request for an LtU will be considered on a case-by-case basis. All requests will be outlined by the Secretariat and notified to the Steering Group (or Executive Committee), then discussed in a generic (non-confidential) manner to obtain the necessary approval to proceed with the preparation of the LtU Agreement.

APPENDIX 1 – Illustrative Examples

A. Administration, Management and General Studies

A1. Admin and Management

(example only)

Company	Annual Tonnage	REACH Tonnage Band	Cost by Tonnage
Pauci Magnum Co	5000	1000+	€37,629.35
Multi Magnum Co	4500	1000+	€33,866.41
Pauci Primo Medium Co	4000	1000+	€30,103.48
Multi Primo Medium Co	3500	1000+	€26,340.55
Pauci Medium Co	3000	1000+	€22,577.61
Multi Medium Co	2500	1000+	€18,814.68
Pauci Sub Medium Co	2000	1000+	€15,051.74
Multi Sub Medium Co	1500	1000+	€11,288.81
Pauci Minor Co	1250	1000+	€9,407.34
Multi Minor Co	1150	1000+	€8,654.75
Pauci Minimus Co	500	100-1000	€3,762.94
Multi Minimus Co	250	100-1000	€1,881.47
Pauci Sub Minimus Co	50	10-100	€376.29
Multi Sub Minimus Co	25	10-100	€188.15
Pauci Miniscula Co	5	1-10	€37.63
Multi Miniscula Co	2.5	1-10	€18.81
Total	29,232.5		€220,000 (per year)

A2. General Studies

Company	Annual Tonnage	REACH Tonnage Band	Cost by Tonnage
Pauci Magnum Co	5000	1000+	€76969.13
Multi Magnum Co	4500	1000+	€69272.21
Pauci Primo Medium Co	4000	1000+	€61575.30
Multi Primo Medium Co	3500	1000+	€53878.39
Pauci Medium Co	3000	1000+	€46181.48
Multi Medium Co	2500	1000+	€38484.56
Pauci Sub Medium Co	2000	1000+	€30787.65
Multi Medium Co	1500	1000+	€23090.74
Pauci Minor Co	1250	1000+	€19242.28
Multi Minor Co	1150	1000+	€17702.90
Pauci Minimus Co	500	100-1000	€7696.91
Multi Minimus Co	250	100-1000	€3848.46
Pauci Parvus Minor Minimus Co	50	10-100	€769.69
Multi Parvus Minor Minimus Co	25	10-100	€384.85
Pauci Miniscula Co	5	1-10	€76.97
Multi Miniscula Co	2.5	1-10	€38.48
Total	29,232.5		€450,000 (per year)

B. Historic Dossier Cost-Share (2007-2016) per Company

Blue Consortium Historic Dossier Cost-Share (2007-2016) per Company Registrant Substance					
	Intermediate SCC	1 – 10 tpa	10 – 100 tpa	100 – 1000 tpa	1000+ tpa
Cobalt	€900	€1,700	€3,400	€5,000	€6,700

Red Consortium Historic Dos Cost-Share (2007-2016) per Company Registrant Substance					
	Intermediate SCC	1 – 10 tpa	10 – 100 tpa	100 – 1000 tpa	1000+ tpa
COBALT DICHLORIDE	€5,000	€10,000	€18,000	€26,000	€32,000
COBALT DINITRATE	€4,000	€7,000	€13,000	€19,000	€24,000
COBALT SULPHATE	€2,000	€5,000	€9,000	€13,000	€17,000
COBALT CARBONATE	€2,500	€5,000	€9,700	€14,000	€18,000
COBALT OXIDE	€1,500	€3,000	€6,000	€8,000	€11,000
TRICOBALT TETRAOXIDE	€1,300	€3,000	€5,000	€8,000	€10,000
COBALT DIHYDROXIDE	€1,500	€3,000	€6,000	€8,000	€11,000
COBALT TRIHYDROXIDE	-	-	-	-	-
COBALT HYDROXIDE OXIDE	€7,500	€15,000	€26,000	€34,000	€40,000
COBALT SULPHIDE	€3,000	€6,000	€11,000	€15,000	€18,500
COBALT LITHIUM DIOXIDE	-	-	-	-	-
WHITE ALLOY (REACTION MASS OF COBALT, COPPER, IRON AND SILICON DIOXIDE)	€8,000	€14,000	€23,000	€28,000	€32,000
MIXED COBALT-NICKEL SULPHIDE (REACTION MASS OF COBALT SULPHIDE AND TRINICKEL DISULPHIDE)	-	-	-	-	-

Note: Above costs do not include substances which have (currently) been registered by fewer than three companies.

Green Consortium Historic Dossier Cost-Share (2007-2016) per Company Registrant Substance					
	Intermediate SCC	1 – 10 tpa	10 – 100 tpa	100 – 1000 tpa	1000+ tpa
COBALT DI(ACETATE)	€3,400	€6,500	€12,000	€17,000	€22,000
COBALT(2+) PROPIONATE	€4,000	€8,000	€15,000	€20,000	€25,000
COBALT BIS(2-ETHYLHEXANOATE)	€2,000	€4,000	€8,000	€12,000	€15,000
COBALT(2+) ISONONANOATE	-	-	-	-	-
NEODECANOIC ACID, COBALT SALT	€2,000	€4,000	€7,500	€11,000	€14,000
STEARIC ACID, COBALT SALT	€2,000	€5,000	€9,000	€12,500	€16,000
NAPHTHENIC ACIDS, COBALT SALTS	€4,000	€8,000	€14,000	€19,000	€24,000
FATTY ACIDS, TALL-OIL, COBALT SALTS	€9,000	€16,000	€26,000	€32,000	€37,000
RESIN AND ROSIN ACIDS, COBALT SALTS	€5,000	€10,000	€18,000	€25,000	€31,000
COBALT BORATE PROPIONATE COMPLEXES	€4,000	€7,000	€13,000	€18,000	€23,000
COBALT BORATE 2-ETHYLHEXANOATE COMPLEXES	€4,000	€7,000	€13,000	€18,000	€23,000
COBALT BORATE NEODECANOATE COMPLEXES	€3,000	€6,000	€11,000	€16,000	€20,000
COBALT OXALATE	-	-	-	-	-
COBALT ACETYL ACETONATE	-	-	-	-	-

Note: Above costs do not include substances which have (currently) been registered by fewer than three companies.

C. Historic Local Exposure Cost-Shares (2007 to 2011)

Historic (2007 – 2011) LOC done as GEN calculation (Cost per tonne - €6.03)	
Tonnage Band	Cost (t/€)
1 - 10 tpa	€60 for 10 tpa
10 - 100 tpa	€603 for 100 tpa
100 – 1000 tpa	€6030 for 1000 tpa
1000+ tpa	€6030+

Note: the historic LOC cost-share was not previously applicable (N/A) for companies registering the substance as Intermediate under SCC only. In November 2016 it was agreed by the SG members, that the Historic LOC cost-shares would be calculated based upon cost per tonne (as per the GEN cost-sharing mechanism).

D1. Historic Effects Cost-Share (2007-2016) per Company

		Intermediate SCC	1 – 10 tpa	10 – 100 tpa	100 – 1000 tpa	1000+ tpa
Blue Consortium	Average	€1,000	€2,000	€4,000	€6,000	€8,000
Red Consortium	Minimum	€400	€700	€1,000	€1,400	€1,500
	Average	€3,000	€5,500	€10,000	€16,000	€19,000
	Maximum	€14,000	€27,000	€45,000	€60,000	€70,000
Green Consortium	Minimum	€2,500	€5,000	€9,000	€13,000	€17,000
	Average	€3,500	€6,500	€12,000	€18,000	€22,500
	Maximum	€7,500	€14,000	€26,000	€35,000	€43,000

Note: Above costs do not include substances which have (currently) been registered by fewer than three companies. Lower cost-shares apply for substances registered as Intermediates under SCC.

D2. Effects Test Work Read- Across approach to Cost Sharing

Volume Range	Factor Set	Share for One Substance	Indicative Share (Example)	Cost
Intermediate SCC	0.5	0.001	€1000	
1 to 10 tonnes	1	0.002	€2000	
10 to 100 tonnes	2	0.004	€4000	
100 to 1000 tonnes	3	0.006	€6000	
>1000 tonnes	4	0.008	€8000	
Total Participation	All Three Consortia Participating		Total Cost	
Total Sum	500		€1,000,000 (Example)	

Company	No of Substances	1-10 tpa	10-10tpa	100-1000t pa	1000+ tpa	Company Score	Company cost Fraction	Cost Share (Example)
Pauci Magnum Co	4	1(1)	1(2)	1(3)	1(4)	10	0.02	€20,000
Multi Magnum Co	10	2(1)	3(2)	3(3)	2(4)	25	0.05	€50,000
Pauci Primo Medium Co	4	2(1)	2(2)	0(3)	0(4)	6	0.012	€12,000
Multi Primo Medium Co	8	0(1)	0(2)	4(3)	4(4)	28	0.056	€56,000
Pauci Medium Co	2	1(1)	1(2)	0(3)	0(4)	3	0.006	€6,000
Multi Medium Co	1	1(1)	0(2)	0(3)	0(4)	1	0.002	€2,000
Pauci Sub Medium Co	2	0(1)	2(2)	0(3)	0(4)	4	0.008	€8,000
Multi Medium Co	1	0(1)	1(2)	0(3)	0(4)	2	0.004	€4,000
Pauci Minor Co	2	2(1)	0(2)	0(3)	0(4)	2	0.004	€4,000
Multi Minor Co	3	1(1)	1(2)	1(3)	0(4)	3	0.006	€6,000
Pauci Minimus Co	1	0(1)	0(2)	1(3)	0(4)	3	0.006	€6,000
Multi Minimus Co	3	1(1)	2(2)	0(3)	0(4)	5	0.01	€10,000
Sum =						500		€1,000,000

E. CDI HS&E data (Historic Costs)

Year	HS&E Budget	Member Tonnage	Cost per Tonne
Before 2004	£438,903	27,243	£16.11
2004	£262,870	27,359	£9.61
2005	£445,001	28,465	£15.63
2006	£583,485	35,949	£16.23
2007	£372,558	37,795	£9.86
2008	£586,500	38,836	£15.63
	£2,699,317		£82.80
Less Total General Non-Project:	-£280,002		
Average Member Tonnage 2000-2008:		32,608	
Less Average General Non-Project:			-£8.59
	£2,419,315		£74.21
EFF (Effects) Data Costs	£2,058,788	85.10%	£63.15
EXP (Exposure) Data Costs	£360,527	14.90%	

Cost for Substances up to 2008 = £74.21 per tonne Cobalt (€85.34)

Cost for Intermediates (under Strictly Controlled Conditions) up to 2008 = £63.15 per tonne Cobalt (€72.63)

Year	HS&E Budget	Member Tonnage	Cost per Tonne
2009	£196,450	33,361	£5.89
2010	£63,600	35,366	£1.80
2011	£60,733	34,596	£1.76
2012	£21,600	37,987	£0.57
2013	£21,418	41,727	£0.51
2014	£204,328	48,520	4.21
2015	£256,550	64,643	3.97
2016	£154,630	70,096	2.21
CDI REACH Spending	£979,309		£20.91
EFF (Effects) Data Costs	£912,245	93.15%	£19.48
EXP (Exposure) Data Costs	£67,064	6.85%	

Cost for Substances for 2009-2016 = £20.91 per tonne Cobalt (€24.05)

Cost for Intermediates (under Strictly Controlled Conditions) for 2009-2016 = £19.48 per tonne Cobalt (€22.41)

Appendix 2: Example Calculation

Company A Portfolio (Over 6 years 2007-2016)

Total Number of Substances: 5

Substances: Cobalt (1,000+ tpa)

Cobalt Oxide (1 – 10 tpa)

Cobalt Sulphide (10 – 100tpa)

Stearic Acid (10 – 100tpa)

Cobalt Borate Neodecanoate Complexes (1 – 10tpa)

Average Tonnage: (2007-2016): 1,000tpa

Manufacturing Sites: 1 Blue, 1 Red and 1 Green

Example Calculation

Subscription: $6.99(\text{€}/\text{year}) \times 9(\text{years}) \times 1,000(\text{tpa}) = \text{€}63,000$

GEN: $13.5(\text{€}/\text{year}) \times 9(\text{years}) \times 1,000(\text{tpa}) = \text{€}121,500$

CDI (<2008): $85.34 (\text{€}/\text{t}) \times 1,000(\text{tpa}) = \text{€}85,340$

CDI (2009-2016): $24.05 (\text{€}/\text{t}) \times 1,000(\text{tpa}) = \text{€}24,050$

LOC: $(1 \times 6,030) + (2 \times 61) + (2 \times 630) = \text{€}7,412$

DOS: $6,700 + 3,000 + 11,000 + 9,000 + 6,000 = \text{€}35,700$

EFF (Read-Across): Company Score = 12 $(12/500) * 1,250,000 = \text{€}30,000$

Company Score = Cobalt 1(3) Cobalt Oxide 1(1), Cobalt Sulphide 1(2), Stearic Acid 1(2), Cobalt Borate Neodecanoate Complexes 1(4) $\rightarrow 1(3) + 1(1) + 1(2) + 1(2) + 1(4) = 12$

EFF: MIN $8,000 + 700 + 1,000 + 9,000 + 5,000 = \text{€}23,700$

AVG $8,000 + 5,500 + 10,000 + 12,000 + 6,500 = \text{€}42,000$

MAX $8,000 + 27,000 + 45,000 + 26,000 + 14,000 = \text{€}120,000$

Total Cost (MIN): $63,000 + 121,500 + 85,340 + 24,050 + 7,412 + 35,700 + 30,000 + 23,700 = \text{€}390,702$

Total Cost (AVG): $63,000 + 121,500 + 85,340 + 24,050 + 7,412 + 35,700 + 30,000 + 42,000 = \text{€}409,002$

Total Cost (MAX): $63,000 + 121,500 + 85,340 + 24,050 + 7,412 + 35,700 + 30,000 + 120,000 = \text{€}487,002$