



15 March 2009

TO: Enquirer about membership

FR: Molybdenum Consortium Secretariat

RE: Molybdenum Consortium for REACH

Thank you for downloading this set of Molybdenum Consortium (MoCon) membership application documents. The Consortium is an initiative of the International Molybdenum Association ([www.imoa.info](http://www.imoa.info)). You are invited to join the Molybdenum Consortium, which has been formed for the purpose of assisting those companies who join it to achieve REACH-registration for specified Mo substances.

#### **Introduction:**

As you will already be aware, REACH is a recent EU Regulation, which requires all manufacturers in Europe and/or importers into Europe of chemical substances (including metals and their compounds), to register extensive technical dossiers about each substance with the European Chemicals Agency. And if you are a non-European manufacturer that imports into the EU, then you need to REACH-register those substances via an Only Representative.

Within that context, the essence of the ongoing task is to conduct a comprehensive human health and environmental risk assessment, with appropriate risk management measures, for each chemical substance.

Given that this is a huge task, within a strict tiered timeframe, many industries are forming voluntary Consortia to share the technical workload and costs involved in achieving REACH-registration as the Regulation requires.

Even prior to the formation of the Consortium, the IMO A HSE Committee did much technical groundwork to prepare for this REACH challenge. This technical work is now conducted by the MoCon Technical Working Group that meets several times per year. After an initial exercise to identify Mo data-gaps in the REACH requirements, it has been actively conducting a research programme to generate the data that, together with existing data, is necessary to conduct the risk assessments on the Mo substances that will be covered by the Molybdenum Consortium.

#### **Consortium Purpose:**

REACH is a complex, long-term business obligation and it is the remit of individual companies to assess what REACH means to them in the context of their business. The purpose of the Molybdenum Consortium is to facilitate the collection, generation and assessment of the **science**, and then compile the Mo substance dossiers for submission to the European Chemicals Agency.

The Molybdenum Consortium cannot be a 'one-stop shop' for REACH, but we will certainly always help as much as we can with all Consortium member enquiries. Our Molybdenum Consortium website is on-line at [www.molybdenumconsortium.org](http://www.molybdenumconsortium.org), to act as: 1) a basic REACH-information resource, 2) a Molybdenum Consortium membership enquiry point, and now in 2009 as a source of information about REACH Pre-SIEF and SIEF progress, where MoCon is acting as Facilitator for the substances in the MoCon substance portfolio.

### **Membership Commitment to-date:**

You will be interested to learn that over 50 companies have already joined the Consortium – see separate pdf list.

### **Finances:**

Attachment 9 of the Consortium Agreement details the cost sharing basis, and how membership costs are calculated. It is envisaged that Molybdenum Consortium expenditure to achieve REACH-registration of its Mo substances will not exceed US\$ 8 million, over the four year period 2007-2010. This is expected to equate to a charge of approximately 1 - 2 US cents/lb Mo-contained on each Members annual volume of Mo imports into the EU. There is a minimum annual charge of US\$15,000.

### **Consortium REACH-registration Licence:**

Entitlement to obtain a copy of the REACH-registration dossiers, (i.e. entitlement to refer to and to use them, as well as all the supporting data and/or studies) will be on the basis of a single licence for all the Mo substances covered by the Molybdenum Consortium, as listed in Attachment 1. The single licence is underpinned by the approach to the Mo research, in that the physiologically and environmentally significant species is the  $\text{MoO}_4^{2-}$  ion, for all the Mo Consortium substances at the pHs and Mo concentrations of interest for REACH. This permits the use of an intelligent testing strategy, whereby the results from testing one substance, where appropriate, can be read-across to the other substances in the MoCon portfolio.

### **Consortium Agreement:**

The Consortium structure and rules are detailed in the attached Consortium Agreement. A diagram is also enclosed showing the different Consortium Committees and the Consortium Secretariat which services them.

Kindly address any questions you may have about membership of the Molybdenum Consortium to the Consortium Secretariat:

Sandra Carey on E-mail: [sandracarey@imoa.info](mailto:sandracarey@imoa.info)

Frank Martin on E-mail: [frank.martin@btconnect.com](mailto:frank.martin@btconnect.com)

Please always send your E-mail questions to both the above E-mail addresses.

## **Consortium Joining Procedure:**

1) Kindly print, sign and return the following documents to the Molybdenum Consortium Secretariat (at the IMOA address at the bottom of the page):

- Consortium Agreement signature page
- Consortium Cost Sharing Agreement
- License Agreement (in duplicate please)
- Non-Disclosure and Non-Use Agreement
- Designation of Company Representative

2) E-mail the MoCon Secretariat with your request for MoCon to issue you with a pro-forma invoice for US\$15,000.00 (fifteen thousand US dollars) before you make payment. This is your initial minimum joining fee payment to secure your membership.

Upon completion of the above two steps, your company will be required to report its EU Mo imports for 2006 and 2007 to the Molybdenum Consortium Secretariat. The Consortium Secretariat will then issue the appropriate invoice for the 2007 & 2008 fees from your company to the Consortium.

We recognise that all companies will need some time to examine and consider the Consortium Agreement. We nevertheless look forward to your earliest reply, and please bear in mind that the 'delay premium' (see Clause 4.4 of the MoCon Agreement) remains at just 10% until the end of June 2009. From 1 July 2009 it rises to 15%.

Yours faithfully

*Sandra Carey*     *Frank Martin*  
**Sandra Carey & Frank Martin**  
Molybdenum Consortium Secretariat

Enc.:  
Molybdenum Consortium Agreement & Cost Sharing Agreement  
Licence Agreement  
Non-Disclosure & Non-Use Agreement  
Consortium Structure Diagram  
Company representative sheet