HelpNet events: BPR and CLP workshops and the 13th Steering Group meeting

This document summarises the presentations given and the discussions taking place at the HelpNet events.

Time: 2 October 2018

Place: ECHA Conference Centre, Annankatu 18, Helsinki, Finland

Disclaimer: Please, note that the text of the BPR, CLP and REACH Regulation is the only authentic legal reference and that the summaries in this document do not constitute legal advice. For further advice contact your national helpdesk.

Contents

BPR WORKSHOP

Opening by the Chair

The Chair, Johan NOUWEN opened the BPR Workshop by welcoming the representatives of the BPR national helpdesks, observers from candidate countries and industry. The names of participants attending the workshop are listed in Annex I to these minutes.

The Chair gave an overview of the topics on the agenda and the status of the action points from the previous HelpNet BPR workshop on 22 March 2017. The agenda was adopted with no further comments.

1. Updates from ECHA

1.1 Active substances redefinitions – hot topic from ECHA Helpdesk

Anisa KASARUHO (Support Forum & HelpNet Secretariat, ECHA) gave an update on ECHA Helpdesk's hottest topic in 2018 – active substance redefinitions and the way ECHA Helpdesk replies to such questions.

Since the beginning of the year, ECHA had received 25 enquiries on the redefinion of active substances. They touched upon several different topics, including active substance approval, review programme management, inclusion on the Article 95 list, data sharing and inquiry, and classification and labelling of biocidal products containing redefined active substances. Out of these enquiries, 19 were related to the redefinition of pyrethrins and pyrethroids.

In the following discussion, ECHA wished to understand whether the redefinition of active substances attracted questions at national level, and some participants stated that there are no such questions received by their national helpdesks (NHDs). One correspondent asked whether there are any clarifications provided by the Commission on the labelling of precursors of active substances generated *in situ*.

Regarding the issue of the relabelling of redefined active substances by the Commission, ECHA Secretariat replied that this requires dialogue between all the partners involved in the process – the Member States, the Commission and ECHA. Prior to active substance approval, the BPR does not apply as such, and it is CLP and national law which are applicable to labelling. Under the CLP Regulation, there is an obligation to update labels; however, this obligation does not address the scenario of a change in active substance identity. One important question is what grace period will be given to companies affected by the redefinition. From ECHA's point of view there is a need for dialogue, and possibly a discussion at CA meeting level.

Regarding how long it takes to include a redefined substance in the Article 95 list, it was clarified that following redefinition, the redefined substance is included on the Article 95 list, while the original substance will not. Therefore, ECHA includes the original substance in the Agency's list of open invitations for notification[1], which allows interested companies to submit a notification for taking over the role of Review Programme participant and for the original substance to stay on the market. Companies have one year to submit a notification from the date that the open invitation for notification is published. Companies that have submitted a compliant notification are then granted two years to submit an active substance approval application which covers the original substance. When the dossier is submitted and accepted/validated by an evaluating Competent Authority, the original substance becomes 'relevant' and is included on the Article 95 list. In practice, it takes at least three years for the original substance to be included on the Article 95 list.

[1] Open invitations for notification: https://echa.europa.eu/regulations/biocidal-products-regulation/upcoming-deadlines.

Additionally, it was explained that the original substance can stay on the market as long as it is covered by a compliant notification that will be followed by a submitted approval dossier. If this is not the case, the Commission prepares a non-approval draft decision, in accordance with Article 20 of the Review Programme Regulation, which is linked to Article 89 of the BPR. Member States may continue to make biocidal products available on the market for up to 12 months after the date of the decision not to approve an active substance, and use biocidal products for up to 18 months after that decision.

ECHA Secretariat informed participants that the Agency is in the process of updating its web pages related to the redefinition of active substances, possibly developing new Q&As and/or updating the practical guide on active substance approval.

1.2 Enforcement activities

Nicola TECCE (Forum Secretariat, ECHA) presented an update on the BPR enforcement activities, providing an overview of the activities, composition and decision-making procedures of the BPR Subgroup (BPRS) of the Forum for Exchange of Information on Enforcement (Forum).

The BPRS disseminates best practices and enforcement strategies at community level. The presentation introduced the BPRS activities performed by its working groups[2] and provided a snapshot of the experience gathered so far by the national enforcement authorities (NEAs) under BPR.

The presentation mentioned some of the practical issues on enforcement currently discussed by inspectors, underlining that the BPRS is the right body for discussing such matters, and inviting HelpNet to forward any related issues directly to the BPRS.

Participants discussed questions related to borderline cases between the BPR and other pieces of legislation, and, in particular, issues concerning treated articles/biocidal products. It was clarified that consultation within HelpEx and ultimately with the European Commission is recommended, and once legal clarity has been reached, the BPRS is the right body to harmonise the enforcement aspect.

The Chair mentioned the need to streamline discussions on HelpEx questions, with the aim to avoid parallel discussions in different fora.

1.3 Biocides data dissemination

Karina KUBINAKOVA (Computational Assessment and Dissemination Unit, ECHA) presented news on the dissemination of biocides data. ECHA wished to raise awareness and provide information on the upcoming dissemination improvements on ECHA's website due by the end of 2018.

The update revamps the biocides web pages. It focuses mainly on extending the published information on biocidal product authorisations according to the dissemination requirements set in Article 67 of the BPR. In practice, this means enabling the publication of the final version of the Summary of Product Characteristics (SPC), the non-confidential Product Assessment Report (PAR) and the authorisation document, among other things. The new pages will provide more detailed information on finalised and ongoing applications for active substance approval, and on already authorised biocidal products.

Through the update, new search functionalities will be made available. Also, the documents subject to dissemination will be automatically published from R4BP, to make them more readily available on ECHA's website. In addition, users will have access to current and previous

[2] Current BPRS activities include: the enforcement project on treated articles (BEF-1); the first training for national inspectors on treated articles; and joint activities with the Forum concerning the enforcement on classification and labelling of biocidal products.

lifecycles of active substance approvals and products authorisations (initial applications, subsequent renewal data, and amendments to approvals/authorisations).

Dissemination will expose R4BP 3[3] data to a greater extent and stakeholders may have concerns regarding the confidentiality of the content[4] of their authorisation. It is therefore likely that requests for data changes (legitimate or not) will arrive to the ECHA Helpdesk. The Agency will redirect the request to the process owner, e.g. the relevant Member State Competent Authority, the Commission, or ECHA.

The improved biocides dissemination pages will be made available to the public in late November.

2. Working together

2.1 Withdrawal of the UK from the EU: ECHA's updated information activities

Andreas HERDINA (Director of Cooperation, ECHA), Brexit coordinator and Chair of HelpNet, gave an update on the UK's withdrawal from the EU, providing information on the foreseen timelines, the forthcoming potential withdrawal agreement and the impact on national authorities.

Regarding substances evaluated by the UK under the BPR, the groundwork for a handover of pending cases is being prepared by the Commission. Later this year, the European Commission will publish two Delegated Acts, one amending the Review Programme and one relating to active substances. Q&As on active substances and mutual recognition[5] will be published in October 2018.

The Chair emphasised that NHDs need to join forces to support companies in understanding the transfer of pending evaluation processes.

After the UK's withdrawal, UK-based companies will be no longer be subject to the BPR, but may eventually benefit from a transitional period. The UK competent authorities functioning as an evaluating or reference Member State will not continue to cover these functions. Likewise, UK enforcement authorities will no longer need to ensure compliance of UK-based companies with the EU chemicals legislation, and they can also cease enforcing ECHA's regulatory decisions addressed to such companies. Upon giving up its status of EU Member State at the date of its withdrawal, the UK will cease to be part of ECHA's bodies and networks, probably including the HelpNet.

As the withdrawal process is constantly evolving, ECHA cannot yet fully determine the full impact of the UK withdrawal on ECHA or on companies within the EU-27. The participants were invited to monitor ECHA's web pages[6], which will be updated as more certainties emerge.

2.2 HelpEx overview

Eveline BEIJ, from the Dutch Board for the Authorisation of Plant Protection Products and Biocides (Ctgb)[7], provided an overview on the activity in HelpEx and the type of BPR questions posted by users in HelpEx. National BPR helpdesks have used HelpEx as a platform to discuss issues related to the implementation of the BPR since 2013.

In her presentation, the Dutch correspondent gave an overview on the use of the tool for BPR

[3] SPCs uploaded or submitted after 1 January 2016 are subject to dissemination.
[4] Only information contained in public versions of the documents will be disseminated.
[5] BPR Q&As on ECHA's website: https://echa.europa.eu/advice-to-companies-q-as/bpr.
[6] Information on the impact of the UK's withdrawal from the EU on ECHA's website: https://echa.europa.eu/uk-impact-on-echa-background.
[7] Ctgb is the competent authority in the Netherlands answering questions about biocides.

questions over the years, and indicated that she considered the it useful. However, she expressed some worries about the waning activity of HelpEx users, as well as about the unclear outcome of a number of questions posted in HelpEx.

The Chair wished to know how satisfied the BPR members were with the functioning of HelpEx. Some participants expressed their view regarding the tool and agreed that the process described in the competent authority paper[8] works well. A participant agreed that the Netherlands' suggestion of indicating the HelpEx ID of similar questions in the text of newly raised HelpEx questions was a good idea. Another participant voiced their frustration with the outcome of the discussions in HelpEx, as often conclusions cannot be made due to conflicting opinions. There is considerable lack of harmonisation of regulatory boundaries, such as the boundary between veterinary medicinal products and biocidal products. The need for harmonisation is felt acutely by some Member State Competent authorities. Scope questions are considered to be within the remit of Member States. However different Member States may have different opinions about the applicable regulation. This can create inconsistencies in the interpretation of the regulations at EU level.

Eveline BEIJ encouraged her colleagues to provide feedback on posted questions in HelpEx as often as possible, even if reduced resources in some NHDs or lack of sufficient BPR expertise would prevent some of them from providing a thought-through response or comment. This would allow the mapping of Member State views on a given issue, and would facilitate the assessment of how to move forward.

Participants agreed that discussing HelpEx questions in the HelpNet meeting would be an effective way of filtering out items for the Competent Authority meetings, or other fora. ECHA took the action to propose a clear, linear process for the handling of HelpEx questions.

3. Break-out groups

NHDs and ECHA selected a couple of representative examples of HelpEx questions which touched upon the identification of the nature of the product, the regulatory framework and the product-type covering the product use.

In this session, HelpNet members had the opportunity to have more fluid, face-to-face discussions on questions which appear to be complex and/or controversial.

Two representative questions for each of the three identified scope issues were selected and were discussed by the participants with the objective of identifying a common understanding and a more harmonised approach for addressing such topics.

3.1 Identification of the nature of the product: treated article vs biocidal product (HelpEx 14101 and 14609)

Shelley COLLINS (United Kingdom) introduced HelpEx questions 14609 and 14101 to the participants and chaired the discussion. Both questions were on the identification of the nature products, more specifically, the distinction between treated articles and biocidal products.

The first case (HelpEx 14609) was on whether clothing items treated with biocidal products (PT 9, 18) should be considered as biocidal products or treated articles. It was agreed that the current guidance documents do not help providing a clear-cut answer to this question.

The participants highlighted the importance of considering the advertisement and claims made by the suppliers when deciding on the nature of the product (i.e. whether the biocidal function

[8] Revised process for BPR questions in HelpEx CA-March17-Doc.7.2 (former CA-Nov16-Doc.7.2) document uploaded before the meeting on S-CIRCABC at: https://webgate.ec.europa.eu/s-circabc/w/browse/1e55874e-9526-438f-ab28-66cae244fbbc.

of the article is primary or secondary). It was mentioned that, when needed, industry could be involved in the discussions to clarify the intended use of their products.

The need to solve disagreements, whenever possible, through HelpEx was emphasised, also considering that a request for an Article 3(3) decision is not always effective. However, when disagreements persist, there is a need for more clarity on the process to follow to channel them.

Another point of discussion related to the distinction of PT 18 and PT 19 uses, especially with regard to insecticidal products. A mention was made that more guidance could be beneficial.

The second case (HelpEx 14101) concerned paints containing preservatives (PT 6, 7). The participants agreed that when the treatment confers a biocidal property to the product, which aims at protecting the article itself, the item should be considered a treated article.

3.2 Identification of borderlines between pieces of legislation

Agnieszka BARANOWSKA-MOREK (Poland) chaired the discussions around HelpEx questions touching upon borderline issues between different regulations.

HelpEx 14202 was related to borderlines between BPR and the Medical Devices Regulation (MDR). The question raised was: 'Which is the applicable regulation for a generic disinfectant used for disinfection of medical devices (e.g. beds, operating tables, monitors)?'

Divergent opinions were expressed in favour of the MDR, the BPR as well as both the BPR and the MDR. However, the majority of participants agreed on the view that given the dual use of the disinfectant (used both as a generic disinfectant and as a disinfectant of medical devices), it should be covered by both regulations, the BPR and the MDR.

HelpEx 14803 concerned borderlines between biocidal products and veterinary medicinal products. The question raised was: 'Is the pet collar containing an insecticide – Permethrin/PT 18 – a biocidal product or a veterinary product?'

The case was more controversial than in the first one, and in the discussion it was difficult to clearly conclude on the applicable regulatory regime.

Besides discussing the HelpEx questions, participants sought to understand why Member State opinions are divergent and what is needed to harmonise views at EU level. It was agreed that there is a need to:

- develop clear guidance on scope issues;
- organise regular WebEx sessions to discuss scope questions among Member States, the Commission and ECHA;
- involve experts from different fields to discuss and take authoratitative decisions on borderline matters;
- identify a coordinated and stepwise approach for tackling scope issues;
- have steering from the Commission.

3.3 Identification of the relevant product-type covering the use of the product

Anneli RUDSTRÖM (Sweden) and **Irina JANSEN** (Germany), the moderators of the break-out group, introduced the HelpEx questions 14507 and 14013 on identification of the relevant product-type concerning wood fibres (PT 8, 9, 18) and biological treatment of wash water in plastic recycling plants (PT 2, 11, 13).

Participants discussed: i) 'wood fibres', where two approaches were foreseen – harmful organism to be controlled and type of material to be protected; and ii) 'biological treatment of

wash water in plastic recycling plants', where three approaches were foreseen – disinfection, preservation, and control of microbiological deterioration.

The following main findings were presented to the plenary:

Wood fibres: PT 8 was considered the most suitable product-type. For the product to classify as PT 8, the wood fibres should be in panels (according to ECHA's Guidance on the BPR: Volume II Efficacy, Assessment + Evaluation (Parts B+C)). It was recognised that more information would be needed on the area of use. Further refinement of the product-types on wood would be beneficial and welcome.

Biological treatment of wash water in plastic recycling plants: PT 11 could be suitable if the main aim is to preserve water and the system is a closed circulation system. However, to distinguish between the product-types, there was a need for more information on the application (e.g. closed circulation system or not) and efficacy (e.g. long-term or short-term effect, achieved reduction of microbes). It was proposed that in determining the suitable product-type, the related emission scenarios might also be taken into account, and that it could be helpful to contact the respective working groups regarding this matter. PT 13 was not considered suitable for the purpose.

In summary, the outcome of the break-out group discussions was fruitful and provided concrete insights for an enhanced process for handling scope questions in the future.

Closing of the BPR workshop

The Chair presented the action points and the meeting conclusions:

- There is a need for more guidance and input from industry to shed light on scope matters in general, including the identification of the nature of the product (e.g. biocidal product versus treated article).
- Meetings/Webex sessions where experts from different areas participate and discuss borderlines between regulations could bring more clarity on some of the scope matters.
- Input from the Commission in HelpEx would be desirable.
- If issues related to enforcement are initiated in the HelpEx tool, they will be forwarded to the BPRS by the HelpNet Secretariat.
- There is a need to improve the way questions are processed in HelpEx (e.g. closing questions and recording outcome or way forward in the tool). Improvement proposals already submitted by BPR members will be taken into consideration.
- Participants agreed to use HelpEx and HelpNet meetings as a first instance for understanding the issues and needs for alignment, and as a filter for bringing issues to competent authority meetings or other fora.
- HelpNet Secretariat took the task to propose a clear, linear process for the HelpNet members to follow in order to enhance the transparency and efficiency for everybody involved.

The Chair thanked all BPR participants for their active and valuable contribution to the workshop and invited them to the 13th Steering Group meeting starting in the afternoon.

CLP WORKSHOP

Opening by the Chair

The Chair, Outi TUNNELA opened the CLP Workshop by welcoming the representatives of the BPR national helpdesks, Commission, observers from candidate countries and industry. The names of participants attending the CLP workshop are listed in Annex I to these minutes.

1. Outstanding HelpEx questions

1.1 Labelling of aerosols: state of play (ECHA/NHD)

Outi TUNNELA (ECHA) presented the state of play and asked the participants to share their views on the topic.

Germany pointed out the upcoming 12th adaptation to technical and scientific progress (ATP), where the wording of the related bridging principle is changed to refer to tested mixtures. The Commission informed that the 12th ATP has just been voted on and will be scrutinised, and should be published early next year. No further discussion is expected in CARACAL. Ireland emphasised that the published FAQ (Q&A 1456) follows the precautionary principle, but should be amended to take the ATP into account.

ECHA concluded that the FAQ – current or amended - cannot solve all the issues, but makes industry think about what they are placing on the market. It is clear that the proposal as presented by Commission at CARACAL will need to replace the existing FAQ when (if) agreed. No timeline was given by the Commission for this, but it should coincide with the publication of the 12th ATP.

The representative of the European Council of the Paint, Printing Ink and Artists' Colours Industry (CEPE) informed that the European Blind Union preferred to limit the tactile warning of danger (TWD) to the more dangerous aerosols (flammable and with another danger), as people with impaired vision perceive all aerosols as flammable. There was a general agreement that consistency is needed and that Aerosols Dispensers Directive (ADD) experts should be involved in the discussion for the next ATP. The Commission proposed to bring the issue to the next CARACAL.

1.2 Labelling of writing instruments

CEPE expressed its view that the safety of writing instruments has been achieved through (and is a legal requirement of) the General Product Safety Directive (GPSD, 2001/95/EC), and still questioned the application of the CLP labelling obligation since CEPE considers the objects to be articles and not packaging.

The representative of the European Commission replied that the approach follows the Guidance rules. The current view is that hazardous substances in inks should be substituted as far as possible, but CLP labelling is required where the hazards warrant this. The derogation proposal put forward by industry covered serious hazards without appropriate justification and received little support from Member States, and therefore could not be accepted.

Ireland warned that raising the issue to the UN GHS group would not be effective, as the GHS does not cover packaging. However, they acknowledge that industry needs answers to questions about labelling. During the discussion, it became clear that while some writing instruments are clearly containers, some others might be not so straightforward to define what they are. It was agreed that industry should bring examples to HelpNet of labelled writing instruments, so that the general problem can be broken down to specific cases.

1.3 Classification of multi-constituent substances (HelpEx 14908 and 14909)

The questions were based on discussions in the Forum. ECHA presented the current views on each of the questions, and promised to post these on HelpEx, where the HelpNet members could still add further comments.

The approach under both REACH and CLP is that there is no need to test the multi-constituent substance if there is already information on the component substances. Moreover, the CLP Regulation specifies that for skin sensitisation, test data on a mixture can only be part of the weight-of-evidence approach.

2. Topics proposed by national helpdesks

2.1 Labelling derogations according to Article 29.1 and 29.2

Susanna NORRTHON RISBERG (Sweden) presented several cases of misuse of the labelling exemptions for small packaging. The discussion that followed also addressed the inclusion of the unique formula identifier (UFI) in the safety data sheet (SDS), Section 1.1. The Commission announced that Annex II to REACH was under revision to include nanos, revisions 6 and 7 from the UN GHS, the UFI, M-factors, and the REACH Review conclusions. The process for the publication of the Annex II amendment will probably be delayed due to the upcoming changes of the EU parliament next year. Therefore, it might still be possible to propose further amendments.

2.2 CLP labelling requirements versus consumer packaging

Caroline WALSH (Ireland) presented the Irish concerns on CLP labelling on consumer products, in particular for small packaging, covering both content and readability issues. All participants were afterwards invited to discuss the topic in a brainstorming session. Participants were encouraged to think about the aim of CLP and other pieces of legislation, rather than to focus on the details of their implementation.

Caroline WALSH noted that this wasn't a new issue, as it was highlighted in the ECHA '*Report on the communication on safe use of chemicals'* published in 2012. It was also discussed during the '*CARACAL Sub-Group on labelling and packaging'* in 2015, which resulted in 'readability' guidance for font size being included in the ECHA guidance on labelling and packaging in 2016.

For the CLP workshop, the topics considered were minimum font size, background colour, number of languages, highlighting sensitisers and the use of technology such as QR codes. Furthermore, there was a general discussion on the challenges of getting consumers to read the label, i.e. behavioural change, along with the need for more awareness-raising. For the discussion, the 'OPERA'[9] approach was used ensuring that everyone got an opportunity to consider the issues and to present their thoughts. The issues from the previous presentation on labelling exemptions (2.1) were also included in this OPERA session. The participants thoughts where gathered on post its.

Overall, most participants considered that the CLP labelling for consumer products needs to be reviewed to ensure it remains fit for purpose. There was strong support for the inclusion of a minimum font size, good contrast between font colour and background (black and white being preferable), with font size needing to being linked to packaging size, i.e. the larger the package the larger the font size. Regarding languages, most participants considered that they should be limited on small packaging, with a suggestion to limit them also to geographical location, where possible.

On the issue of highlighting sensitisers in bold font, there were mixed views with some

[9] **O**wn thoughts, Discuss in **P**airs, **E**valuate, **R**ank, **A**gree

participants proposing to also highlight corrosive and toxic substances, while others suggested highlighted hazard statements only on consumer packaging. In contrast, there was also a discussion on the need to include long chemical names on consumer labels.

On QR codes, while the idea itself was supported, some participants had concerns regarding access to the information in the QR code, as many consumers may not have access to smartphones or internet. Some suggested having scanners in supermarkets to work around this issue, while others proposed to combine the information in QR codes and UFI to have most of the CLP content in the UFI, in all languages, while maintaining minimum information on the consumer packaging including pictogram(s), hazard statements and UFI. It was noted that, currently, the UFI is only for the use of appointed bodies/poison centres and the information is not available to others. Some participants advised that this topic was also being discussed at the UN GHS level, with China proposing to submit a paper for the December 2018 session. Most participants acknowledged that more awareness- raising/behavioural change amongst consumers was needed. During the discussions, the Commission advised that CLP was also part of the overall chemical refit programme, and so were interested in the outcome of this discussion as it could be fed into that work.

In addition to the above topics, there was a general discussion on communicating chemical hazards effectively to consumers and the exemptions under Article 29 presented under agenda item 2.1 by the Swedish helpdesk. Some participants suggested that an EU wide communication campaign was needed to ensure everyone understands what the CLP pictograms mean, and that this could involve behavioural scientists/communication experts to help prioritise and ensure its effectiveness.

Overall it was agreed, amongst the participants, that there is too much information required on the CLP label of consumer products and that action is required. Such labels are difficult to read and understand as, in many cases, the labels also require label elements from other legislations including aerosols, detergents and biocides to be included. It was agreed that this is a challenge for both industry and enforcement authorities.

While no next steps were concluded during the workshop, the Commission acknowledged that they would take on board the issues raised in their ongoing chemical 'refit' programme, which includes CLP.

2.3 Raising awareness about chemical safety

Caroline WALSH (Ireland) put forward some thoughts about awareness raising about chemical safety. While the Irish chemicals authority covers consumer chemicals, it is more recognised for occupational health and safety. This is in their view a serious limitation when trying to fulfil the obligations for awareness-raising to consumers.

She suggested other NHDs to liaise with educational authorities to push awareness-raising activities, as they often overlap with educational ones. Ireland has an ongoing educational campaign for young schoolchildren. As this campaign is similar to a previous (still ongoing) Nordic initiative, ECHA asked the Nordic NHDs to inform the HelpNet about any feedback they may have received from the audience of the campaign (teachers, parents, children, etc.).

Closing the CLP Workshop

The Chair established the action points and closed the CLP workshop. She then invited the participants to the Steering Group meeting after the lunch break.

THE 13TH HELPNET STEERING GROUP MEETING

1. Opening the Steering Group meeting

The Chair of HelpNet, **Andreas HERDINA** opened the 13th HelpNet Steering Group meeting by welcoming the representatives of REACH, CLP and BPR national helpdesks (NHDs), European Commission, observers from candidate countries and industry, and remote participants who could not join the Steering Group meeting[10].

The names of all participants attending the 13th HelpNet Steering Group meeting and the regulatory workshops are listed in Annex I to these minutes.

Without further changes the agenda of the meeting was approved. No objections were flagged regarding the participation of observers to any of the agenda items.

1.1 Welcome by Bjorn HANSEN, Executive Director of ECHA

Bjorn HANSEN (Executive Director, ECHA) welcomed the participants and referred to the agenda of the meeting, highlighting the importance of the topics on the agenda of the Steering Group meeting and the CLP and BPR workshops, mentioning some of them: CLP topics related to labelling and awareness-raising activities; BPR scope issues and the use of the HelpEx tool; and Brexit. He also welcomed the discussions on the future of HelpNet.

He praised the experience gained by the REACH national helpdesks and ECHA after three registration deadlines, particularly in reaching out to registrants of the last REACH registration deadline, spreading the news and the information available on our websites, and for providing guidance to companies, especially SMEs.

He mentioned the upcoming changes in the evaluation process; the new nano REACH annexes to be published by the Commission; ECHA's new tasks related to poison centres notifications; and the forthcoming submission of information to ECHA's database on substances in articles.

Bjorn HANSEN announced that the Steering Group will have a new Chair starting from 2019, and on behalf of the Agency thanked Andreas HERDINA for the 10 years of running the network.

2. Updates from the HelpNet Secretariat

2.1 National helpdesks activities 2017

Viorica NAGHY (HelpNet Secretatriat, ECHA) presented the main findings from the 2017 report of national helpdesk activities. The report contains information collected from 66 REACH, CLP and BPR national helpdesks from 34 countries: 28 EU Member States, 3 EEA countries (Iceland, Liechtenstein and Norway), Serbia and Turkey (candidate countries as observers), and the CLP and BPR helpdesks of Switzerland (third-country observers).

In 2017, national helpdesks (NHDs) received around 52 000 enquiries from their customers. This is an increase of 26 % compared to the previous year, with 10 000 more enquiries received in 2017 than in 2016. 38 % of the enquiries were related to biocides, 26 % to REACH and 26 % to CLP, while 10 % of the total were reported without being allocated to a specific regulation.

The increase of CLP-related enquiries was significant – the number more than doubled from 2016 to 2017. For REACH, the number of enquiries reported by NHDs increased by 3 000, but remained below the number reported in 2012, one year before the previous REACH registration deadline.

The countries with the highest number of enquiries received in 2017 were Greece, Croatia,

[10] The 13th HelpNet Steering Group meeting was webstreamed and HelpNet members from Greece, Iceland, Malta, Norway, Sweden and ORO joined the meeting remotely.

France, Germany and Poland. For the first two countries, two thirds of the total number of CLP questions were related to Article 45, Annex VIII and poison centres.

Regarding resources, only 5 % of NHDs reported fewer resources in 2017 than in the year before, and mostly the biocides helpdesks were affected.

For support activities and events in 2017 and 2018, the HelpNet Secretariat compiled the information submitted by NHDs, and the REACH 2018-related events are available on ECHA's website[11]. The full list is available in Annex 3 of the 2017 report of national helpdesk activities.

The Secretariat proposed re-launching the visiting programme introduced in 2008 by ECHA's Executive Director. With this programme, ECHA aims to get to know the work of the BPR helpdesks, and ideally visit all three helpdesks of a given country in one go. The participants were encouraged to invite ECHA to visit the national helpdesk, potentially in connection with an event organised by NHDs in 2019, or to express their wish to visit ECHA.

The Secretariat proposed to have the NHD report published on ECHA's website, considering that by doing so the collective daily work – providing daily regulatory support to companies, organising national awareness campaigns, publishing guidance material in national languages – becomes visible to the outside world.

In the discussion, the comparability of enquiries received by different NHDs was questioned as they may use different methods to keep track of enquiries received from their customers. It was agreed that prior to the publication of the report NHDs will have the opportunity to provide more information on the division of BPR, CLP and REACH enquiries. The agreement to publish the report will be sought by written procedure.

2.2 Preparing companies for Brexit

Andreas HERDINA, ECHA's Brexit coordinator and Chair of HelpNet, explained in more detail the milestones of the UK's withdrawal negotiations and potential transitional arrangements and the changes of relevance to HelpNet[12], the impact on companies and supply chains, potential models for the future EU-UK partnership, and changes in the UK's relationship with ECHA.

The HelpNet was informed that Mr Michel Barnier, the Commission's chief negotiator for the EU-27 Member States, visited ECHA in April 2018 to learn about how the UK withdrawal will impact the work of ECHA alike on other EU agencies. Mr Barnier was impressed by the work ECHA does for the environment and human health as well as the smooth functioning of the internal market, and by our state of Brexit preparedness.

ECHA's web pages on the UK's withdrawal from the EU[13] contains information on numerous consequences of the withdrawal, advice to companies with questions and answers (Q&As), which are continually updated. The Q&As cover the most frequently raised questions on this matter, and are the outcome of collaboration between the Commission and ECHA. The upcoming updates are related to REACH, the BPR, in particular to the transfer of assets within a company.

Participants discussed the impact of the UK's withdrawal on their daily helpdesk activity. The majority of national helpdesks are not receiving questions on this matter, while Ireland's helpdesk is possibly one of the most strongly impacted by the UK's exit. In support of Irish companies who use and supply chemicals, Ireland's Health and Safety Authority[14] is organising in early November a seminar on the possible implications of Brexit on national businesses. The speakers are inspectors, representatives from industry, and an expert from ECHA.

[11] REACH 2018 events: https://echa.europa.eu/reach-2018/events REACH 2018 events.
[12] Draft Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, Article 123 (5): https://ec.europa.eu/commission/sites/beta-political/files/draft_agreement_coloured.pdf.
[13] UK's withdrawal from the EU on ECHA's website: https://echa.europa.eu/uk-withdrawal-from-the-eu.
[14] Brexit seminar: https://www.hsa.ie/eng/News_Events_Media/Events/Brexit_Seminar_Flyer.pdf.

The HelpNet Secretariat emphasised that ECHA is preparing for a peak of questions on this topic in spring 2019, and is ready to support colleagues from national helpdesks, if needed.

2.3 Montenegro new observer in HelpNet

The Chair explained that according to the HelpNet operating procedures, the Secretariat sought the HelpNet members' agreement on the participation of Montenegro in the work of the HelpNet as an observer. Following the favourable outcome of the written procedure, concluded on 3 September 2018, the HelpNet members decided to accept Montenegro as a new observer and invite them to the 13th Steering Group meeting to introduce their helpdesk activities.

Montenegro was previously involved in ECHA's IPA project[15] and has selected and translated leaflets and factsheets currently available on the website the Nature and Environmental Protection Agency (NEPA): Export of chemicals (in 2015); Guidelines and instruments for further users; Information on chemicals; Safety data sheets and exposure scenarios.

The Chair introduced **Ilija GOJOVIĆ**, from the Department for chemicals management of NEPA, who presented the Montenegrin helpdesk's activities. NEPA is responsible for the implementation of the law on chemicals and the law on biocidal products.

In August 2017, representatives of NEPA visited the Croatian competent authority. The aim of the TAIEX study visit was to establish a helpdesk and to introduce the Montenegrin participants to the regulatory framework for national helpdesk activities, helpdesk responsibilities and frequently asked questions. Following the study visit, Montenegro established a national helpdesk, which provides assistance to companies, in May 2018. Since then, they received 7 requests, regarding the permits for placing on the market and use of biocidal products.

The Montenegrin helpdesk answers questions concerning EU regulations, organises events, cooperates with other national authorities (e.g. customs and inspectors), and prepares and publishes brochures and guidelines[16].

Ilija GOJOVIĆ highlighted the benefits they see in joining the HelpNet as an observer: awareness of the current issues related to chemicals management in the EU, building of their capacity in this sector, and learning from the experiences of other HelpNet members.

3. Updates from the European Commission and ECHA

3.1 Updates from the European Commission on REACH and CLP

Sylvain BINTEIN (European Commission, DG GROWTH[17]) presented the main elements of the Commission communication on the second general report on the operation of REACH[18] published on 5 March 2018, focusing on recommendations for follow-up actions.

Also, he provided a brief overview of REACH and CLP legal acts which are under preparation or ready to be published, and briefly mentioned the DG Environment study on the non-toxic environment strategy of the 7th Environment Action Programme (EAP)[19].

In its REACH review, the Commission representative noted that after 10 years, the REACH Regulation functions well, delivers results and addresses citizens' concerns about chemical safety, promoted alternatives to animal testing, and ensures the free movement of chemicals on the EU

[15] Instrument for Pre-accession Assistance (IPA) project: Preparatory measures for the management of chemicals for the EU candidate countries and potential candidates.
[16] Guidelines for the differentiation of plant protection products from biocidal product; handbook on mercury; handbook for handling the materials containing asbestos fibres.
[17] DG GROWTH – Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs.
[18] The second REACH review: http://ec.europa.eu/environment/chemicals/reach/review_2017_en.htm.
[19] DG Environment study on the non-toxic environment strategy: http://ec.europa.eu/environment/chemicals/non-toxic/index_en.htm.

market. He mentioned that there are nevertheless 16 concrete actions identified to further improve REACH, to make the legislation more efficient - especially for the evaluation, restriction and authorisation processes - but there is no need to change its enacting terms for the time being. The Commission launched an open debate with all interested parties on the implementation of the actions to be put in place by ECHA, the Member States, the Commission, and industry:

Action 1: Encourage updating registration dossiers. The update of registration dossiers is still a weak point – only 25 % of dossier owners conduct a regular routine review of their REACH data. 50 % of updates were requested by ECHA, who concluded that companies may need stronger incentives to stimulate updates of registration dossiers, especially on the use, exposure and tonnage information. The Commission, ECHA, Member States and industry will make proposals by the first quarter of 2019.

Action 2: Improve the evaluation processes, as evaluation decisions are a driver for generating new data. This is an action mainly for ECHA, but also for Member States, and ECHA has already taken action (this topic will be addressed under agenda item 4.5).

Action 3: Improve workability and quality of extended data sheets through a legal act. Make use of harmonised formats and IT tools, and reduce deficiencies in information in exposure scenarios for formulators of mixtures. The Commission and ECHA, with the help of industry, will develop methodology for SDSs for mixtures.

Action 4: Tracking substances of concern in the supply chain. The Commission is monitoring the deliverables of the Circular Economy Action Plan and may transfer some responsibilities to ECHA.

Action 5: The Commission, ECHA and Member States are the main actors involved in promoting substitution of SVHCs.

Actions 6 and 7: Making authorisation more workable and predictable. The Commission is working on proposals for regulatory measures to simplify the application procedure for the use of SVHC for legacy spare parts or low volume substances. The Commission is considering promoting joint downstream user applications. This was the preferred solution at a workshop which took place at ECHA in November 2017. The REACH review now includes an action to monitor such applications closely and address difficulties.

Actions 8 and 9: The Commission, ECHA and Member States need to continue the activity of the task force on restrictions and improve the procedure and enhance the Member State involvement.

Actions 10 and 11: Precautionary principle and interplay of authorisation and restriction. The Commission, ECHA and its Committees, and Member States are to better evaluate scientific uncertainties and use the precautionary principle more often. The Commission is considering organising a combined meeting between the task force for authorisation and restrictions to see how these two processes can be applied for the same substances.

Action 12: The interface between REACH and the occupational safety and health (OSH) legislation covers a range of aspects, most notably: the use of information on chemical substances generated and communicated through the supply chain under REACH (e.g. use of SDSs, the generation of exposure scenarios and information on exposure control measures), the authorisation and restrictions processes versus the principles of OSH-related to risk assessment and risk management, and the enforcement obligations of REACH and OSH national authorities.

Action 13: Enhance enforcement. Thanks to the joined efforts of the Forum and ECHA, there have been improvements, but Member States need to enhance their enforcement activities, clarify the role of the custom authorities and harmonise reporting of enforcement activities.

Action 14: The Commission, ECHA's Forum and Member States to support SMEs compliance. The current support measures are already useful, but there is a need for more practical, user-friendly information in national languages.

Action 15: Fees and future of ECHA. In addition to the existing tasks, ECHA will take over new activities in the future, e.g. poison centres, waste, etc.

Action 16: The Commission is in the process of reviewing information requirements for low tonnage and polymer registrations, to assess affordability for companies (low tonnage) and identify relevant polymers.

In the discussion, the Commission representative was asked on the status of the planned implementing regulation on the operation of REACH after the expiry of the final registration deadline for phase-in substances on 1 June 2018. This has been an important issue to HelpNet in 2018. Sylvain BINTEIN clarified that a draft has been presented to CARACAL in October, and that the regulation would be probably finalised by the end of this year.

3.2 Updates from ECHA

Borbála ADER (Legal Affairs Unit, ECHA) presented the Board of Appeal (BoA)[20] decision A-011-2017 received this year.

Before discussing this case, a reference was made to an appeal case (A-022-2013), where the lead registrant for the joint submission (JS) of charcoal contested an individual registration (outside the JS) submitted by another registrant which was found by the Agency as complete and received a registration number. The BoA decided to remit the case to ECHA for further examination, stressing that ECHA has the power to revoke a registration which does not comply with the 'one substance, one registration' principle.

The Agency's registration procedure requires a registrant to possess a 'token' – normally issued by the LR – to submit a registration dossier for a substance that was already registered.

In case A-011-2017, the individual registrant relying on a complete opt-out and the LR failed to agree on the terms on which the token was to be issued by the LR, and therefore the individual registrant submitted a JS dispute to ECHA.

After assessing the efforts made by the parties to find a fair, non-discriminatory and transparent agreement on the access to the JS, it was found that the individual registrant made every effort to reach an agreement with the LR. Thus, ECHA decided in the favour of the individual registrant and provided a token and access to the JS.

In case A-011-2017, the LR for the JS of charcoal (appellant) challenged the Agency's registration procedures (as explained above), and the access given to the JS based on the conclusions of the JS dispute.

This case was dismissed by the BoA, and the appeal was found inadmissible, underlining that only certain ECHA decisions, which are listed in Article 91 of REACH and Article 77 of the BPR, can be appealed[21] before ECHA's BoA. According to the BoA, the legal basis of this case is Article 11, which is not listed in Article 91 of REACH.

Following the findings of the BoA in its decision in the appeal case A-011-2017, ECHA changed its processes and will no longer assess the efforts of the parties in disputes on access to the JS when companies claim they have all the information (full opt out). Instead, ECHA will provide the registrant with a token enabling them to have access to the JS and the justification for the full opt-out will undergo the completeness check process.

[20] Board of Appeal on ECHA's website: https://echa.europa.eu/about-us/who-we-are/board-of-appeal.
[21] Appeal procedure: https://echa.europa.eu/regulations/appeals.

4. Updates on ECHA activities

4.1 Guidance activities

Laura WALIN (ECHA) has recently taken over the role of team leader in the newly formed regulatory support team covering guidance regulatory advice and HelpNet Secretariat.

The presentation summarised the guidance activities initiated or completed in 2018.
As members have received regular updates through the HelpNet updates, the presentation did not cover the whole 18 months since the previous Steering Group meeting.

For REACH, the following guidance documents are in the pipeline:

- Guidance updates related to the foreseen update of REACH Annexes regarding the information requirements for nanomaterials (guidance on nanoforms; information requirements for nanomaterials and human health endpoints; information requirements for nanomaterials regarding physico-chemical and environmental endpoints).
- Guidance for information requirements, chapters R.11 and R.7b (PBT assessment of non-extractable residues).
- A new Appendix to chapter R.8 on the setting of occupational exposure limits (OELs).

For CLP, new guidance on the harmonised information relating to emergency health response (Annex VIII of CLP) is in the pipeline. Also, a fast-track update to remove outdated information and include the latest ATPs is ongoing for the Introductory Guidance on the CLP Regulation.

For BPR, the following guidance documents have been published in 2018: Identity/physico-chemical properties/analytical methodology (Volume I, parts A+B+C); Efficacy (Volume II, part A); Efficacy, Assessment + Evaluation (Volume II, parts B+C); Human Health (Volume III, part A); Environment (Volume IV, part A); guidance on applications for technical equivalence; and guidance for identification of endocrine disruptors.

This means that the complete guidance package is now published for the duty holders on the ECHA's website. Of these guidance documents, it is worth mentioning that the guidance on endocrine disruptors was done in collaboration with EFSA, and will be applied to both the BPR and the Plants Protection Products Regulation (1107/2009).

4.2 Forum activities

Maciej BARANSKI (Forum Secretariat, ECHA) provided an update on the Forums' enforcement activities, focussing on current and future Forum projects and activities of interest to the HelpNet.

The REF-projects[22] carried out by inspectors aim at improving the quality of enforcement in Member States but also at improving the compliance of registrants with REACH, CLP, BPR and PIC obligations. In any given year, the Forum is preparing one project, launching another one and concluding a third one. An overview fo the project is provided below.

Finished Forum projects:

- REF-4 on restrictions: 29 countries participated, covering 14 substances and 5 625 products checked; overall, 18 % of products did not comply with the conditions of the restriction.
- Pilot project on authorisation 2: checking for the placing on the market and/or use of substances subject to authorisation with sunset dates that were reached in 2015 and, where relevant, checking compliance with conditions in granted authorisations; 17 countries participated; roles of the company inspected – 75 % downstream users, 18 % importers; most inspections discovered that these substances were not placed on the market (91 %) and not used (93 %).

[22] REACH-EN-FORCE (REF) projects on ECHA's website: https://echa.europa.eu/about-us/who-we-are/enforcement-forum/forum-enforcement-projects.

- Pilot project on CLP focusing on control of internet sales: 14 countries participated, and 1 314 inspections took place; suppliers were inspected, out of which 97.1 % were professional suppliers; the rate of non-compliance was 82.4 % with Article 48(2) of CLP.

Ongoing Forum projects:

- REF-5: Implementation of risk management measures and extended safety data sheets.
- REF-6: Classification and labelling of mixtures.
- REF-7: Registration including check of strictly-controlled conditions for intermediates and cooperation with customs.
- Pilot – Authorisation 3: Timeline – 2018 and 2020; scope – chromium VI compounds and other substances.
- Pilot – Substances in articles: timeline – 2017-2019; scope – Article 7(2) and Article 33 of REACH; focus on consumer articles; inspections currently ongoing.
- Pilot – PIC: timeline – 2017-2018; scope – export notifications and PIC procedure; Report currently in preparation.
- Pilot – Cooperation with customs: timeline – 2018-2020; scope – restrictions and CLP labelling in imported goods in close cooperation with customs.

Future Forum projects:

REF-8 Internet sales: the scope of the project is not yet specified, but most likely it will cover restrictions and CLP labelling.

In the coming years, the Forum will take due account of new priorities for all regulations as spelled out in their Work Programme for 2019-2023, addressing actions in the Commission's 2017 REACH review.

Maciej BARANSKI highlighted that the Forum training for trainers for 2018 is dedicated to registration, including intermediates and cooperation with customs. 21 HelpNet REACH correspondents registered for the annual event (3-4 October 2018).

4.3 Communication activities

Johanna SALOMAA-VALKAMO (Head of Communications Unit, ECHA) presented the latest and most important communication activities relevant for HelpNet members which took place since the previous meeting.

The REACH 2018 communication activities were kicked off in 2014. Between then and May 2018, the one-stop shop for REACH 2018 advice on ECHA's website had attracted over half a million visitors and ECHA had 260 communication actions, with more than 500 articles reaching 9 350 000 users on social media. As to more direct support, the 15 REACH 2018 webinars reached 4 000 participants, and individual phone calls were made to 243 registrants in April-May 2018.

Biocides dissemination will be enhanced in autumn 2018, and more information will be available on ECHA's website, with more searching options and possibilities to find products with a more favourable profile to health and the environment.

In the beginning of 2019, new features will be avaible for users of ECHA's website: one single login for all ECHA websites and IT tools will be made available, and registered accounts will have access-tailored functionalities such as 'Follow my substance" and 'Save my search'. There will also be the possibility to rate the web content, and to tailor communication on the basis of users' preferences.

Also, ECHA's Poison Centres website will have new, redesigned pages offering stepwise support to importers and downstream users placing hazardous mixtures on the market. The new portal will gradually become multilingual, and will be compatible with IUCLID 6.

For the European Union Observatory for Nanomaterials (EUON), ECHA aims to collect and analyse information from a wide range of existing sources, supplement the existing information with external studies, and create a one-stop-shop for objective and reliable information on the market and safety of nanomaterials in the EU.

Johanna SALOMAA-VALKAMO told participants that ECHA is preparing a new communication strategy aligned with the Agency's new strategy and its aims. In this communication strategy, the various audiences and their special needs will be defined, and a special emphasis will be given to the tone of voice ECHA uses in order to be approachable and understandable by the target audiences.

One helpdesk representative asked whether ECHA considers to continue the cooperation with NHDs and use the experience gained within the REACH 2018 Communicators' Network. The answer was that ECHA considers building this network up again, strengthen it with professional communicators working in the national helpdesks and Member State competent authorities, and used it for future communication campaigns.

4.4 Update on IUCLID 6.3

Eduardo VENCESLA JIMENEZ (Computational Assessment & Dissemination Unit, ECHA) introduced the new web user interface that will be featured in the latest version of IUCLID. Due to the REACH registration deadline, only one release is planned for this year in October.

IUCLID 6.3 will feature, as already introduced to the HelpNet in the past[23], a completely new user interface that runs in a standard web browser. Users will not need to install Java or any other software to run IUCLID 6.3. The new interface provides a more streamlined user experience, while still containing the basic features needed to prepare a REACH, CLP or BPR dossier.

The changes to the IUCLID format include the latest updates of the OECD harmonised templates, specific elements for microorganism datasets and support for European poison centre notifications.

The advantages of using IUCLID 6.3 in a browser include the following:

- Users can search and copy any text on the screen (Crtl+F) and zoom in/out or change the font size of the text.
- Every document has a URL to access it, so users can open multiple IUCLID windows/tabs and better organise their work, as well as bookmark and access a page later. It is also easier to share a document with other users or colleagues.
- Some functionalities (i.e. copying of other endpoints, the Validation Assistant) have been improved for use through the web interface.

The web interface will be further developed in 2018 and 2019, with the aim of a new version replacing the current one by the end of 2019. Users will be able to use both versions during the transition period.

4.5 Changes to the dossier evaluation process

Laurence HOFFSTADT (Evaluation Unit, ECHA) presented the new developments on ECHA's processes related to REACH dossier evaluation as of January 2019, to increase the NHDs' understanding and awareness, as they will be in the front line when member registrants start receiving the draft decisions.

Over the past 10 years, ECHA has normally performed the dossier evaluation on the lead registrant of a joint submission. When data gaps were identified, the lead registrant has been asked, through the notification letter to the draft decision and the decision, to inform the members of the requests made by ECHA.

However, a decision sent to the lead registrant does not create regulatory obligations for the member registrants. In the situation of non-compliance with an evaluation decision, the approach has put the lead registrant alone facing enforcement sanctions, regardless of how

[23] ECHA introduced the web user interface in the IUCLID Cloud for SMEs service back in 2017, at the 12th HelpNet Steering group meeting.

many other members of the joint submission have, as a consequence of non-compliance with the evaluation decision, also non-compliant dossiers.

ECHA has therefore decided that, as of 1 January 2019, compliance check will be performed on all relevant dossiers for a given substance and will address decisions to all registrants with non-compliant dossiers within a joint submission. For the same reason, the decision on testing proposals can be addressed to other registrants within the joint submission who rely on this test to comply with their registration requirements.

On 19 September 2018, ECHA held a webinar with industry representatives to explain the changes to the dossier evaluation process. Member State competent authorities and national helpdesk representatives were also invited to attend. The presentations and the recording of the webinar are available on ECHA's website[24].

ECHA will continue general communication and dialogue and, where relevant, early interaction with registrants, but informal interaction will be no longer offered after a draft decision is sent.

The HelpNet is encouraged to relay this information at national level and to highlight that from 2019 onwards, ECHA will consider all evaluated dossiers as up to date and will only under exceptional circumstances accept updates after the decision has been sent. The recipients will need to comply with the requests listed in the decision according to the tonnage declared.

Finally, ECHA will publish new and updated support material by the end of 2018: new Q&As[25], a new practical guide, updated web pages and a new 'Dossier evaluation status' page[26].

5. World Café: Future of HelpNet

The participants engaged in **the World Café discussion on the future of HelpNet had the opportunity to contribute to five different topics:**

- Upcoming chages to regulations
- Poison centres
- Synergies in HelpNet
- Substances in articles database (Waste Framework Directive, WFD)
- Collaboration platforms.

The outcome[27] of the discussion is available in Annex 3: Future of HelpNet.

Closing of the HelpNet Steering Group meeting

The Chair closed the 13th HelpNet Steering Group meeting, thanking all correspondents and observers for their active and valuable contribution during the HelpNet 13 events. He also listed all the action points noted for the meeting (see Annex 2).

He thanked the participants for the good decade spent in REHCORN and the HelpNet, and in particular for making his last meeting a success. He emphasised the importance of HelpNet in supporting companies in complying with the complex chemical legislation over the last 10 years.

As Chair of HelpNet, SME Ambassador and coordinator of the DCG, and ECHA's Director of Cooperation, the Chair said he had developed empathy towards companies, and that he currently sees supporting them as a kind of preventive medicine – the more we can provide advice and assistance upfront, the less we need to struggle downstream with bad-quality dossiers or other forms of non-compliance.

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[24] Information session on changes in dossier evaluation (19 September 2018): https://echa.europa.eu/-/online-information-session-extending-dossier-evaluation-to-members-of-the-joint.-submission.
[25] Q&As on ECHA's website: https://echa.europa.eu/support/qas-support/qas
[26] Dossier evaluation status on ECHA's website: https://www.echa.europa.eu/web/guest/information-on-chemicals/dossier-evaluation-status.
[27] The Future of HelpNet report was published on 17 October 2018 on S-CIRCABC at: https://www.echa.europa.eu/web/guest/information-on-chemicals/dossier-evaluation-status.

Annex 1: List of participants

Members of HelpNet

Country	Members of HelpNet / Advisers		BPR workshop	CLP workshop	HelpNet Steering Group meeting
	First name	Last name			
Austria	Peter	SCHINDLER	x		x
Austria	Barbara	WETZER		x	x
Belgium	Kristof	CLAES		x	x
Belgium	Daphné	HOYAUX		x	x
Bulgaria	Teodora	BANDAKOVA		x	x
Croatia	Ramona	GRIZELJ	x		x
Croatia	Zdravko	LOVRIĆ		x	x
Cyprus	Maria	ORPHANOU			x
Czech Republic	Jan	KOLAR			x
Czech Republic	Jarmila	SLADKOVA		x	x
Denmark	Iryna	MARCUSLUND	x		x
Estonia	Anna	AMELKINA			x
Estonia	Aigi	LAHE		x	x
Estonia	Riina	LAHNE	x		x
Finland	Hannu	MATTILA	x		x
Finland	Leeni	TOLSA		x	x
Finland	Sari	TUHKUNEN			x
Finland	Jussi	OLLIKKA		x	x
France	Nathalie	HAYAUD			x
Germany	Irina	JANSEN	x		x
Germany	Anja	KNIETSCH		x	x
Germany	Suzanne	WIANDT		x	x
Hungary	Boglárka	DURUCSKO		x	x
Hungary	Emese	SZÁNTÓ	x		x
Iceland	Ísak Sigurjón	BRAGASON			x
Iceland	Hafdis Inga	INGVARSDOTTIR	x		x
Iceland	Einar	ODDSSON		x	x
Ireland	Caroline	WALSH		x	x
Italy	Maria	ALESSANDRELLI		x	x
Italy	Francesca	CARFI			x
Latvia	Kristine	KRAFTE	x		x
Latvia	Amanda	OZOLA		x	x
Lithuania	Jurgita	BALCIUNIENE			x
Lithuania	Agne	JANONYTE		x	x
Lithuania	Dovile	PETUKAUSKIENE	x		
Luxembourg	Laurene	CHOCHOIS		x	x
Luxembourg	Jeff	ZIGRAND	x		x
Netherlands	Eveline Tatjana	BEIJ	x		x
Netherlands	Mattheus Josephus	DE KORT		x	x
Netherlands	Lizette	WELGRAVEN	x		x
Netherlands	Margaretha	WOUTERS		x	x
Norway	Solveig	AAMODT	x		x
Poland	Agnieszka	BARANOWSKA-MOREK	x		x
Poland	Krzysztof	DOMANSKI		x	x
Portugal	Isabel	LAGINHA		x	x
Portugal	João	PIMENTEL			x

Country	Members of HelpNet / Advisers		BPR workshop	CLP workshop	HelpNet Steering Group meeting
	First name	Last name			
Romania	Mihaela	PRIBU	x		x
Romania	Nicoleta	CAROLE		x	x
Slovakia	Dasa	PAULIKOVA			x
Slovakia	Michal	PORUBIAK		x	x
Slovakia	Mária	ŠKULTÉTYOVÁ	x		x
Slovenia	Marta	PAVLIČ ČUK	x		x
Spain	Maria Elena	SANCHEZ DIAZ		x	x
Spain	Laura	ZAMORA NAVAS			x
Sweden	Helena	KRAMER			x
Sweden	Susanna	NORRTHON RISBERG		x	x
Sweden	Anneli	RUDSTRÖM	x		x
United Kingdom	Shelly	COLLINS	x		x
United Kingdom	James	LLOYD		x	x

Observers of HelpNet

Organisation Country	Stakeholders/Observers		BPR workshop	CLP workshop	HelpNet Steering Group meeting
	First name	Last name			
H2 Compliance, Ireland	Kevin	HOBAN		x	x
Ministry of Agriculture and Environmental Protection, Serbia	Jelena	GRUJIC	x		x
Ministry of Agriculture and Environmental Protection, Serbia	Aleksandra	RASOVIC		x	x
Ministry of Agriculture and Environmental Protection, Serbia	Snezana	JOKSIMOVIC		x	x
Montenegro	Ilija	GOJOVIĆ		x	x
CEPE, Belgium	Janice	ROBINSON		x	x
CEFIC, Belgium	Amaya	JANOSI		x	x

European Commission

European Commission	First name	Last name	BPR workshop	CLP workshop	HelpNet Steering Group meeting
DG ENV	Sylvain	BINTEIN		x	x

ECHA staff

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Computational Assessment & Dissemination:

Karina KUBINAKOVA, Eduardo VENCESLA JIMENEZ

Biocides Assessment:

Roberto GILIOLO

Evaluation

Laurence HOFFSTADT

Business Information Systems

Pedro TAVARES

Corporate Services

Tero ALENIUS, Hilde-Renate ERIKSEN, Daniel NYGARD, Michaela PASCARU, Katrin PELLA, Marco POPOVIC, Oskari SALMI, Ari VALKEINEN

Annex 2: Action points

BPR Workshop

No	Action	Agenda item	Responsible	Due date	Status
1.	Post the question regarding labelling of precursors of active substances in HelpEx.	1.1	AT HD	15 October 2018 (HelpEx ID 16201)	Closed
2.	Prepare a proposal for a linear workflow on how to handle discussions on BPR scope questions from HelpEx initiation until the potential Article 3(3) decision, with a view to improve the efficiency and transparency of the process for all actors.	2.2	ECHA	1 February 2019	Ongoing

CLP Workshop

No	Action	Agenda item	responsible	Due date	Status
4.	Aerosols (only flammable) and TWD: to be discussed in November CARACAL, with input from European Blind Union (and possibly other relevant bodies).	1.1	European Commission	21-22 November CARACAL-28	Closed
5.	Provide the new conclusions to HelpEx questions 14908 and 14909.	1.3	ECHA	12 October	Closed
6.	Post on HelpEx question about the reduced information on outer and inner packaging.	2.1	SE HD	22 October (HelpEx ID 16304)	Closed
7.	Report to the HelpNet Secretariat about any feedback from the Nordic campaign about chemicals at home (Hannas hus).	2.3	DK, FI, IS, NO, SE	9 November	Closed
8.	Summarise and distribute the outcome of brainstorming on consumer labels.	2.3	ECHA, IE	End of October	Closed

13th HelpNet Steering Group meeting

No	Action	Agenda item	Responsible	Due date	Status
9.	Inform the HelpNet Secretariat on any incorrect numbers/information in the draft **2017 report of national helpdesk activities** available on S-CIRCABC.	2.1	NHDs	26 October 2018	Closed

No	Action	Agenda item	Responsible	Due date	Status
10.	Reply to the questions regarding publishing the **2017 report of national helpdesk activities** in the Webropol survey shared with you after the meeting. Make use of the commenting fields to explain your national statistics.	2.1	NHDs	26 October 2018	Closed
11.	Express your interest to **invite ECHA** to visit your country/helpdesk in 2019. Preferably ECHA would like to see all three helpdesks during the visit.	2.1	NHDs	By the end of 2018	Open
12.	Express your interest to come and **visit ECHA Helpdesk** in 2019.	2.1	NHDs	By the end of 2018	Open
13.	NHDs to promote **EUON** and place the banner and a link to EUON home page on their websites.	4.3	NHDs	Any time	Open
14.	Prepare and publish the **report 'Future of HelpNet'** (outcome of the World Café session) on S-CIRCABC	5	ECHA	31 October 2018	Closed
15.	Investigate if indicating the **appointed bodies**, replying to Poison Centres-related questions, is possible in the NHD contact list on ECHA's web page so the customers could approach them directly concerning Poison Centres issues.	5.2	ECHA	31 October 2018	Closed
16.	ECHA's Poison Centre team considers to organise a webinar for NHDs to get them familiarised with the notification tool.	5.2	ECHA	31 October 2018	Closed
17.	Investigate if having the Poison Centres banner is possible also on ECHA's CLP web page	5.2	ECHA	31 October 2018	Closed
18.	Investigate if the Poison Centres Q&As can be also published among ECHA's other Q&As divided by regulation.	5.2	ECHA	31 October 2018	Closed
19.	Share the link to the public consultation on ECHA's draft scenario for the substances in articles database (WFD) (including supporting documents).	5.4	ECHA	4 October 2018	Closed

Annex 3: Future of HelpNet: Report of World Café discussion

Contents

Background

After the REACH 2018 deadline, ECHA is orienting itself into the future where the existing chemicals have been phased in to REACH. Implementation of CLP and BPR are likewise continuously evolving, and furthermore, novel tasks are given to the Agency. To be ready to face these new challenges, ECHA has prepared a strategic plan for 2019-2023.

In this first post-REACH 2018 meeting of the HelpNet Steering Group it was thus appropriate to reflect the future of the HelpNet. The overall objective was to gather input from the participants on how the network can be of most use for them.

The discussions on the future of HelpNet were conducted in a World Café format during the 13th HelpNet Steering Group meeting, and the main outcome of those discussions are reported here. The detailed input has also been recorded and maintained by the HelpNet Secretariat.

Outcome of individual discussions

5.1 Upcoming changes to regulations

Moderators: Anna-Liisa PIKKARAINEN, Pedro ROSELLÓ VILARROIG, Virve SIHVOLA (ECHA)

Objective: The REACH registration deadline is over, while other processes, such as evaluation and authorisation, are running and will become increasingly important in the near future. The UK is in the process of withdrawing from the EU. BPR and CLP have updates in their agendas, too. How do the national helpdesks see themselves providing advice on these new topics? In this group we will discuss the function of the HelpNet and the role of the national helpdesks and ECHA towards these upcoming regulatory changes.

BPR: Enquiries related to endocrine disruptors (EDs) received by the NHD are low in numbers; very general; and many of them targeted the evaluation of ED properties. Dissemination of information is perceived as insufficient or slow. For example, it is challenging to know the status of the active substance approval process, or even whether it is a new substance or part of the Review Programme. Regarding the borderline cases, the NHD would appreciate a dedicated workshop to analyse the resources available at both ends (NHD and ECHA) and how to best use them, as well as clarifying the process. This point was also discussed in the BPR workshop itself. Finally, there was a proposal to improve the Q&As related to Brexit with a more visual format, including flowcharts of the actual withdrawal process.

CLP: The NHDs seemed to be in very different situations regarding the poison centres obligations. Some received many questions and were confident in their replies; some did not wish any further awareness-raising or discussion in HelpNet now. The inclusion of respective authorities and poison centres was agreed to be a good idea, e.g. in a common workshop. The arrangements varied between countries, so there is room for learning from others.

REACH: Focus should now be on issues other than registration, and information provided by ECHA (website, guidance) should be updated to the post-deadline era. However, some open questions are still pending and we need to wait for the implementing legislation from the Commission. The UK is withdrawing from the EU, but some companies are not aware of it and some others tend to wait for big decisions. However, NHD are not receiving many questions at the moment. ECHA's website is frequently visited and referred to.

HelpNet tools and support from the Secretariat: For all regulations, a review is needed of whether the most relevant material is available in all EU languages. The WebEx calls were felt adequate for following the UK's withdrawal, once things become clear. A banner on ECHA's website on this topic could be considered for the months around the event. Regarding poison centres, a workshop on how they work and how to coordinate their work with that of the NHD received most support; it would not be integrated in HelpNet, as they have a very narrow scope.

5.2 Poison Centres

Moderators: Erika BURAI, Pedro TAVARES, Ana VALLEJO CORTES, ECHA

Objective: January 2020 marks the first deadline for importers and downstream users placing on the market mixtures classified as hazardous based on their health or physical effects to submit certain information on their substances (e.g. chemical composition, identity and concentration ranges of ingredients, toxicological information, and the product category according to a harmonised European product categorisation system (EuPCS)). The notifications to the national appointed bodies in the relevant Member States will be made through a centralised notification portal maintained by ECHA. In this group, the aim was to understand the level of national interaction between appointed bodies and national helpdesks, and to collect information on forthcoming awareness-raising campaigns and support material needed by the companies and also by the national helpdesks during these activities.

National interaction: The appointed bodies and poison centres are involved in the EU-level development of tools and guidance in relation to Article 45 and Annex VIII to the CLP Regulation. In many Member States, these bodies are not identical to the competent authority or national helpdesk, and are located in a different institution. This segregation between the national helpdesks (NHDs) and appointed bodies at the national level makes communication difficult. The flow of information needs to be improved, and hence also promoted by ECHA, targeting both. In general, there is no direct communication; however, in some Member States, information exchange is smooth and happens face-to-face.

The majority of NHDs filter the received questions, reply to all or just the basic regulatory questions, and forward the rest to the appointed bodies, especially the ones related to fees and technical issues. Some NHDs forward the inquiries without filtering. For this reason, the NHDs suggested that the appointed bodies replying to poison centre-related questions be indicated in the national helpdesk contact list on ECHA's web page, so customers could approach them directly concerning poison centre matters.

The appointed bodies do not have their own helpdesks and usually do not deal with enquiries directly, but are open to consultations with the NHDs to ensure that the customers get correct and extensive answers. They do not approach NHDs proactively to share information on the latest EU and national level developments. Some appointed bodies record and make their questions received and answers given accessible to NHDs so they are able to reply to similar questions.

Awareness-raising campaign: Many NHDs are waiting with their planning until ECHA provides more concrete information on the implementation of the Annex VIII provisions on, for example, how the submission needs to be made. When these instructions become available, discussions on awareness-raising can start between the national helpdesks and appointed bodies. This collaboration can be foreseen as a direct face-to-face consultation and attending events and organising workshops together. SMEs were highlighted as the main target group and also the one most challenging to reach, especially if they are not members of any industry associations.

ECHA's materials, including leaflets, guidance documents and the Steps for industry web page, are intended to be promoted and distributed as soon as translations are available. All NHDs are interested in the *Guidance on harmonised information relating to emergency health response* to be developed and translated. Template slide sets on poison centres provided by ECHA would be helpful to be used by the NHDs during their national awareness-raising activities. The idea of a short guidance addressing companies and delivered by inspectors also came up. One Member State has had meetings with their Chamber of Commerce on how to raise awareness regarding the UFI. In one Member State, a leaflet addressed to consumers is foreseen to be published.

Although on ECHA's home page there is a banner as a direct link to ECHA's website dedicated to poison centres, having the banner also on ECHA's CLP web pages would be appreciated. The

NHDs would also be happy to hear about the most common poison centre-related questions that ECHA receives, and even to discuss the related issues through HelpEx. They wish to be involved in the poison centres Q&A process and also to have somehow the published Poison Centres Q&As among ECHA's other Q&As, which are divided by regulation on the Agency's website.

An IT training on the submission process would be welcomed by the NHDs to get an understanding of the layouts and steps of notification. Since the notification tool is going to be used by neither the NHDs nor the appointed bodies, no in-depth training is needed. ECHA will consider organising a targeted webinar to the interested national helpdesks to get them familiarised with the tool.

From the industry point of view, a 'one-stop' overview of the national variations and requirements would be much appreciated, for example, regarding fees or process-specific matters concerning the notification in different Member States.The confidential notification information will be stored by ECHA, shared with Member States, but not made publicly available. Confidentiality should be clearly communicated to notifiers.

5.3 Synergies in HelpNet

Moderators: Anisa KASARUHO, Claudio PUTZU, ECHA

Objective: HelpNet has both members who have participated in the network for several years and newcomers. Also, it is a network that brings together national helpdesks for three different regulations. Participants were encouraged to provide ideas on how to further enhance the work of the HelpNet through learning from peers and across regulations. The main topics discussed were the visiting programme, the benefits related to HelpNet's activities, and the future of HelpNet.

The visiting programme: The feedback was very positive. Participants felt this was a sound way to foster collaboration between ECHA and NHDs, share experiences, and learn about the different practices followed by the helpdesks. It was suggested that ECHA could provide feedback to the host NHDs and share with all the NHDs a report describing the visit.

The benefits related to HelpNet's activities: Most comments pointed out that HelpNet is very beneficial through building synergies and strengthening collaboration between ECHA and NHDs. Its activities provide great learning and knowledge exchange opportunities.

More specifically, the comments pointed out that:

- HelpEx and workshops are essential to improve harmonisation and to build synergies;
- candidate countries strongly benefit from their exposure to HelpNet's activities;
- meetings allow NHDs to learn about ECHA's activities and to anticipate actions needed at national level; and
- HelpNet is very important also in relation to the development of FAQs, web pages and guidance documents.

The future of HelpNet: The comments received addressed mostly the need for more time dedicated to informal discussions, improvements to the Q&As, and training and knowledge exchange needs.

A common view expressed by the participants was the need to informally discuss difficult topics at an early stage. More specifically, the following points were mentioned:

- It is important to obtain a consolidated view through informal discussions before moving discussions to more formal settings.
- The greatest benefit of HelpNet meetings derives from the discussions between NHDs

and ECHA. It was proposed to dedicate more time for discussions through, for example, breakout groups during these events.

- Regular WebExes should take place throughout the year to discuss difficult topics.
- It is important to always have three workshops (not overlapping, if possible) during HelpNet meetings.
- It would be useful to involve the Commission in the workshops (especially for BPR).
- Participants appreciated learning about ECHA's hot topics related to BPR questions and wished to be up to date in the future. They wish to know which questions the Agency receives and how we reply.
- It is important to bring together experts from fdifferent fields to discuss and agree on borderline issues; there is a need to develop authoritative positions.
- There is a need for identifying a stepwise approach to tackle issues and for a better-coordinated way of working.

The participants also discussed how they could benefit more from each other's replies and the material published by ECHA. They mentioned the following points:

- Creating a unique portal for all the helpdesk questions at EU level.
- It would be useful if ECHA shared its helpdesk answers, for NHDs to have an extra knowledge source. This would promote harmonisation of replies at EU level.
- The keyword search functionality of ECHA's website in relation to Q&As has room for improvement.
- The ECHA Q&A web page would benefit from a revamp.

Finally, some NHDs commented that they would like to learn more about ECHA's hot topics and future projects. The following points were mentioned:

- Need for more timely training on hot topics/emerging issues/databases/IT.
- Need to clarify links/overlaps between different regulations (e.g. REACH vs WFD).
- Need to better define/harmonise common actions at EU level.

5.4 Substances in articles database (Waste Framework Directive)

Moderators: Outi TUNNELA, Christina LOUKOU, ECHA

Objective: The recently revised and adopted Directive 2008/98/EC on waste (Waste Framework Directive, WFD) sets an obligation to ECHA to establish and maintain a database on SVHCs in articles. This information submitted to ECHA by suppliers of articles must be made available to waste treatment operators and consumers. The obligation to submit information must be transposed in national legislation and its implementation involves tight timelines. The objective of the discussion was to map how well the HelpNet members are aware of this new obligation, if they have been consulted by the relevant national authorities, whether there was a role foreseen for them in supporting customers, and if they had concerns regarding the implementation of this obligation.

Discussion: Most of the participants were aware of this new task to ECHA, but some were not. No helpdesk had been contacted before the WFD revision was adopted. The general feeling was that the obligation set for suppliers under the WFD may be more challenging than the legislator intended. The first challenge arises from the WFD not defining 'supplier', with the REACH definition thus applying. The obligation to provide information also refers to REACH Article 33. This means that a new interface between the waste authorities and the REACH authorities will be required, and this may not be trivial in many Member States. In any case, new contacts need to be established and the implications of the obligations were discussed.

The WFD does not provide a requirement for a helpdesk. However, it can be foreseen that a broad obligation on suppliers will lead to many questions: how to get information; does information need to be requested proactively; analytical methods; how to actually submit the information; etc. The REACH helpdesks cannot answer these questions under WFD unless mandated under national law. In the current situation, they will not have the necessary resources, either. Many helpdesks also do not include consumers or waste operators as their stakeholders. It should be mentioned that the German helpdesk has already received questions on this topic, expressing concerns.

The major concerns emerging from the discussion were the following:

- What types of information will be required? What can legally be required? What is fit for the purpose?
- Which information will be made publicly available? What is relevant and useable for the waste operators?
- How can a specific part of a complex object really be identified?
- How can the obligation to submit information be enforced?
- The concept of 'supplier' is too broad for this context. The obligation should apply to producers of articles and importers.
- The consumer has a product label for identifying the product, the waste operator does not.
- If REACH-IT is used, the number of accounts can be massive and probably impossible to manage.
- The definition of 'article', as it stands now, will cause problems.
- A stepwise or grouping approach should be used for implementing the Directive.
- Certain article-types could be excluded (where other legal requirements already apply).
- Transposition timeline is too short.

5.5 Collaboration platforms

Moderators: Olena KRYCHEVSKA, Viorica NAGHY, Sorina PARASCHIV, ECHA

Objective: In times of change, communication is the glue that holds us – the HelpNet - together. Participants were encouraged to express their opinion about the usefulness and effectiveness of the existing tools and means of communication in HelpNet, namely HelpEx, S-CIRCABC, the HelpNet newsletters, virtual meetings/web conferences, as well as online surveys (using Webropol). The objective was to collect a pool of improvement ideas to enhance cooperation in the future.

Discussion: **HelpEx** was the tool that gave rise to most of the comments and requests for improvement. Specifically, the participants would welcome a friendlier, more intuitive user interface, with increased search functionalities (e.g. search for certain questions/topics in an easier way, free text search). The participants mentioned the following more detailed points:

- It would be interesting to develop new discussion platforms in HelpEx, e.g. a chat functionality. Participants said a previously used software called FabaSoft had been working very well.
- HelpEx could be improved with a better way to search and filter questions.
- More structure to the procedures that NHDs need to follow when using HelpEx was requested.

- Users receiving alerts/notifications when a new FAQ is developed or an update is made[28].
- Email(s) from the HelpNet Secretariat to inform about the important updates or consultations are useful and welcomed by many members.

Virtual meetings were found to be useful, especially by the REACH members who had the opportunity to participate in six **WebEx sessions** in 2018 in preparation for the last registration deadline. Virtual meetings were considered very good if organised for specific topics. However, they should not replace but rather complement face-to-face meetings. The participants suggested using WebEx for topics such as poison centres/Annex VIII, practical HelpEx training, and Brexit.

For **S-CIRCABC**[29], the application used to share information and work together over the web, one request for improvement was received, namely to get an email notification when new documents have been uploaded on the platform. This functionality already exists in the tool.

The **HelpNet update** (newsletter) was appreciated, as it offers a good summary of ECHA's activities and processes, IT tools updates, events, etc. It is read and shared with colleagues. However, one participant mentioned that the same information comes through other channels as well, such as the ECHA Newsletter and ECHA Weekly.

Conclusions and follow-up actions

The discussions on the future of HelpNet provided the participants an opportunity to reflect on the past functioning of the network and to brainstorm about future topics and ways of working.

The value of the network in harmonising advice to duty holders, discussing complex issues and aligning opinions and sharing best practices was recognised.

Of specific concern were the new tasks given to ECHA. They may prompt duty holders to approach also the NHDs even though the NHDs would not have a task to provide support in these areas.

Thanks to the lively discussions, many useful improvement ideas were recorded. Each idea will be analysed by the HelpNet Secretariat for feasibility, and the Secretariat will report back on the analysis during the 14th HelpNet Steering Group meeting foreseen to be held in spring 2019[30].

[28] Alerts which trigger email notifications can be set by each HelpEx user. There are three types of alerts: (i) a reminder 5 days before a commenting deadline deadline; (ii) an alert when the status has changed; and (iii) an alert when ECHA posts feedback. This is described in chapter *5*, *HelpEx alerts*, of the HelpEx Quick guide, available on S-CIRCABC at: https://webgate.ec.europa.eu/s-circabc/w/browse/3338b925-5984-4133-87f5-6b5c14fa0535.

[29] S-CIRCABC - Communication & Information Resource Centre for Administrations, Businesses & Citizens is a collaborative platform, which offers an easy used to create collaborative workspaces where communities of users can work together over the web and share information.

[30] The Steering Group meeting and the REACH, CLP and BPR Workshops are tentatively planned to take place in the first week of April 2019.