ECHA
EUROPEAN CHEMICALS AGENCY

2021 Report of National Helpdesk Activities: Overview

2 May 2022

Disclaimer

Table of contents

List of acronyms

BPR	Biocidal Products Regulation (EU) 528/2012
CLP	CLP Regulation (EC) 1272/2008
EEA	European Economic Area
FAQ	Frequently asked questions
Forum	Forum for Exchange of Information on Enforcement
FTE	Full time equivalent
HelpEx	Tool to communicate and discuss questions among the members of HelpNet
HelpNet	BPR, CLP and REACH Helpdesk Network, consisting of representatives from the national helpdesks of the 27 EU Member States, as well as Iceland, Liechtenstein and Norway, ECHA and the European Commission
HelpNet Secretariat	Service within the Support and Enforcement Unit of ECHA responsible for the coordination of HelpNet activities
NHD	National helpdesk
NWOW	New way of working
OR	Only representative
PCN	Poison centre notification
PIC	Plant protection products
POP	Persistent organic pollutants
RDI	Research, development and innovation
UFI	Unique formula identifier
Q&A	Question and answer
REACH	REACH Regulation (EC) 1907/2006
RoHS	Restriction of hazardous substances under the Electric and electronic equipment Directive
SCIP	SCIP is the database for information on substances of concern in articles as such or in complex objects (products) established under the Waste Framework Directive (WFD)
SDS	Safety data sheet
SiA	Substances in articles
SME	Small and medium-sized enterprise
SSN	Simplified SCIP notification
SVHC	Substance of very high concern

Foreword by the Chair of the HelpNet

Dear readers,

Writing this foreword in April 2022, my heart bleeds that war is back in Europe. Some of your countries are confronted with millions of refugees escaping the war and the help that is offered is encouraging to see in these sad times.

It is as well the moment that most COVID-19 restrictions have been abandoned and many people are going back to the office, at least on a regular basis. It is great that we start organising the first HelpNet Steering Group meeting in Helsinki since 2019. In ECHA, we opened our doors on 22 March and are so glad to see visitors again this year after such a long time.

In the last quarter of 2021, we introduced the new ways of working, with a redistribution of questions between ECHA and national helpdesks, following the Management Board decision of December 2020. In this report you will find the first figures and we will discuss this more in depth in the evaluation in our planned live Helsinki meeting in October.

Although the number of questions went down compared to the first COVID-19 year, the 55 000 questions handled by the national helpdesks and the 12 000 questions covered by ECHA is still the second highest number in the history of the legislation that we cover. Thank you very much for this continuous engagement and support to help companies to understand their obligations and to be compliant with our legislation in place.

It is clear for me that the number of questions will not go down soon. The upcoming REACH and CLP revision will create a lot of additional questions. Only mentioning the discussion on polymers requiring registration and new categories in CLP we can expect a lot of enquiries on this. Even without changes, the questions on biocides are and will remain high given the complexity of certain aspects of the BPR legislation. We remain committed to support you, in particular through our video conferences where we can share our questions and experiences.

Again, thank you very much for your efforts and counting down to see you in Helsinki.

Erwin Annys

Chair of the HelpNet

1. Introduction

Each year, the national BPR, CLP and REACH helpdesks report to ECHA on their activities, workload, organisation and other topics.

This report summarises the activities of the national helpdesks (hereinafter NHDs) from 1 January to 31 December 2021. The HelpNet Secretariat collected the information from January to February 2022 through a web-based survey.

In 2021, the survey was open to the NHDs of the 27 EU Member States and three EEA countries, observers from three EU candidate countries, as well as a third-country observer of the HelpNet (for BPR and CLP). Overall, the responses provided reflect the activities of the BPR, CLP and REACH helpdesks[1] across **32 countries**.

This report includes a section dedicated to ECHA's Helpdesk activities, mirroring when feasible the activities of the NHDs, and a newly added section on the enhanced division of competences between ECHA and the NHDs on REACH and CLP questions (Section 2.5).

2. National helpdesks in numbers

2.1. Total number of enquiries received by national helpdesks in 2021[2]

In 2021, NHDs received 55 000 enquiries[3] from their customers on the BPR, CLP and REACH regulations. In total, 57 % were related to BPR, 21 % to CLP, and 22 % to REACH (see Figure 1). Only 14 questions remain unallocated to any of the three regulations.

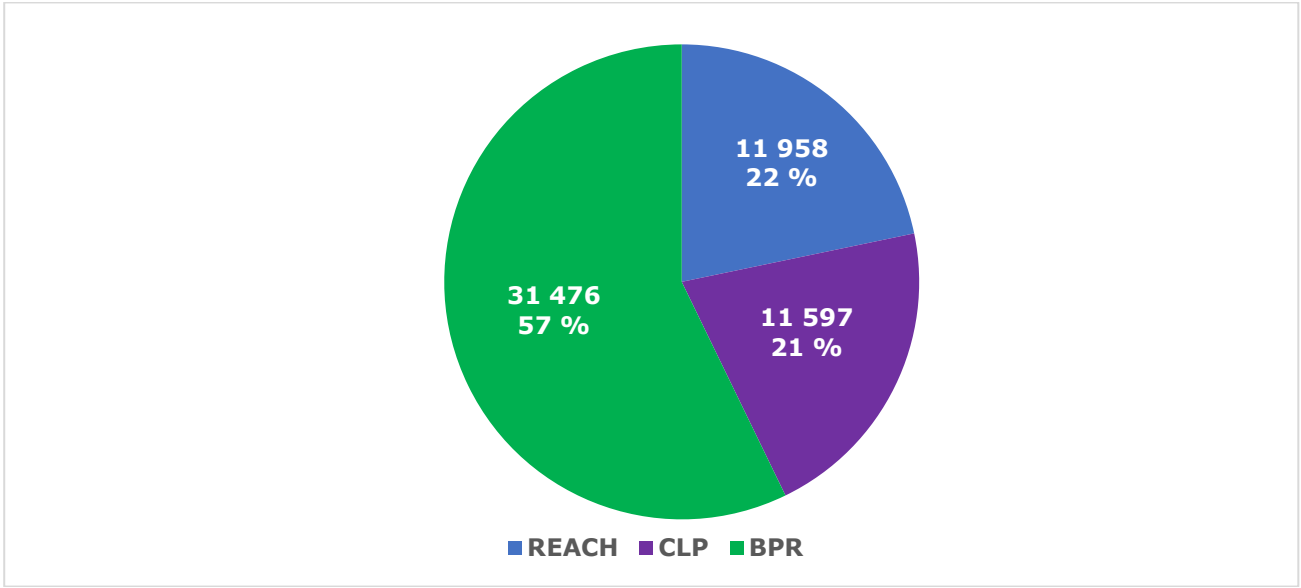

Figure 1: Enquiries received by NHDs in 2021, split by regulation

[1] 55 respondents to the survey representing 29 BPR, 32 CLP and 31 REACH national helpdesks.
[2] Disclaimer: trends presented in this report are indicative as they rely on data provided by the reporting national helpdesks, which may use different methods to keep track of enquiries received from customers and replied during the reporting period.
[3] Not including the data of five BPR national helpdesks and the REACH and CLP helpdesks of two candidate countries that are observers to the HelpNet, as the numbers were not provided.

The total number of BPR, CLP and REACH enquiries[4] received by NHDs **decreased** by one third, compared to 2020, when the number was close to 80 000 due to the COVID-19 pandemic. However, aside from 2020, 2021 recorded the highest number of questions since 2017 (52 000 questions), so we can still conclude there is an upward trend. The trends per regulation are as follows:

- ✓ The number of BPR-related enquiries decreased by 40 % in 2021, but consistently remained the highest among the three regulations since 2014.
- ✓ For CLP, the number of enquiries reported decreased by 15 % compared to 2020.
- ✓ REACH-related enquiries remained almost the same compared to 2020, with a slight increase of 6 %.

2.2. Enquiries received by national helpdesks by regulation

The information below is based on figures reported by NHDs, with reference to each of the three regulations in their remit. Trends presented in this report are indicative as they rely on data provided by the reporting national helpdesks, which use different methods to keep track of enquiries received from customers and replied during the reporting period[5].

The number of enquiries reported by NHDs usually describes the number of times a customer contacted the helpdesk (by contact forms, email, phone, etc.). This does not necessarily result in one question as, for example, one email may be counted as just one enquiry although the customer may have included several questions in it.

BPR

The total number of BPR enquiries received by 29 NHDs in 2021 was 31 476, showing a substantial decrease of 40 % compared to 2020 (53 393 enquiries). The seemingly sharp decline is mainly a consequence of the extremely strong increase in 2020 and it still represents the highest percentage (57 %) of all received enquiries among the three regulations. Only 10 NHDs received more than 1 000 questions in 2021, compared to 18 NHDs in 2020, with a variation from 1 000 to 9 000 enquiries per national helpdesk.

In 2021, many NHDs reported having received significantly less BPR enquiries linked to the COVID-19 pandemic, which were previously connected to the urgent demand for disinfectants to be placed on the market. There seems to be a return to normal mode, with a transition from specific COVID questions to more general queries related to transitional products and national authorisation (in particular for disinfectants).

CLP

The total number of CLP enquiries received by 32 NHDs in 2021 was 11 597 questions (21 % of all received enquiries), showing a decrease of 15 % compared to 2020, when 13 629 questions were received. Following the trend of the last three years, three NHDs received more than 1 000 questions in 2021, with a variation between 1 398 and 2 350.

[4] For more information on 2020 statistics, see '2020 Report on National Helpdesk Activities: Overview' at: https://echa.europa.eu/about-us/partners-and-networks/helpnet/2021
[5] The NHDs of one candidate country reported 14 enquiries which could not be allocated to BPR, CLP or REACH.

Up to 11 NHDs noticed an increase in CLP questions. For most of them, the increase was linked to the implementation of Annex VIII to the CLP Regulation: the poison centre notifications (PCN) obligation[6]. One NHD noted that the new ways of working (NWOW, see Section 2.5) had influenced the upgoing trend for CLP.

For six NHDs, the number of questions for CLP had decreased. Some NHDs had noticed that there were less questions on poison centre notifications compared to 2020, and this can be linked to the advice already given, the increased knowledge of the customers and the fact that UFI and PCN questions were registered mainly at the end 2020/beginning 2021. One NHD considered there was a decline to a more normal mode, after the huge increase of PCN questions after its introduction in the previous year.

REACH

Based on the input provided by 31 NHDs, the total number of REACH enquiries received in 2021 by NHDs was 11 958 (almost 22 % of all received questions). This is almost the same number of enquiries as in 2020 (11 282 enquiries).

Out of all REACH helpdesks, three received more than 1 000 questions in 2021 (there were also three in 2020, and five in 2019). The highest number of queries received by one national helpdesk was 1 657 enquiries in 2021, compared to 1 420 in 2020. General enquiries on REACH obligations were replaced by more questions on restrictions (e.g. tattoo inks) and SCIP obligations. It is worth noting that several NHDs reported a decrease of more than 10 % in the number of REACH enquiries compared to last year.

Some NHDs reported an increase in questions related to substances in articles, which might be related to the obligation to notify to the SCIP database for companies supplying articles containing substances of very high concern (SVHCs)[7]. In this context, as it occurred in 2020, it was noticed that some NHDs report SCIP questions as part of the REACH questions, while other NHDs reported them under the WFD or other legislation with specific numbers. Therefore, SCIP questions might have contributed to the total number of REACH questions in this survey.

2.3. BPR, CLP and REACH enquiries received by national helpdesks since 2017

On a general level, the BPR remains the regulation with the highest number of questions replied by NHDs, followed by REACH and CLP. This clearly differentiates NHDs from ECHA, for which the number of REACH questions has clearly been highest in the last five years.

The high demand for the BPR NHDs support continued in 2021 and it is partly linked to the continued support for enquiries concerning disinfectants, as the majority of such biocidal products need to comply with national law.

The number of CLP enquiries decreased in 2021, probably due to the shift from regulatory to technical questions around PCN, making the customers contact ECHA rather than their NHD.

[6] From 1 January 2021, companies placing new hazardous mixtures for consumer and professional use on the EU market must submit a 'poison centre notification' (PCN). The obligation applies to all importers and downstream users under Annex VIII to the CLP Regulation (EC) 1272/2008. Further application dates for the notification of mixtures for industrial use, as well as existing products, will also apply over the coming four years.

[7] Companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1 % weight by weight (w/w) on the EU market have to submit information on these articles to the SCIP database maintained by ECHA, as from 5 January 2021.

However, with the NWOW the situation could change, as NHDs can now also address some of the technical questions, in particular, those related to dossier preparation.

The number of REACH enquiries, on their side, increased only slightly (around 6 %) to a similar level as 2019.

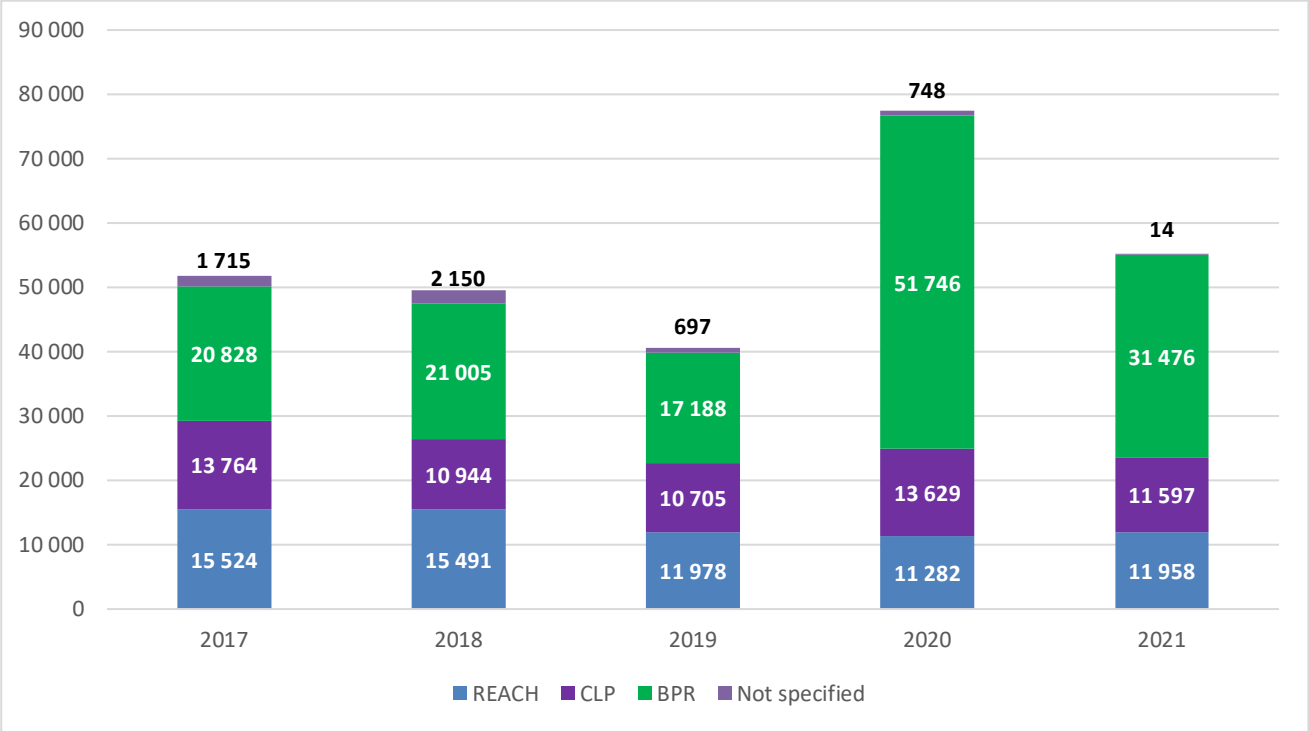

Figure 2: Total number of enquiries received by NHDs from 2017 to 2021

2.4. Hot topics

NHDs reported on the hot topics raised by their customers on the BPR, CLP and REACH in 2021[8]. The five most frequent topics reported for each regulation are shown in Figure 2.

[8] Respondents were asked to rank their topics from 1st to 10th, first being the topic for which the national helpdesk received the highest number of questions and the 10th being the topic with the least number of questions or no questions at all. If topics other than those listed in the survey were among the 'Top 10', respondents were asked to specify them in the open fields marked 'Other'. Trends presented in this report are based on the data provided by the NHDs.

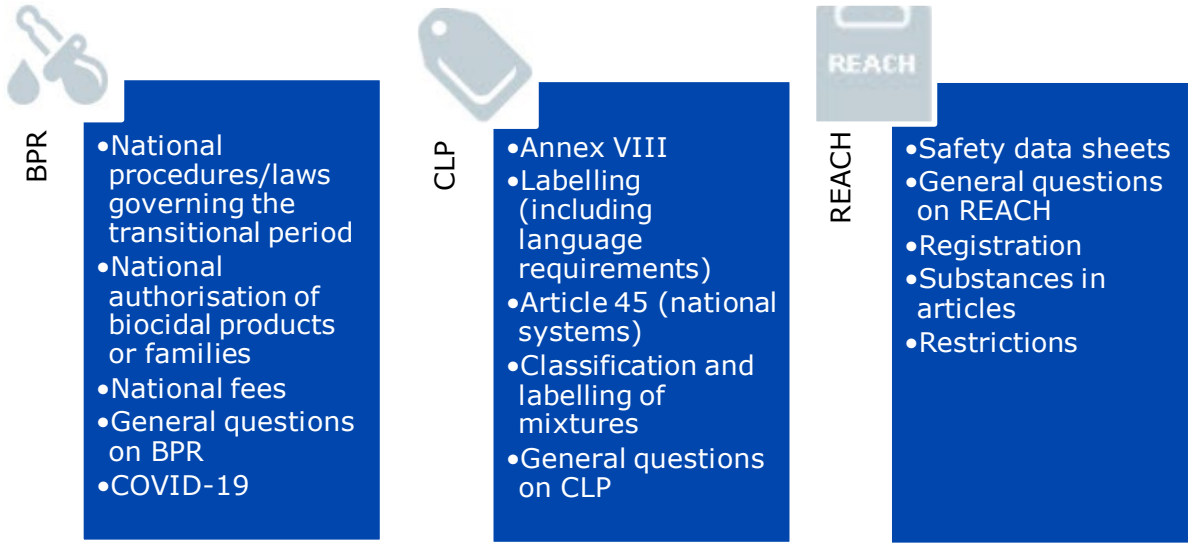

Figure 2: Overview of the hot topics under the BPR, CLP and REACH in 2021.

A comparison of the top 10 most frequently asked topics in 2021 and 2020 is presented below for the BPR (Table 1), CLP (Table 2) and REACH (Table 3).

BPR

Table 1: Hot topics concerning the Biocidal Products Regulation in 2021 and 2020

2021		2020
National procedures/laws governing the transitional period	**1**	COVID-19
National authorisation of biocidal products or families[9]	**2**	National procedures/laws governing the transitional period
National fees	**3**	National authorisation of biocidal products or families
General questions on the BPR[10]	**4**	General questions on the BPR
COVID-19[11]	**5**	Scope questions
Scope questions[12]	**6**	*In situ* generation of active substances
In situ generation of active substances	**7**	National fees
Active substance approval (or renewal of active substance approval)	**8**	Treated articles
Substance identity	**9**	Article 95
Re-definition of substances	**10**	Classification, labelling & packaging of biocidal products

For the BPR, there is a significant change in the hot topics as the number one in 2021 is no longer COVID-19, as enquiries from companies placing disinfectants on the market significantly

[9] Including questions on mutual recognition, same biocidal product authorisation, simplified authorisation and renewals of biocidal product authorisations and mutual recognitions.
[10] Questions on roles, processes and obligations under the BPR.
[11] Questions related to the placing on the market of disinfectants.
[12] Nature or the product (biocidal product, treated article, neither), borderline between the BPR and other legislation (e.g. cosmetics, medicinal products, veterinary medicinal products, plant protection products, etc.), borderline between different product types.

decreased, down to fifth position.

As expected, the four top positions remain occupied by topics that fall within the remit of national authorities (e.g. **'National procedures'**, **'National authorisations'**, **'National fees'** and **'General questions on BPR'**). More specific topics included:

- national procedures for making disinfectant available on the market;
- national requirements for placing on the market devices generating ozone and free radical under Article 93;
- data requirements for biocidal product authorisation under the BPR and EU guidelines, especially on efficacy;
- questions from consumers concerning safe use of biocidal products;
- rodenticides;
- borderline between cosmetics and biocides products; and
- treated articles.

Other hot topics that remain in the list, although in a slightly different order than in 2020, include: **'*In situ* generation of active substances', 'Scope questions'**, whereas new topics of **'Active substance approval', 'Substance identification' and 'Re-definition of substances'** made their entry in the top 10**.**

CLP

Table 2: Hot topics concerning the CLP Regulation in 2021 and 2020

2021		2020
Annex VIII	**1**	Annex VIII (future obligations)
Labelling (including language requirements)	**2**	Article 45 (current practices)
Article 45 (current practices)	**3**	Labelling (including language requirements)
Classification and labelling of mixtures	**4**	Classification and labelling of mixtures
General questions on CLP[13]	**5**	General questions on CLP
Harmonised classification/Annex VI	**6**	Packaging
Related EU chemicals legislation[14]	**7**	Classification of substances
Packaging	**8**	Harmonised classification/Annex VI
Classification of substances	**9**	Notification of substances in C&L Inventory
Use of alternative chemical name	**10**	Related EU chemicals legislation

For CLP, there were few differences between the top ten topics, with **'Annex VIII'**, **'Labelling'** and **'Article 45'** still occupying the first three positions, even though there was a change of order. **'Classification and labelling of mixtures'** and **'General questions of CLP'** are in fourth and fifth position, as in 2020.

'Related EU chemicals legislation' has jumped to sixth position. This topic covers a variety of specific issues, one of them being safety data sheets (SDSs), as pointed out by one NHD. The amendment to Annex II to REACH, related to SDSs, may have raised the number of

[13] Questions on scope and exemptions, as well as on roles and obligations under CLP.
[14] Questions on other EU chemicals legislation related/at the borderline/overlapping or parallel with CLP.

questions. Legislation on cosmetic products, detergents, aerosols dispensers and occupational health are related with CLP and may have implementation differences at national level, which could be behind the increased interest.

Other hot topics that remain in the list, although in a slightly different order than in 2020, include: **'Harmonised classification/Annex VI'**, **'Packaging'**, and **'Classification of substances'**. A new topic has entered the top ten: **'Use of alternative names'**.

For 10 NHDs, there have been no changes, or only small changes in the hot topics. For another seven, the PCN obligations, in the form of Article 45, or Annex VIII, have generated a lot of questions, and the topic has shifted to the second position. Questions related to classification and labelling of substances still remain very frequent.

REACH

Table 3: Hot topics concerning the REACH Regulation in 2021 and 2020

2021		2020
Safety data sheets	**1**	Safety data sheets
General questions on REACH[15]	**2**	Registration
Registration[16]	**3**	General questions on REACH
Substances in articles	**4**	Substances in articles
Restrictions	**5**	Restrictions
SCIP and Article 33 obligations	**6**	SCIP
Authorisation	**7**	Authorisation
Related EU chemicals legislation[17]	**8**	Related EU chemicals legislation
Data sharing and joint submission	**9**	Substance identity
Substance identity	**10**	Data sharing and joint submission

For REACH, the observed trends of the hot topics in the last three years are very similar. The ranking of the first three topics **'Safety data sheets', 'General questions on REACH'** and **'Registration'** remained slightly the same as in 2020. While the number of **'Registration'** enquiries slightly decreased compared to 2020, it remains one of the most important REACH topics.

Enquiries concerning **'Substances in articles', 'Restrictions'**, **'SCIP and Article 33 obligations'**, **'Authorisation'** and **'Related EU chemicals legislation'** remain as high as in 2020, occupying the same positions as in 2020.

Regarding **'Restrictions'**, enquires on new and existing entries were received. An increased number of **'Authorisation'** questions were observed, in particular, related to uses of

[15] Questions on scope and exemptions, as well as on roles and obligations (such as importer and only representative roles) under REACH.
[16] Questions on registration obligations, dossier preparation and updates, tonnage requirements, information requirements etc.
[17] Questions on other EU chemicals legislation related/at the borderline/overlapping or parallel with REACH, such as Medicinal Products Regulation, PIC, Cosmetic, Seveso Directive, Water Directive, etc. Some NHDs noted still the impact of Brexit in the high number of enquiries related to registration obligations.

chromium trioxide. This is result of the high number of new applications being prepared by the companies/applicants.

Furthermore, the NHDs reported a slightly increasing number of questions on **'Related EU chemicals legislation'**. Specifically enquiries related to the Waste Framework Directive (WFD) (i.e. SCIP) but also on borderline between the WFD and REACH (i.e. SiA/SCIP obligations).

Lastly, '**Data sharing and joint submission'** and **'Substance Identity**' appeared in ninth and tenth position.

In addition to the above-mentioned topics, some NHDs highlighted the high number of questions related to REACH-IT and ECHA accounts, to downstream users' obligations and obligations within the supply chain, as well as enquiries related to recovered substances and Article 2(7) exemptions.

2.5. The new way of working and queries redirected to the REACH and CLP national helpdesks

To implement the new priority setting as outlined in the ECHA Programming Document for the years 2021-2024[18], ECHA developed a proposal aiming to transfer part of the regulatory REACH and CLP enquiries to the NHDs, both from EU and non-EU customers.

This change does not affect the technical questions involving IT tools and applications, that remain within ECHA's remit, nor the regulatory BPR questions, for which the existing division of competences between ECHA and NHDs remains the same.

The questions that ECHA continues to reply relate, in a nutshell, to the following: submissions and processes; ECHA's decisions (e.g. dossier evaluation, data sharing); ECHA's Board of Appeal decisions; ongoing disputes; opinions under development or administrative practice; newly adopted policies related to ECHA's regulatory processes; consultations; new tasks for ECHA; fees and charges and questions that require harmonisation and consultation with the Commission.

The new ways of working (NWOW) project was discussed with the NHDs at first in June 2021, during the REACH and CLP workshops. ECHA introduced the proposal and the criteria for redistribution of REACH and CLP enquiries to NHDs, including scenarios on how questions would be forwarded to NHDs. The NWOW proposed by ECHA took into account the input received from NHDs through a survey on the new division of competences[19].

After gathering the agreement of the NHDs through a written consultation, the actual NWOW and redirection of questions was kicked-off in autumn 2021. The HelpNet Secretariat has closely monitored its implementation and produced a report on the enquiries received by ECHA Helpdesk from companies and redirected to NHDs during the period 8 September – 31 December 2021.

To support the harmonisation of answers among all NHDs, ECHA prepared handbooks on topics of interest (dossier evaluation, authorisation, restrictions, nanomaterials, CLP, PCN and SCIP)

[18] https://echa.europa.eu/documents/10162/13609/programming_document_2021-2024_en.pdf/fdc0a236-696b-b2a8-a6fb-523066eadf30

[19] The survey was conducted from 25 March to 16 April 2021 as a follow-up of the 15th HelpNet Steering Group meeting in October and the Management Board meeting in December 2020. The aim of the survey was to identify the NHDs' competences, resources, training needs and discuss the outcome during the June workshops.

which were presented in the June REACH and CLP workshops. ECHA also committed to involve the NHDs further during the drafting and review of Q&As.

Moreover, ECHA suggested to organise monthly REACH and CLP videoconferences to discuss difficult questions and topics, to increase the harmonisation of replies and the support to NHD colleagues, if needed. Finally, ECHA offered to organise training sessions on topics of interest raised by the NHDs. The support material presented in the June workshops, along with the above-mentioned handbooks, were made available in S-CIRCABC.

In this context, by the end of 2021, ECHA organised two training sessions on nanomaterials (28 September) and mixture classification (15 November) and three REACH videoconferences.

From September to December 2021, on average, the ECHA helpdesk redistributed 32 % of EU and 24.5 % of non-EU enquiries on REACH and CLP.

The HelpNet will review the functioning of the NWOW, including its criteria for reassignment, based on regular ECHA reports and feedback provided by the NHDs. The agenda of HelpNet 17 will include a look to the future on how to report, continue implementing the NWOW, and better cooperate within the network.

In the meantime, the HelpNet Secretariat can report on some aspects of the implementation of the NWOW project. Regarding the redistribution of queries, the NHD have in general not noticed an increase of workload in the last months of the year since the NWOW was introduced.

Some helpdesks mentioned that enquiries related to NWOW were difficult to be tracked but highlighted that the numbers seemed to remain within the limits of questions handled on a yearly basis. None of the reporting NHDs received feedback nor complaints about the new division of competences. Some customers did mention that they were advised by ECHA to send their questions to the NHDs.

Regarding resources allocated due to the NWOW, only one NHD reported that two additional staff members joined the REACH and CLP helpdesk, while another NHD mentioned having plans to increase their staff, though probably only at a later stage.

2.6. Support provided by national helpdesks on other regulations

In 2021, NHDs reported that they replied to 4 985 enquiries allocated to chemicals legislation other than BPR, CLP and REACH. More than 2 800 enquiries were replied by one competent authority responsible for 16 pieces of legislation in addition to the BPR, CLP and REACH.

Regarding the other legislation NHDs provided advice upon, 18 REACH NHDs provided support on the Waste Framework Directive and the extension of REACH Article 33 into the SCIP database[20]. The top five most common pieces of legislation on which NHDs provided support were the Waste Framework Directive (WFD), Persistent Organic Pollutants (POPs), Prior Informed Consent (PIC), Detergents and Cleaning Products Regulation, and Electric and Electronic Equipment Directive (RoHS) (see Figure 5).

[20] Article 9(1)(i) of the WFD requires any supplier of an article, as defined in Article 3(33) of the REACH Regulation, to provide the information according to Article 33(1) of that regulation to ECHA as from 5 January 2021.

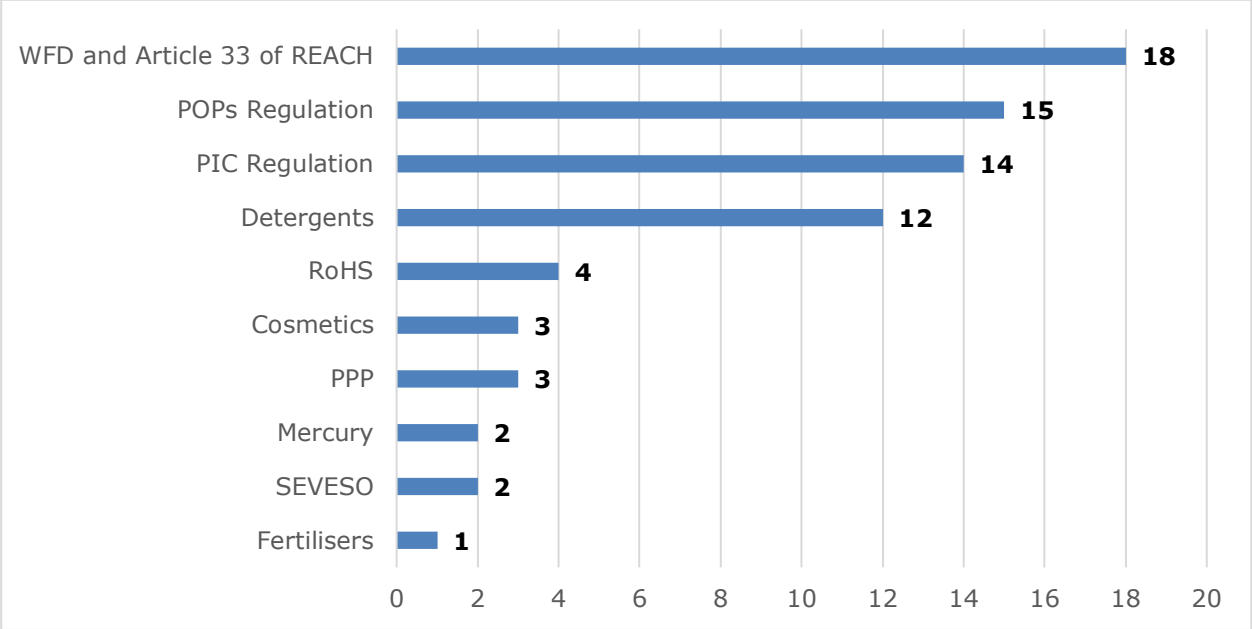

Figure 5: Other pieces of EU chemicals legislation on which NHDs provide support, in particular those related to ECHA's 'new tasks'

3. Customer support

3.1. Communication channels

Customers have contacted their NHD mostly by contact forms, telephone and email, summing up over 35 000 questions. Due to the persisting COVID-19 pandemic, the number of face-to-face meetings taking place was extremely low and so was the number of enquiries answered by NHDs in this context. Some NHDs do not keep track of the questions received during meetings.

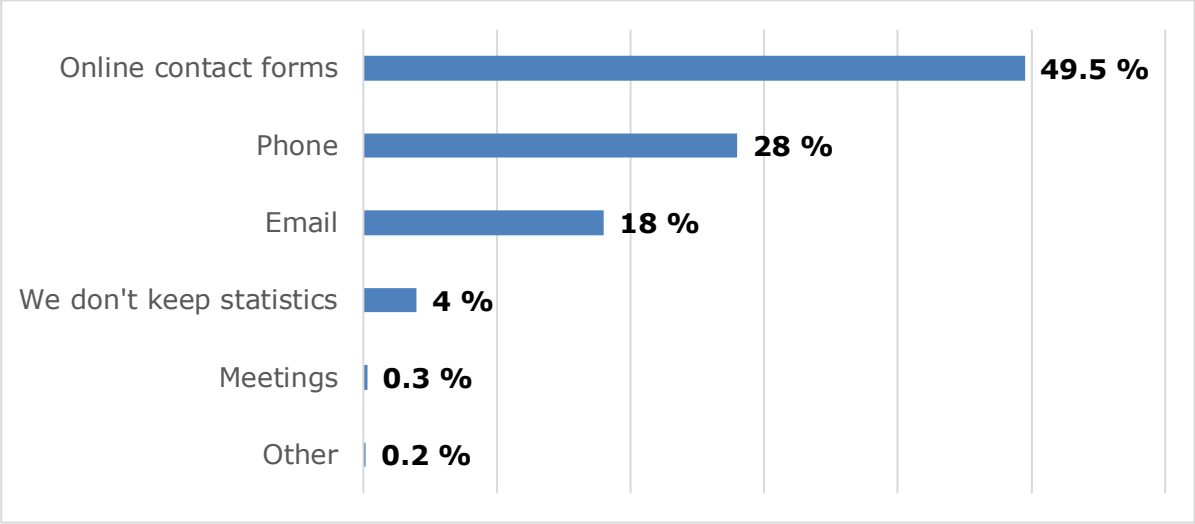

Figure 6: Communication channels

3.2. Service response time

According to the information provided by the 27 reporting NHDs, the average response time is determined mostly by the resources and only partly by the complexity of the questions received.

In general, NHDs aimed at answering enquiries as soon as possible, respecting the deadlines required by the national laws or internal rules. While simple questions can be replied in the same day, the most complex questions were replied within a timeframe of 45 days. Whenever a question could not be replied as required by national or internal rules, NHDs informed the customer that more time would be needed.

Based on the information provided by the reporting NHDs, the average response timeframe – for different types of questions received in 2021 is shown in Table 4.

Table 4. Average response time considering the complexity of enquiries received by NHDs

Complexity of enquiry	Response time	
	Minimum	Maximum
Simple	30 minutes	14 days
Moderate	1 hour	30 days
Complex	3 hours	45 days

3.3. Helpdesk resources

In 2021, HelpNet members continued to provide high quality support and harmonised answers to queries on BPR, CLP and REACH. As presented in Section 2, NHDs are also responsible for regulatory support on other pieces of EU chemicals legislation and national laws.

From the NHDs that provided information on their resources, the majority reported having had the same resources as in 2020, and only four NHDs benefited from an increase. In contrast, eight REACH, five CLP and seven BPR helpdesks faced resource cuts (for detailed information see Figure 8). Typical reasons for this were either staff leaving the organisation, or resource allocation to other tasks due to less queries received.

In terms of full-time equivalents (FTEs), NHDs reported between 0.25 and 7 FTEs allocated to helpdesk activities. On average: 1.3 FTEs per BPR national helpdesk, and 1.5 per REACH and CLP national helpdesk. On average, each BPR staff replied to about 1 500 enquiries, and each REACH and CLP staff replied to almost 500 enquiries last year.

In most of the NHDs, experts work also on other tasks related to various chemicals legislation in the remit of the national competent authority. For example, one BPR helpdesk mentioned that they do not differentiate between the hours invested in the BPR authorisation process and the helpdesk activities. Another NHD expert was collaborating with the competent authority responsible for the Waste Framework Directive.

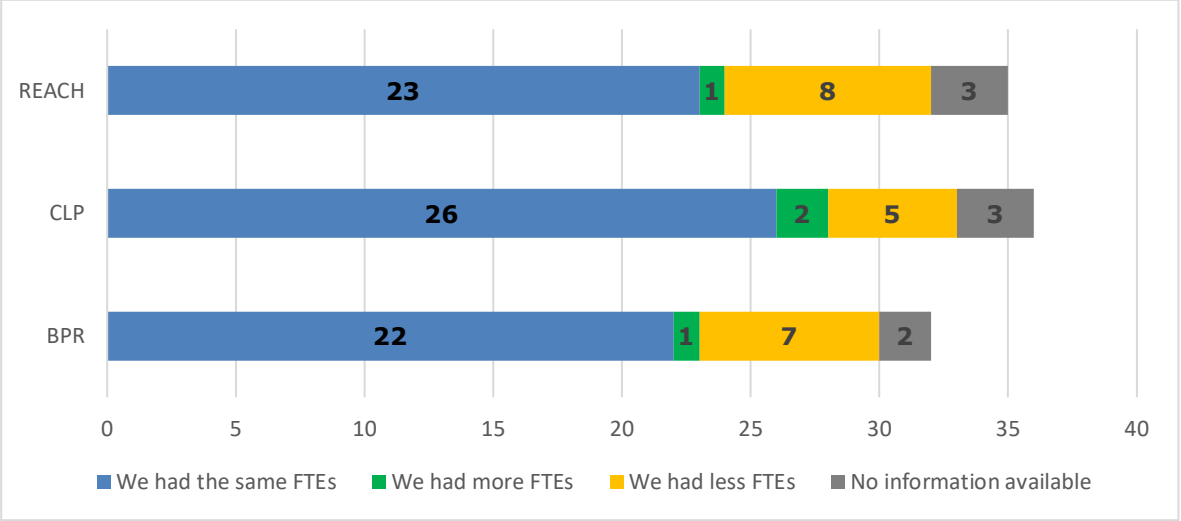

Figure 7: Resources available to provide helpdesk advice in 2021 compared to 2020

4. National helpdesk activities

4.1. Ways to support companies

As the remote working setting was still the normality in 2021, the majority of NHDs interacted with their customers through digital platforms (online events) and by phone. The NHDs shared their experiences in supporting companies in relation to the hot topics, as summarised below.

Events, seminars, lectures, workshops, training sessions:

- Online events continued in 2021 with only few meetings taking place face-to-face.
- Events were targeted to hot topics and practical issues.
- Representatives of NHDs participated as speakers in events organised by authorities and trade associations.

Standard answers:

- NHDs used standard answers and emails to reply to recurring questions.

National web pages and ECHA's website:

- The NHDs continued to update their websites with support material, FAQs and redirect customers to ECHA's website for specific Q&As, guidance documents and practical guides.
- Used formal announcements for important legislative changes (e.g. new restrictions, PCN obligations, etc.).

Support on 'hot topics':

- Seminars, on-site visits, phone service.
- Information promoted through social media (Facebook, LinkedIn), YouTube video presentations.
- Newsletters, newspapers, informative notes, factsheets.

Cooperation:

- Videoconferences with ECHA on difficult topics.
- Meetings with trade associations, Chambers of Commerce and national authorities.

Regarding suggested areas in which ECHA could continue support to NHDs on hot topics, the majority of the respondents appreciated the work and support provided by ECHA in the form of videoconferences, support material, consultation on FAQs, and social media campaigns (e.g. on poison centre notifications and UFI). They also appreciated the opportunity to contact the ECHA Secretariat whenever needed and acknowledged the usefulness of the HelpEx knowledgebase.

4.2. Events organised by national helpdesks in 2021

In 2021, face-to-face communication continued to be affected by the COVID-19 pandemic and a large number of NHDs, like ECHA, used a remote working model where virtual meetings were the norm.

Per regulation, events have been organised on the following topics:

- For the BPR, the most common topic addressed has been the requirements for placing disinfectants on the market and basic obligations for biocidal products.

- For CLP, Article 45 and Annex VIII remained the most popular topics. In addition, labelling and packaging provisions, and basics of CLP for specific sectors.

- For REACH, workshops, events or webinars have been organised on the following: basics of REACH, Brexit, new requirements for SDSs, SCIP notifications, substances in articles and SVHCs, restrictions on products for consumer use, and on tattoo inks and permanent make-up. Some events were specifically targeted to SMEs.

- More specific topics covered the use of IT tools provided by ECHA, targeted seminars to teachers, inspectors, and chemical advisers.

Several NHDs participated in media campaigns organised by ECHA, by national competent authorities and by chemical producers' associations.

Since most products have to comply with several regulations at the same time, one helpdesk organised 'chemical regulations events' covering more than one piece of legislation. Another one participated in an SME open day and the 'Right to know' of consumers addressing SVHCs in articles.

4.3. Events planned by national helpdesks in 2022

The NHDs also reported on events and communication activities they plan to organise in 2022, many of them similar to those organised in the previous year.

For the BPR, the topics of seminars and campaigns will address market surveillance and raising awareness on the Article 95 obligation by distributing informative material.

As expected, the CLP events planned in 2022 will focus on Annex VIII, covering practical training sessions on PCNs.

For REACH, the topics that are planned to be addressed include: safety data sheets, the Chemical Strategy for Sustainability and the REACH review, substances in articles, restrictions (in particular on tattoo inks and permanent make-up). In addition, information campaigns will be organised on articles under REACH and the SCIP database. One helpdesk will be producing short animations on SCIP.

More specifically, one NHD considered organising an event on all applicable restrictions per

type of product/article and what the importers can ask from their non-EU supplier to confirm compliance of their products.

As a novelty, another helpdesk is preparing an information session on national funding of research, development, and innovation (RDI) activities linked to substitution. Another will prepare short recommendations for companies which are supplying chemicals and mixtures on the national market.

Flyers and brochures about services provided by the helpdesks, and EU pieces of legislation managing chemicals and biocidal products will be prepared by the helpdesk of one candidate country.

In 2022, six NHDs are considering inviting ECHA to participate in their events, and CLP and REACH are the pieces of legislation receiving most interest, with a focus on Annex VIII to CLP and SCIP notifications.

4.4. Visits to and from national helpdesks in 2022

Three NHDs indicated their interest in participating in the helpdesk visiting programme by visiting the ECHA Helpdesk. One candidate country was interested in visiting ECHA, another NHD and hosting a visiting NHD. In addition, 69 % of the respondents to the survey showed their willingness to attend the HelpNet 17 events in autumn 2022.

5. ECHA Helpdesk activities

This section outlines ECHA Helpdesk's activities in 2021. The figures and trends presented in this section rely on data recorded by the ECHA Helpdesk: this is the Regulatory Support Team and the IT External Support Team in ECHA's Support and Enforcement Unit[21].

5.1. Enquiries received by ECHA Helpdesk

5.1.1. Number of regulatory enquiries received per regulation in 2021

In 2021, the ECHA Helpdesk replied to 5 283 regulatory enquiries for the three regulations, of which 2 814 (also counting 765 on SCIP[22]) on REACH, 1 090 on CLP and 983 on BPR. Additionally, replies were made to 352 enquiries on PCN and 44 on POPs[23] (see Figure 9).

PCN is reported separately (both for regulatory and IT questions) to reflect the effort done by the Submissions and Processing Unit (A3). Due to the high-paced legal changes to Annex VIII, with a direct and extended impact on the IT tools and the support material, this Unit was in the lead of the PCN process and involved in replying to the related questions[24].

The IT External support team (iTEX) replied to 6 525 questions in 2021, of which 2 014 on REACH, 1 341 on IUCLID/CHESAR, 1 226 on SCIP, 849 on BPR, 844 on PCN, and 251 on CLP.

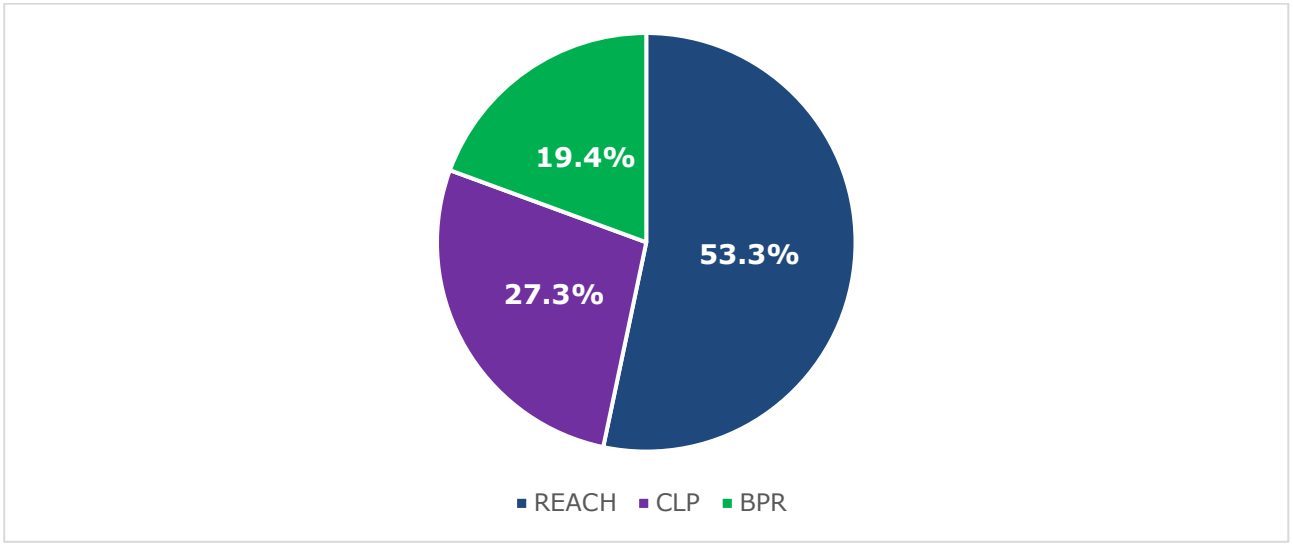

Figure 8: Enquiries received by ECHA in 2021, split by regulation

[21] Reference is made, where relevant, to selected data collected by other teams and units in ECHA, which may use different channels in receiving enquiries and various approaches in recording and classifying received enquiries.
[22] SCIP is the database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD). More information at: https://echa.europa.eu/scip
[23] Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment. Under the POPs Regulation, ECHA helps to identify and propose new POPs from the EU to the Stockholm Convention. Information from Member States implementing the regulation is received and processed by the Agency and compiled into a Union overview. ECHA also supports in identifying the necessary future actions of the EU for the POPs Union Implementation Plan. More information at: https://echa.europa.eu/understanding-pops
[24] The numbers of PCN questions do not include the ones replied in the LinkedIn group.

In comparison with 2020, the total number of regulatory BPR, CLP and REACH enquiries received by ECHA Helpdesk in 2021 increased by 7 %. This is the highest number of questions received per year since 2017. The distribution of topics has changed significantly, however, with the number of CLP questions **doubling** since 2020, and BPR still quite high and close to a thousand questions (see Figure 10).

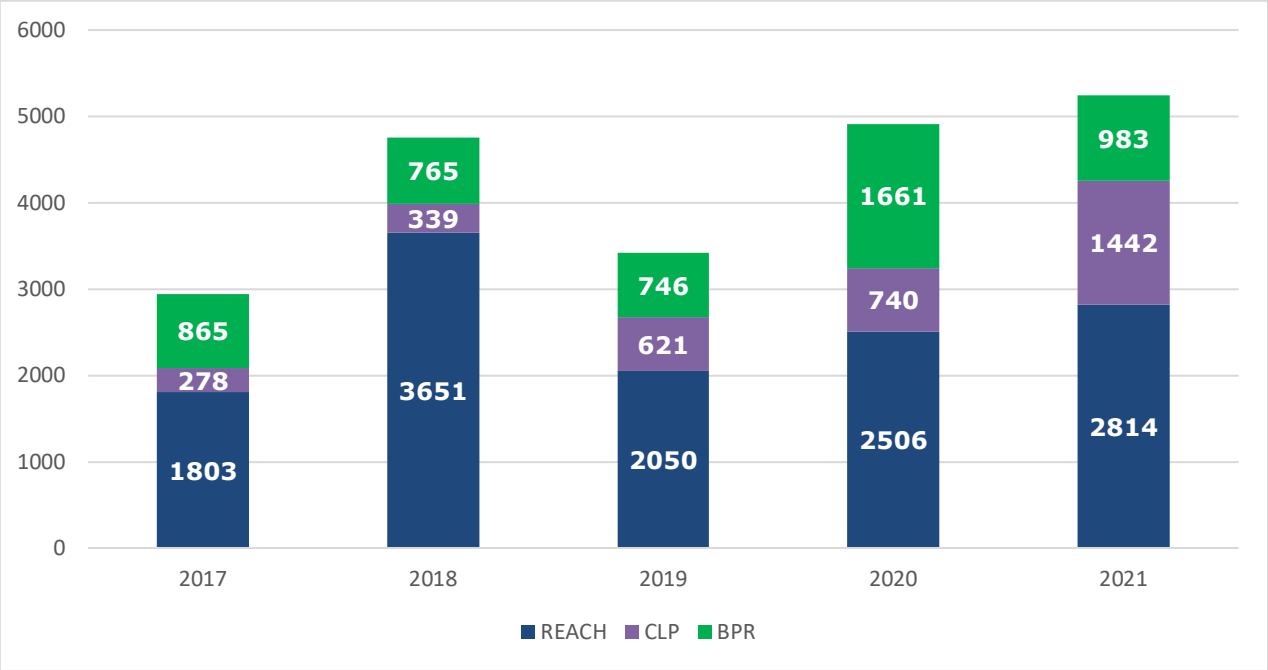

Figure 9: Total number of enquiries received by ECHA 2017-2021

- ✓ The number of enquiries on BPR decreased by 41 % compared to 2020, the year of the COVID pandemic. It still remains high and above the figures of past years.
- ✓ The CLP-related enquiries almost doubled (194 % increase). The increase is largely due to the issues related to the application of Annex VIII.
- ✓ The enquiries on REACH increased by 12 % compared to 2020. In spite of topical issues such as the Brexit consequences and the SCIP deadline, the number remains below the record of 2018, the year of the last registration deadline for phase-in substances.

5.1.2. Hot topics

The five most frequent topics of regulatory enquiries per regulation, as observed by the ECHA Helpdesk, are shown in Figure 11.

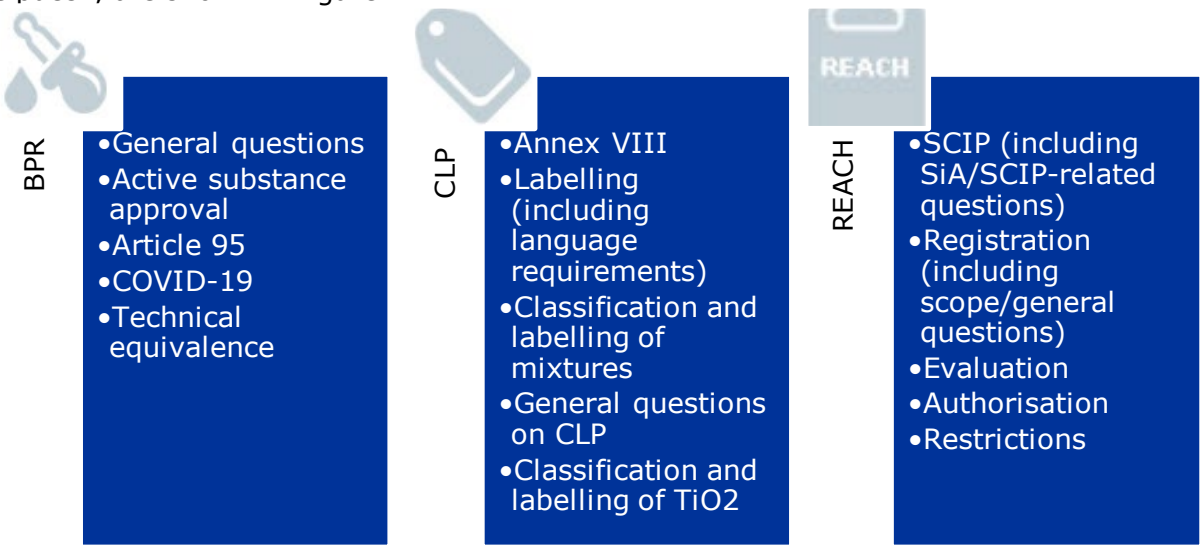

Figure 10: Overview of the hot topics of regulatory enquiries received by ECHA under the BPR, CLP and REACH in 2021

BPR

In 2021, the ECHA Helpdesk received 983 BPR regulatory questions. This is around 40 % fewer questions than in the previous year (1 661 questions), but still about 25 % more questions than in pre-COVID years (2018, 2019). In 2021, COVID-related queries were only around 10 %, whereas in 2020 they represented 42 % of all BPR questions.

The most popular topics in 2021 were: general questions related to different processes under the BPR (placing on the market, granting authorisations, including changes of biocidal products authorisations), followed by enquiries on active substance approval and the regulatory status of different active substances (especially "Silver, as a nanomaterial" and "silver", "Eucalyptus citriodora oil and citronellal") and by queries on Article 95. Questions related to technical equivalence were around 6 % of the total.

The drop of COVID-19 questions on the placing on the market of disinfectants is evident, as well as the rise in general questions, with all the other topics changing positions. The second most popular topic in 2021 (active substance approval) covers questions on the regulatory status of specific substances and possible approval timelines. The increase may be related, *inter alia*, to the relatively slow progress in the evaluation under the Review Programme observed so far, the uncertainties about possible future outcomes, the timing of the transition from making available biocidal products under national law to the marketing of the products under the BPR, and duties of the companies to maintain their products on the market.

The management of the Review Programme (second most popular topic in 2020) was of less interest, and this may be explained by the fact that the majority of the actions required under the latter, such as taking over the role of the Review Programme participant or submission of declarations of interest, have already been accomplished.

CLP

The regulatory enquiries received on CLP in 2021 were 1 442, almost doubling the number received in the previous year. The majority of these questions (58 %) were related to the implementation of CLP Annex VIII and the poison centre notification duties in the context of the first notification obligation for professional and consumer use as of 1 January 2021.

The questions related to PCN covered all possible regulatory and technical aspects, with no outstanding hot topics. Interestingly enough, a number of them covered more general CLP topics and even touched upon safety data sheets.

Candle makers (in the EU but mostly in the UK) have had questions about how to continue their business after Brexit. Common worries were also how to deal with the situation when the non-EU supplier does not want to share the full composition of the mixture imported and understanding the difference between industrial and professional use types. Although outside the scope of ECHA, customers have also been asking about the specificities of each Member State, such as fees or notification systems in place (ECHA submission portal or the national system).

Closely related to the obligations stemming from Annex VIII, a number of candle makers and importers contacted ECHA to understand their duties on classification, labelling, compilation of safety data sheets and notifications to poison centres. Brexit also had an impact on CLP questions, more specifically regarding the decision on which contact details should be put on the label. Questions about labels and multiple languages, as well as the possibilities for fold-out labels, were also frequent. Following the trend in 2020, questions around the classification and labelling of titanium dioxide remained a hot topic, though with a decreasing tendency, probably due to the publication of the Guide on the classification and labelling of titanium dioxide.

REACH

The ECHA Helpdesk received 2 814 regulatory enquiries related to the REACH Regulation in 2021. Each of the topics, from 'Substances in articles' to 'Scope of REACH', are analysed below.

Substances in articles questions are mostly arriving in the context of SCIP. The relation is clear when the customer asks about identifying the duty holder or defining placing on the market, about the definition of article, the scope of the Candidate List entries, or specific substances (such as lead in alloys, overlap with RoHS, entry 63 to name a few). Some questions, however, are purely SCIP-related as they touch upon practicalities of the submission, such as referencing, grouping, or the simplified SCIP notification (SSN).

Registration is the area that has the second highest number of questions. There was a high number of questions related to Brexit, especially in the first part of the year, and also to imports in general: about the 'sufficient knowledge' of the only representative, or how to calculate the tonnage covered by them, who is an importer; possible exemptions related to re-import, and legal entity changes. Questions on dossier updates have also been common, touching upon clarifications of the Commission Implementing Regulation (EU) 2020/1435 and its deadlines, or upon the cease of manufacture and related obligations.

Evaluation is the third most popular area and it has exchanged positions with restrictions compared to the previous year. The matters of the questions are typically: requests for extension of deadlines for testing, consequences of dossier updates after receiving a decision (draft or final), consequences of cease manufacture after a draft or final decision and data sharing issues during the evaluation process. ECHA has already received questions about the revision of Annexes VII to XI, and its impact on dossier updates.

Authorisation is the fourth area in number of questions. Of these, around two-thirds are related to specific applications for authorisation. Article 66 notifications for authorised uses is also a common question. The effects of Brexit are still reflected in the questions received, as well as those of the pandemic, in particular, in relation to both the extension of sunset dates and latest applications dates for related uses.

Restriction questions were mostly related to the scope of different restrictions and clarification of the background documents, such as microplastics or entry 72 restricting certain substances in parts of textiles, clothing and footwear products.

Data sharing continues to be a hot area, with questions on how to handle joint and individual registrations, clarifications about the 12-year rule, requests of access to data for compliance with legislation other than REACH, unresponsive lead registrants, data sharing disputes and 'opt-outs'.

Substance identification remains stable in terms of content, with customers asking regularly about Annex V exemptions, polymers and monomers, nanoforms, or waste. These questions, by nature, frequently touch upon other processes, such as the scope of SVHC, restrictions and POPs.

The scope of REACH remains in the list of hot topics, with customers asking about substances which may be exempted as already affected by other legislation, duties of different actors in the supply chain or the identification of the importer in a given scenario.

Consequently, the three most frequent regulatory 'hot topics' observed during 2021 for BPR, CLP and REACH, were:

- **General questions on BPR** (286 questions). The need to understand how the regulation and the different processes work probably reflects the dynamism of the sector, with frequent newcomers and new products that need to comply with different legal requirements.

- **Questions on SCIP** (765 questions). This topic continued to be popular after the notification deadline of 5 January 2021. The need to understand important concepts for duty holders and notification obligations remained, and questions about updates started to arrive.

- **Questions on Annex VIII** (837 questions). The poison centre notifications continued to be on the top list as the first notification deadline came into force for consumer and professional users. However, the publication of support material together with the combined effort with NHDs to take care of regulatory questions made the numbers go down in the second half of the year.

As pointed out previously, COVID-19 and Brexit have been two underlying and horizontal frequent topics. The effective withdrawal of the UK from the EU on 1 January has still taken some companies by surprise, and the consequences further down the supply chain have become real. For both of these topics, however, the frequency has clearly dropped over the months.

Finally, enquiries were also received on the new obligations to report nanoforms of substances and the related amendments of the REACH annexes but remained at a stable rate over the year. ECHA receives these inquiries through several channels, one being the European Union Observatory for Nanomaterials (EUON)[25].

[25] https://euon.echa.europa.eu/

5.2. Customer support

5.2.1. Communication channels and service response time

ECHA receives enquiries through its dedicated regulatory and technical contact forms[26], as well as through other channels (ECHA Switchboard, functional mailboxes).

The ECHA Helpdesk is committed to replying to regulatory enquiries within 15 working days. Depending on the workload and complexity of the question, this may take up to two months, as indicated in the ECHA Code of good administrative behaviour[27]. The questions are analysed as they arrive, and the easier questions, or urgent questions are typically answered within a few days. While the overall median answering time is five working days, it varies per topic, reaching up to two months in the most complicated areas and when third party consultation (e.g. European Commission) are needed.

Questions posted in the HelpEx tool for discussion among NHDs are normally more complex and ECHA's input may require internal consultations, as well as further discussion following comments from different NHDs. They are, however, prioritised and the target is to provide input two working days before the deadline set by the originator.

5.2.2. Information resources and ways to support companies

The ECHA Helpdesk uses various resources to respond to questions. Starting from the key legal texts, those resources include guidance documents, manuals, practical guides, factsheets, questions and answers (Q&As), the HelpEx database, internal knowledgebase of questions, and other supporting material publicly available on the support tab on ECHA's website.

In 2021, ECHA worked on updating its available support material and developing new guidelines and tools to help companies to comply with their obligations in several areas (PCN, SCIP, restrictions, nanomaterials). Selected support material developed by ECHA, relevant to the 'hot topics' and other regulatory enquiries received during 2020, are listed below.

- ***Guidance updates***

Guidance documents that were updated and published during 2021 include: Guidance on registration, Appendix for nanoforms applicable to the guidance on registration and substance identification, Guidance on the preparation of an application for authorisation, Guidance on harmonised information relating to health emergency response - Annex VIII to CLP and Guidance on labelling and packaging in accordance with CLP.

ECHA also developed two new guidance documents related to the BPR: guidelines on confidentiality claims, and active chlorine released from hypochlorous acid – advice for technical equivalence.

The classification and labelling requirements for titanium dioxide (TiO_2) changed in February 2020. As of 1 October 2021, following the Delegated Regulation (EU) 2020/2017, new classification and labelling requirements entered into force, and the German CA (BAuA[28]) published a guidance document to help companies understand it. The HelpNet noticed its value and offered to translate it and share it on the ECHA website. The HelpNet Secretariat then translated the document into English and consulted with ECHA experts, the Commission and NHDs. The contribution received from all parties was compiled into the final version of the

[26] Helpdesk support - ECHA (europa.eu)
[27] Code of good administrative behaviour - ECHA (europa.eu)
[28] Federal Institute for Occupational Safety and Health

guide published in September 2021 on ECHA's website, under the HelpNet section[29].

- ***Q&A (FAQ) update and development***

In 2021, ECHA has developed **new** Q&As on emerging or recurring topics, such as nanoforms of substances, POPs, REACH - assessment of regulatory needs, SCIP requirements and data dissemination and confidentiality.

With ECHA's decision to stop providing registration numbers to non-claimed NONS notifications, the set of Q&As related to the previous chemicals legislation has been reviewed. A few of the new Q&As explain how notifiers can still claim a registration number under REACH and get into the system within a set deadline.

Two FAQs were published. The first under CLP, regarding the possibility to publish the non-EU supplier information on the CLP label as supplementary information (Q&A 1808), the second FAQ related to REACH (Q&A 1838) on the need to register a nanoform of a substance generated by milling the non-nanoforms of a substance.

At the end of 2021, ECHA initiated also bulk revision of all regulatory Q&As related to the BPR. The revision covers both Q&As and FAQs and is expected to be finalised in 2022.

Also, the drafting of the 7th batch of Q&As on restrictions started at the end of 2021, with NHDs and Commission's consultation, touching upon the following topics:

- Clarification on restriction conditions for substances included in the list of POPs and also in Annex XVII of REACH (as the PFOA (now under POP) and the C9-C14 PFCA restriction (Entry 68)).
- Restrictions applicable to plastic articles (request from a Member State).
- Clarification of the scope of the restriction and/or the interpretation of the legal text for 'group restrictions' (i.e. entries 75 (tattoo inks), 74 (diisocyanates), 73 (TFDAs), 68 (PFCAs).

- ***Ad hoc support***

For the following three areas, support material in different formats has been developed or updated.

  - ***SCIP***

In addition to the new Q&As on SCIP, a wealth of support material was updated in 2021. This includes the following documents, available on the SCIP support web pages:

- 'How to prepare and submit a SCIP notification' support material was translated to all EU languages[30]
- 'Tools to refer to SCIP data already submitted to ECHA'[31]
- 'SCIP Notification Format Preparing a SCIP dossier'[32]
- Interactive support material[33] was developed such as podcasts and online presentations

[29] Guide on the classification and labelling of titanium dioxide:
https://echa.europa.eu/about-us/partners-and-networks/helpnet/2020
[30] https://echa.europa.eu/scip-support
[31] Tools to refer to SCIP data already submitted to ECHA:
https://echa.europa.eu/documents/10162/17247/tools_to_refer_to_already_submitted_sip_data_en.pdf
[32] Preparing a SCIP dossier:
https://echa.europa.eu/documents/10162/6205986/preparing_scip_dossier_en.pdf/
[33] The material is available at:
https://echa.europa.eu/-/know-more-about-hazardous-chemicals-in-products-scip-data-published

- ***Poison centres obligations***

ECHA continued to provide support to companies to help them prepare their notifications in the new harmonised format. No new material was produced, the focus being in keeping up to date the published one, mainly related to the submission tools. The biggest effort was to keep the "PCN: a practical guide" up to date, to reflect the changes in the ECHA submission portal. The LinkedIn[34] discussion group had lively discussions, where companies were also sharing their knowledge on the Member State preparedness, transitional situations and fees, for example. This group is managed by Unit A3 in ECHA, with the help of the Helpdesks.

- ***Nanoforms of substances***

Besides the new Q&As developed on nanoforms of substances, ECHA published a new manual '*How to prepare registration dossiers covering nanoforms*'[35], which is meant to be used as an add-on to the generic registration manual. The HelpNet correspondents received a training from ECHA experts on nanoforms on 28 September.

5.3. ECHA events

5.3.1. ECHA events in 2021

Due to the COVID-19 restrictions imposed in 2021, ECHA had to organise its annual Safer Chemicals Conference online (6 October 2021)[36]. The Conference focused on the EU Chemicals Strategy for Sustainability with high-level political discussions and ad hoc stands for companies support, among which one on the ECHA Helpdesk's support.

Among the webinars organised for stakeholders, two were on restrictions (January, April), Chesar 3.6 (January), poison centre notifications (March, November), REACH-IT (March, November), harmonised classification and labelling dossier (May, December), completeness checks of chemical safety reports (November), QSAR (June, November), assessing groups of chemicals (December) and SCIP dissemination portal (December).

The ECHA HelpNet Secretariat organised, remotely through WebEx, the following HelpNet events: a Steering Group meeting (2 November), two REACH workshops (8 June, 3 November), two CLP workshops (9 June, 4 November), one BPR workshop (5 November), eight meetings of the Borderline case Working Group, a training session on nanomaterials (28 September) and one on classification of mixtures (23 November), and three REACH videoconferences on topics proposed by NHDs (20 October, 25 November, 15 December). In addition, HelpNet members and observers were informed on topics of their interest through the HelpNet updates, issued in April, July and December 2021.

Moreover, HelpNet REACH, CLP and BPR members participated in two Forum training sessions on integrated chemical compliance of products (REF-10 project) and biocidal products containing non-approved/approved active substances (BEF-2 project).

Due to travel restrictions linked to the COVID-19 situation, all visits were cancelled.

5.3.2. Planned events in 2022

The ECHA HelpNet Secretariat plans to organise both virtual and physical HelpNet events in 2022: regulatory workshops from 17 to 19 May, the 17th Steering Group meeting, and the BPR, CLP and REACH workshop from 4 to 6 October. In addition, four meetings of the Working Group on 'Borderline cases on the article definition' (February, April, June, September) and the

[34] https://www.linkedin.com/groups/12364138/
[35] How to prepare registration dossiers covering nanoforms (europa.eu)
[36] https://echa.europa.eu/-/safer-chemicals-conference

monthly REACH and CLP videoconferences are planned.

In Q4, ECHA intends to organise an online event in relation to the SPC Editor integration into IUCLID. Although technical questions are within ECHA's remit, the awareness of new functionalities and the knowledge of the practical consequences of this integration may be useful in the daily work of NHDs and national competent authorities. In particular, the online event would be an opportunity to get familiar with the new solution and deepen the knowledge on the SPC, considering the planned go-live, envisaged in February 2023.

6. Summary and conclusions

In 2021, the NHDs replied to 55 000 enquiries and continued working together, adapting to the remote and hybrid ways of working linked to the prolongation of the pandemic. The ECHA Helpdesk replied to almost 12 000 questions, counting both regulatory and IT tools related questions.

The responses provided through the survey reflect the activities of the BPR, CLP and REACH helpdesks across 32 countries. Helpdesks of one candidate and one third country reported on their 2021 activities, complementing the picture of chemicals legislation implemented in Europe.

The number of enquiries and hot topics dealt with by NHDs in relation to the BPR, CLP and REACH, summarised, were as follows:

- For BPR, the number of enquiries reported in 2021 decreased by 40 % . The BPR remains the regulation with the highest number of enquiries in the past seven years. The most popular topics were 'National procedures/laws governing the transitional period', and 'National authorisations of biocidal products, or families'.

- Regarding CLP, the number of enquiries replied in 2021 decreased by 15 %. The questions continued to target poison centre notifications (both Article 45 and Annex VIII), labelling (including language requirements), classification of mixtures, but also general questions on CLP.

- Concerning REACH, the number of enquiries increased by 6 % compared to 2020. The number of questions and topics seem to be stable. As a matter of fact, no new topic has entered the list of hot topics, and the changes in places have been only swaps amongst them.

A historic trend shows that the number of queries addressed by the NHDs in 2021 is still the highest after the peak in 2020, surpassing the number of questions recorded previously, including 2017, the year before the last registration deadline (that recorded 52 000 questions).

Comparing the trends in number of questions received per regulation between the NHDs and ECHA, we see that it has been the same for BPR (both experienced a decrease of 40 %), and similar for REACH. In this case, ECHA received slightly more incidents, up to 12 % more. The most important difference comes for CLP, for which ECHA received almost double compared to 2020, whereas NHDs recorded a decrease of 15 %. The main reason seems to be the application of Annex VIII, and its technical implementation, which falls in the remit of ECHA.

Topic wise, the split of responsibilities between ECHA and NHDs is clearly shown for the BPR. It is worth noticing, however, that 'General questions' and 'COVID-19' appear in both sides, amongst the five hottest topics. The NHDs have almost the same list of five hot topics as ECHA regarding CLP.

Concerning REACH, there is quite some difference between ECHA and the NHDs, though it is

not surprising. The NHDs continue to deal with questions around safety data sheets and general questions on REACH. The latter will continue to remain there now that the NWOWs are settling. On ECHA's side, SCIP, registration, evaluation and authorisation remain high, mainly due to the role ECHA plays in those processes.

HelpNet members and ECHA staff continued working remotely under different lockdown formats, organising online meetings and communicating through various virtual means to coordinate efficiently and ensure the support of companies. Overall, the activities of the HelpNet and communication among its members has continued, overcoming the challenging times and even recording an increase in communications.

The expectations for 2022 are high, with the ongoing discussion on the CLP and REACH revision, and ECHA is looking forward to organising at least some meetings physically. The HelpNet will surely benefit from the networking going around the Steering Group meeting and the workshops. Virtual tools and hybrid meetings will be made available to create the necessary communication channels and to ensure an equal access to information and exchanges to all NHDs. This to make sure NHDs and ECHA continue to fulfil the HelpNet mandate to ensure a harmonised and consistent advice on chemicals legislation.