

BPRS-1/M/2017 – INTERNAL
Adopted on 30/08/2017

Minutes of the
1st meeting of the BPR Subgroup of the Forum for Exchange of Information on
Enforcement
Helsinki, Finland
31 March 2017

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I. Summary record of the proceedings

The items reported in the minutes refer to the agenda of the BPRS-1 (Content IV, Annex I) and follow a chronologic order. Amendments made at the beginning of the plenary meeting are reported in point 1.2 'Adoption of the agenda'.

Item 1 – Welcome and introduction

1.1 Opening by ECHA Head of Unit A2

The ECHA Head of Unit "Support, Forum and HelpNet Secretariat", chairing the meeting in items 1 and 2, welcomed the participants and opened the meeting. He announced apologies and stated the proxies appointed. He informed that the quorum requirement was met.

At the beginning of 2017 the European Commission (COM) officially handed over the coordination of a network of Member States' enforcement authorities on biocides to ECHA, which – following the consultation of NEAs, MSCAs and COM - decided to establish a Forum BPR Subgroup (BPRS). This is the newly coordinated network of the BPR enforcement authorities and it is incorporated into the already established Forum for REACH, CLP and PIC (Forum).

The Chair announced that the meeting was recorded for the purpose of writing the minutes. The recordings are going to be destroyed after the minutes are adopted.

1.2 Adoption of the agenda

The ECHA Forum Secretariat informed the plenary about the changes to the agenda (Content IV, Annex I) and indicated that there was one room document: ECHA/BPRS-1/2017/2_room_doc.

The agenda was adopted.

1.3 Declarations of conflicts of interest with regard to agenda items

No conflicts of interest (according to Article 9(2) of the Forum Rules of Procedure (ROPs)) were declared at the meeting.

1.4 State of play with regard to the action points from BEG-3

The Forum Secretariat informed the plenary on the status of the action points from the Biocidal Enforcement Group - 3 (BEG-3) and highlighted the open actions (document ECHA/BPRS-1/2017/1.4). All actions were discharged. The European Commission was requested to deliver the pending minutes of the previous BEG-3 meeting (Content II, Action Points).

Item 2 – Election of the BPR Subgroup Chair and Vice Chair

The Chair introduced the members to the procedural aspects of the election process, as described in the meeting document concerning the current draft rules of procedure of the Forum (ROPs). The election was for two posts:

- Chair of the BPRS (mandate starting on 31 March 2017);
- Vice Chair of the BPRS (mandate starting on 31 March 2017).

The candidate for the Chair having accepted the candidature before the meeting was:

- Eugen ANWANDER (AT)

The candidates for Vice Chair having accepted the candidature before the meeting were:

-Dominik PISAREK (PL);
-Francesca RAVAIOLLI (IT).

There were no new nominations submitted during the plenary.

All candidates gave speeches highlighting their strong motivations and commitment to the tasks.

The voting for the election of the Chair and the Vice-Chair of the BPR Forum Subgroup was done by secret ballot. Two members of the BPRS volunteered as tellers to count the votes.

The Chair elected in the first round was Eugen Anwander (AT). The Vice-Chair elected in the third round was Dominik Pisarek (PL).

The newly elected Chair and Vice Chair immediately started to chair the meeting from agenda point 3 onwards.

Item 3 – Address by ECHA’s Director of Risk management

Jack de Bruijn, ECHA’s Director of Risk management welcomed the newly established BPR Subgroup and stressed the importance of setting priorities in enforcement projects under the BPR, the synergies with the Forum and the commitment of ECHA in fulfilling the needs of inspectors and more in general of the BPR Subgroup.

Item 4 – Rules of procedure

ECHA’s Forum-Secretariat introduced the revised draft of the Rules of Procedures (ROPs) previously consulted with the BEG (ECHA/BPRS-1/2017/4).

In the ensuing discussion the members of the BPRS stressed that the group wishes to be free to take its own decisions and believes that there is no need to have its conclusions approved by the Forum, but that it should strive for maximum synergies with the Forum and close coordination on common activities and outputs. The BPRS also agreed with the Forum that the Chairs, of the Forum and the BPRS, should represent their group, unless they are mandated to represent the other group (speak on behalf of each other, e.g. in case of international conferences). The ultimate goal is to have a consistent voice from the two groups in the Forum.

The BPRS was invited to submit written comments to the ROPs by 21 April 2017.

Item 5 – Update from the Forum

The Chair gave the floor to the newly elected Forum Chair, Katja VOM HOFE (DE), who briefly summarised the relevant subjects for the BPRS from the Forum-26 meeting held at ECHA on 28-30 March 2017:

- i) A summary of the results of a discussion about the relationship between the Forum and the BPRS;
- ii) An invitation to the BPRS to join the REF-6 project on the Classification and Labelling of biocidal products;
- iii) A revision of the Forum best practice documents in order to integrate the BPRS;

- iv) The transfer to the BPRS of the subgroup of the Working Group on the Portal Dashboard for biocides (the subgroup of the Working Group on the Portal Dashboard for REACH and CLP remained within the remit of the Forum).

Item 6 – Enforcement in Member States

The Chair gave the floor to the French BPRS members who presented the French policy for the enforcement of the BPR Regulation and the results of the controls in the year 2015 and 2016.

In the ensuing discussion one BPRS member asked about what was measured in the samples collected during the survey and the FR representative clarified that the focus was on products that were forbidden to be put on the French market at the time of the survey (non-approved a.s.). Another member asked about the training provided to inspectors and the speaker clarified that the French authority dedicates usually two weeks per year to train inspectors on enforcement. Regarding the language on labels, the FR inspectors focused their efforts only on imported products resulting in a higher rate of non-compliance. Priorities are set based on clear instructions from policy bodies in the government. Regarding the duration of the survey campaigns in France, the FR BPRS members replied that it has been already a long time since the French authority had put in place inspection campaigns in the market area. The FR speaker also explained that non-compliances are timely followed up, and that the French authority is attempting to make good use of non-compliances to set priorities for future inspection campaigns.

The Chair asked the BPRS members to contribute to the improvement of the ECHA website on the dedicated page on the national enforcement authorities in charge of BPR. BPRS members were invited to send to the ECHA-Secretariat descriptions of their BPR enforcement authorities that can be published on the ECHA website.

The Chair invited other BPRS members to present their national approaches at the next meetings as well.

Item 7 – Priorities and the BPRS Work Programme 2017-2018

7.1. BPR enforcement priorities and the Forum Work Programme 2017-2018

ECHA's Forum-Secretariat invited the BPRS to record its plans and priorities for the years 2017-2018 in the Forum Work Programme 2014-2018, which was under review. The main priorities for the BPRS indicated by BEG members in the previous consultations were the establishment of an enforcement project (on CLP, check of authorisations for biocidal products and presence of approved active substances in the product) and integrating the BPRS in existing Forum activities and outputs.

In the ensuing discussion the BPRS agreed to joining the REF-6 project on classification of mixtures to implement an enforcement project focused on the Classification and Labelling of biocidal products. The BPRS also established a new Working Group (WG) on "Prioritisation of BPR enforcement projects" to identify and prioritise the subject(s) for the next BPRS enforcement project. Lastly, the subgroup mandated the Forum-Secretariat to revise the Forum Multi Annual Work Programme 2014-2018 on the basis of written feedback submitted by the BPRS members.

Members were invited to submit further written feedback to the ECHA-Secretariat by 21 April (see Action Point – Chapter II).

7.2 Data to be collected for Member State BPR Reporting under Art 65.3

An invited expert from Italy, presented a proposal for a potential BPRS activity aimed at defining standard rules for collecting biocides poisonings data in the framework of the reporting activities under the Article 65(3) of the BPR. This would harmonise the collection of biocides poisonings data, by including them into the regular obligatory MS reports to the Commission.

The BPRS agreed to wait for the inputs and plans from the Commission on the template under Art 65(3), which would be discussed in more detail at the BPRS-2.

Regarding the data on poisoning one BPRS member pointed out that the collection of biocides poisoning data could be in the remit of Competent Authorities (CAs) and must be decided with the BPR CAs at Commission level. The BPRS agreed to invite the IT colleagues to bring the matter to the attention of the BPRS CA at their next meeting organised by COM. The BPRS would then be debriefed at the next plenary meeting of the results of the discussion with the BPR CAs.

7.3 Transfer of the Subgroup of Forum WG "Implementation of PD-NEA" from REACH/CLP Forum to the BPRS

The Vice-Chair of the Forum WG "Implementation of PD-NEA", explained that the implementation of the Portal Dashboard for biocides is currently addressed in a sub-working group of the Forum WG "Implementation of PD-NEA", which should now be transformed into a WG under the umbrella of the BPRS.

The sub-WG has been working with the ECHA biocides experts to finalise the data requirements, and has also collaborated with ECHA's contractors to define the functional requirements and related data requirements for the biocides PD-NEA.

The BPRS agreed to establish a new WG "Implementation of BPR PD-NEA".

7.4 Forum best practise documents: applicability to BPR

Forum-S summarised the discussions held at Forum-26 with reference to the Task Force (TF) on revising the Forum best practise documents. These documents consist of the Strategies for enforcement of REACH and CLP and the Minimum criteria for REACH and CLP inspections.

The BPRS agreed that the elements concerning BPR enforcement should be integrated into the best practice documents, and the BPRS will send its experts to the TF, who will develop "BPR essential requirements for enforcement". The TF will remain in the remit of the Forum since the documents were originally developed by them. Progress reports of the TF will be presented at the next plenary meetings of the BPRS. The BPRS members were invited to clarify the names of BPR experts for the TF by 21 April (see Action Point – Chapter II).

7.5 Establishment of the BPRS WGs

BPRS reviewed the mandates of the following WGs:

- BPRS WG "Implementation of PD-BPR";
- BPRS WG "Prioritisation of the BPR enforcement projects"
- Forum WG REF-6 for Classification and Labelling of Biocidal products.

Members were invited to clarify the names of experts by 21 April (see Action Point – Chapter II).

Item 8 – Cooperation with other networks / CLEEN plans for an enforcement project

The BPRS member representing the CLEEN Secretariat presented the BPR projects that the CLEEN had undertaken so far and planned future activities. This included a presentation of the results of the EuroBiocides projects III and the plans for an EuroBiocides IV project.

The BPRS appreciated the work of the CLEEN network and recommended to pursue synergies and use the experience from past CLEEN projects when designing new BPRS projects. CLEEN will be invited to present the results of the EuroBiocides IV project when it is finished in autumn 2017.

Item 9 – Practical issues for enforcement

- Issue 3.1 - Article 3.3 decisions (horse rug as a biocidal product)

The Forum-Secretariat presented the issue and the BPRS discussed the proposed conclusion.

The BPRS agreed to address the issue again in the future plenary.

- Issue BEG 3.2 - Article 95 enforcement

The Forum-Secretariat presented the issue and the BPRS discussed the proposed conclusion.

The BPRS endorsed the BEG 3.2 draft conclusion, which was to be added to the Forum's "Manual of Conclusions" after editorial consultations and adoption of the final text in written procedure.

The Forum-Secretariat explained that the idea behind the "Manual of Conclusions" of the Forum is to collect all conclusions on practical issues approved by the Forum and the BPRS. The Forum-Secretariat suggested adding a new BPR section to it in order to keep one version of the manual for all the legislations covered by the Forum. The BPRS agreed to this approach.

The Chair requested that members should submit new practical issues for enforcement for the next BPRS 50 days before the next meeting, namely by 26 April 2017. The new practical issues should be sent using the revised template of Annex II of the MoC.

Item 10 – IT Support

The Forum-Secretariat indicated that it is now considering two IT projects aimed at providing BPR data: the Portal Dashboard and Dissemination, and highlighted the synergies of these projects (related to the same data). As ECHA management was still discussing the way forward for these two projects, more information was expected to be available by the end of April 2017.

The BPRS noted that the PD-BPR will be optimised to better serve the needs of the NEAs.

BPRS members were invited to submit feedback on the latest acceptable availability of the IT tool by 14 April.

Item 11 – Updates from the COM

The COM representative (DG SANTE) gave the BPRS an update of the COM's activities that were relevant for the work of the Forum, in particular the plans for developing the template of Article 65(3).

In the discussion one BPRS member asked what Commission is going to do with the data collected during a previous DG SANTE survey addressed to the MS national enforcement authorities in the context of the fact finding missions organised by the COM. COM responded that this project is indeed not an audit and therefore no legal action will be taken at the end of it. The ultimate goal of the project is to provide the MSs with suggestions for a better implementation/enforcement of BPR.

Another BPRS member asked the COM to inform the BPRS as soon as possible about the template to be used under the Article 65(3) reporting and to communicate in advance to the MSs to be checked during the fact-finding missions. COM confirmed that it is working on the template. The COM will inform the BPRS as soon as possible.

COM has also committed to circulate an email with the MSs that will be involved in the fact-finding missions (see Action Point – Chapter II).

Item 12 – Adoption of conclusions and action points

The BPRS adopted the conclusions and action points (see Chapter II).

II. MAIN CONCLUSIONS & ACTION POINTS - Adopted at the BPRS-1

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
Item 1- Welcome and introduction		
1.2 Adoption of the Agenda	Agenda was adopted.	
1.4 State of play with action points from BEG-3		COM is invited to deliver the pending minutes of the BEG-3 meeting by 21 April.
Item 2 – Election of the BPR Subgroup Chair and Vice Chair		
	The BPR Subgroup elected Eugen Anwander (AT) as Chair and Dominik Pisarek (PL) as a Vice Chair.	
Item 3 – Address by ECHA's Director of Risk management		
Item 4 – Rules of Procedure		
		BPRS members are invited to submit comments to the draft Rules of Procedure by 21 April BPRS members are invited to submit suggestions for an acronym to be used for the BPR Subgroup by 21 April.
Item 5 – Update from the REACH/CLP Forum		
	The BPRS agreed that it needs not to validate its decisions with the Forum, but for common outputs and issues the Forum takes the final decision after thoroughly consulting the BPRS. The BPRS also agreed that each chair should represent their body unless mandated to represent the other body including agreed cross-cutting issues related to both bodies by the other chair. Art 9.7 of ROPs applies.	
Item 6 – Enforcement in Member States		
		BPRS members are invited to submit a description of the BPR enforcement authorities (with links to their websites) that can be published on the existing sections of the ECHA website that describe the national inspectorates by 31 May.
Item 7 – Priorities and BPRS Work Programme 2017-2018		
	BPRS decided to join the Forum REF-6 project. The BPRS agreed that the BPR input into the Forum MAWP will be drafted by Forum-s and consulted with BPRS. BPRS established a new WG for prioritising BPRS enforcement projects.	Forum-S will draft the BPR elements of the MAWP and consult it with the BPRS before the BPRS-2 meeting.

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
7.2 Data to be collected for MS BPR Report under Art 65(3) regarding the data on poisonings	BPRS agreed to provide its input for the elaboration of a template for a MS Report under Article 65(3) of BPR by commenting on the COM draft template of the MS Report.	IT BPRS member is invited to bring the proposal on collection of data on poisonings to the BPRS CA COM is invited to schedule the discussion at one of the future meetings of the BPR CAs.
7.3 Transfer of Subgroup of Forum WG "Implementation of PD-NEA" from REACH/CLP Forum to BPRS	BPRS transferred of the Subgroup of Forum WG "Implementation of PD-NEA" under the remit of BPRS and established a BPRS Working Group "Implementation of PD BPR".	
7.4 Forum best practice documents	The BPRS agreed to continue providing input to the Forum TF "Revision of Best Practice Documents".	BPRS members are invited to inform the Forum-s if they already have a list of BPR obligations that are relevant for enforcement by 21 April.
7.5 WG mandates		The BPRS members proposing experts to the WGs are invited to provide names by 21 April.
Item 8 – Cooperation with other networks		
Item 9 – Practical issues for enforcement		
BEG-3.1	BPRS discussed the issue and agreed that there is no legal basis for the flexible approach proposed in the draft conclusion. The issue remains open.	COM is invited to continue investigating with its legal service for a legally sound solution to this issue.
BEG-3.2	The BPRS agreed on the conclusion for the practical issue.	Forum-S will send a supplement for the MOC for BPRS consultation by 14 April 2016.
Practical issues		Forum-S will send out a template for submitting new practical issues by 7 April. BPRS members are invited to submit new practical issues for the next plenary meeting by 26 April 2017.
Item 10 – IT Support		
		BPRS members are invited to submit feedback on the latest acceptable availability of the IT tool by 14 April.
Item 11 – Updates from the COM		
		COM is invited to provide to the Forum-S the list of Member States which will be visited by the "fact finding missions" by 14 April. Forum-S will distribute this list to the BPRS members by 21 April.
Item 12 – Adoption of conclusions and action points		
Item 13 – AOB		
17.1 Dates of the meetings in 2017 and 2018	BPRS future meetings: BPRS-2 - 22 June 2017; BPRS-3 - 10 November 2017; BPRS-4 - 16 March 2018; BPRS-5 - 21 June 2018; BPRS-6 - 9 November 2018.	

III. List of attendees

BPRS members

	Country	Name
1	AT	ANWANDER Eugen
2	BE	DE VOS Helmut
3	BG	HRISTOVA Viktoriya
4	CH	BUERGY Heribert
5	CY	GAVRIEL Alexandros
6	CZ	JAROLIM Oldrich
7	DE	VOM HOFE Katja
8	DK	SKALS Dorrit
9	EE	LINNO Annemari
10	EL	MITSOPOULOU Kornilia
11	ES	VÁZQUEZ CORTIZO Margarita
12	FI	KARNANI Paivi
13	FR	CROIZE-POURCELET Gilles
14	HU	NÉMET Balázs
15	IS	PALMADOTTIR Elisabet
16	IT	RAVAIOLI Francesca
17	LT	VZESNIAUSKAITE Evelina
18	LU	ENGELS Kim
19	LV	KAZEROVSKA Kristine
20	MT	FARRUGIA Bernice
21	NL	DE BOER Jabik
22	NO	SKJAERGAARD Cathrine
23	PL	PISAREK Dominik
24	PT	MARTINS DE ALMEIDA Inês
25	RO	CIRLAN Cristiana
26	SE	BERGSTROM Emma
27	SK	POCAROVSKA Miriam
28	UK	POTTS Mike

Advisors

	Country	Name
1	DE	FRENZEL Stefan
2	DE	WURSTHORN Sibylle
3	DK	MADSEN Bettina
4	ES	GÓMEZ GALLEGGO Prado
5	FI	LAHTINEN Marilla
6	FR	COISSARD Vincent
7	IT	SETTIMI Laura

European Commission representative

	DG	Name
1	SANTE	NAGTZAAM Mario

ECHA Staff

	ECHA	Unit
1	BARANSKI Maciej	Support, Forum and HelpNet Secretariat
2	TECCE Nicola	Support, Forum and HelpNet Secretariat
3	CLIFFE Brendan	Support, Forum and HelpNet Secretariat
4	KURONEN Terhi	Support, Forum and HelpNet Secretariat
5	TUOMAINEN Anita	Support, Forum and HelpNet Secretariat
6	NOUWEN Johan	Support, Forum and HelpNet Secretariat

IV. List of Annexes

- Annex 1. Final agenda of BPRS-1
- Annex 2. List of mandates of BPRS WGs/Forum WGs/Forum Task Forces:
ANNEX 2 a –“Implementation of PD BPR”
ANNEX 2 b –“Prioritisation of BPR enforcement projects”
ANNEX 2 c –“Coordinated enforcement project REACH-EN-FORCE-6”
ANNEX 2 d –“Revision of the best practice documents”
- Annex 3. Glossary of acronyms and abbreviations

Annex 1 – Final agenda of BPRS-1

Agenda of the 1st BPR Subgroup Forum meeting (BPRS-1)

European Chemicals Agency
Helsinki, Finland
31 March: starts at 08:30; ends at 16:00

Item 1 – Welcome and Introduction	8:30-08:45
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- 1.1 Opening by ECHA – *ECHA Head of Unit A2*
- 1.2 Adoption of the Agenda – *ECHA Head of Unit A2*
- 1.3 Declarations of conflict of interest with regard to agenda items – *ECHA Head of Unit A2*
- 1.4 State of play with action points from BEG-3 – *ECHA Forum Secretariat/COM*

For adoption
For information

ECHA/BPRS-1/2017/1.4

Item 2 – Election of the BPR Subgroup Chair and Vice Chair	08:45-09:25
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- 2.1 Presentation of the candidates by the *ECHA Head of Unit A2*
- 2.2 Candidates' motivation speeches
- 2.3 Election procedure
- 2.4 Counting of the votes and announcement of the elected Chair and Vice-Chair of the Forum BPR Subgroup

For discussion

ECHA/BPRS-1/2017/2_room doc

Item 3 – Address by ECHA's Director for Risk Management	09:25-09:35
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For information

Item 4 – Rules of procedure	09:35-10:20
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Revised Forum Rules of Procedure – *ECHA Forum Secretariat*

For discussion

ECHA/BPRS-1/2017/4

Coffee break 10:20-10:40

Item 5 – Update from the REACH/CLP Forum 10:40-11:00

Update from relevant discussions in the Forum – *Forum Chair, Forum Vice Chair or Forum member*

For information

Item 6 – Enforcement in Member States 11:00-11:25

French policy for the enforcement of BPR Regulation and the results of controls in 2015/2016 – FR BPRS member

For information

Item 7 – Priorities and BPRS Work Programme 2017-2018 11:25-12:45

- 7.1. BPR enforcement priorities and Forum Work Programme 2017-2018 – *ECHA Forum Secretariat*
- 7.2 Data to be collected for Member State BPR Reporting under Art 65.3 – *IT BPRS member*
- 7.3 Transfer of Subgroup of Forum WG “Implementation of PD-NEA” tools from REACH/CLP Forum to BPRS – *BPRS Chair*
- 7.4 Forum best practise documents; applicability to BPR
 - *Forum TF “revision of the best practise documents”*
- 7.5 Establishment of the BPRS WGs: - *BPRS Chair*
 - *Implementation of PD BPR;*
 - *BPR elements of Forum Work Programme;*
 - *Preparation of BPR project (TBC);*
 - *Preparation of the report in accordance with Art 65.3.*

For discussion

ECHA/BPRS-1/2017/7.1
ECHA/BPRS-1/2017/7.2
ECHA/BPRS-1/2017/7.3
ECHA/BPRS-1/2017/7.4
ECHA/BPRS-1/2017/7.5

Lunch break 12:45-13:35

Item 8 – Cooperation with other networks 13:35-14:05

CLEEN plans for enforcement project EuroBiocides 2017 – *CH BPRS member*

For discussion

Item 9 – Practical issues for enforcement 14:05-14:45

Items raised by Forum/ECHA/COM (list of practical issues is prepared independently from the agenda) - *ECHA Forum Secretariat*

For discussion/adoption

ECHA/BPRS-1/2017/9

Item 10 – IT Support 14:45-15:20

Developments on the BPR IT support – *ECHA Forum Secretariat*

For information

Item 11 – Updates from the Commission 15:20-15:50

Updates by the European Commission – *COM representative*

For information/discussion

Item 12 – Adoption of conclusions and action points 15:50-16:00

For adoption

End of the meeting 16:00

Coffee after the end of the meeting

Annex 2. List of mandates of BPRS WGs/Forum WGs/Forum Task Forces

ANNEX 2 a –“Implementation of PD BPR”

BPRS Working Group

“Implementation of PD BPR”

Composition:

Chair: Eugen ANWANDER (AT)

BPRS Members/Alternates

- Francesca RAVAIOLI (IT)

Invited Experts

- Brigitte EDER (AT)
- Natalja UMBRASIENE (LT)
- Pia LINDFORS (FI)
- Jurgen SCHMID (DE)

Objective:

- Support the implementation of the Portal Dashboard for biocides (PD BPR) allowing inspectors access to data submitted to ECHA

Mandate:

- Analyse the requirements for the BPR inspectors;
- Provide input during the further development and implementation of PD BPR;
- Verify that the UAT conditions are implemented and follow up the implementation of the WG improvement requests;
- Provide training on the use of the PD BPR to MSs;
- Support the production of a Manual for using the PD BPR.

Timeline:

- BPRS-4 (Q1 2018)

ANNEX 2 b –“Prioritisation of BPR enforcement projects”

Forum BPR Subgroup Working Group “Prioritisation of BPR enforcement projects”

Composition:

Chair: Emma BERGSTRÖM (SE)

Forum Members/Alternates:

- Jabik DE BOER (NL)
- Francesca RAVAIOLI (IT)
- Marios ADAMIDES (CY)

Experts

- Marianne BRAAM (NL)
- Karin PFAFF (DE)
- FR (to be nominated)
- AT (to be nominated)

Objective:

- Define the priorities for the BPR Subgroup enforcement project

Mandate:

- Propose a subject of the first BPR-related enforcement project to the BPRS;
- Examine the Forum process and methodology for selecting and running enforcement projects and report to BPRS on its applicability for BPRS
- Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project;
- Prepare and deliver the training for the project for the national coordinators;
- Management of the operational phase;
- Management the reporting phase: Follow-up the operational phase, collect the results and draft the project evaluation.

Timeline:

- BPRS-2 – proposal for the project and tentative planning

ANNEX 2 c –“Coordinated enforcement project REACH-EN-FORCE-6”

Forum Working Group

“Coordinated enforcement project REACH-EN-FORCE-6”

Composition

Chair: Henrik HEDLUND (SE)

Forum Members and Alternates

- Gro HAGEN (NO)
- Elena ZIDAROVA (BG)
- Dimitrios CHATZIANTONIOU (EL Alternate)
- Sofia BARATA (PT Alternate)
- Pablo SÁNCHEZ PEÑA (ES)

Invited Experts

- Petra SCHLAG (DE)
- Markus MAKI (FI)
- Mariana DE VRIES-HLAVACOVA (NL) (also biocides?)
- Žilvinas UŽOMECKAS (LT)
- Zsuzsanna KISS (HU)
- Panagiota SKAFIDA (EL)

BPRS Members and Experts

- Viktoriya HRISTOVA (BG)
- Emma BERGSTRÖM (SE)

Objective:

- Conceive and manage the sixth major Forum enforcement project REF-6

Mandate:

- Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project
- Prepare and deliver the training for project national coordinators
- Management of the Operational phase
- Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
- Elaborate tips and hints for inspectors based on the relevant outcomes from the project
- Decide whether to include biocides in the scope of the project in collaboration with the appointed BPR experts

Timeline:

- Project manual: Q4 2017
- Prepare and deliver the training for project national coordinators: Q4 2017
- Operational phase: 2018
- Reporting phase (National Coordinators): Q1 2019
- Evaluation phase: Q3 2019
- Draft report: Q4 2019
- Adoption of the report: Q4 2019
- Tips and hints for inspectors: Q4 2019

ANNEX 2 d –“Revision of the best practice documents”

Forum Task force

“Revision of the best practice documents”

Composition:

Chair: ECHA Secretariat

Forum Members/Alternates

- Katja VOM HOFE (DE) (also BPR)
- Marilla LAHTINEN (FI Alternate)
- Sinead McMICKAN (IE)
- Eugen ANWANDER (AT) (also BPR)

Forum BPR Subgroup members

- Emma BERGSTRÖM (SE)

Commission

- Miguel AGUADO

Objectives:

- Review and amend the Forum’s best practice documents “Strategies for the enforcement of REACH and CLP” and “Minimum Criteria for REACH and CLP Inspections” according to the MWAP 2014-2018.

Mandate:

- Revise the best practice documents taking into account the information in the MAWP 2014-2018 and the experience from the Member States in the application and implementation of these documents.
- Consider the REACH review and the experience obtained with the Forum’s projects to cover new issues and any changes that affect the implementation of the Chemicals legislation.
- Include enforcement activities related to the PIC Regulation and BPR.
- Cooperate with the Forum’s BPR Subgroup and revise the documents to include enforcement activities related to BPR.

Timeline:

- Q4 2017: Adoption of the revised best practice documents by the Forum.

Annex 3. Glossary of acronyms and abbreviations

AOB: Any Other Business

BEG: Biocidal Enforcement Group (chaired by DG SANTE)

BPRS: BPR Subgroup, a Subgroup of the Forum which coordinates the BPR enforcement

CLEEN: Chemicals Legislation European Enforcement Network

CLP or CLP Regulation: Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures

COM: European Commission

DG: Directorate General at Commission

DG SANTE: Directorate General on Health and Food Safety/European Commission

EU: European Union

FORUM: The Forum for Exchange of Information on Enforcement: Network of authorities responsible for the enforcement of the REACH, CLP and PIC regulations in the EU, Norway, Iceland and Liechtenstein

MAWP: Multiannual Work Programme

MOC: Manual of Conclusions

MS: Member State

NEAs: National Enforcement Authorities

REACH and REACH Regulation: Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

REF: REACH-EN-FORCE, Coordinated Enforcement Project of the Forum

ROPs: Rules of Procedure

PD-NEA: Portal Dashboard for National Enforcement Authorities – the successor system to RIPE

TF: Task Force of the Forum/BPRS

WG: Working Group of the Forum/BPRS

WIN PPIE: ECHA Work Instruction - Processing Practical Issues for Enforcement