



Forum-31/M/2018- Public

Adopted on 26.03.2019

**Minutes of the
31st meeting of the Forum for Exchange of Information on Enforcement
Brussels, Belgium
13-16 November 2018**

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I. Summary record of the proceedings

Item 1 – Welcome and introduction

1.1 Opening by the Vice-Chair of the Forum

The Chair welcomed all the participants. She announced apologies from Liechtenstein and Slovenia. She announced that Croatia was nominated as the proxy for Slovenia.

The Chair informed that the quorum requirement was met.

1.2 Adoption of the agenda

The Chair indicated the changes in the agenda (Content IV, [Annex 1](#)). The agenda was adopted.

1.3 Declarations of conflicts of interest with regard to agenda items

The Chair requested all participants to declare any potential conflicts of interest for any of the agenda items, according to Article 9(2) of the Rules of Procedure. No conflicts of interest were declared in the meeting.

1.4 State of play with action points from Forum-30

The ECHA Forum Secretariat informed the plenary on the status of the action points from Forum-30 and highlighted the open actions.

1.5 Report of the written procedures and other issues between Forum-30 and Forum-31

The Chair referred to the document with the results of the written procedures between Forum-30 and Forum-31.

A Forum member raised the issue that various consultations of the different projects generate various deadlines and suggested for it to be streamlined.

Item 2- Preparation for the open session

The Forum discussed and agreed on the common approach concerning the topics for discussion in the open session.

Item 3- Welcome and Introduction to the open session

3.1 Welcome to the Stakeholders

The Chair welcomed the 17 ECHA Accredited Stakeholders (ASOs) participating in the meeting. This was the first time the open session was prepared jointly with the Forum Biocidal Products Regulation Subgroup (BRPS). She welcomed the five observers representing the Instrument for Pre-Accession Assistance (IPA) programme.

3.2 Introduction of the Forum BPR Subgroup

The BPRS Chair presented the BPRS' mandate and the work done since this body that was set up in Forum 1,5 year ago, to deal with the enforcement of the Biocidal Products Regulation.

Item 4 – Opening address by ECHA

The ECHA's Head of Unit of the Support, Forum and HelpNet Secretariat Unit welcomed the participants and highlighted some topics to be discussed during the day.

Item 5 - Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs

5.1 Discussion with the ASOs on opportunities for improvement of the quality of SDS

5.1.1 WG provisional findings

The WG chair presented a summary of the activities of the WG that was set-up to try to help improve the quality of the safety data sheets (SDSs) in collaboration with the stakeholders. At the time, approx. 200 SDSs were gathered from 12 participating countries. The WG prepared the methodology for the analysis of the data, aiming at profiling the common deficiencies for different sections of the SDS. He presented the findings so far on the missing or not adequate/appropriate information in the different sections. The WG would then propose solutions for improvement and encouraged ECHA ASOs to implement the solutions and monitor the progress.

5.1.2 Member State experience

A Forum member shared that in his country, they have identified a large number of problems with the distribution and quality of SDSs. They have implemented programmes, prepared guides and developed tools in close cooperation with industry to address these shortcomings. He proposed some ideas to improve the quality of SDS that the WG will discuss.

A stakeholder suggested considering the project on digitalisation of SDS also in the context of Poison Centres, as similar information would need to be provided, ideally, using the same software/data base. The same tool could be used, to some extent, to combine information about what was supplied with the SDS.

5.1.3 Stakeholder experience

The CEFIC representative briefed the meeting on their work in the Exchange Network on Exposure Scenarios (ENES), whose work Programme has identified 24 actions supporting the supply chain communication. He presented the ENES tools already in place for down and up-stream communication and identified the areas that could use further cooperation between all actors to better define and describe the content and application of extended SDS.

5.1.4 Discussion on possible solutions and next steps

The WG would continue to analyse the SDSs submitted and would discuss the findings and actions to improve SDS with the ASOs. The list of improvement actions would be presented in the 2019 open session (November 2019, Forum-34). The WG would then be closed and the follow-up on the implementation of the actions would be reported by the ASOs in future open sessions.

The ASOs were invited to submit initiatives taken to improve the quality of SDSs as well as to join the WG.

5.2 WG Mandate amendment

Some ASOs expressed their interest in participating in the WG and were added to the mandate. The timeline was adjusted according to the proposed actions. The Forum adopted the revised mandate of the WG ([Annex 2p](#)).

Item 6 – Discussion topics proposed by ASOs

6.1 European Association of Chemical Distributors (Fecc)

6.1.1 Management of ES information in SDS - Distributors' consolidation methodology

The presenter shared with the Forum their guidance "Distributors' consolidation process" on management of exposure scenario (ES) information in SDS. It was developed by distributors to make the supply chain communication more efficient in the context of the ENES 2020 Programme to standardise the best practices. Additionally, some pilot projects were running to better assess the methodology.

Some participants requested clarification on some issues from the presentation. The Chair informed on the REF-5 project, under finalisation, about the communication of exposure scenarios in the supply chain. The findings were in line with the concern of Fecc, on the low quality of the safe use information from the chemical safety report (CSRs) passed in the supply chain. However, the mechanism for transferring the ES information along the supply chain was seen to be working effectively. The REF-5 project was prepared in alignment with the current ENES programme and the report included some recommendations taking into account the actions mentioned in the ENES programme. Moreover, the Forum mandated three Forum representatives to follow the discussion in ENES.

The Forum took note of the presented guide but explained it does not endorse industry-made guidance. However, the Forum/BPRS members interested to comment individually on the Fecc's documents were invited to do so.

6.1.2 Fecc good practice guidance: Storage tank management for Active Substances under BPR

The presenter shared with the Forum their document on "Good practice guidance on Storage tank management for Active Substances under BPR" prepared by the organisation's Biocide task force.

Some participants asked for clarification on some of the issues presented. The BPRS appreciated the effort to trace the process and took note of the guidance presented. However, the BPRS explained it does not endorse industry-made guidance but the members were invited to comment individually on the organisation's guidance and future versions.

6.2 Aerospace and Defence Industries of Europe (ASD)

Enforcement issues at manufacturers of articles' whilst no EU IT Infrastructure is in place for codification and distribution of SDSs

The presenter brought to the Forum the challenges the manufacturers of articles face, in particular related to poor information in the SDS. They were in the end-part of very complex supply chains and often received non-compliant SDSs from their suppliers. In order to fulfil their obligations, manufacturers of articles had to create their own database linking the chemical products (mixtures) to their substance. As no unique identifier was presently available for mixtures, the reliability of such internal databases was low.

The Forum acknowledged the challenges and suggested for the article manufacturer to put pressure on their suppliers, or even find another supplier, in case they received non-compliant SDSs and to inform the NEA of the country of the non-compliant supplier. Moreover, the 'declaration of compliance' that some suppliers provide to their customers would need to include the relevant information.

The ECHA Forum Secretariat added that Annex VIII of CLP the mixture information notified to appointed bodies will be available only to these appointed bodies for the purposes of medical demands in emergency and for statistical purposes and possibly to enforcement authorities. ECHA was currently working on the Poison Centres Notification (PCN), which the first version was planned for Q1 2019 and a second version for November 2019.

The COM representative highlighted that the same issue was identified in other industry sectors and recommended cooperation between them.

A Forum alternate gave some examples of the recommendations given by inspector to companies in her country.

6.3 European Consensus Platform for 3R Alternatives to Animal Experimentation (ECOPA)

Regulatory Acceptance of Read-Across approach

The presenter highlighted the Read Across as the most used alternative technique to waive new *in vivo* animal tests. Even though well described in Annex XI of REACH and Annex IV of BPR, the initial Read Across justification in registration dossiers often lack strong scientific justification. This has triggered initiatives to improve the robustness of the approach and the scientific endorsement for better regulatory acceptance. As inspectors have direct contact with the companies, they can have a role as multipliers of this information for it to reach the right audiences.

The Forum took note of the use of Read Across for the fulfilment of information requirements. However, the NEAs only deal with such situations in the follow-up to dossier evaluation decisions and rely on the assessment of ECHA and the Competent Authorities. The Chair informed about the Forum's activities on the REACH provisions related to reduction of unnecessary animal testing, in particular regarding tests with no testing proposals and cases related to the potential breach of the requirement to use animal testing as last resort under Article 13(1).

6.4 International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)

6.4.1 Learnings from the 2016 Forum pilot project on child-resistant fastenings and AISE safe use campaign

The presenter informed on the actions triggered by the Forum Pilot project on child-resistant fastenings, where inspectors found a relatively high non-compliance rate (29%) with Article 35(2) of CLP. The Forum recommended improving the companies' knowledge on the importance of the mentioned requirement and that it was essential for guidance and support to be provided by stakeholder organisations, particularly for SMEs. Therefore, the organisation would issue a short and simple guidance aiming at SMEs, involving retailers and distributors. When available, the Forum members were invited to comment individually on the guidance.

Some Forum members mentioned some experiences with the enforcement of child-resistant fastenings and that some problems derived from wrong classification. The Chair noted that awareness on the issue should also be raised at the top of the supply chain, among the formulators, re-fillers or importers of hazardous products.

The presenter informed on the campaign launched in different countries, with different partners, with the view to raise awareness and educate parents on the safe use of this product type. The Forum members were invited to express interest in becoming a partner of such campaign.

A Forum member shared the results of a national project that collected data from the hospitals on accidental poisonings of children with liquid laundry detergent capsules. Forum members raised concern on the fact that the number of such accidents have been raising in the last years, with the continued raise of market share of such products. Moreover, there should be campaigns also to raise awareness on the compliance with CLP regulation on the packaging provisions.

6.4.2 Bridging principles and mixture classification under CLP and DetNet: challenges and opportunities

The presenter updated the Forum on DetNet, an IT tool developed by the organisation to help their members to classify their mixtures under CLP.

The Forum noted the continued development of the tool and the challenges reported by the detergent industry to comply with the stringent rules set in the CLP Regulation.

The Chair responded saying that Forum may not give a blanket approval for any classifications proposed in DetNet. The calculation method is one of the legitimate and legally binding methods of applying the CLP classification, so enforcement authorities have full legal basis to refer to it in their judgements regarding classification. Ultimately, correctness of classification (and resulting label) for a specific mixture is conducted on a case-by-case basis. If found that the use of bridging principles in DetNet was not correct and according to CLP, the inspectors would request the company to change the classification from DetNet. Individual Forum Members were invited to contact the organisation to get access to the tool.

Some Forum members and invited experts shared their experiences when inspecting companies that used the tool.

6.4.3 Labelling of treated articles under BPR: case of detergents

In light of the first enforcement project of the BPRS focused on treated articles (BEF-1), the presenter gave examples of specific cases of detergents and cleaning products, especially with regard to the labelling elements, since there were some common elements in the labelling requirements in BPR and the Detergent Regulation.

The BPRS took note on the examples presented. In case of dual/triple labelling requirements, the BPRS inspectors undertaking the BEF-1 project will focus on checking the BPR labelling requirements for treated articles defined under Article 58(3) and 58(6) of BPR as well as any additional national requirements for the treated article labels.

Replying to a BPRS member, the presenter informed that, whenever there was an approval decision for the relevant active substances, this information was disseminated via their network of national associations for them to convey the message to SMEs, as much as possible. Additionally, in the public list of harmonised classification approved by RAC, there was an indication if it was a biocidal product, or used in plant protection products, etc., ECHA could make this information more visible.

6.5 European Apparel and Textile Confederation (EURATEX)

Urgent need for better market surveillance for textile and apparel products

The presenter highlighted the importance of having a level playing field between EU and non-EU companies, as the EU-based textile industry has to put extra efforts

to comply with REACH, namely concerning the restrictions. The new restrictions would cover a group of chemicals and the question raised was how the market surveillance authorities will deal with it, especially in terms of testing and market surveillance.

The Chair informed that restrictions were one of the priority areas for the Forum (REF-4, pilot on substances in article, REF-8). Results of REF-4 indicated that there was low level of non-compliance for restrictions relevant for the textile industry. Other Forum members shared their national campaigns on restrictions. One strategy that could be used to tackle the group of chemicals covered by the future restrictions could be to identify the top importers and check if they have practices in place to ensure that their imports are compliant.

The organisation was invited to propose a topic for a future Forum project and to indicate specific restriction entries that could be checked already by customs in the upcoming pilot project with customs. Such list of restriction could be shared with the national coordinators for them to consider controlling these restrictions during the operational phase of the pilot project.

6.6 European Chemical Industry Council (CEFIC)

6.6.1 Improved collaboration between enforcement authorities and stakeholders

The presenter suggested for the stakeholders to cooperate more with the NEAs by approaching the NEAs with concrete evidence of non-compliance by other company, so that it could trigger direct enforcement actions towards that company. Examples of such non-compliance could be in respect to registration, not sharing costs after receiving the registration number and in regard to the use of substances subject to authorisation and restricted. Industry was ready to cooperate with NEAs. They were interested to know the type of evidences needed by inspectors and what could be the process for such communication.

The Forum welcomed the suggestion and informed that follow-up of complaints about suspected breach of duties were already a practice in many Member States. In case there was a suspicion of a breach of duty, the inspectors welcomed all information available to support that suspicion. The NEA where the non-compliant company was based is the correct authority to contact. NEA's contact information for all EU countries is available in ECHA's website. Moreover, companies were invited to submit information on legacy substances that were used in articles to ECHA so that it can be shared with NEAs.

Some Forum members shared their procedures to follow-up complaints and such investigations could be initiated by a simple contact with the authorities. However, the complaint should be supported with as much evidences as possible for the inspectors to investigate.

6.6.2 REACH Exposure Scenario Compliance Check: Industry experience and a proposal for a pragmatic approach

The presenter shared their proposal for a pragmatic approach for enforcing exposure scenarios, as the information in the CSRs are often of poor quality and the risk management measures are difficult to implement in the workplace. She gave a few examples of mismatching information provided by different suppliers, illustrating the challenges of the users to comply with article 37 of REACH while, at the same time, not contributing to a higher level of safety. She proposed for inspectors to check the use coverage but limit the checks on RMM and OC, as long as safe use according to OSH legislation was demonstrated.

The Forum acknowledged the difficulties faced by the companies but did not support the simplified approach presented, as the companies have to fulfil their REACH duties. The Chair informed that the Forum was addressing the interface between OSH and REACH during inspections and COM was preparing a document on the issue.

The participants shared that the fundamental problem was the low quality of the information in exposure scenarios/CSR and that this should be the main issue to be tackled.

Item 7 – SLIC-CHEMEX Working group

7.1 REACH implementation in the work place

The SLIC representative informed the meeting on the scope of the work of the senior labour inspectors and the overlapping with REACH and highlighted the SLIC Guidance published for national labour inspectorates on 'enforcement and interaction of REACH/CAD and CMD'. He shared the observations from the labour inspectors concerning exposure scenarios, which were not used or trusted as work place risk assessment. Even though the difficulties faced by the downstream users regarding their obligations were noted, the REACH text was flexible enough for them to comply. However, more work was required to improve the usability of SDS and ES and more trust was needed in the quantitative models and limit values, in order for REACH generated information to be perceived as added value and not as a burden.

Replying to participants, the labour inspectors observed that the Downstream Users (DU) lack information to perform appropriate scaling. What was found instead was the workplace risk assessment was compiled using quantitative models or other methods. If the assessment shows safe use, the labour inspectors accepts it. The investigations of the actors up in the supply chain were also done by labour inspections and the collaboration between REACH and labour inspectors were very dependent of the national organisation.

Item 8 – Updates from the Forum/BPRS

8.1 Update on the scope of REF projects

The chair of the Forum WG 'Prioritisation of REF projects' presented the results of the prioritisation exercise of 2018, where the new project REF-8 was selected and focuses on 'on-line sales including restrictions'. The prioritisation exercise also recommended undertaking an awareness raising campaign on mixtures with extreme pH. The stakeholders were invited to submit new or re-submit old project proposals for assessment in the 2019 prioritisation cycle, for which the deadline for submissions is 19 April 2019. If not taken individually, the proposal could be complemented by others to define the scope of the next REF project.

8.2 Forum's finalised projects during 2018

The Forum Vice-chair summarised the results of the three projects finalised during 2018, namely the project [REF-5](#), and the pilot projects on the control of [internet sales](#) and [control of PIC](#).

COM representative communicated that COM was contacting online platforms to implement actions to avoid selling non-compliant products online. Thus, it was expected for REF-8 project to find less non-compliances than the pilot project on the same subject.

A.I.S.E. informed that online sales was already under the radar of the organisation and they had discussions planned on the digitalisation of information as a way to improve the distribution of safe use information.

8.3 Cooperation with customs – upcoming pilot project

The chair of the WG 'Cooperation with customs 2' reminded of the previous activities where the Forum cooperated with customs. A new pilot project will run in 2019 focusing on the investigation of three restrictions entries (23, 27, 63) and CLP labelling. For the purpose of the pilot project, several models of cooperation were identified, depending on whether REACH/CLP compliance affected the release by Customs for free circulation or not.

Item 9 – Conclusions and actions points from the open session

The participants agreed on the action points for the meeting.

The Chair thanked all participants and closed the open session.

Item 11 – Welcome from COM DG GROW

The Head of Unit of the REACH Unit of DG GROW welcomed the Forum to Brussels and congratulated the work of the Forum.

Item 12 – Debriefing of the Open Session and Enforcement Conference

The Forum appreciated the high number of stakeholders and the various issues brought forward. Moreover, stakeholders shared the actions they have put in place to address their own challenges. The BPRS Chair welcomed the fact that it was joint session and found it successful.

Item 13 - Forum's enforcement activities- Projects under preparation

13.1 REF-8

13.1.1 Mandate set-up

The Chair of BPRS informed the preference of the BPRS members in participating in the Forum's project, with the aim of having information about the classification and labelling elements for biocidal products sold online.

The Forum agreed to have BPR elements in the scope of the REF-8 project "Enforcement of CLP, REACH and BPR duties related to substances, mixtures and articles sold on-line". The Forum adopted the mandate of the WG ([Annex 2a](#)).

Item 14 - Forum's enforcement activities- Ongoing projects

14.1 Forum Action Programme 2019-2023

14.1.1 WG progress report

The WG chair informed that the Forum Multiannual Work Programme (MAWP) 2019-2023 was finalised, taking into account the comments submitted by the Forum members and ECHA management during the two consultation rounds. The BPRS was consulted during their plenary (BPRS-6) and agreed with the proposed MAWP.

14.1.2 Adoption of the Forum's MAWP 2019-2023

The Forum adopted the Forum's work programme for the next five years.

14.1.3 Survey on OSH and REACH enforcement

The WG chair informed that task 6 of the WG mandate concerning the OSH-REACH survey was still open and for that requested the Forum to nominate additional OSH experts. The WG suggested creating a new WG focusing only on the preparation of the survey on existing interactions in enforcement of OSH and REACH.

14.1.4 Mandate amendment

The WG 'Forum Action Programme 2019-2023' was closed and a new WG "OSH REACH Survey" was created to take forward the preparation and conduct of the OSH-REACH survey. The Forum adopted the new mandate ([Annex 2b](#)).

14.2 Prioritisation of REF projects

14.2.1 WG progress report

The WG chair briefed the Forum on the activities of the WG. She informed the REF methodology was updated to include the terminology to be used also by the BPRS to cover the Biocides Enforcement Projects (BEF). Other changes to reflect the timings of the BEF projects were also included. This new version of the methodology was adopted by the BPRS. The Forum adopted the 'Methodology for the selection, management and evaluation of harmonised enforcement projects, coordinated by the Forum and the BPRS' (REF and BEF project methodology).

13 Forum members indicated their interest in participating in the pilot project on recovered substances. The Forum agreed to initiate the operational phase of the pilot project on 2020.

14.2.2 Mandate amendment

A new chair for this WG was appointed. The Forum adopted the revised mandate of the WG ([Annex 2c](#)).

14.3 Third pilot project on authorisation

14.3.1 WG progress report

The Chair summarised the work of the WG, which implemented the comments received from the Forum members on the draft project manual.

14.3.2 Mandate amendment

SLIC-CHEMEX would discuss with the network the possible involvement of a representative in this WG. The Forum adopted the updated mandate ([Annex 2d](#)).

14.4 REACH-EN-FORCE-6 on CLP

14.4.1 WG progress report

The Chair informed that the operational phase of this project was ongoing.

14.4.2 Enforcement of Article 45 and Annex VIII of CLP

The WG was mandated to define the scope of the enforcement activities under Article 45 and Annex VIII of CLP *i.e.* obligation for industry to submit information on hazardous mixtures placed on the market. The Forum discussed the issues highlighted by the WG and what would be required to guarantee proper enforcement.

14.4.3 Enforcement of liquid laundry detergent capsules (LLDC) in REF-6

The German expert presented the experiences when checking the LLDC during the operational phase of the REF-6 project.

14.4.4 Mandate amendment

The Forum adopted the updated mandate ([Annex 2e](#)).

14.5 Implementation of PD-NEA

14.5.1 WG progress report

The Chair informed that the WG tested the new functionalities and evaluated that the data and functional requirements were implemented.

14.5.2 Update on ECHA IT tools for inspectors

ECHA Forum Secretariat informed on the updates that came with the new release of the PD-NEA tool as well as the upcoming changes.

14.5.3 Mandate amendment

The Forum adopted the updated mandate ([Annex 2f](#)).

14.6 REACH-EN-FORCE-7 on Registration

14.6.1 WG progress report

The WG chair informed that the project manual was adopted. All 31 Member States nominated National Coordinators that have received the needed training.

14.6.2 Mandate amendment

The Forum adopted the updated mandate ([Annex 2g](#)).

14.7 Training for enforcement trainers 2019

14.7.1 WG progress report

The Forum took note of the progress report submitted for the meeting.

14.7.2 Discussion of the proposed topics

The WG chair informed on the topics proposed by the Forum members for the training event of 2019 (2-3 October 2019). The Forum discussed and agreed on the main topic for next year's training to be the issues under the scope of REF-8, control of internet sales. The Forum members and COM were invited to submit any available materials concerning the issue.

14.7.2 Mandate amendment

As it was discussed under the [REF-8 item](#), the BPRS would be participating in the project and would have interest in participating in the training as well. Therefore, the training event would be organised for trainees appointed by both Forum and BPRS members. Since the number of participants would be higher than normal, a request was launched for the nomination of additional WG members (trainers).

The Forum took note that BPRS was organising a 'Training for enforcement trainers 2019' event concerning BPR issues only.

The Forum adopted the updated mandate ([Annex 2h](#)).

14.8 Categorisation of risks

14.8.1 TF progress report

The ECHA Forum Secretariat informed about the progress of the work of the Task Force (TF) that collected feedback from the Forum members after Forum-29 regarding the notifications to RAPEX.

14.8.2 Mandate amendment

A chair was appointed, hence the TF changed into a WG. The Forum adopted the revised mandate of the WG, including a revision of the tasks and an extension of the timeline ([Annex 2i](#)).

14.9 Pilot project on Substances in Articles (SiA)

14.9.1 WG progress report

The Chair summarised the activities of the WG and on the state of play of the national inspections. The operational phase will continue until 31 December 2018.

14.9.2 Mandate amendment

The Forum adopted the updated mandate ([Annex 2j](#)).

14.10 Cooperation with Customs 2

14.10.1 WG progress report

The WG chair informed that the manual for the pilot project, after being consulted with Forum members, was also consulted with the national coordinators and was finalised and ready for adoption. 15 Member States would participate in the pilot project.

14.10.2 Adoption of pilot project manual

Some Forum members requested to extend the timeline of the operational phase until the end of 2019 to better align with their annual planning. In order to take into account some last-minute comments, the Forum agreed to have one more - final - consultation round and adopt the manual via written procedure after the meeting. That implied that the start of the operational phase was shifted to March 2019.

14.10.3 Mandate amendment

Taking into account the request of the Forum members, the timeline of the project was adjusted and the Forum adopted the updated mandate ([Annex 2k](#)).

14.11 Enforceability of restrictions

14.11.1 WG progress report

The WG chair informed about the activities of the WG concerning the advices elaborated after Forum-30 and the number of future Annex XV proposals. An increase in the number of proposals to be processed (12 dossiers in 2019) was noted, which was causing difficulties in finding resources within the WG. The WG chair highlighted the new dossiers that would still require rapporteurs and invited the Forum members to volunteer or to appoint experts. Ideally, the rapporteurs should also be a WG member but in light of the lack of resources, Forum members/experts could be appointed as rapporteurs on an *ad-hoc* basis.

The WG started to prepare the second edition of the Forum Compendium of analytical methods. So far, no input from Stakeholders was received but the WG would consult various actors during 2019 to collect further feedback.

Additionally, the WG elaborated a first draft of the Registry of Concerns and elaborated templates to assess the enforceability of newly adopted Annex XVII restrictions and the list of new Annex XVII restrictions.

With the view to use the scarce resources of the WG in a more efficient way during 2019, the WG proposed to prioritise its work to focus in their main mandated task, providing advice on the enforceability of restrictions, and postpone all the other activities for 2020.

14.11.2 Mandate amendment

The Forum agreed with the proposal to prioritise the work of the WG and adopted the updated mandate, including the changes in the timeline of the abovementioned tasks for 2020 ([Annex 21](#)).

Item 15 – Practical issues for enforcement of REACH and CLP

The ECHA Forum Secretariat informed that there were two practical issues running in the fast-procedure in HelpEx.

Issue 21.2 - Who is responsible for the elaboration of a Safety Data Sheet when an only representative is appointed?

ECHA Forum Secretariat reminded that the Forum was consulted on this issue after Forum-30. There were requests to describe new scenarios in the practical issue, hence COM will be requested to provide further clarification. Once received, the issue will be discussed in the Forum for conclusion.

Issue 26.4 - Can NEAs accept test results on a multi-constituent substance containing a constituent with a harmonised classification in Annex VI where the test result contradicts the classification of the multi-constituent substance based on its constituents?

ECHA Forum Secretariat informed that the HelpEx consultation on the issue was not conclusive. The draft conclusion was revised and re-discussed at the HelpNet Steering Group in October, where it was agreed. A revised version was posted in HelpEx for the final consultation. The ECHA Forum Secretariat will now draft a conclusion for this issue to reflect the agreed solutions and initiate a written consultation with the Forum.

Issue 29.4 - Is it possible for the applicant and DUs to implement different conditions than what appears in the CSR?

The issue concerned the situation where OC/RMM found on the site differed from the ones in the CSR and from the application and authorisation. The ECHA Forum Secretariat informed that the issue has been suspended until further feedback has been received from COM.

Issue 31.1- Does the registration obligation apply to substances in fireworks?

The submitter of the issue presented the case encountered where companies state that they import articles and therefore do not need to register any substances in

the fireworks. The Forum discussed this issue and would continue the discussion via written consultation.

Issue 31.2- Can resellers and other intermediate traders be part of a supply chain of creosote treated wood?

The submitter presented the case based on the text of entry 31 of REACH Annex XVII, which covers the placing on the market of wood treated with creosote. The Forum Secretariat prepared a draft conclusion based on the available [Q&A 1067](#), which explained the applicability of the phrase “placing on the market for the first time”. The issue would be further consulted with the Forum and the draft conclusion would be revised.

Item 17 – Forum’s enforcement activities- projects under finalisation

17.1 REACH-EN-FORCE-5 on Extended SDS, exposure scenarios, risk management measures and operational conditions

17.1.1 WG progress report

The Chair informed that the WG have drafted the project report, taking into account the Forum members comments. The report was under adoption during the Forum-31 meeting and the Forum members were invited to reply to the written procedure. The WG also started drafting the ‘Tips and hints’ document, which will be consulted with the national coordinators and finalised in the beginning of 2019.

17.1.2 Discussion on the follow-up of the project results

In the open session, under item 8.2, the Forum Vice-Chair presented the results of the REF-5 and recommendations to Industry. A WG member, in the absence of the WG chair, presented the conclusions and recommendations from the project and proposed some follow-up actions to address them.

COM representative welcomed the recommendations for COM and noted that some of the actions were being addressed under the REACH review.

Some Forum members shared that the project was very useful and that the results support that the control of extended SDS/CSR should continue to be a priority in the Member States.

Forum members questioned whether the exercise done by ECHA Secretariat under the scope of the REF-5 project, checking in detail the content of the some CSRs could be continued and requested in an *ad-hoc* basis and even extrapolated for the Evaluation process. ECHA Forum Secretariat informed that it would need advance planning, as these tasks were very resource intensive.

The WG had not discussed on submitting a project proposal for the next prioritisation cycle of REF projects on the topics of REF-5. This action would be for the Forum members, in case of interest.

17.1.3 Mandate amendment/closure

The timeline for the completion of the “Tips and Hints” was amended and the Forum adopted the updated mandate. The Forum conditionally closed the mandate of the WG, as all the deliverables were expected before the next plenary meeting ([Annex 2m](#)).

17.2 PIC pilot project

17.2.1 WG progress report

The Chair summarised the activities of the WG. The draft report was prepared and was under consultation with the Forum. It was foreseen that the written procedure for the adoption would be launched in early December, followed by the publication of the report still in 2018. The WG would prepare the "Tips and Hints" document in the beginning of 2019.

17.2.2 Discussion on the follow-up of the project results

In the open session, under item 8.2, the Forum Vice-Chair presented the results of the PIC pilot project and recommendations to Industry. The WG chair presented the draft conclusions and recommendations from the project to the other actors in the project and made some proposals for actions to address the recommendations. A COM representative welcomed the finding concerning the need to improve the unique code system used by Customs authorities. Some Forum members confirmed that the CN codes were very broad for some chemicals making it difficult target the relevant chemical.

On the proposal to have a future project based on imports, the WG chair observed that there was no obligation under PIC to notify on imports.

17.2.3 Mandate amendment/closure

The timeline for the completion of the "Tips and Hints" was amended and the Forum adopted the updated mandate. The Forum conditionally closed the mandate of the WG, as all the deliverables were expected before the next plenary meeting ([Annex 2n](#)).

17.3 Training for enforcement trainers 2018

17.3.1 WG final report

The WG chair presented to the Forum the statistics concerning the training event of 2018 that took place back-to-back with the training for BPR inspectors. 69 trainees attended the training in ECHA and several remote connections were established. In the overall, 98% of the trainees rated the training as "excellent" or "good". The Forum adopted the final report of the WG.

17.3.2 Mandate amendment/closure

The Forum closed the mandate of the WG ([Annex 2o](#)).

Item 18 – Update on relevant developments by the Commission

18.1 General updates by the European Commission

The Chair referred to the meeting documents for this agenda item. The COM representative informed that the programme for exchange of inspectors would continue throughout 2019. Some Forum members expressed appreciation for the programme, which was found very useful for the inspectors. It was suggested for the travel costs to be paid directly by COM rather than have them reimbursed later.

DG ENV was initiating the preparations for the REACH report from the Member States in 2020 by selecting a contractor. It was foreseen that Forum members would be consulted about the revised questionnaire. The Forum Chairs expressed regret about the absence of representative from DG ENV attending at that time of the meeting who could elaborate more on COM's plans on this subject.

18.2 ICSMS update

A COM representative gave a demonstration of the features of the current version of the ICSMS concerning REACH and CLP DRPIs and the potential of a statistic tool based on the information recorded by inspectors in ICSMS. Access to this tool could be given, upon request, from the list of users of ICSMS. The PIC DRPI was still under discussion and there was no foreseen date for its release.

Replying to the questions from the Forum member, the presenter informed that training on site was not provided. However, the Member States could use available pre-recorded trainings or via a live Webinar, that could be recorded for future trainings in the Member State.

Translated versions of ICSMS were not provided by COM but could be done by the national contact points, upon request.

Item 19 – Cooperation with other networks

19.1 Updates from SLIC-CHEMEX

A representative from the SLIC CHEMEX WG presented the ongoing activities of the network. She presented the new published guidance for national labour inspectors on 'Addressing health risks from welding fumes' and the future work of the long latency sub-group. Moreover, she informed that the translations of the interim CHEMEX guidance on 'How to use OELs, DNELs and DMELs when assessing effective control of exposure to chemicals in the workplace' were completed. The presenter highlighted the collaborative work with ECHA and the importance to continue the cooperation with the Forum.

The Forum welcomed the work of SLIC and highlighted that OSH interface with REACH was becoming more relevant (e.g. authorisation) and that further collaboration was envisaged in the Forum's MAWP. The Forum invited the participation of a SLIC expert in the WG 'OSH REACH Survey' and for SLIC to identify the areas where collaboration between labour and REACH inspectors was found important.

19.2 Update from CLEEN

The ECHA Forum Secretariat informed that a presentation on the activities of the Forum was given at the last CLEEN meeting (October 2018).

Item 20 - Updates from the ECHA and Forum Secretariat

20.1 Update on ECHA's strategic plan 2019-2023

The ECHA Forum Secretariat informed that the Forum comments were considered and coordination of enforcement was better reflected in the new draft of ECHA's strategic plan. The document will be adopted at the Management Board meeting in December.

20.2 Follow-up of ECHA Decisions: updates from ECHA

The Forum took note of the meeting document that included a summary table of the cases sent to the Member States Focal points.

20.3 Animal testing without testing proposals

The ECHA Forum Secretariat informed the members that ECHA prepared a new report identifying cases where animal tests were conducted for the purposes of a registration without a Testing Proposal. ECHA informed the NEAs about these cases of potential non-compliance and invited an investigation. ECHA will produce a public

report including the feedback from the NEAs at a later stage. The report will be consulted with the Forum before publication.

20.4 Update on ECHA Guidance activities

The Forum took note of the updates from ECHA Guidance. The Forum members were alerted on the divergent views regarding the Poison Centres Guidance. If no agreement was achieved in the current discussions, the guidance should include a "note to the reader" stating the minority position.

20.5 Forum indicators – wrap up

The ECHA Forum Secretariat informed that the Forum's feedback on the indicators document was collected and implemented. It was foreseen its adoption and publication of the document by the end of 2018. The revision of the indicators would be done on a yearly basis. COM welcomed the publication of the Forum's indicators.

20.6 Monitoring system for the flow and use of safe use information

The Chair referred to the meeting document that provided an overview of a monitoring system that was currently being developed under the ENES Programme to better understand the flow of extended SDS in the European market place. An implementation plan for the monitoring activities was foreseen to be prepared in 2019 and the first survey round to take place in 2020. The Forum took note of the monitoring system.

The Forum's ENES Contact Points were invited to keep the ENES Programme informed about any SDS related enforcement projects run during the monitoring period and coordinate as appropriate.

Item 21 – Updates on the cooperation between Forum and BPR Subgroup

The Chair of the BPRS informed about the outcome of the discussions during the BPRS-6¹ plenary meeting that took place before the Forum-31.

Item 22 – Updates on the follow up of ECHA's Evaluation decisions

The ECHA Forum Secretariat summarised the changes to the addressee policy that affected how ECHA will send the dossier evaluation (DEV) decisions to registrants as of 2019. As of that year, DEV decisions will be addressed to all members of the joint submission. The NEAs in the countries of all registrants will be informed about the non-compliance with any requests in the decision. The impact on NEAs on this change of policy will not be immediate and will be felt, at the earliest, in 2020, when the first deadlines of such decisions expire.

During 2019, the Forum will be invited to discuss how to handle the enforcement of such decisions and the need to cooperate between NEAs. Consequently, the interlinks guide should be reviewed during 2019 to reflect the possible changes in the process. It was foreseen that the DEV decisions process would become similar to the SEV decision process. The Chair noted that the Forum does not yet have much experience with SEV decisions as follow-up actions were needed for only very few SEV decisions. She suggested to set up a WG, in a future meeting, for the revision of the Interlinks document.

¹ Minutes of the BPRS meetings available in <https://echa.europa.eu/about-us/who-we-are/enforcement-forum/meetings-of-the-forum/2018>

The Forum was also informed on the changes in ECHA's DEV follow-up process put in place to reflect the ECJ judgement on the SONC, discussed at Forum-30, that ruled that, when ECHA assesses the information submitted by registrants, the assessment must be done as a decision under Art 42(1), unless the submitted information is manifestly unreasonable.

The Forum members were invited to submit feedback on potential issues that may arise due to the upcoming changes in the addressee policy and on the revised follow-up process.

Item 23 – POP recast and the role of the ECHA Forum

The ECHA Forum Secretariat informed that the position of the Forum on this issue was conveyed to the European Council by the Executive Director of ECHA in July 2018. The new draft of the POP Regulation included the wording based on Article 76(1) of REACH. Similar to PIC, it gives the Forum a mandate to act with regard to the POP regulation as it does for REACH (based on the tasks defined in Article 77(4) of REACH).

The Forum agreed with the references to the Forum activities related to POPs, as included in the adopted MAWP 2019-2023.

Item 24 – Closing remarks by ECHA's Head of Unit of the Support, Forum and Helpnet Secretariat

ECHA's Head of Unit of the Support, Forum and Helpnet Secretariat shared his personal impressions about the open session and the active discussions that took place. He congratulated the Forum on the achievements of the meeting and wished success with the upcoming work.

Item 25 – A.O.B.

25.1 - Follow-up of a substance under SEV

A Forum member shared the fact that examination of a substance under the Substance Evaluation (SEV) process was taking place and that one of the registrants was required to submit tests results to allow the competent authority to conclude the evaluation. Involvement of the NEA from other Member States was needed to enforce that the registrant submits the needed data.

Item 26 – Closing of the meeting

The Chair thanked the participants, the COM and the ECHA Forum Secretariat for their contributions and support. With that, she closed the meeting.

II. MAIN CONCLUSIONS & ACTION POINTS - Forum-31**13-16 November 2018**

(Adopted at the Forum-31 meeting)

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 Forum-30		
1.5 Report of the written procedures and other issues between Forum-30 and Forum-31		Forum-S will explore ways in which deadlines for the Forum members can be streamlined by 30 November.
Item 2 – Preparation for the open session		
Item 3 – Welcome and Introduction to the OPEN SESSION		
Item 4 – Opening address by ECHA		
Item 5 – Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs		
5.1 Discussion with the ASOs on opportunities for improvement of the quality of SDS		
5.1.1 WG provisional findings		
5.1.2 Member State experience		
5.1.3 Stakeholder experience		
5.1.3 Stakeholder experience		
5.1.4 Discussion on possible solutions and next steps		<p>ASOs are invited to submit examples of initiatives taken to improve the quality of SDSs by 14 December 2018</p> <p>ASOs who have not expressed an interest in joining the work, but</p>

		still wish to do it, are invited to do so by 14 December 2018.
5.2 WG Mandate amendment	The Forum revised the mandate of the WG.	
Item 6 – Discussion topics proposed by ASOs		
6.1 European Association of Chemical Distributors (Fecc) 6.1.1 Management of ES information in SDS - Distributors' consolidation methodology		Forum members who wish to individually comment on the "FECC guidance on management of ES information in the SDS" are invited to do so.
6.1.2 Fecc good practice guidance: Storage tank management for Active Substances under BPR		BPRS members who wish to individually comment on the FECC guidance on management of store tanks for active substances are invited to do so.
6.2 Aerospace and Defence Industries of Europe (ASD) Enforcement issues at manufacturers of articles' whilst no EU IT Infrastructure is in place for codification and distribution of SDSs		Forum-S will send out a recent ECHA presentation on poison centre notifications and the state of preparations to the participants of the open session by 23 November.
6.3 European Consensus Platform for 3R Alternatives to Animal Experimentation (ECOPA) Regulatory Acceptance of Read-Across approach		
6.4 International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.) 6.4.1 Learnings from the 2016 Forum pilot project on child-resistant fastenings and AISE safe use campaign	Forum members agreed to individually share views on AISE guide for SMEs or implementation aids.	AISE is invited to provide the guide on the importance of requirements for packaging under Art 35(2) of CLP or other related implementation aids intended for SMEs to the Forum-S by 1 February 2019 Forum-S who will distribute it to the Forum members

		<p>Forum members are invited to individually comment and provide views on the guide or implementation aids directly to AISE.</p> <p>Forum members willing to become partners in “Keep caps from kids” are invited to express their interest to AISE directly.</p>
6.4.2 Bridging principles and mixture classification under CLP and DetNet: challenges and opportunities		<p>Forum members willing to obtain access to DetNet are invited to individually contact AISE.</p>
6.4.3 Labelling of treated articles under BPR: case of detergents		
<p>6.5 European Apparel and Textile Confederation (EURATEX)</p> <p>Urgent need for better market surveillance for textile and apparel products</p>		<p>EURATEX is invited to provide list of restriction entries that could potentially be covered by inspection under the pilot project on customs by 23 November.</p> <p>Forum-S will distribute the list to the Forum members.</p> <p>Forum WG “Cooperation with Customs” will provide the list to the national coordinators of the pilot project for consideration when planning controls under the project.</p>
<p>6.6 European Chemical Industry Council (CEFIC)</p> <p>6.6.1 Improved collaboration between enforcement authorities and stakeholders</p>	<p>Companies may submit information on legacy substances that were used in articles, (but will not be notified to the SVHC database prepared by ECHA under WFD), to ECHA so that it can be shared with NEAs.</p>	
6.6.2 REACH Exposure Scenario Check: Industry experience and proposal for a pragmatic approach		

Item 7 - SLIC-CHEMEX Working group		
		Forum-S will distribute the SLIC Guidance for National Labour Inspectorates (NLIs) on enforcement and interaction of REACH/CAD & CMD to the participants of the open session by 30 November.
Item 8 – Updates from the Forum/BPRS		
8.1 Update on the scope of REF projects		ASOs are invited to submit project proposals for the 2019 Forum project prioritisation cycle by 19 April 2019. Forum-S will send a reminder to the ASOs about this opportunity in January 2019.
8.2 Forum’s finalised projects during 2018: REF-5 and pilots on Online sales and PIC		
8.3 Cooperation with customs – upcoming pilot project		
Item 9 - Conclusions and actions points from the open session		
Item 11 – Welcome from COM		
Item 12 – Debriefing of the Open Session and Enforcement Conference		
Item 13 – Forum’s enforcement activities- Projects under preparation		
13.1 REF-8 13.1.1 Mandate set-up	Forum set up the WG for preparing REF-8 project.	Forum members appointing experts are invited to indicate their names by 30 November 2018.
Item 14 – Forum’s enforcement activities- Ongoing projects		
14.1 Forum Action Programme 2019-2023 14.1.1 WG progress report		
14.1.2 Adoption of the Forum’s MAWP 2019-2023	<u>The Forum adopted its Work Programme 2019-2023.</u>	

14.1.3 Survey on OSH and REACH enforcement		
14.1.4 Mandate amendment	The Forum revised the mandate of the WG and changed its focus to cover the survey on OSH-REACH interactions in enforcement.	Forum members appointing experts are invited to indicate their names by 30 November 2018.
14.2 Prioritisation of REF projects 14.2.2 WG progress report	Forum agreed to execute the operational phase of the pilot project on recovered substances in 2020. Forum members adopted the revised REF/BEF project methodology.	Forum members are invited to submit project proposals for the 2019 Forum project prioritisation cycle by 19 April 2019. Forum-S will send a reminder to the Forum members about this opportunity in January 2019.
14.2.2 WG Mandate amendment	The Forum revised the mandate of the WG.	
14.3 Third pilot project on authorisation 14.3.1 WG progress report		
14.3.2 Mandate amendment	The Forum revised the mandate of the WG.	
14.4 REF-6 14.4.1 WG progress report		
14.4.2 Enforcement of Article 45 and Annex VIII of CLP		
14.4.3 Enforcement of liquid laundry detergent capsules in REF-6		
14.4.4 Mandate amendment	The Forum revised the mandate of the WG.	
14.5 Implementation of PD-NEA 14.5.1 WG progress report		
14.5.2 Update on ECHA IT tools for inspectors		Forum members who have not yet provided the contact details of the National Contact Points are

		invited to do so by 31 December 2018.
14.5.3 Mandate amendment	The Forum revised the mandate of the WG.	
14.6 REF-7 project 14.6.1 WG progress report		
14.6.2 Mandate amendment	The Forum revised the mandate of the WG.	
14.7 Train the trainers 2019 14.7.1 WG progress report	-	<p>Forum members are invited to propose specific content on the agreed topic by 30 November 2018</p> <p>Forum and BPRS members are invited to propose additional experts who could contribute to the training by 30 November 2018.</p> <p>Forum members are invited to suggest possible training material suitable for the adopted topic by 15 February 2019</p> <p>UK Forum member and COM are invited to provide materials on methodology for control of internet sales to the WG by 29 March 2019.</p>
14.7.2 Discussion of the proposed topics		
14.7.3 Mandate amendment	The Forum revised the mandate of the WG.	
14.8 Characterisation of risks 14.8.1 TF progress report		
14.8.2 Mandate amendment	The Forum revised the mandate of the WG.	
14.9 Pilot project Substances in Articles 14.9.1 WG progress report		

14.9.2 WG Mandate	The Forum revised the mandate of the WG.	
14.10 Cooperation with Customs 2 14.10.1 WG progress report		<p>Forum members are invited to comment on the manual by 30 November</p> <p>Forum members willing to take part in the project, but have not yet nominated the national coordinator are invited to do so by 30 November.</p> <p>WG Customs will consider sending a representative to the joint PARCS-AMS meeting in March in 2019, upon agreement of the Forum Chair.</p>
14.10.2 Adoption of pilot project manual		
14.10.3 WG Mandate	The Forum revised the mandate of the WG.	
14.11 Enforceability of Restrictions 14.11.1 WG progress report		<p>Forum members are invited to indicate interest in rapporteurship (by members, alternate or experts) for the following dossiers:</p> <ul style="list-style-type: none"> • N,N-DMF (Italy) by 3 December • January dossiers: by 14 December <ul style="list-style-type: none"> ○ Skin sensitisers (France, Sweden) ○ Microplastics (ECHA) ○ D4,D5,D6 (ECHA) ○ Calcium cyanamide (ECHA) • April dossiers: by 15 March 2019 <ul style="list-style-type: none"> ○ Lead chromates (ECHA) ○ Perfluorohexane (Norway) <p>Forum-S will send a table with relevant information (substances, scope, submitter and received expression of interest etc.) by 19 November</p> <p>Forum members are invited to specify names of additional</p>

		members to the WG by 15 December
14.11.2 Mandate amendment	The Forum revised the mandate of the WG.	
Item 15 – Practical issues for enforcement of REACH and CLP		
Practical issues		Forum members are invited to submit new practical issues by 22 January 2019
21.2 Who is responsible for the elaboration of a Safety Data Sheet when an only representative is appointed?		
26.4 Can NEAs accept test results on a multi-constituent substance containing a constituent with a harmonised classification in Annex VI where the test result contradicts the classification of the multi-constituent substance based on its constituents?		
29.4 Is it possible for the applicant and DUs to implement different conditions than what appears in the CSR?		
31.1 Does the registration obligation apply to substances in fireworks?		Forum-S will send out the issue for written comments by 30 November.
31.2 Can resellers and other intermediate traders be part of a supply chain of creosote treated wood?		Forum-S will send out the issue for written comments by 30 November.
Item 17 – Forum’s enforcement activities- projects under finalisation		
17.1 REACH-EN-FORCE-5		Forum members are invited to reply to written procedure for the adoption of the final REF-5

17.1.1 WG progress report		project report by 23 November 2018
17.1.2 Discussion on the follow-up of the project results		<p>Forum members are invited to comment on the presented proposals for follow-up actions or propose new ones by 11 Jan 2019.</p> <p>Forum-s to discuss internally whether the support provided by ECHA in cluster 1 regarding the check of the quality of CSRs could be provided upon request from NEAs.</p>
17.1.3 Mandate amendment/closure	The Forum revised and conditionally closed the WG mandate.	
17.2 PIC pilot project 17.2.1 WG progress report		Forum members are invited to provide comments to the draft PIC pilot project report by 23 November
17.2.2 Discussion on the follow-up of the project results		Forum members are invited to comment on the proposals for follow-up actions presented by the WG Chair at Forum-31 and recommendations from the draft report. Comments should be submitted by 23 November.
17.2.3 Mandate amendment/closure	The Forum revised and conditionally closed the WG mandate.	
17.3 Training for enforcement trainers 2018 17.3.1 WG progress report	The Forum adopted the final report of the training 2018	
17.3.2 Mandate amendment/closure	The Forum revised and closed the WG mandate.	
Item 18– Update on relevant developments by the Commission		
8.1 General updates by the European Commission		<p>COM will inform the Forum on the new programme for exchange of inspectors by 23 December</p> <p>Forum members willing to benefit from the exchange of inspectors programme funded by the</p>

		<p>European Commission are encouraged to apply.</p> <p>COM will involve the Forum in the update of the MS report template due for 2020</p>
8.2 ICSMS update		<p>Forum-S will include the contact details of the DG GROW ICSMS team in the minutes of Forum-31.</p> <p>Forum-S will share the link to the ICSMS training materials received from the COM by 23 November.</p> <p>Forum members are invited to use the training materials available and if further training is required bring this up at one of the Forum meetings in 2019.</p>
Item 19– Cooperation with other networks		
19.1 Updates from SLIC-CHEMEX		<p>SLIC CHEMEX WG representative will liaise with the CHEMEX members and consider committing a member to the Forum WG on REACH/OSH interactions in enforcement.</p> <p>SLIC CHEMEX representative will discuss at the next meeting of the CHEMEX WG, whether CHEMEX could prepare a mapping of areas where NLIIs would be able to cooperate with REACH inspectors while enforcing the REACH duties.</p> <p>SLIC CHEMEX WG representative will share the survey on REACH/OSH interactions that was conducted by CHEMEX</p>
19.2 Update from CLEEN		<p>Forum-S will ask the CLEEN secretariat for the minutes of the last meeting and distribute them to the Forum members.</p>
Item 20 – Updates from the ECHA and Forum Secretariat		
20.1 Update on ECHA's strategic plan 2019-2023		

20.2 Follow-up of ECHA Decisions: updates from ECHA		
20.3 Animal testing without testing proposals		
20.4 Update on ECHA Guidance activities		
20.5 Forum indicators – wrap up		Forum-S will launch a written procedure to adopt the document by 30 November.
20.6 Monitoring system for the flow and use of safe use information		Forum’s ENES Contact Points are invited to keep the ENES programme informed about any safety data sheet related enforcement projects they may run during the monitoring period.
Item 21 – Updates on the cooperation between Forum and BPR Subgroup		
Updates from the BPRS discussions		
Item 22 – Updates on the follow up of ECHA’s Evaluation decisions		
		<p>Forum members are invited to send feedback on potential issues that may arise due to the upcoming changes in the addressee policy by 11 January 2019.</p> <p>Forum members are invited to send written feedback on the revised follow-up process by 11 January 2019.</p>
Item 23 – POP recast and the role of the ECHA Forum		
		Forum members are invited to submit feedback on the two discussion points by 11 January
Item 24 – Closing remarks by ECHA’s Executive Director		
Item 25 – AOB		
25.1 - Follow-up of a substance under SEv		

III. List of Attendees**Forum members**

	Country	Name
1	AT	ANWANDER Eugen
2	BE	CUYPERS Paul
3	BG	ZIDAROVA Elena
4	CY	KYPRIANIDOU-LEONTIDOU Tasoula
5	CZ	JAROLÍM Oldřich
6	DE	VOM HOFE Katja
7	DK	BØRGLUM Birte Nielsen
8	EE	LINNO Annemari
9	EL	FOUFA Eleni
10	ES	SÁNCHEZ-PEÑA Pablo
11	FI	ASSMANN Mervi
12	FR	LEMAITRE Cecile
13	HR	KREKOVIĆ Marija Dubravka
14	HU	DEIM Szilvia
15	IE	MCMICKAN Sinead
16	IS	BRAGASON Isak
17	IT	POLCI Maria Letizia
18	LT	ŠPURIENĖ Otilija
19	LU	ENGELS Kim
20	LV	NEIMANE Jana
21	MT	FARRUGIA Bernice
22	NL	VAN DEN BERG Jos
23	NO	HAGEN Gro
24	PL	OSOWNIAK Marta
25	PT	BRAVO Graca
26	RO	MIJA Maria
27	SE	HEDLUND Henrik
28	SK	POČAROVSKÁ Miriam
29	UK	POTTS Mike

Invited experts

	Country	Name
1	BG	TCHOBANOVA Elena
2	CZ	MUSIL Petr
3	DE	WURSTHORN Sibylle
4	DK	MIKKELSEN Sonja
5	EE	LUTSOJA Marilin
6	ES	ZAMORA NAVAS Laura
7	FI	MAKI Markus
8	FR	MARTINACHE Manon
9	IE	LOWE Majella
10	LT	UZOMECKAS Žilvinas
11	PL	MOCZULAK Aleksandra

	Country	Name
12	PT	BARATA Sofia
13	SE	RUMAR Karin
14	SK	HAJNALA Róbert
15	UK	Collins Shelley

Advisers

	Country	Name
1	BE	LEYNEN Michel
2	DE	FRENZEL Stefan
3	FR	LE Elisa
4	FR	COUTURAUD Oliver

European Commission representatives

	DG	Name
1	GROW	AGUADO-MONSONET Miguel

SLIC-CHEMEX

	Name
1	SNAITH Christine
2	KUPER Nathan

	ECHA	Unit
1	BARANSKI Maciej	Support, Forum and HelpNet Secretariat
2	CALVO TOLEDO Juan Pablo	Support, Forum and HelpNet Secretariat
3	MATEUS Tania	Support, Forum and HelpNet Secretariat
4	NIKULA Terhi	Support, Forum and HelpNet Secretariat
5	NOUWEN Johan	Support, Forum and HelpNet Secretariat
6	TŁOCZEK Magdalena	Support, Forum and HelpNet Secretariat
7	TUOMAINEN Anita	Support, Forum and HelpNet Secretariat
8	VALENTINI Marco	Evaluation

Additional participants in the Open Session**BPRS members**

	Country	Name
1	BG	HRISTOVA Viktoriya
2	CH	BUERGY Heribert
3	CY	GAVRIEL Alexandros
4	DK	HANSEN Lise Bach
5	EL	GKILPATHI Dimitra
6	ES	VAZQUEZ Margarita
7	FI	KARNANI Päivi
8	HR	VRHOVAC FILIPOVIC Ivana
9	IE	WHELAN Michelle
10	IT	RAVAIOLI Francesca
11	LT	HAKAITE Palmira
12	NL	BRAAM Marianne
13	NO	SKJARGARD Cathrine

	Country	Name
14	PL	PISAREK Dominik
15	SE	KARLSSON Jenny

BPRS Advisors

	Country	Name
1	BE	VAN DEN DRIESSE Kristof
2	IE	MURPHY Brian
3	NL	DE BOER Jabik

Accredited Stakeholders Organisation representatives

	Organisation	Name
1	AISE	BYRNE Dominic
2	AISE	CAZELLE Elodie
3	AISE	SCAZZOLA Roberto
4	Amfori	SARRAZIN Florence
5	Association of Manufacturers and Formulators of Enzyme Products	KEMENDI Gabriella
6	ASD	FROU Pascal
7	CEFIC	ANNYS Erwin
8	CEFIC	MIAHI Camelia
9	CEFIC	TJOE NIJ Evelyn
10	Concawe	KERANEN Hannu
11	DUCC	PORTUGAL Laura
12	ECOPA	ROVIDA Costanza
13	EUFiAs	KELLER Fritz
14	EURATEX	DRMAČ Dunja
15	EURATEX	SCALIA Mauro
16	Euroalliages	VINCK Nadia
17	EuroCommerce	BEDERT Els
18	European Chemical Employers Group	ARGUTYAN Emma
19	Fecc	COZZUPOLI Giovanna
20	Fecc	LYNGSAE Marianne
21	FEICA	GOMEZ Divina
22	Fertilizers Europe	DELLA PIETRA Leondina
23	Plasticseurope	CASSART Michel

Instrument for Pre-Accession Assistance (IPA) representatives

	Country	Name
1	Albania	DIBRA Laureta
2	Kosovo	LAJQI MAKOLLI Violeta

	Country	Name
3	Montenegro	PAJKANOVIC Jadranka
4	Serbia	KOVACEVIC Tanja
5	Turkey	ÇEKIM Ahu

IV. List of Annexes

ANNEX 1. Final agenda Forum-31

ANNEX 2. Revision of mandates of Forum WGs/Task Forces

ANNEX 2 a – “REF-8 on Online sales”

ANNEX 2 b – “Forum Work Programme 2019-2023”

ANNEX 2 c – “Prioritisation of REF projects”

ANNEX 2 d – “Authorisation 3”

ANNEX 2 e – “REF-6 on CLP”

ANNEX 2 f – “Implementation of PD-NEA”

ANNEX 2 g – “REF-7 on Registration”

ANNEX 2 h – “Training for Enforcement Trainers 2019”

ANNEX 2 i - “Characterisation of risks”

ANNEX 2 j - “Pilot project on substances in article”

ANNEX 2 k – “Customs 2”

ANNEX 2 l – “Enforceability of restrictions”

ANNEX 2 m – “REF-5 on Exposure Scenarios, extended SDS, RMM and OC”

ANNEX 2 n – “Pilot Project on control of PIC”

ANNEX 2 o – “Training for Enforcement Trainers 2018”

ANNEX 2 p – “Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs”

ANNEX 3. Glossary of acronyms and abbreviations

Annex 1 – Final agenda Forum-31

9 November 2018
ECHA/Forum-31/2018/dA

**Thirty first meeting of the
Forum for Exchange of Information on Enforcement
(Forum-31)
13-16 November 2018
Brussels, Belgium**

**Tuesday, 13 November: starts at 17:30
Friday, 16 November: ends at 16:15**

DAY 1 CLOSED SESSION Tuesday, 13 November 2018

Location: Charlemagne Building (meeting room: Alcide de Gasperi)

Item 1 – Welcome and Introduction 17:30-17:40

- 1.1 Opening by the Chair of the Forum –*Chair*
- 1.2 Adoption of the Agenda –*Chair*

ECHA/Forum-31/2018/dA

***For adoption
For information***

Item 2 – Preparation for the open session 17:40-18:45

Discussion by the Forum and BPRS members of the topics to be addressed in the joint open session

For discussion

*ECHA/Forum-31/2018/2_room_doc
ECHA/Forum-31_BPRS-6/2018/2_room_doc*

DAY 2 OPEN SESSION Wednesday, 14 November 2018**LOCATION: Centre de Conférence Albert Borschette (Rue Froissart 36)****Item 3 – Welcome and Introduction to the OPEN SESSION** 09:00-09:20

- 3.1 Welcome to the Stakeholders – *Forum Chair*
- 3.2 Introduction of the Forum BPR Subgroup (BPRS) – *BPRS Chair*

For information**Item 4 – Opening address by ECHA** 09:20-09:30**For information****Item 5 – Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs** 09:30-11:30

- 5.1 Discussion with the ASOs on opportunities for improvement of the quality of SDS (95')
 - 5.1.1 WG provisional findings – *WG Chair*
 - 5.1.2 Member State experience – *Forum member*
 - 5.1.3 Stakeholder experience – *ASO representative*
 - 5.1.4 Discussion on possible solutions and next steps
- 5.2 Mandate amendment - *ECHA Forum Secretariat*

ECHA/Forum-31/2018/5.1.1
ECHA/Forum-31/2018/Draft_mandates

For information
For adoption**Coffee break 10:15-10:35****Item 6 – Discussion topics proposed by ASOs** 11:30-17:00

- 6.1 European Association of Chemical Distributors (Fecc)
 - 6.1.1 Management of ES information in SDS - Distributors' consolidation methodology (20') - *Giovanna Cozzupoli*
 - 6.1.2 Fecc good practice guidance: Storage tank management for Active Substances under BPR (20') - *Marianne Lyngsaae*
- 6.2 Aerospace and Defence Industries of Europe (ASD)
 - Enforcement issues at manufacturers of articles' whilst no EU IT Infrastructure is in place for codification and distribution of SDSs (20') - *Pascal Frou*
- 6.3 European Consensus Platform for 3R Alternatives to Animal Experimentation (ECOPA)
 - Regulatory Acceptance of Read-Across approach (20') - *Costanza Rovida*

Lunch break 12:50-13:50

- 6.4 International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)
- 6.4.1 Learnings from the 2016 Forum pilot project on child-resistant fastenings and AISE safe use campaign (30') - *Roberto Scazzola*
- 6.4.2 Bridging principles and mixture classification under CLP and DetNet: challenges and opportunities (40')- *Roberto Scazzola*
- 6.4.3 Labelling of treated articles under BPR: case of detergents (30') - *Elodie Cazelle*
- 6.5 European Apparel and Textile Confederation (EURATEX)
Urgent need for better market surveillance for textile and apparel products (20') - *Mauro Scalia*

Coffee break 15:50-16:10

- 6.6 European Chemical Industry Council (CEFIC)
- 6.6.1 Improved collaboration between enforcement authorities and stakeholders (30') - *Erwin Annys*
- 6.6.2 REACH Exposure Scenario Check: Industry experience and proposal for a pragmatic approach (20') - *Evelyn Tjoe Nij (Dow Benelux)*

ECHA/Forum-31/2018/6.1.1

ECHA/Forum-31/2018/6.3

ECHA/Forum-31/2018/6.4.1

***For information
For discussion***

Item 7 - SLIC-CHEMEX Working group

17:00-17:30

- 7.1 REACH implementation in the work place - *Nathan Kuper*

For information

Item 8 - Updates from the Forum/BPRS

17:30-18:30

- 8.1 Update on the scope of REF projects (10')- *Chair of WG Prioritisation*
- 8.2 Forum's finalised projects during 2018: REF-5 and pilots on Online sales and PIC (30') - *Forum Vice-Chair*
- 8.3 Cooperation with customs - upcoming pilot project (20') - *WG Chair*

ECHA/Forum-31/2018/8

***For information
For discussion***

Item 9 – Conclusions and actions points from the open session	18:30-18:40
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For adoption

Item 10 – End of the open session	18:40
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DAY 3 CLOSED SESSION Thursday, 15 November 2018

LOCATION: Centre de Conférence Albert Borschette (Rue Froissart 36)

Item 1 – Welcome and Introduction (continuation)	09:00-09:10
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- 1.3 Declarations of conflict of interest with regard to agenda items –
Chair
- 1.4 State of play with action points from Forum-30 – *ECHA Forum Secretariat*
- 1.5 Report of the written procedures and other issues between Forum-30 and Forum-31 - *Chair*

ECHA/Forum-31/2018/1.4
ECHA/Forum-31/2018/1.5

For information

Item 11 – Welcome from COM	09:10-09:25
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For information

Item 12 – Debriefing of the Open Session and Enforcement Conference	09:25-09:40
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For discussion

Item 13 – Forum’s enforcement activities- Projects under preparation	09:40-09:55
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- 13.1 REF-8 (15’)
 - 13.1.1 Mandate set-up - *ECHA Forum Secretariat*

ECHA/Forum-31/2018/13_room_doc
ECHA/Forum-31/2018/Draft_mandates

For adoption

Item 14 – Forum’s enforcement activities- Ongoing projects

09:55-16:50

14.1 Forum Work Programme 2019-2023 (35')

- 14.1.1 WG progress report – *WG Chair*
- 14.1.2 Adoption of the Forum’s MAWP 2019-2023 – *WG Chair*
- 14.1.3 Survey on OSH and REACH enforcement – *WG Chair*
- 14.1.4 Mandate amendment- *ECHA Forum Secretariat*

Coffee break 10:30-11:00*14.2 Prioritisation of REF projects (30')*

- 14.2.1 WG progress report – *WG Chair*
- 14.2.2 Mandate amendment – *ECHA Forum Secretariat*

14.3 Third pilot project on authorisation (10')

- 14.3.1 WG progress report – *WG Chair*
- 14.3.2 Mandate amendment – *ECHA Forum Secretariat*

14.4 REACH-EN-FORCE-6 on CLP (65')

- 14.4.1 WG progress report – *WG Chair*
- 14.4.2 Enforcement of Article 45 and Annex VIII of CLP- *WG Chair*
- 14.4.3 Enforcement of liquid laundry detergent capsules in REF-6 – *DE invited expert*
- 14.4.4 Mandate amendment – *ECHA Forum Secretariat*

14.5 Implementation of PD-NEA (15')

- 14.5.1 WG progress report – *WG Chair*
- 14.5.2 Update on ECHA IT tools – *ECHA Forum Secretariat*
- 14.5.3 Mandate amendment – *ECHA Forum Secretariat*

Lunch break 13:00-14:00*14.6 REACH-EN-FORCE-7 on Registration (5')*

- 14.6.1 WG progress report – *WG Chair*
- 14.6.2 Mandate amendment – *ECHA Forum Secretariat*

14.7 Training for enforcement trainers 2019 (20')

- 14.7.1 WG progress report – *WG Chair*
- 14.7.2 Discussion of the proposed topics – *WG Chair*
- 14.7.3 Mandate amendment – *ECHA Forum Secretariat*

14.8 Categorisation of risks (30')

- 14.8.1 Task Force progress report – *ECHA Forum Secretariat*
- 14.8.2 Mandate amendment – *ECHA Forum Secretariat*

14.9 Pilot project on substances in articles (5')

- 14.9.1 WG progress report – *WG Chair*
- 14.9.2 Mandate amendment – *ECHA Forum Secretariat*

14.10 Customs 2 (30')

- 14.10.1 WG progress report – *WG Chair*
- 14.10.2 Adoption of pilot project manual – *WG Chair*
- 14.10.3 Mandate amendment- *ECHA Forum Secretariat*

Coffee break 15:30-15:50

14.11 Enforceability of Restrictions (60')

14.11.1 WG progress report - *WG Chair*

14.11.2 Mandate amendment - *ECHA Forum Secretariat*

*ECHA/Forum-31/2018/14.1.1
ECHA/Forum-31/2018/14.1.1_Appendix1
ECHA/Forum-31/2018/14.1.1_Appendix2
ECHA/Forum-31/2018/14.2.1
ECHA/Forum-31/2018/14.3.1
ECHA/Forum-31/2018/14.4.1
ECHA/Forum-31/2018/14.5.1
ECHA/Forum-31/2018/14.6.1
ECHA/Forum-31/2018/14.7.1
ECHA/Forum-31/2018/14.8.1
ECHA/Forum-31/2018/14.9.1
ECHA/Forum-31/2018/14.10.1
ECHA/Forum-31/2018/14.10.1_Appendix1
ECHA/Forum-31/2018/14.11.1
ECHA/Forum-31/2018/Draft_mandates*

***For information
For discussion
For adoption***

Item 15 – Practical issues for enforcement of REACH and CLP *16:50-17:50*

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

ECHA/Forum-31/2018/15

For discussion

Item 16 – Adoption of conclusions from day 3 *17:50-18:00*

For adoption

LOCATION: Centre de Conférence Albert Borschette**DAY 4 CLOSED SESSION** Friday 16 November 2018**Item 17 – Forum’s enforcement activities- projects under finalisation** 09:00-10:00

17.1 REACH-EN-FORCE-5 on Extended SDS, exposure scenarios, risk management measures and operational conditions (20')

17.1.1 WG final report – WG member

17.1.2 Discussion on the follow-up of the project results – WG member

17.1.3 Mandate closure - ECHA Forum Secretariat

17.2 Pilot project on Control of PIC (20')

17.2.1 WG final report – WG Chair

17.2.2 Discussion on the follow-up of the project results - WG Chair

17.2.3 Mandate closure - ECHA Forum Secretariat

17.3 Training for enforcement trainers 2018 (20')

17.3.1 WG final report - WG Chair

17.3.2 Mandate closure - ECHA Forum Secretariat

ECHA/Forum-31/2018/17.1.1

ECHA/Forum-31/2018/17.2.1

ECHA/Forum-31/2018/17.3.1

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ECHA/Forum-31/2018/Draft_mandates

For information

For discussion

For adoption

Item 18 – Update on relevant developments by the Commission 10:00-11:00

18.1 General updates by the European Commission

18.2 ICSMS update

ECHA/Forum-31/2018/18.1

ECHA/Forum-31/2018/18.1_Annex

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For information

For discussion

Coffee break 11:00-11:30**Item 19 – Cooperation with other networks** 11:30-12:00

19.1 Updates from SLIC-CHEMEX – Chris Snaith

19.2 Update from CLEEN – ECHA Forum Secretariat

For information

Item 20 – Updates from the ECHA and Forum Secretariat 12:00-12:45

- 20.1 Update on ECHA's strategic plan 2019-2023 (5')
- 20.2 Follow-up of ECHA Decisions: updates from ECHA (5')
- 20.3 Animal testing without testing proposals (10')
- 20.4 Update on ECHA guidance activities (5')
- 20.5 Forum indicators – wrap up (15')
- 20.6 Monitoring system for the flow and use of safe use information (5')

ECHA/Forum-31/2018/20.2
ECHA/Forum-31/2018/20.2_Annex1
ECHA/Forum-31/2018/20.3
ECHA/Forum-31/2018/20.4
ECHA/Forum-31/2018/20.5
ECHA/Forum-31/2018/20.5_Annex
ECHA/Forum-31/2018/20.6

For information

Item 21 – Updates on the cooperation between Forum and BPR Subgroup 12:45-13:00

Updates from the BPRS discussions – *BPRS Chair*

For information

Lunch break 13:00-14:00

Item 22 – Updates on the follow up of ECHA's Evaluation decisions 14:00-14:50

ECHA/Forum-31/2018/22_1
ECHA/Forum-31/2018/22_2

For information
For discussion

Item 23 – POP recast and the role of the ECHA Forum 14:50-15:35

ECHA/Forum-31/2018/23

For discussion

Item 24 – Closing remarks by ECHA’s Executive Director 15:35-15:45

For information

Item 25 – A.O.B. 15:45-16:00

25.1 Follow-up of a substance under SEv (5') – *FR Alternate*

For information

Item 26 – Adoption of conclusions from day 4 16:00-16:15

For adoption

Item 27 – End of the meeting 16:15

Annex 2 a "REF-8"

Forum Working Group

Work Package A.1

"Coordinated enforcement project REACH-EN-FORCE-8"

(Mandate created at Forum-31)

Composition:

Chair: Karin RUMAR (SE)

Forum Members and Alternates

- Marta OSOWNIAK (PL)
- Eugen ANWANDER (AT)
- Martin MARKO (CZ)
- Maria Leticia POLCI (IT)

Invited Experts

- Kevin BUCKLEY (IE)
- Sara YASSINE (DK)
- Timea TARNO CZAI (HU)
- Maria PALEOMILITOU (CY)
- Jurgita BALCIUNIENE (LT)
- Ingrida STULGIENE (LT)
- Lotta KAILA (FI)

BPRS Members and Experts

- Cathrine SKJÆRGÅRD (NO) (BPRS member)
- Jenny KARLSSON (SE) (BPRS member)
- Francesca RAVAIOLI (IT) (BPRS member)
- Brian MURPHY (IE) (BPRS alternate)
- Fiona TCHANAKIAN (FR) (BPR expert)
- Olivier COUTURAUD (FR) (BPR expert)
- Anne HORN (DE) (BPR expert)
- Jabik DE BOER (NL) (BPR expert)

COM

- Miguel AGUADO (DG GROW)

ECHA

- Tania MATEUS
- Ales FRONTINI
- Nicola TECCE

Objective:

- conceive and manage the eighth major Forum enforcement project REF-8 'Enforcement of CLP, REACH and BPR duties related to substances, mixtures and articles sold on-line'.

Mandate:

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project, taking into account the learnings from previous Forum projects "control of internet sales" and "REF-4" and others at EU level;
2. Define the specific duties to be covered in the project;
3. Prepare and deliver the training for project national coordinators

4. Management of the Operational phase
5. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
6. Elaborate tips and hints for inspectors based on the relevant outcomes from the project

Timeline:

- Project manual: Q4 2019
- Prepare and deliver the training for project national coordinators: Q4 2019
- Operational phase: 2020
- Reporting phase (National Coordinators): Q1 2021
- Evaluation phase: Q3 2021
- Draft report: Q4 2021
- Adoption of the report: Q4 2021
- Tips and hints for inspectors: Q4 2021

Annex 2 b "OSH-REACH interactions"

Forum Working Group "Survey on OSH-REACH enforcement interactions" (Mandate adopted at Forum-31 and BPRS-6)

Composition:

Chair: Sinead McMICKAN (IE)

Forum/BPRS Members/Alternates

- Katja VOM HOFE (DE)
- Abdulqadir SULEIMAN (NO)

Invited Experts

- DE
- Paul CARTER (UK) - OSH
- Teresa ALMEIDA (PT) - OSH
- Tom O'SULLIVAN (IE) - OSH
- Nikoletta MAROSVOLGYI (HU)
- Elvera Breedland (NL)
- Tuija Vähänen (FI)
- Monique WAEGEMAEKERS (NL)

Commission

- Miriam GUTIERREZ-MEDINA (DG GROW)

ECHA

- Maciej BARANSKI
- Magda TLOCZEK

Objectives:

Prepare and process a survey on interactions in OHS and REACH enforcement

Mandate:

1. Prepare, send and process the results of a survey to Forum members on existing interactions in OHS and REACH enforcement to allow the Forum to support and respond to Action 12(2) recommended in the REACH Review 2017

Tentative Timeline:

- Forum-33

Annex 2 c “Prioritisation of REF Projects”

Forum Working Group

Work Package A.1

“Prioritisation of REF Projects”

(Mandate adopted at Forum-31)

Composition:

Chair: Oldrich JAROLIM (CZ) – rotating Chair

Vice Chair(s):

Forum Members/Alternates

- Tasoula KYPRIANIDOU LEONTIDOU (CY)
- Maria Letizia POLCI (IT Alternate)
- Paul CUYPERS (BE)
- Dubravka KREKOVIC (HR)
- Abdulqadir SULEIMAN (NO Alternate)
- Sofia BARATA (PT Alternate)

Invited Experts

- Semira MEHIC (SI)
- Andrea MAYER-FIGGE (DE)
- Tamas KOVACS (HU)

ECHA

- Juan Pablo CALVO TOLEDO

Objective:

- Propose annually the subject for the next harmonised enforcement project coordinated by the Forum (REF Projects).

Mandate:

According to the working procedure for the prioritisation and selection of REF projects, the WG shall:

1. Review annually a list of proposals for REF projects submitted by Forum members, ECHA Secretariat, the Commission and the Stakeholder Organisations accredited by ECHA (ASOs);
2. Prioritise the subjects by applying Forum’s methodology for the prioritisation, selection and management of REF projects
3. Draft a recommendation proposing the subject for the next REF project
4. Elaborate and update a registry of legal obligations subject to previous enforcement projects.
5. Propose to the Forum topics for pilot and small-scale projects as an output of the prioritisation exercise where appropriate.
6. In addition, the WG will revise, when needed, the methodology for the prioritisation, selection and management of REF projects and implementing its working procedures to be adopted by the Forum.

The WG will operate from Forum-31 (November 2018) until the end of 2023 (end of the Forum MAWP 2019 – 2023). The mandate of the WG can be renewed to operate after this period.

Timelines:

- The basic timeframes are regulated by the Forum Methodology on Prioritisation and Selection of Project Proposals and the working procedure for the prioritisation and selection of harmonised enforcement projects coordinated by the Forum
- Shortlist of subjects for REF-9 by Forum-34.

Annex 2 d "Authorisation 3"

Forum Working Group

Work Package A.1

"Third Forum Pilot Project on Authorisation"

(Mandate adopted at Forum-31)

Composition:

Chair: Jos VAN DEN BERG (NL)

Forum Members/Alternates

- Eugen ANWANDER (AT)
- Paul CUYPERS (BE)
- Majella LOWE (IE)
- Emilie RASOOLY (FR)
- Žilvinas UŽOMECKAS (LT)

Invited Experts

- Lina DUNAUSKIENĖ (LT)
- Lisa EKSTIG (SE)
- Nicole NOWKA-ROSSMANN (DE)
- Elvera BREEDLAND (NL)
- Pirjo KORHONEN (FI)

SLIC-CHEMEX

- Nathan KUPER (NL) tbc

ECHA

- Magdalena TLOCZEK
- Ales FRONTINI

Objectives:

- Coordinate and manage the preparatory, operational and reporting phases of the Forum third pilot project on authorisation aimed at building enforcement experience and practices involved in controlling authorization related obligations.

Mandate:

1. Develop the project manual and necessary materials for the execution of the Forum third pilot project on authorisation related to the presence of chromium VI compounds and other substances subject to authorisation on the market
2. Prepare and deliver the training for the national coordinators
3. Coordinate and provide consulting assistance to the national coordinators from the participating countries during the operational and reporting phase of the project
4. Supply the national coordinators with up-to-date versions of project documents
5. Collect and compile results from the national coordinators
6. Prepare final project report and present it to the Forum plenary
7. prepare proposal to the Forum about the feasibility of timelines and substances to be included in scope taking into account the authorisation decisions issued by the end 2018

Timeline:

- Preparatory phase – March 2018 – December 2019
- Operational phase January – June 2020
- Reporting phase – July – December 2020

Annex 2 e "REF-6"

Forum Working Group

Work Package A.1

"Coordinated enforcement project REACH-EN-FORCE-6"

(Mandate adopted at Forum-31 and BPRS-6)

Composition:

Chair: Henrik HEDLUND (SE)

Forum Members and Alternates

- Gro HAGEN (NO)
- Elena ZIDAROVA (BG)
- Dimitrios CHATZIAN TINOU (EL Alternate)
- Graca BRAVO (PT)
- Pablo SANCHEZ-PEÑA (ES)
- Žilvinas UŽOMECKAS (LT)
- Markus MAKI (FI)

Invited Experts

- Petra SCHLAG (DE)
- Panagiota SKAFIDA (EL)
- Adhemar ROG (NL)
- Harm VOERMAN (NL)

BPRS Members and Experts

- Viktoriya HRISTOVA (BG)
- Emma BERGSTROM (SE)
- Gilles CROIZÉ-POURCELET (FR)
- Anna MASLARSKA (BG)

ECHA

- Outi TUNNELA
- Ales FRONTINI
- Anita TUOMAINEN

Objective:

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

Mandate:

1. Management of the Operational phase
2. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
3. Elaborate tips and hints for inspectors based on the relevant outcomes from the project
4. Include biocides in the scope of the project in collaboration with the appointed BPR experts
5. Define the scope of enforcement activities under Art 45 and Annex VIII of CLP
6. Address in the manual the issue of mechanical compression strength of the LLDCs

Timeline:

- Project manual: Q4 2017
- Prepare and deliver the training for project national coordinators: Q4 2017
- Define the scope of enforcement activities under Art 45 and Annex VIII of CLP: Q2 2018
- 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 f "PD-NEA"

**Forum Working Group
"Implementation of PD-NEA"**
(Mandate adopted at Forum-31)

Composition:

Chair: Pablo SANCHEZ-PEÑA (ES)

Forum Members/Alternates

- Eugen ANWANDER (AT)
- Eleni FOUFA (EL)

Invited Experts

- Juergen SCHMID (DE)
- Maria Jose Falcao (PT)

ECHA

- Ales FRONTINI
- Anita TUOMAINEN

Objective:

- Support the implementation of the PD-NEA allowing inspectors access to data submitted to ECHA

Mandate:

1. Provide input during further development and implementation of PD-NEA
2. Verify that the UAT conditions are implemented with and follow up the implementation of the WG improvement requests

Timeline:

- Forum-32 (Q1 2019)

Annex 2 g "REF-7"

Forum Working Group

Work Package A.1

"Coordinated enforcement project REACH-EN-FORCE-7"

(Mandate adopted at Forum-31)

Composition:

Chair: Paul CUYPERS (BE)

Forum Members and Alternates

- Michael FAGERLUND (DK)
- Abdulqadir SULEIMAN (NO)
- Jos VAN DEN BERG (NL)
- Emilie RASOOLY (FR)

Invited Experts

- Rui CABRITA (PT)
- Angelika HOOPS (DE)
- Tamas KOVACS (HU)
- Barbro SILLREN (SE)

ECHA

- Magdalena TLOCZEK
- Ales FRONTINI
- Catherine CORNU
- Augusto DI BASTIANO
- Istvan MAK

Objective:

- conceive and manage the seventh major Forum enforcement project REF-7 'Enforcement of Registration obligations after the last registration deadline in cooperation with customs authorities including the verification of the strictly control conditions applicable to the substances registered as intermediates'.

Mandate:

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project
2. Consider the inclusion of an optional module on the registration of monomers in polymers within the project
3. Discuss with ECHA Secretariat possibilities for preliminary screening of the registration dossiers and identification of some cases where there is concern
4. Prepare and deliver the training for project national coordinators
5. Management of the Operational phase
6. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
7. Elaborate tips and hints for inspectors based on the relevant outcomes from the project

Timeline:

- Project manual: Q4 2018
- Prepare and deliver the training for project national coordinators: Q4 2018
- Operational phase: 2019
- Reporting phase (National Coordinators): Q1 2020
- Evaluation phase: Q3 2020
- Draft report: Q4 2020
- Adoption of the report: Q4 2020
- Tips and hints for inspectors: Q4 2020

Annex 2 h “Train the trainers 2019”

Forum Working Group

Work Package C.2.

“Training for enforcement trainers 2019”

(Mandate created at Forum-31)

Composition:

Chair: Henrik HEDLUND (SE)

Forum Members/Alternates

- Eugen ANWANDER (AT)
- Gro HAGEN (NO)
- Semira HAJRLAHOVIĆ MEHIĆ (SI)
- Martin MARKO (CZ)
- Aleksandra MOCZULAK (PL)
- Mike POTTS (UK)
- Otilija SPURIENE (LT)

Invited Experts

- Shelley COLLINS (UK)
- Uwe LICHT-KLAGGE (DE)
- Hayley KEATING (UK)
- Maria PALEOMILITOU (CY)

Commission

- TBC

ECHA

- Magdalena TLOCZEK

Objective:

- Prepare and deliver the training for trainers on the enforcement of REACH CLP and PIC in the fourth quarter of 2019.

Mandate:

1. Examine the training subjects relevant for enforcement in the fourth quarter of 2019 and prepare the priority topics for agreement before Forum-31
2. Specify as early as possible the envisaged level of the content of the training
3. Cooperate with the WG REF-8
4. Prepare materials necessary for the training such as presentations or documents
5. Actively conduct the training event with support from other Forum members, ECHA and COM and other experts in specific topics as necessary
6. Collect, summarise and evaluate the recommendations and reactions of participants

Timeline:

- Before Forum-31: conclude on list of subjects and prioritisation
- Forum-34/Forum-35: final report

Annex 2 i “Categorisation of Risks”

Forum Working Group
Work Packages B.1 and C.1
“Categorisation of Risks”
(Mandate adopted at Forum-31)

Composition:

Chair: Paul CUYPERS (BE)

Forum Members/Alternates

- Eugen ANWANDER (AT)
- Stefan FRENZEL (DE)
- Sofia BARATA (PT)

Invited Experts

- Margareta DAHO (SE)
- Andrea MAYER FIGGE (DE)
- Sehbar KHALAF (DK)
- Roberto VALADARES (PT)
- Olivier COUTURAUD (FR)

ECHA

- Juan Pablo CALVO TOLEDO
- Celia TANARRO (Unit A.2, Support, Forum & HelpNet Secretariat)

COM

- Miguel AGUADO (DG GROW)
- Ana BLASS (DG GROW)

Objective:

Develop the guidelines enabling the inspectors and NEAs to categorise the risks from non-compliance when using ICSMS.

Mandate:

The Working Group shall:

1. Develop the guidelines enabling the inspectors and NEAs to categorise the risks from non-compliance when using ICSMS

Timeline:

- F-29: Example(s) to be presented for the Forum for validation of the methodology utilised
- F-33: Guidelines for the inspectors for the use of ICSMS.

Annex 2 j "Substances in Articles"

Forum Working Group "Pilot project Substances in Articles" (Mandate adopted at Forum-31)

Composition:

Chair: Karin RUMAR (SE Alternate)

Forum Members/Alternates

- Mervi ASSMAN (FI)
- Maria Letizia POLCI (IT Alternate)
- Eugen ANWANDER (AT)

Invited Experts

- Ingvild KVIEN (NO)
- Sibylle WURSTHORN (DE)
- Juergen SCHMID (DE)
- Susana BARBOSA ANDRADE (PT)
- Nikoletta MAROSVÖLGYI (HU)

Commission

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ECHA

- Juan Pablo CALVO TOLEDO
- Ales FRONTINI
- Telmo VIEIRA PRAZERES
- Rémi LEFEVRE

Objectives:

- conceive and manage the pilot project on substances in articles

Mandate:

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project
2. Prepare and deliver the training for project national coordinators
3. Management of the Operational phase
4. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation

Timeline:

- Project manual: Q3 2017
- Prepare and deliver the training for project national coordinators: Q3 2017
- Operational phase: 1 October 2017 – 31 December 2018
- Reporting phase (National Coordinators): 28 February 2019
- Draft report: 31 May 2019
- Adoption and publication of the report: 30 September 2019

Annex 2 k "Customs 2"

Forum Working Group "Cooperation with Customs 2" (Mandate adopted at Forum-31)

Composition:

Chair: Tasoula Kyprianidou-Leontidou (CY)

Forum Members/Alternates

- Eleni FOUFA (EL)
- Pablo SANCHEZ-PENA (ES)
- Annemari LINNO (EE) (NEA)

Invited Experts

- Paivi SIMPANEN (FI) (Customs)
- Efstathios THEOCHAROUS (CY) (NEA)
- Sibylle WURSTHORN (DE) (NEA)
- Ricardo FERREIRA MARMELO (PT) (Customs)
- Alfred EBNET (DE) (Customs)

Commission

- Miguel AGUADO (DG GROW) Christophe ROELAND (DG GROW)

ECHA

- Maciej BARANSKI
- Ales FRONTINI
- Magda TLOCZEK

Objectives:

- Prepare, execute and report from joint pilot project with the Customs related to enforcement of REACH and CLP.

Mandate:

1. Prepare, oversee and report from a pilot project testing the cooperation with customs authorities, in cooperation with the PARCS network. The WG will test the questionnaire by inviting the three members of the WG to test the questionnaire with their National Coordinators.
2. Examine the draft market surveillance regulation to see whether it affects the cooperation with customs as defined by the Working Group.

Timeline:

- Task 1:
 - preparatory phase April 2018 – February 2019,
 - operational phase: March 2019 – December 2019
 - Reporting phase: January 2020 – October 2020
- Task 2: Q4 2018-Q1 2019

Annex 2 I “Restrictions”

Forum Working Group
Work Package B12
“Enforceability of restrictions”
(Mandate adopted at Forum-31)

Composition:

Chair: Maria Letizia POLCI (IT Alternate) – rotating Chair

Vice-Chair: Eugen ANWANDER (AT)

Forum Members/Alternates

- Mariano ALESSI (IT)
- Jos VAN DEN BERG (NL)
- Tasoula KYPRIANIDOU-LEONTIDOU (CY)

Invited Experts (advisory process)

- Leonello ATTIAS (IT)
- Tone Line FOSSNES (NO)
- Uwe LICHT-KLAGGE (DE)
- Gernot WURM (AT)
- Katarina WAGNER (DE)
- Michael LAMBERT (UK)
- Charlotte RAHM (SE)

Invited experts (analytical methods)

- Werner ALTKOFER (DE)
- Kevin PITCHFORD (UK)
- Carolina FERRANTI (IT)
- Julia GONZALEZ GUTIERREZ (ES)
- Durk SCHAKEL (NL)
- Aristotelis PAPAGEORGIOU (EL)
- Andromachi KATSONOURI (CY)

European Commission

- Patricia HUALDE GRASA (DG GROW)
- Giuseppina LUVARÀ (DG ENV)

ECHA

- Juan Pablo CALVO TOLEDO
- Stephen HOLLINS

Objective:

- Facilitate the enforceability of restrictions

Mandate:

1. According to the working procedure for developing the Forum advice on enforceability of the Annex XV proposals for restrictions adopted by the Forum, the WG shall:
 - a) Prepare a draft Forum advice on the enforceability of Annex XV proposals for restrictions that are in conformity with the REACH requirements, taking into account the comments of the Forum members. This draft Forum advice will be submitted to the Forum for adoption.

- b) Provide support when possible on enforcement related issues to RAC and SEAC during the process of the elaboration of the RAC and SEAC opinions.

In the execution of this mandate, the members of the WG shall follow the rules and principles established in the mandate given by the Chair of the Forum to the individual members and invited experts of the WG.

2. The WG shall report to the Forum plenary the results of its findings and its actions between the plenaries
3. Review in 2019 the information provided by the stakeholders during 2016/2017/2018 and revise if needed the methodology and the compendium by F-34 (Q4 2019).
4. Provide advice to the Commission on the development of standard methods when invited to do so by the Commission, in line with the proposal from the Forum to the Commission on this matter.
5. Consider to provide an advice to the Commission on the restriction proposal prepared by the COM regarding Article 68 (2).
6. Provide ad-hoc support to the WG managing the pilot project on Substances in Articles
7. Propose to the Forum, in cooperation with ECHA Secretariat, a "Registry of concerns on restrictions" highlighting the potential issues identified by National Enforcement Authorities during the enforcement of REACH Annex XVII restrictions and a proposal to handle the resolution of these issues
8. Assess the enforceability of relevant new Annex XVII restrictions

Timeline:

- Examination of proposals for restriction and support to RAC and SEAC according to plans
- Review Compendium of analytical methods: F-37
- First proposal of the "Registry of concerns": F-37
- Assessment of the enforceability of relevant new Annex XVII restrictions: F-37
- 30 November 2020, reporting at each plenary meeting

Annex 2 m "REF-5"

Forum Working Group

Work Package A.1

"Coordinated enforcement project REACH-EN-FORCE-5 on Exposure Scenarios, extended SDS, RMM and OC"

(Mandate closed at Forum-31)

Composition:

Chair: Abdulqadir SULEIMAN (NO Alternate)

Forum Members

- Dimitrios CHATZIANTONIOU (EL Alternate)
- Eugen ANWANDER (AT)
- Maria ORPHANOU (CY Alternate)
- Otilija ŠPURIENĖ (LT)
- Paul CUYPERS (BE)
- Sofia BARATA (PT Alternate)

Invited Experts

- Jan WESTERNLAKEN (NL)
- Annette KRÜGER (DE)
- Jouni RÄISÄNEN (FI)
- Sonja Mikkelsen (DK)
- Gediminas VALENTĖLIS (LT)
- Janka MORÁVKOVÁ (CZ)
- Kristina KARLSSON (SE)

ECHA

- Tania MATEUS
- Ales FRONTINI
- Andrew MURRAY (Risk Management Implementation Unit)
- Sandrine LEFEVRE-BREVART (Computational Assessment and dissemination Unit)
- Andreas AHRENS (Computational Assessment and dissemination Unit)

Objective:

- Conceive and manage the fifth major Forum enforcement project.

Mandate:

1. Identify the difficulties for conducting the project and propose the actions to facilitate the project in 2017
2. Narrow down and propose a specific scope of the project and recommend it to Forum for adoption
3. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project
4. Prepare and deliver, if needed, the training for project national coordinators
5. Management of the Operational phase
6. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
7. Cooperate with WG Train the trainers 2016 during the preparation and delivery of the content of the training
8. Elaborate tips and hints for inspectors based on the relevant outcomes from the project

Timeline:

- Assessment of needs and proposals to facilitate the project: Q4 2015
- Approve the scope by the Forum: Q4 2015
- Project manual: Q4 2016
- Prepare and deliver the training for project national coordinators: Q4 2016
- Operational phase: 2017
- Reporting phase: Q1 2018
- Evaluation phase: Q3 2018
- Draft report: Q3 2018
- Adoption of the report: Q4 2018
- Tips and hints for inspectors: Q1 2019

**Annex 2 n “Pilot Project on PIC”
Forum Working Group
“Forum Pilot Project on PIC”
(Mandate closed at Forum-31)**

Composition:

Chair: Jos VAN DEN BERG (NL)

Forum Members/Alternates

- Eugen ANWANDER (AT)

Invited Experts

- Panagiota SKAFIDA (EL)
- Andrea ENGELHARDT (DE)
- Isabel COSTA (PT)

COM

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ECHA

- Tania MATEUS
- Ales FRONTINI
- Chiara MACCHI (Unit C1, Dossier submission and PIC)

Objectives:

- Coordinate and manage the preparatory, operational and reporting phases of the Forum pilot project on PIC.

Mandate:

1. Develop the project manual and other materials needed for the execution of the project
2. Coordinate and provide consulting assistance to the national coordinators from the participating countries during the operational and reporting phase of the project
3. Collect and compile results from the national coordinators
4. Prepare final project report and present it to the Forum plenary
5. Elaborate tips and hints for inspectors based on the relevant outcomes from the project

Timeline:

- Preparatory phase: July – December 2017
- Operational phase: January - June 2018
- Reporting phase: July - December 2018
- Tips and hints document – Q1 2019

Annex 2 o “Training the trainers 2018”

Forum Working Group

Work Package C.2.

“Training for enforcement trainers 2018”

(Mandate closed at Forum-31)

Composition:

Chair: Mike POTTS (UK)

Forum Members/Alternates

- Bernice FARRUGIA (MT)
- Semira HAJRLAHOVIĆ MEHIĆ (SI)
- Krisitīne KAZEROVSKA (LV)
- Tasoula KYPRIANIDOU-LEONTIDOU (CY)
- Maria ORPHANOU (CY)
- Clotilde PIONNEAU (FR)
- Otilija SPURIENE (LT)
- Žilvinas UŽOMECKAS (LT)

Forum Invited Experts

- Gaetano ABATE (DE)
- Paul CARTER (UK)
- Nathalie HAYAUD (FR)
- Uwe LICHT-KLAGGE (DE)

Commission

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ECHA

- Magdalena TLOCZEK
- Catherine CORNU
- Augusto DI BASTIANO
- Istvan MAK

Objective:

- Prepare and deliver the training for trainers on the enforcement of REACH, CLP and PIC in the fourth quarter of 2018.

Mandate:

1. Examine the training subjects relevant for enforcement in the fourth quarter of 2018 and prepare the priority topics for agreement before Forum-28
2. Specify as early as possible the envisaged level of the content of the training
3. Prepare materials necessary for the training such as presentations or documents
4. Actively conduct the training event with support from other Forum members, ECHA and COM and other experts in specific topics as necessary
5. Cooperate with the WG REF-7
6. Collect, summarise and evaluate the recommendations and reactions of participants

Timeline:

- Before Forum-28: conclude on list of subjects and prioritisation
- Forum-31: final report

Annex 2 p “Joint initiative on Improvement of the quality of SDSs”

Forum Working Group “Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs” (Mandate revised at Forum-31)

Composition:

Chair: Henrik HEDLUND (SE)

Forum Members/Alternates

- Chiel BOVENKERK (NL Alternate)
- Sinead MCMICKAN (IE)
- Oldrich JAROLIM (CZ)
- Bernice FARRUGIA (MT Alternate)
- Abdulqadir SULEIMAN (NO Alternate)
- UZOMECKAS Zilvinas (LT)

Invited Experts

- Fatima ARMAGAN (DK)
- Tarja KARLEMO (FI)
- Filipe VITORINO (PT)
- Laura ABEL (DE)
- Paul CARTER (UK)
- Angelo TRAVAGLIA (IT)

Commission

- Miguel AGUADO MONSONET (DG GROW)
- Gert ROEBBEN (DG GROW)

ECHA

- Juan Pablo CALVO TOLEDO
- Fesil MUSHTAQ
- Ales FRONTINI

ECHA Accredited Stakeholder Organisations

- ACEA
- ASD
- CEEMET
- CEFIC
- CEM BUREAU
- Cerame-Unie
- CONCAWE
- ECEAE
- DUCC
- ECOPA
- ECPA
- EEB
- ETUC
- EURATEX
- EUROFER
- EUROMETAUX
- FECC
- Fertilizers Europe
- Orgalime
- ORO

MS volunteering to share deficiencies experiences with SDSs

- HU, CY, IT, IE, DK, CZ, DE, NO, SE, UK, NL, MT, PT, AT, FI, EE, LT

Objectives:

Identify the common deficiencies found in the SDSs and propose solutions for improvement and encourage ECHA ASOs to implement the solutions and monitoring the progress.

Mandate:

1. Define the detailed scope of the joint action
2. Prepare an action plan including such actions as:
 - a. The collection of data on deficient SDSs
 - b. Identify the topics that require priority actions
 - c. The analysis of the data and the identification of reasons for the deficiencies
 - d. The identification of potential solutions
 - e. The implementation by the ECHA ASOs of the solutions
 - f. The monitoring of the progress with the improvements
3. Oversee the implementation of the joint action
Oversee the reporting from the joint action and identification of solutions during the open sessions 2018/2019

Tentative Timeline:

- Draft scope and action plan: October 2017
- Adoption of the action plan: December 2017
- Implementation of the action plan:
 - o Data collection : May 2018 – September 2018
 - o Analysis of the data and identification of potential solutions– September 2018 – February 2019
 - o Presentation of the preliminary outcomes in the open session of Forum-31 (November 2018)
 - o Presentation of the final outcomes of the main deficiencies with SDS at Forum-32
 - o Presentation of the final outcomes to the ECHA Accredited Stakeholders and elaboration of list of actions to improve SDS (F-32 – F-34)
 - o Presentation of the list of actions to improve SDS (open session Forum-34)
- Monitoring of results during open sessions
 - o 2019 onwards: Implementation of the solutions proposed in the action plan by ASOs
 - o 2019 onwards: ASOs report on actions taken during annual open sessions of the Forum meetings
- Closure of the mandate (F-34: November 2019)

Annex 3- Glossary of acronyms and abbreviations

AMS: Accreditation and Market Surveillance regulation
ASO: ECHA's Accredited Stakeholder Organisations
BPR: Biocidal Product Regulation
C&L: Classification and Labelling
CAD: Chemical Agents Directive
CARACAL: MSCA Committee for REACH and CLP
CEN: European Committee for Standardization
CLP or CLP Regulation: Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures
CMD: Carcinogens and Mutagens Directive
CN (codes): Combined Nomenclature
COM: European Commission
CSA: Chemical Safety Assessment
CSR: Chemical Safety Report
DEV: Dossier Evaluation
DG: Directorate General at Commission
DNA: Designated national authority (PIC)
DMEL: Derived Minimal Effect Levels
DNEL: derived no effect levels
DU: Downstream Users
ECHA: European Chemicals Agency
ECJ: European Court of Justice
ENES: Exchange Network on Exposure Scenarios
ES: Exposure Scenario
EU: European Union
ICSMS: Information and Communication System for Market Surveillance
MSCA: Member State Competent Authority
NEAs: National Enforcement Authorities
OC: Operational conditions
OEL: occupational exposure limits
OSH: Occupational Safety and Health
PARCS: Prohibitions and Restrictions Customs Controls Strategy (Expert Group on Customs Action to protect Health, Cultural Heritage, the Environment and Nature)
POP: Persistent and Organic Pollutants
RAC: Committee for Risk Assessment
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
RMM: Risk Management Measure
PD-NEA: Portal Dashboard for National Enforcement Authorities – the successor system to RIPE
SDS: Safety Data Sheet
SEAC: Committee for Socio-economic Analysis
SEV: Substance Evaluation
SME: Small and Medium Sized Enterprises
SONC: Statement of Non-Compliance
SVHC: Substance of very high concern
WG: Working Group of the Forum