



Forum-33/M/2019 – PUBLIC
Adopted on 28/10/2019

Minutes of the
33rd meeting of the Forum for Exchange of Information on Enforcement
Helsinki, Finland
18-19 June 2019

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I. Summary record of the proceedings

Item 1 – Welcome and introduction

1.1 Opening by the Chair of the Forum

The Chair welcomed all the participants. She announced apologies from Liechtenstein, Iceland and Malta Forum members, which did not appoint a proxy.

The Chair informed that the quorum requirement was met.

1.2 Introduction of the new Head of Unit of ECHA's Support and Enforcement unit

Erwin Annys gave a short introduction of himself and his work path and welcomed the future work with the Forum.

1.3 Adoption of the agenda

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

1.4 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 at the meeting.

1.5 State of play with action points from Forum-32

The ECHA Forum Secretariat informed the plenary on the status of action points from Forum-32 and highlighted the open actions.

1.6 Report of the written procedures and other issues between Forum-32 and Forum-33

The Chair referred to the document with the results of the written procedures between Forum-32 and Forum-33.

As there were two Forum members that abstained in the written procedure for the adoption of the practical issue 32.2, this practical issue will be addressed again in Forum-33, aiming for its adoption by consensus (agenda item [11](#)).

Item 2 – Address by ECHA's Director of Risk Management

The new Director of Risk Management, Peter van der Zandt, presented himself to the Forum and highlighted the tasks of his directorate, which included the Restrictions and Authorisation processes under REACH as well as all ECHA activities under Biocides – approvals of Active Substances and Union Authorisations of Biocidal Products. He expressed interest in expanding the use of the Forum and BPRS expertise in making the regulatory risk management more enforceable.

The Director highlighted how critical the enforcement of authorisation duties is for the effectiveness of authorisation as a risk management measure. Furthermore, ECHA was expecting a new major wave of applications for authorisations in 2020, which will require significant resourcing and preparation to process it.

The ECHA Secretariat would support a project on Authorisation, particularly targeting substances known to be still in use such as Chromium VI and its compounds.

The Director recognised that the advice of the Forum on the enforceability of restrictions proposals is an important element of the Restrictions process as it is important that the enforceability aspects of new entries are properly considered and fed into the regulatory process. He suggested re-assessing the interactions between the ECHA staff and the Forum WG during the process and the harmonisation of the process to ensure the best possible outcome.

The Director reminded the Forum on the REACH evaluation joint action plan (REAP), being developed by ECHA and COM, addressing the best way to improving the evaluation process and setting more ambitious goals to address issues with dossier compliance. The latest version included four actions related to enforcement of the dossier evaluation decisions intended to make the evaluation more impactful. He encouraged the Forum to provide feedback on the proposed actions and work together with ECHA on implementing them.

Item 3 – Debriefing of the meeting with ECHA Directors

The Chairs summarised the discussions held with the ECHA's directors.

Item 4 - Forum's enforcement activities

4.1 Prioritisation of REF projects

4.1.1 WG progress report

The WG chair summarised the prioritisation process and presented the outcome of such exercise. The potential topics for REF-9 were on Authorisation or on PIC regulation. The Forum members voted and excluded PIC as a topic for REF-9.

The ECHA Forum Secretariat would explore the possibilities of extending the operational phase of the REF project on authorisation and its impact on the current project cycles and resources.

The WG recommended having a pilot on bridging principles for classification provisions applicable to cleaning/detergent products according to CLP. As there was interest of at least nine countries, the Forum agreed to initiate a pilot project focused on such issue. The timeline of the project will be proposed at Forum-34.

4.1.2 Mandate amendment

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

4.2 Categorisation of risks in ICSMS

4.2.1 WG progress report

The WG chair presented the proposed guidelines to assist in selecting the risk level of non-compliances with REACH, CLP or PIC observed by market surveillance authorities when notifying via ICSMS, covering the non-compliance with restrictions. The Forum would be invited to comment on the proposed guidelines during the summer.

The Forum discussed whether the WG should continue the work and expand the guidelines to include non-compliances with other legal obligations, e.g. authorisation, registration, communication of safety information, CLP, etc. In order to allow some time for the inspectors to gain experience with the use of ICSMS and the guidelines, the Forum agreed to close this WG after the adoption of the guidelines and, if needed, re-open it in the future to work on guidelines for other areas.

4.2.2 Mandate amendment

The Forum adopted the revised mandate of the WG and conditionally closed the WG after the adoption of the guideline for categorisation of Risks in ICSMS ([Annex 2b](#)).

4.3 Enforceability of restrictions

4.3.1 WG progress report

The WG prepared the final draft advices on the enforceability of the restriction proposals regarding D4D5D6, Micro plastics and Formaldehyde and provided support to RAC and SEAC on the restriction proposals regarding PAH in rubber granules and Cobalt salts. The WG developed a detailed activity plan for 2019 taking into account the new proposals for restrictions submitted in the Registry of Intentions.

4.3.2 Mandate amendment

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

4.4 Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs

4.4.1 WG progress report

The Forum adopted the report on the 'Improvement of the quality of SDS' after Forum-32 and it was published on ECHA's website. Such report was shared with the ASOs as background information for the meeting of the WG with ASOS on 4 July 2019. In the meeting, the recommendations from the report would be discussed with the ASOs to find possible solutions to the deficiencies observed in the SDS. Potentially a second meeting would be organised in the autumn to draft a list of proposals for solutions.

4.4.2 Mandate amendment

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

4.5 Pilot project Substances in Articles (SiA)

4.5.1 WG progress report

The WG has started drafting the project report and analysing the national results.

4.5.2 Mandate amendment

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

4.6 REACH-EN-FORCE-8 on online sales

4.6.1 WG progress report

The WG was preparing the draft manual for it to be consulted with the Forum, BPRS and national coordinators during the summer. The WG was also preparing the training for the national coordinators, which will take place at the end of the training for the enforcement trainers' event (3 October 2019). The Forum members were reminded to appoint the missing national coordinators for the project.

The WG chair informed that COM would also run a project on online products in 2020 (CASP online2020), targeting dangerous metals in jewellery. The WG REF-8 would gather more information on this and assess its implications, if there could be some funding possibility that could be used in the framework of the REF-8 project.

4.6.2 Mandate amendment

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

4.7 Training for enforcement trainers 2019

4.7.1 WG progress report

The WG was preparing the material for the next Training for Trainers event (2-3 October 2019) taking into account the agenda adopted by the Forum. Training about the methodology for the control of internet sales will be given also to the BPRS trainees.

The training sessions given in plenary will be broadcasted for inspectors attending remotely in the Member States. As there were not enough resources to mediate so many break-out groups, the WG chair informed that the HelpNet correspondents will be able to attend the training only remotely.

The Forum members were reminded to appoint the missing trainees and indicate the number of remote attendees.

4.7.2 Mandate amendment

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

4.8 Cooperation with Customs 2

4.8.1 WG progress report

The operational phase of the project was ongoing, where 17 countries were participating. The document 'Potential effects of the proposal for a new market surveillance regulation on the cooperation with customs' was adopted by the Forum after Forum-32.

COM representative reported that he presented this project to the PARCS meeting, and received positive feedback.

COM (including DG TAXUD) was preparing replies to the comments received by the Forum members on the REACH Annex XIV and XVII restrictions and its possible integration into the customs' conversion table.

4.8.2 Mandate amendment

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

4.9 REACH-EN-FORCE-7 on Registration

4.9.1 WG progress report

The operational phase of the project was ongoing and it will run throughout the year. As a follow-up of an action point from Forum-32, the adopted "Report on Improvement of Quality of SDS" was passed on to the REF-7 national coordinators as background information for controls involving the check of SDS for DUs of intermediates.

4.9.2 Mandate amendment

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

4.10 Survey on OSH-REACH enforcement interactions

4.10.1 WG progress report

The WG chair informed that the survey on REACH-OSH enforcement interactions was finalised and sent to all Forum members. The WG was collecting the replies for assessment and preparation of a report. The missing respondents were invited to inform on the possible deadline to submit their results.

4.10.2 Mandate amendment

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

4.11 Third pilot project on authorisation

4.11.1 WG progress report

As the timeline of the project was yet to be decided, further preparations of the manual were suspended.

4.11.2 Mandate amendment

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

4.12 REACH-EN-FORCE-6 on CLP

4.12.1 WG progress report

The WG have started analysing the data collected from the participating countries and started preparing the project report. The WG chair presented the preliminary results but further analysis was still needed.

The WG sent to COM the request related to enforcement of Article 45/Annex VIII of CLP and awaits response. COM confirmed that it would be discussed in CARACAL.

4.12.2 Mandate amendment

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

4.13 Implementation of Interact portal (ex PD-NEA)

4.13.1 WG progress report

The WG tested the new Interact tool for NEAs. There were no changes in the functionalities, as they were the same as available for PD-NEA, but due to the migration of the tool they needed to be tested and no issues were found. The WG started the user acceptance testing for the new release of the tool in July 2019.

4.13.2 Update on ECHA IT tools for inspectors

The ECHA Forum Secretariat informed that PD-NEA was incorporated into the Interact portal as of 24 April 2019. With this new portal, authorities would have access to all their ECHA tools, including ePIC, in only one place. The new version of the Interact V2 will be released in November and will include a module for collaboration between ECHA and NEAs. In the future, all documents where the Forum/BPRS/WG members are invited to produce or comment, will be launched in this module. Other modules would follow, such as "meeting", "voting" and "consultation", minimising the exchange of information via email and transferring it to this more secure tool. Moreover, the use of S-CIRCBC will be discontinued in the future, hence the relevance of using this new tool. There will be training on the tool closer to the release date in November 2019. More information was given in agenda item [10.2](#).

ECHA Forum Secretariat gave an update on the work done towards the Interact NEA for Biocides and presented statistics of Interact NEA/PD-NEA usage during 2018 and 2019.

4.13.3 Mandate amendment

The Forum members were invited to appoint additional experts. The Forum adopted the updated mandate ([Annex 2m](#)). A new chair was appointed for this WG.

4.14 Interlinks

4.14.1 WG progress report

The WG chair presented the work done by the WG on the review of the Interlinks guide taking into account the new DEV follow-up processes, namely the change of addressee policy and the new ECHA process to replace SONCs by Article 42(1) decisions on non-compliance and Failure to Respond (FTR) notifications. She outlined the new proposed process for DEV follow up, which was similar to the current SEV process.

The Forum would be invited to comment on the different work packages during the summer and autumn.

4.14.2 Mandate amendment

The timeline for this WG was expanded and the Forum adopted the updated mandate ([Annex 2n](#)).

4.15 Member States reporting

4.15.1 WG progress report

The WG chair informed that the WG had commented on the REACH and CLP reporting template and sent their comments to Milieu (COM's contractor). After revision, Milieu will send the template to CARACAL and Forum for comments during the summer. The work on the template for annual reporting of the BPR activities would start soon.

COM clarified that the WG would not receive the revised template for another review before it is sent for consultation with CARACAL and Forum. The Forum members and the WG would have the opportunity to send their comments during the summer.

4.15.2 Mandate amendment

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

4.16 Training for enforcement trainers 2020

4.16.1 WG set-up

As there was no clarity on the scope of REF-9, it was challenging to appoint experts and set up the WG. The setting-up of the WG was postponed for Forum-34.

The Forum members were invited to submit proposals for three topics for the training in 2020 and to rank them according to their priority in the Member State.

The Forum Chairs and ECHA Forum Secretariat would present at Forum-34 the result of the proposals for training topics collected and recommend the topics for the training 2020 for the Forum to decide. Furthermore, the WG would explore the possibility of organising the training event closer to the end of 2020.

Item 5 – Updates on the cooperation between Forum and BPR Subgroup

The BPRS chair gave a summary of the issues to be discussed at BPRS-8 meeting¹.

Item 6 – Updates from other networks

6.1 Forum representative(s) in the COM's Market surveillance WGs

The Chair informed on the call for interest sent out by the ECHA Forum Secretariat to invite Forum representatives in the current four COM's WGs: Electronic data sharing, Single Digital Gateway, ADCO Chairs WG and ICSMS. The first two WGs were customs-related and no Forum representative was nominated to participate.

The Forum mandated the AT Forum member to represent the Forum in the ADCO Chairs WG meetings. The Forum mandated the LU Forum member to represent the Forum in the ICSMS WG meetings. The mandate of the Forum representatives would be prepared by the ECHA Forum Secretariat and signed by the Forum Chairs.

ECHA Forum Secretariat would liaise with COM (DG GROW) to confirm the reimbursement of the missions.

Item 7 – Conclusions from day 1

The Forum adopted the conclusions and actions points collected for the issues discussed during the day.

Item 8 – Update on relevant developments by the Commission

8.1 General updates by the European Commission

The DG ENV representative gave an update on the implementing regulations to Article 22 and 23 of REACH, which were triggered by the REACH review. With the view to clarifying registrant's obligations concerning dossier update (REACH Article 22), a proposal to specify the timeframes of "undue delay" would be discussed at the REACH Committee and adopted in September by the same body. The proposed timeframe is 3 months (and in some cases 6 months) and are to be considered as "upper limits".

He stressed that the adoption of the POPs recast was imminent and the Forum could expect it soon.

DG GROW representative introduced the intention of COM to carry out a study to further analyse the integration of REACH into the customs procedures. The main purpose of the contract will be to elaborate a set of options and tools to further support the integration of REACH provisions into Customs legislation/procedures. The feasibility of the various options will be evaluated and the Forum was invited to contribute with experts to form part of the steering group of this project. DG GROW would cover the travel and accommodation costs in case physical meeting are organised in Brussels. A Forum member and an expert from the WG Customs 2 volunteered to take part of the steering group.

Replying to a question from a Forum member, the COM representative explained that this project would be more extensive than the integration of REACH restrictions in the customs' codes.

¹ Agenda and minutes of the BPRS meetings: <https://echa.europa.eu/about-us/who-we-are/enforcement-forum/meetings-of-the-forum/2019>

Item 9 – Enforcement of Authorisation decisions

9.1 Consequences on enforcement due the ruling by the ECJ on the authorisation case T-837/16 on lead chromates

The ECHA Forum Secretariat updated the Forum on the follow up to in case T-837/16 (Sweden *versus* Commission), where the European Court of Justice (ECJ) annulled the Commission decision granting authorisation for the uses of lead chromates yellow and red.

The presenter gave a summary of the case where the applicant argued that the court decision meant they could still market and use the substance. As they have submitted an application within the legal deadline, the legal effect of the annulment of the COM decision by the Court is that the authorisation process reverts to the stage before the Commission decision. This meant that transitional measures apply as if the applicant was still waiting for the Commission decision after application and the company and the downstream users can be on the market without being subject to the conditions set in the authorisation decision, until new authorisation decision have been taken by the COM.

The presenter clarified that judgement's documents were not in many languages and would investigate if it were available in English. A Forum member noted that in ECHA website, this particular authorisation case was identified as "authorisation expired". The ECHA Secretariat explained that it referred to some of the uses for which the review period finished in May 2019. It would be updated since the authorisation decision was annulled.

9.2 Follow-up of COM's document on changes in authorisations

The Forum members provided feedback after Forum-32 on the document prepared by the COM on the changes in operational conditions (OCs) and risk management measures (RMMs) in the authorisation. The COM document indicated that there was room for some changes on the conditions of the authorisation (as applicants are obliged to reduce exposure) and therefore there is some room for manoeuvre in interpreting whether the conditions are met. The COM document proposed for the NEAs to make the assessment, based on risk/exposure levels, whether the conditions of authorisation were met or whether they were not and thus a review of the authorisation was required. The Forum feedback did not support the COM's proposal nor did CARACAL. The Forum expressed legal and technical concerns about giving such task to the inspectors.

ECHA Secretariat offered to work with COM on a proposal to address these concerns and propose a practical way by which NEAs could make such an assessment.

ECHA Secretariat was exploring how the inspectors could assess actual exposure compared to the exposure scenarios (ES) referenced, and what could be the potential triggers for the authorisation review. The presenter noted that deviations from the ES in relation to the OCs/RMMs were expected to be quite common.

Discussions were still ongoing and a more elaborated proposal could be provided at Forum-34. In the meantime, the Forum members were invited to comment on the presentation.

Item 10 – Updates from the ECHA Forum Secretariat

10.1 Forum meetings' dates in 2021

The Forum took note of the dates for the Forum meetings in 2021:

- Forum-38: 15-19/03/2021
- Forum-39: 14-18/06/2021
- Forum-40: 8-12/11/2021

The Chair added that the CARACAL meetings in 2020 would not clash with the Forum meetings.

10.2 Future use of the collaborative platform 'Interact'

A member of the ECHA's project team on Interact portal presented the tool that was live since 24 April 2019. In November 2019 and in 2020 it is expected that additional modules in the platform are launched, such as "collaboration" for NEAs, as well as "consultation" and "meetings" modules. Collaboration between ECHA and Forum/BPRS members and WGs will be done almost exclusively with this tool after the release at the end of 2019.

In the future, S-CIRCABC would be phased-out and Interact portal would be the one-stop shop for authorities, with one single sign-on. A separate project was exploring new ways to deal with the authentication tokens, as it was not the most efficient tool.

The presenter demonstrated the tool and the collaboration module already in place for some of the ECHA committees.

Replying to some Forum members, the presenter clarified that Biocidal Products committee has not started to use the tool but are involved in its development. The access to the tool and the view of the user will be dependent of its access rights/role. NEAs would only be able to see NEA-related information. If a user has more than one role, all the information for which the user have access would be visible to him/her.

The Forum members were invited to consider any additional requirements the Forum might need for its work.

Item 11 – Practical issues for enforcement of REACH and CLP

The ECHA Forum Secretariat summarised the three issues posted in HelpEx, out of which one was closed and the remaining two were timed out. He reminded the submitters to close the questions that have been answered and summarise a reply, indicating how the case was solved.

The ECHA Forum Secretariat informed that there was a potential joint Forum-BPRS practical issue (31.2 on creosotes) which was seen to be beneficial to include the interlinks with the BPR. The ECHA Forum Secretariat would explore such possibility.

Issue 33.1 - Questions on the enforcement of restriction 47

The submitter summarised the issue, which was generated from a case concerning leather gloves imported in 2008.

The ECHA Forum Secretariat drafted the draft conclusion replying to the questions posed. The Forum was invited to provide further feedback and the issue would be revised according to the feedback received.

Issue 32.2 - Is it obliged to notify benzene in fuels according Article 8 of the PIC-regulation?

During the adoption of the issue in written procedure, there were two abstentions. Formally, this does not stop the adoption procedure but in order to ensure consensual acceptance on practical issues, the ECHA Forum Secretariat in consultation with the Chairs decided to bring the conclusion for re-adoption with the Forum, after minor changes were included to address the concerns of the members who abstained.

The Forum agreed and re-adopted the draft conclusion.

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

The COM services provided feedback on this issue during the preparation for Forum-33 and it was not possible to prepare the document for discussion at the meeting. Hence, the ECHA Forum Secretariat would analyse the feedback and consult a new version of the draft conclusion with the Forum before Forum-34.

Item 12 - Updates from the ECHA Secretariat

12.1 REACH evaluation joint action plan

The ECHA Secretariat presented the draft REACH Evaluation Joint Action Plan (REAP)², developed by ECHA and COM, aiming at finishing the identification of substances of concern and checking the compliance of registration dossiers by 2027.

One of the areas the REAP introduced that would require the collaboration of the Forum, was to keep dossiers compliant, improving follow-up and enforcement of ECHA evaluation decisions. That could be done by prioritising the enforcement of Article 22 in the Member States and through the compilation of enforcement instruments available in all Member States. One of the chapters (3.4, [Actions 11-14](#)) was devoted to enforcement and acknowledged NEAs work on enforcing the decisions and contributing to dossier compliance.

As suggested by the ECHA Secretariat, the Forum agreed to tackle the handling and implementation of some of these actions with the Forum WGs dealing with the Interlinks and Member States reporting.

The Forum members were invited to provide comments on the enforcement related actions proposed in the REAP.

As regards action 14, ECHA was interested in the work of the WG Member States reporting and would welcome the reporting exercise to become permanent, this possibly would need to be discussed with the policy makers, since it related to an additional reporting obligation of the Member States.

COM highlighted that the reporting template for Article 117 REACH was being updated and was proposed to incorporate the information reported to ECHA, to avoid double reporting by the Member States.

The WG Interlinks would discuss the implementation of action 12 by looking into the article 117 report and assess whether another survey would be needed and consult the Forum on it.

²

https://echa.europa.eu/documents/10162/21877836/final_echa_com_reach_evaluation_action_plan_en/0003c9fc-652e-5f0b-90f9-dff9d5371d17

In order to better plan, a Forum member welcomed to know an estimation of the amount of cases that would be directed to the NEAs in 2020, consequence of the implementation of action 11 (obligation to update the registration dossier). ECHA Secretariat added that only the clear cases would be forwarded to NEAs.

12.2 ECHA's position on "Use and Exposure Information in the Regulatory Strategy" presented at CARACAL

The ECHA Secretariat summarised the document provided for CARCAL-29 (March 2019), where it proposed a way to tackle the shortcomings caused by the lack of (or the lack of confidence in) information which inhibits the identification of regulatory risk management needs. Authorities and ECHA have addressed these shortcomings via REACH's process, e.g. substance and dossier evaluation. Both are complex and time-consuming processes and ECHA proposed not to use the DEV process to request certain elements of the dossier.

The presenter shared the feedback received from the CARACAL members, which were in general supportive of ECHA's proposal. The Member States were encouraged to support and be active in Risk management and evaluation (RIME) group and REACH Exposure Expert Group (REEG).

Replying to a Forum member, the presenter clarified that the document referred to the experience of enforcement as a tool to get information on uses and exposure. NEAs were invited to liaise with the CARACAL/RIME/REEG members to follow-up on this issue.

12.3 Update on the NMP³ Guideline

A consultation exercise with CARACAL was completed in April, and the draft Guideline was also shared with the Forum members at the same time. The Forum took note that the new NMP Guideline⁴ was going to be submitted to CARACAL in July for endorsement and published afterwards.

12.4 Report on the consolidated surveys on downstream user information needs

The Forum took note of a report⁵ being finalised that consolidated the results of a series of six market studies on downstream user information needs made by ECHA. This report would contribute to the work of the [REACH review action 3](#), aiming to improve the workability and quality of extended safety data sheets.

12.5 Follow-up of ECHA Decisions: updates from ECHA

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

³ 1-methyl-2-pyrrolidone

⁴ Post meeting note:
https://echa.europa.eu/documents/10162/13641/entry_71_how_to_comply_en.pdf/c6e09198-c0b1-44e3-abae-6b3d0bc909a8

⁵ Post meeting note:
https://echa.europa.eu/documents/10162/13563/market_studies_esds_en.pdf/dc117445-18ba-34b5-4cb2-f264a44952a9

Item 13 – Enforcement projects in Member States

13.1 The use of mobile analytical instruments in chemical inspections (SVHCs, restrictions)

The Czech Forum member presented the types of mobile analytical instruments used by the inspectors for screening, which allowed qualitative and quantitative analysis of the product. Depending on the product, the inspector would select the best equipment. One important aspect was the safety, as for some instruments the inspector need to wear protective equipment and comply with all the safety instructions.

They were used, for example, for measuring restricted metals in jewellery, Chromium VI in leather articles, phthalates in toys, asbestos, etc. Due to its portability, the instruments could be taken to locally measure the samples in, for example waste fills, water spills and abandoned laboratories.

The presenter clarified that the instruments were expensive (around 30 000€) but since they were used quite often, it was cost effective for the NEA. These were screening instruments for the identification of the proper samples to be sent to the accredited laboratories. The authority cooperated with academia that keeps them informed on the quality of the results obtained from the instruments.

13.2 Inspection campaign of scented candles and diffusers

The NO expert informed on a national enforcement campaign on importers and distributors selling “interior” chemicals such as scented candles and diffusers, which are quite popular in Norway. They focused on the label and its compliance with CLP.

A Forum member informed that a similar project was held in her Member State and a report has been produced. The conclusions were the same as for the NO project.

The Forum Chair suggested investigating the status of this discussion in HelpNet and assessing if it was relevant to propose a harmonised approach for the enforcement of these type of products.

13.3 Enforcement project Azo-dyes and Chromium VI in work gloves

The Forum took note of the information that the UK authority was running a project as follow-up of REF-4.

Item 14 – A.O.B.

14.1 National enforcement actions taken on PAH and MMS

A Forum member informed that, following the Cyprus project on PAH presented at Forum-32, their NEA took enforcement actions against companies that used end-of life rubber tires to produce the playground tiles. The NEA took into consideration the current discussion in the COM on the extension of the PAH restriction and looked into further investigation on the substance and its effects.

14.2 Addressing the “ghost ORs”

A Forum member noted to the Forum that there were no procedure in place for when a “ghost OR” is detected. She referred to the work done under the REF-3 project and would welcome a new discussion in Forum-34 to take stock of the documentation and tools and come up with a harmonised approach to further help inspectors in such situations.

14.3 Enforcement issues related to Nitrous oxide

A Forum member inform about the increase of the use of nitrous oxide (also known as “laughing gas”) as a recreational drug. He asked if similar trends have been identified in other countries. He would inquire the Forum members on this issue in writing, *e.g.* if there were any importers/producers known in other countries.

14.4 Labelling of pens

A Forum member informed about the outcome of the discussion with a pen’s distributor on the labelling of the ink in the pens.

Item 15 – Conclusions from day 2

The Forum adopted the conclusions and actions points collected for the issues discussed during the day.

Item 16 – 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-33**18-19 June 2019**

(Adopted at the Forum-33 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.	
Item 2 – Address by ECHA's Director of Risk Management		
Item 3 – Debriefing of the meeting with ECHA Directors		
Item 4 – Forum's enforcement activities		
4.1 Prioritisation of REF projects 4.1.1 WG progress report	Forum decided to engage in the pilot project on CLP focusing on classification of mixtures.	Forum-S to examine the possibility of extending the operational phase of a REF project. Forum-S to propose a timing for the CLP pilot project on classification of mixtures for Forum-34.
4.1.2 WG Mandate amendment	The Forum revised the mandate of the WG.	
4.2 Categorisation of risks in ICSMS 4.2.1 WG progress report	The Forum agreed to conditionally close down the WG after the adoption of the guideline for categorisation of Risks in ICSMS.	Forum members are invited to comment on the draft guideline by 22 August.
4.2.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.3 Enforceability of Restrictions 4.3.1 WG progress report		
4.3.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.4 Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs 4.4.1 WG progress report		
4.4.2 WG Mandate amendment	The Forum revised the mandate.	
4.5 Pilot project Substances in Articles 4.5.1 WG progress report		
4.5.2 WG Mandate	The Forum revised the mandate of the WG.	

<p>4.6 REACH-EN-FORCE-8 4.6.1 WG progress report</p>		<p>COM is invited to provide further information on the CASP initiative related to potential financing or other support of REF-8 inspections.</p> <p>WG REF-8 will examine the information from the COM and consider if funding or other support could be requested for the purposes of the REF-8 inspections.</p>
<p>4.6.2 Mandate amendment</p>	<p>The Forum revised the mandate of the WG.</p>	
<p>4.7 Training for enforcement trainers 2019 4.7.1 WG progress report</p>		<p>Forum members, who have not yet done so, are invited to nominate two participants per MSs for the REACH/CLP training (one of the participants should also be the National Coordinator for REF-8 project) by 28 June.</p> <p>Forum members are invited to submit the number of the core remote attendees by 20 September 2019.</p>
<p>4.7.2 Mandate amendment</p>	<p>The Forum revised the mandate of the WG.</p>	
<p>4.8 Cooperation with Customs 2 4.8.1 WG progress report</p>		
<p>4.8.2 WG Mandate</p>	<p>The Forum revised the mandate of the WG.</p>	
<p>4.9 REF-7 project 4.9.1 WG progress report</p>		
<p>4.9.2 Mandate amendment</p>	<p>The Forum revised the mandate of the WG.</p>	
<p>4.10 Survey on OSH-REACH enforcement interactions 4.10.1 WG progress report</p>		<p>Members are invited to inform the Forum-S about the expected date of submission of the completed questionnaire at the latest by 28 June.</p>
<p>4.10.2 Mandate amendment</p>	<p>The Forum revised the mandate of the WG.</p>	
<p>4.11 Third pilot project on authorisation 4.11.1 WG progress report</p>		

4.11.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.12 REF-6		COM will provide response to Forum request related to enforcement of Article 45/Annex VIII of CLP by Forum-34.
4.12.1 WG progress report		
4.12.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.13 Implementation of Interact portal		Forum members are invited to submit the names of new WG members to Forum-S by 12 July
4.13.1 WG progress report		
4.13.2 Update on ECHA IT tools		
4.13.3 Mandate amendment	The Forum revised the mandate of the WG.	
4.14 Interlinks		
4.14.1 WG progress report		
4.14.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.15 MS reporting		
4.15.1 WG progress report		
4.15.2 Mandate amendment	The Forum revised the mandate of the WG.	
4.16 Training for enforcement trainers 2020		The Forum members are invited to submit proposals of three topics for the Training 2020 by 31 August 2019 . The Forum members are asked to rank the topics in order of priority 1, 2 and 3.
4.16.1 WG Set-up		Forum-s will reflect on the possibility of scheduling the training for trainers closer to the end of the year and inform the Forum at the next plenary.
Item 5 – Updates on the cooperation between Forum and BPR Subgroup		
Item 6 – Updates from other networks		
6.1 Forum representative(s) in the COM's Market surveillance WGs	Forum mandated the AT Forum member to represent it at the meetings of the ADCO chairs group. Forum mandated the LU Forum member to represent it at the meetings of the ICSMS WG of the Commission.	Forum-S will draft the mandates to be signed by the Forum chair for the agreed representatives. Forum-S and COM will clarify to the Forum who will reimburse these missions.

Item 8– Update on relevant developments by the Commission		
8.1 General updates by the European Commission	The Forum agreed to send EL forum member and the DE adviser to take part in the steering group of the COM study concerning integration of REACH into customs processes.	
Item 9 – Enforcement of Authorisation decisions		
9.1 Consequences on enforcement due the ruling by the ECJ on the authorisation case T-837/16 on lead chromates		<p>Forum-S will liaise with relevant units in the ECHA Secretariat about the review the information provided on the ECHA website about the authorisation decision concerned in this case.</p> <p>Forum-s will schedule an update on this case at one the future plenary meetings, when there are new developments in this case.</p>
9.2 Follow-up of COM's document on changes in authorisations		Forum members are invited to provide feedback on the approach outlined in the presentation by 20 August
Item 10 – Updates from the ECHA Forum Secretariat		
10.1 Forum meetings' dates in 2021		COM is invited to communicate the Forum meeting dates to the COM colleagues planning the CARACAL meetings
10.2 Future use of the collaborative platform 'Interact'		Forum members are invited to provide feedback on the interact portal to the Forum-s by 30 September
Item 11 – Practical issues for enforcement of REACH and CLP		
Practical issues		<p>Forum members are invited to submit new practical issues by 11 September 2019</p> <p>Forum members are invited to close the HelpEx questions they have raised.</p>
33.1 Questions on restriction 47		<p>Forum-s will send the issue for written consultation by 28 June.</p> <p>Forum-S will revise the conclusion based on the comments received.</p>
32.2 Is it obliged to notify benzene in fuels according Article 8 of the PIC-regulation?	The Forum adopted the conclusion as presented.	Forum-s will send the issue for adoption in written procedure by 28 June
21.2 Who is responsible for the elaboration of a Safety Data Sheet when an only		Forum-S will further examine the COM feedback and revise the conclusion before Forum-34

representative is appointed?		
Item 12 – Updates from the ECHA Secretariat		
12.1 REACH evaluation joint action plan (REAP)		<p>Forum members are invited to provide feedback on the actions foreseen in the REAP by 16 August</p> <p>WG Interlinks is invited to discuss with ECHA Secretariat the handling and possible implementation of REAP actions 11, 12 and 14 before the next plenary meeting.</p> <p>WG MS Reporting is invited to discuss with ECHA Secretariat the handling and possible implementation of REAP action 14 before the next plenary meeting.</p> <p>ECHA Secretariat to estimate the volume of cases expected to be channelled to NEAs in context of Action 11 of the REAP.</p>
12.2 ECHA's position on "Use and Exposure Information in the Regulatory Strategy" presented at CARACAL		
12.3 Update on the NMP Guideline		
12.4 Report on the consolidated surveys on downstream user information needs		
12.5 Follow-up of ECHA Decisions: updates from ECHA		
Item 13 – Enforcement projects in Member States		
13.1 The use of mobile analytical instruments in chemical inspections (SVHCs, restrictions)		
13.2 Inspection campaign of scented candles and diffusers		<p>FR Forum member will distribute the report on enforcement cases on labelling or packaging requirements for scented candles by 31 July</p> <p>Forum-s will investigate the status of the HelpNet discussions on labelling and packaging requirements for scented candles</p>

		and diffusers and inform the Forum by 12 July
13.3 Enforcement project Azo-dyes and Chromium VI in work gloves		
Item 14 – AOB		
Hungarian enforcement actions taken on MMS and PAH		
Addressing the “ghost ORs”		Forum-s to include the issue in the Forum-34 agenda about enforcement of ORs and compile the solutions considered for REF-3
Enforcement issues related to Nitrous oxide		NL Forum member will inform the members by email about the national enforcement actions related to nitrous oxide and resulting questions by 28 June.
Labelling of pens		NL Forum member will inform the members by email about the national enforcement actions related to labelling of pens by 28 June

III. List of Attendees

Forum members

	Country	Name
1	AT	ANWANDER Eugen
2	BE	CUYPERS Paul
3	BG	ZIDAROVA Elena
4	CY	ORPHANOU Maria
5	CZ	JAROLÍM Oldrich
6	DE	VOM HOFE Katja
7	DK	SCHARFF Ida
8	EE	LINNO Annemari
9	EL	CHATZANTONIOU Dimitris
10	ES	SÁNCHEZ-PEÑA Pablo
11	FI	MÄKI Markus
12	FR	RASOOLY Emilie
13	HR	KREKOVIC Dubravka
14	HU	DEIM Szilvia
15	IE	MCMICKAN Sinead
16	IT	ALESSI Mariano
17	LT	SPŪRIENĖ Otilija
18	LU	ENGELS Kim
19	LV	NEIMANE Jana
20	NL	VAN DEN BERG Jos
21	NO	HAGEN Gro
22	PL	MOCZULAK Aleksandra
23	PT	BARATA Sofia
24	RO	MIJA Maria
25	SE	HEDLUND Henrik
26	SI	NOVAK Vesna
27	SK	POČAROVSKÁ Miriam
28	UK	POTTS Mike

Invited experts

	Country	Name
1	AT	WURM Gernot
2	BG	TCHOBANOVA Elena
3	CZ	MUSIL Petr
4	DK	MIKKELSEN Sonja
5	EE	LUTSOJA Marilin
6	ES	ZAMORA NAVAS Laura
7	FR	TCHANAKIAN Fiona
8	HR	POLJAK Blaženka
9	IT	POLCI Maria Letizia
10	LT	UZOMECKAS Žilvinas

	Country	Name
11	LV	SUSE Ieva
12	NO	SULEIMAN Abdulqadir
13	PT	RODRIGUES Maria João
14	SE	RUMAR Karin
15	UK	BISHOP Richard

Advisers

	Country	Name
1	BE	LEYNEN Michel
2	DE	WURSTHORN Sibylle
3	DK	FAGERLUND Michael
4	ES	ALIAGA GARCIA Maria José
5	FI	OLIKKA Jussi
6	NO	SKJARGARD Cathrine

European Commission representative

	DG	Name
1	ENV	MAURER Helmut
2	GROW	AGUADO-MONSONET Miguel

European Chemicals Agency (ECHA)

	ECHA	Unit
1	ALBERTO Joana	Support and Enforcement Unit
2	ANNYS Erwin	Support and Enforcement Unit
3	BARANSKI Maciej	Support and Enforcement Unit
4	BROERE William	Legal Affairs Unit
5	CALVO TOLEDO Juan Pablo	Support and Enforcement Unit
6	DE COEN Wim	Hazard Assessment II Unit
7	FRONTINI Ales	Support and Enforcement Unit
8	KOSK-BIENKO Joanna	Risk Management I Unit
9	KRIMIANIOTIS Georgios	Support and Enforcement Unit
10	MATEUS Tania	Support and Enforcement Unit
11	MURRAY Andrew	Exposure and Supply Chain Unit
12	NIKULA Terhi	Support and Enforcement Unit
13	SOSNOWSKI Piotr	Risk Management I Unit
14	TŁOCZEK Magdalena	Support and Enforcement Unit
15	TUOMAINEN Anita	Support and Enforcement Unit
16	VAN DER ZANDT Peter	Risk Management Director

IV. List of Annexes

ANNEX 1. Final agenda Forum-33

ANNEX 2. Revision of mandates of Forum WGs

ANNEX 2 a – “Prioritisation of REF projects”

ANNEX 2 b – “Categorisation of risks in ICSMS”

ANNEX 2 c – “Enforceability of restrictions”

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

ANNEX 2 e – “Pilot project on substances in article”

ANNEX 2 f – “REF-8 on online sales”

ANNEX 2 g - “Training for Enforcement Trainers 2019”

ANNEX 2 h – “Customs 2”

ANNEX 2 i – “REF-7 on Registration”

ANNEX 2 j – “OSH Survey”

ANNEX 2 k – “Third pilot on authorisation”

ANNEX 2 l – “REF-6 on CLP”

ANNEX 2 m – “Implementation of Interact NEA”

ANNEX 2 n – “Interlinks”

ANNEX 2 o – “Member States Reporting”

ANNEX 3. Glossary of acronyms and abbreviations

Annex 1 – Final agenda Forum-33

18 June 2019
ECHA/Forum-33/2019/A

Agenda
Thirty third meeting of the
Forum for Exchange of Information on Enforcement
(Forum-33)
18-19 June 2019

European Chemicals Agency
Helsinki, Finland
Tuesday, 18 June: starts at 09:00
Wednesday, 19 June: ends at 16:15

DAY 1 CLOSED SESSION Tuesday 18 June 2019

Item 1 – Welcome and Introduction *09:00-09:20*

- 1.1 Opening by the Chair of the Forum – *Chair*
- 1.2 Introduction of the new Head of Unit of ECHA's Support and Enforcement unit – *HoU A2*
- 1.3 Adoption of the Agenda – *Chair*
- 1.4 Declarations of conflict of interest with regard to agenda items – *Chair*
- 1.5 State of play with action points from Forum-32 – *ECHA Forum Secretariat*
- 1.6 Report of the written procedures and other issues between Forum-32 and Forum-33 - *Chair*

ECHA/Forum-33/2019/dA
ECHA/Forum-33/2019/1.5
ECHA/Forum-33/2019/1.6

For adoption
For information

Item 2 – Address by ECHA's Director of Risk Management *09:20-09:30*

For information

Item 3 – Debriefing of the meeting with ECHA Directors *09:30-09:50*

For information

Item 4 – Forum's enforcement activities *09:50-17:50*

- 4.1 *Prioritisation of REF projects (60')*
 - 4.1.1 *WG progress report - WG Chair*
 - 4.1.2 *Mandate amendment - ECHA Forum Secretariat*

Coffee break 10:50-11:20

4.2 Categorisation of risks in ICSMS (45')

4.2.1 WG progress report – WG Chair

4.2.2 Mandate amendment - ECHA Forum Secretariat

4.3 Enforceability of Restrictions (20')

4.3.1 WG progress report - WG Chair

4.3.2 Mandate amendment - ECHA Forum Secretariat

4.4 Joint initiative ECHA Forum – ECHA ASOs on Improvement of the quality of SDSs (20')

4.4.1 WG progress report - WG Chair

4.4.2 Mandate amendment - ECHA Forum Secretariat

4.5 Pilot project on substances in articles (30')

4.5.1 WG progress report - WG Chair

4.5.2 Mandate amendment - ECHA Forum Secretariat

Lunch break 13:15-14:00

4.6 REACH-EN-FORCE-8 on internet sales (10')

4.6.1 WG progress report – WG Chair

4.6.2 Mandate amendment - ECHA Forum Secretariat

4.7 Training for enforcement trainers 2019 (10')

4.7.1 WG progress report - WG Chair

4.7.2 Mandate amendment - ECHA Forum Secretariat

4.8 Customs 2 (10')

4.8.1 WG progress report – WG Chair

4.8.2 Mandate amendment- ECHA Forum Secretariat

4.9 REACH-EN-FORCE-7 on Registration (10')

4.9.1 WG progress report - WG Chair

4.9.2 Mandate amendment - ECHA Forum Secretariat

4.10 Survey on OSH-REACH enforcement interactions (30')

4.10.1 WG progress report – WG Chair

4.10.2 Mandate amendment- ECHA Forum Secretariat

4.11 Third pilot project on authorisation (30')

4.11.1 WG progress report - WG Chair

4.11.2 Mandate amendment - ECHA Forum Secretariat

Coffee break 15:40-16:10

- 4.12 REACH-EN-FORCE-6 on CLP (30')
 - 4.12.1 WG progress report - WG Chair
 - 4.12.2 Mandate amendment - ECHA Forum Secretariat
- 4.13 Implementation of Interact portal (ex PD-NEA) (15')
 - 4.13.1 WG progress report – WG Chair
 - 4.13.2 Update on ECHA IT tools - ECHA Forum Secretariat
 - 4.13.3 Mandate amendment - ECHA Forum Secretariat
- 4.14 Interlinks (30')
 - 4.14.1 WG progress report – WG Chair
 - 4.14.2 Mandate amendment- ECHA Forum Secretariat
- 4.15 Member States reporting (15')
 - 4.15.1 WG progress report – WG Chair
 - 4.15.2 Mandate amendment- ECHA Forum Secretariat
- 4.16 Training for enforcement trainers 2020 (10')
 - 4.16.1 WG set-up - ECHA Forum Secretariat

ECHA/Forum-33/2019/4_Draft_mandates
 ECHA/Forum-33/2019/4.1.1
 ECHA/Forum-33/2019/4.1.1_AnnexII
 ECHA/Forum-33/2019/4.2.1
 ECHA/Forum-33/2019/4.3.1
 ECHA/Forum-33/2019/4.4.1
 ECHA/Forum-33/2019/4.5.1
 ECHA/Forum-33/2019/4.6.1
 ECHA/Forum-33/2019/4.7.1
 ECHA/Forum-33/2019/4.8.1
 ECHA/Forum-33/2019/4.9.1
 ECHA/Forum-33/2019/4.10.1
 ECHA/Forum-33/2019/4.11.1
 ECHA/Forum-33/2019/4.12.1
 ECHA/Forum-33/2019/4.13.1
 ECHA/Forum-33/2019/4.14.1
 ECHA/Forum-33/2019/4.15.1

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

Item 5 – Updates on the cooperation between Forum and BPR Subgroup	17:50-18:00
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For information

Item 6 –Updates from other networks	18:00-18:05
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- 6.1 Forum representative(s) in the COM's Market surveillance WGs (5')

For information

Item 7– Adoption of conclusions from day 1	18:05-18:15
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For adoption

DAY 2 CLOSED SESSION Wednesday 19 June 2019

Item 8 – Update on relevant developments by the Commission 09:00-10:00

8.1 General updates by the European Commission

ECHA/Forum-33/2019/8.1

For information

Item 9 – Enforcement of Authorisation decisions 10:00-11:00

9.1 Consequences on enforcement due the ruling by the ECJ on the authorisation case T-837/16 on lead chromates

9.2 Follow-up of COM's document on changes in authorisations

ECHA/Forum-33/2019/9.2

For discussion

Item 10 – Updates from the ECHA Forum Secretariat 11:00-11:20

10.1 Forum meetings' dates in 2021

10.2 Future use of the collaborative platform 'Interact'

For information

Coffee break 11:20-11:50

Item 11 – Practical issues for enforcement of REACH and CLP 11:50-13:00

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

ECHA/Forum-33/2019/11

For discussion

Lunch break 13:00-14:00

Item 12 – Updates from the ECHA Secretariat	<i>14:00-15:00</i>
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- 12.1 REACH evaluation joint action plan (30')
- 12.2 ECHA's position on "*Use and Exposure Information in the Regulatory Strategy*" presented at CARACAL (15')
- 12.3 Update on the NMP Guideline (5')
- 12.4 Report on the consolidated surveys on downstream user information needs (5')
- 12.5 Follow-up of ECHA Decisions: updates from ECHA (5')

ECHA/Forum-33/2019/12.1
 ECHA/Forum-33/2019/12.2
 ECHA/Forum-33/2019/12.3_room_doc
 ECHA/Forum-33/2019/12.5
 ECHA/Forum-33/2019/12.5_AnnexI

For information

Item 13 – Enforcement projects in Member States	<i>15:00-15:45</i>
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- 13.1 The use of mobile analytical instruments in chemical inspections (SVHCs, restrictions) (20')– *CZ Forum Member*
- 13.2 Inspection campaign of scented candles and diffusers (15') – *NO expert*
- 13.3 Enforcement project Azo-dyes and Chromium VI in work gloves (10') - *UK Forum member*

For information

Item 14 – A.O.B.	<i>15:45-16:05</i>
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For information

Item 15– Adoption of conclusions from day 2	<i>16:05-16:15</i>
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For adoption

Item 16 – End of the Forum meeting	<i>16:15</i>
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Coffee available

Annex 2 a “Prioritisation of REF Projects”

Forum Working Group Work Package A.1 “Prioritisation of REF Projects”

(Mandate adopted at Forum-33)

Composition:

Chair: Oldrich JAROLIM (CZ) – rotating Chair

Vice Chair(s):

Forum Members/Alternates

- Maria Letizia POLCI (IT)
- Paul CUYPERS (BE)
- Abdulqadir SULEIMAN (NO)
- Sofia BARATA (PT)
-

Invited Experts

- Semira MEHIC (SI)
- Tamas KOVACS (HU)
- Laura WILMS (DE)
- Marilin LUTSOJA (EE)

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 b “Categorisation of Risks”

Forum Task Force
Work Packages B.1 and C.1
“Categorisation of Risks”
(Mandate adopted at Forum-33)

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)
- Olivier COUTURAUD (FR)

ECHA

- Juan Pablo CALVO TOLEDO
- Celia TANARRO (B4)

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:

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

Annex 2 c “Restrictions”

Forum Working Group Work Package B12 **“Enforceability of restrictions”** (Mandate adopted at Forum-33)

Composition:

Chair: Maria Letizia POLCI (IT) – rotating Chair

Vice-Chair: Eugen ANWANDER (AT)

Forum Members/Alternates

- Mariano ALESSI (IT)
- Jos VAN DEN BERG (NL)

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 ad-hoc (advisory process):

- Karin RUMAR (SE)
- Tara HORIGAN (IE)
- Zilvinas UZOMECKAS (LT)
- Emilie RASOOLY (FR)
- Annemari LINNO (EE)
- Marilin LUTSOJA (EE)

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 (D3)

Mandate:

Advisory process

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.
2. Consider to provide an advice to the Commission on restriction proposals prepared by the Commission regarding Article 68 (2) when invited to do so by the Commission.

Analytical methods

3. Review in 2020 the information on analytical methods provided by the stakeholders during 2016/2017/2018/2019 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.

Other

5. 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 for solutions.
6. Assess the enforceability of newly adopted Annex XVII restrictions.
7. The WG shall report to the Forum plenary the results of its findings and its actions between the plenaries.

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 d “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-33)

Composition:

Chair: Henrik HEDLUND (SE)

Forum Members/Alternates

- Sinead MCMICKAN (IE)
- Oldrich JAROLIM (CZ)
- Bernice FARRUGIA (MT)
- Abdulqadir SULEIMAN (NO)
- Zilvinas UZOMECKAS (LT)
- Mirjam VAN DER MEER (NL)

Invited Experts

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

Commission

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

ECHA

- Juan Pablo CALVO TOLEDO
- Fesil MUSHTAQ (B4)
- Ales FRONTINI

ECHA Accredited Stakeholder Organisations

- ACEA
- AISE
- ASD
- CEEMET
- CEFIC
- CEM BUREAU
- CEPE
- 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 2 e “Substances in Articles”

Forum Working Group “Pilot project Substances in Articles” (Mandate adopted at Forum-33)

Composition:

Chair: Karin RUMAR (SE)

Forum Members/Alternates

- Maria Letizia POLCI (IT)
- Eugen ANWANDER (AT)

Invited Experts

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

Commission

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- Juan Pablo CALVO TOLEDO
- Ales FRONTINI
- Telmo VIEIRA PRAZERES (B4)
- Rémi LEFEVRE (A3)

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
5. Draft practical enforcement guidance for substances in articles for inspectors (tips and hints for inspectors)

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
- Adoption of the practical enforcement guidance for substances in articles for inspectors (tips and hints for inspectors): Forum-34

Annex 2 f "REF-8"

Forum Working Group
Work Package A.1
"Coordinated enforcement project REACH-EN-FORCE-8"
(Mandate adopted at Forum-33 and BPRS-8)

Composition:

Chair: Karin RUMAR (SE)

Forum Members and Alternates

- Eugen ANWANDER (AT)
- Martin MARKO (CZ)
- Maria Leticia POLCI (IT)
- Maria PALEOMILITOU (CY)

Invited Experts

- Kevin BUCKLEY (IE)
- Sara YASSINE (DK)
- Timea TARNOCZAI (HU)
- Jurgita BALCIUNIENE (LT)
- Ingrida STULGIENE (LT)
- Lotta KAILA (FI)
- Olivier COUTURAUD (FR)
- Marilin LUTSOJA (EE)

BPRS Members and Experts

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

COM

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 g “Training the trainers 2019”

Forum Working Group

Work Package C.2.

“Training for enforcement trainers 2019”

(Mandate adopted at Forum-33)

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)
- Maria Letizia POLCI (IT)
- Maria PALEOMILITOU (CY)

Invited Experts

- Shelley COLLINS (UK)
- Uwe LICHT-KLAGGE (DE)
- Hayley KEATING (UK)
- Frida RAMSTROM (SE)
- Cathrine SKJÆRGÅRD (NO)

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. Cooperate with BPRS Training 2019 on the methodology part of the training
5. Prepare materials necessary for the training such as presentations or documents
6. Actively conduct the training event with support from other Forum members, ECHA and COM and other experts in specific topics as necessary
7. 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 h “Customs 2”

Forum Working Group “Cooperation with Customs 2” (Mandate adopted at Forum-33)

Composition:

Chair: Maria ORPHANOU (CY)

Forum Members/Alternates

- Eleni FOUFA (EL)
- Annemari LINNO (EE) (NEA)

Invited Experts

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

Commission

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

ECHA

- Maciej BARANSKI
- Ales FRONTINI
- Magdalena 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 "REF-7"

Forum Working Group

Work Package A.1

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

(Mandate adopted at Forum-33)

Composition:

Chair: Paul CUYPERS (BE)

Forum Members and Alternates

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

Invited Experts

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

ECHA

- Magdalena TLOCZEK
- Ales FRONTINI
- Catherine CORNU (A4)
- Augusto DI BASTIANO (D3)
- Istvan MAK (A4)

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 j “OSH survey”

Forum Working Group “Survey on OSH-REACH enforcement interactions” (Mandate adopted at Forum-33)

Composition:

Chair: Sinead MCMICKAN (IE)

Forum/BPRS Members/Alternates

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

Invited Experts

- Teresa ALMEIDA (PT) – OSH
- Elvera BREEDLAND (NL)
- DE
- Nikoletta MAROSVOLGYI (HU)
- Tom O’SULLIVAN (IE) – OSH
- Tuija VÄHÄNEN (FI)
- Monique WAEGEMAEKERS (NL)

Commission

- Miriam GUTIERREZ-MEDINA (DG GROW)

SLIC-CHEMEX

- Monique WAEGEMAEKERS

ECHA

- Maciej BARANSKI
- Magdalena TLOCZEK
- Ales FRONTINI
- Andreas AHRENS (B4)
- Andrew MURRAY (B4)
- Fesil MUSHTAQ (B4)

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-34

Annex 2 k "3rd Authorisation"

Forum Working Group
Work Package A.1
"Third Forum Pilot Project on Authorisation"
(Mandate adopted at Forum-33)

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)
- Monique WAEGEMAEKERS (NL)
- Sibylle WURSTHORN (DE)

SLIC-CHEMEX

- Monique WAEGEMAEKERS

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 2019

Tentative timeline:

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

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Annex 2 I "REF-6"

Forum Working Group

Work Package A.1

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

(Mandate adopted at Forum-33 and BPRS-8)

Composition:

Chair: Henrik HEDLUND (SE)

Forum Members and Alternates

- Gro HAGEN (NO)
- Elena ZIDAROVA (BG)
- Dimitrios CHATZIAN TINOU (EL)
- Graca BRAVO (PT)
- 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)
- Anna MASLARSKA (BG)

ECHA

- Outi TUNNELA (B4)
- 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 m “Interact”

Forum Working Group “Implementation of Interact NEA” (Mandate adopted at Forum-33)

Composition:

Chair: Eugen ANWANDER (AT)

Forum Members/Alternates

- Eleni FOUFA (EL)
- Jussi OLLIKKA (FI)

Invited Experts

- Juergen SCHMID (DE)
- Maria Jose FALCAO (PT)
- Robert GERHAT (HU)

ECHA

- Ales FRONTINI
- Anita TUOMAINEN

Objective:

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

Mandate:

1. Provide input during further development and implementation of Interact NEA
2. Verify that the UAT conditions are implemented with and follow up the implementation of the WG improvement requests
3. Collaborate with the WG Interlinks about the interlinks functionalities in the Interact Portal

Timeline:

- Forum-35 (Q1 2020)

Annex 2 n “Interlinks”

Forum Working Group “Interlinks”

(Mandate adopted at Forum-33)

Composition:

Chair: Katja VOM HOFE (DE)

Forum Members/Alternates

- Otilija SPURIENE (LT)

Invited Experts

- Stefanie WITZKE (DE)
- Linnea KANNING (SE)
- Louise CONWAY (IE)

Commission

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ECHA

- Maciej BARANSKI
- Ales FRONTINI

Objectives:

- Review the interlinks processes and adapt them to expected challenges

Tasks:

- Review and revise the interlinks guide adapting the processes described there to the current needs, considering the experience from past years and expected changes in policy and practice
- Liaise with ECHA Secretariat on interlinks and consider the enforcement related actions in the Joint Evaluation Action Plan 2027
- Liaise with other WGs to consider reporting needs related to interlinks process, if the WG considers it appropriate
- Comment on Interact portal requirements related to the functionalities for interlinks

Timeline: Forum-36 (June 2020)

Annex 2 o “MS reporting”

Forum Working Group “Member States reporting” (Mandate created at Forum-33 and BPRS-8)

Composition:

- **Chair:** Sinead MCMICKAN (IE)

Forum Members/Alternates

- Katja VOM HOFE (DE)
- Michael FAGERLUND (DK)
- Markus MAKI (FI)
- Elenza ZIDAROVA (BG)
- Emily RASOOLY (FR)

BPRS Members/Alternates

- Francesca RAVAIOLI (IT)
- Annemari LINNO (EE)
- Dominik PISAREK (PL)

Invited Experts

- Andrea MAYER-FIGGE (DE)
- Monika AVIZIENE (LT)

Commission

- Ligia NEGULICI (DG SANTE)

ECHA

- Maciej BARANSKI
- Ales FRONTINI

Objectives:

- Prepare the pilot for the Member States annual reports on enforcement as defined in Forum WP 2019-2023 and comment on the templates of the the Reports prepared by the Commission

Tasks:

- A. Review the templates for the reports to the European Commission required under Article 117(1) of REACH and Article 46(2) of CLP, Art 22(1) of PIC and art 65(3) of the BPR
- B. Liaise with COM consultant preparing the review reporting templates under the Art 117 of REACH, Art 46 of CLP and art 65(3) of BPR
- C. Draft the reporting template for annually reporting the Member States Enforcement activities under REACH and CLP
- D. Liaise with WG Interlinks regarding any data on interlinks to be included in the reports
- E. Start the pilot phase of the annual reporting exercise
- F. Examine MS Report template under Art 65(3) and use it to draft a template for annually reporting the Member States Enforcement activities under BPR, for further consideration by the BPRS in November 2019

Timeline: Forum-35 (March 2020)

Annex 3- Glossary of acronyms and abbreviations

ADCO: Administrative Cooperation Groups
AMS: Accreditation and Market Surveillance regulation
ASO: ECHA's Accredited Stakeholder Organisations
BPR: Biocidal Product Regulation
CARACAL: MSCA Committee for REACH and CLP
CCH: Compliance checks
CLP or CLP Regulation: Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures
C&L: Classification and Labelling
COM: European Commission
CSR: Chemical Safety Report
DEV: Dossier Evaluation
DG: Directorate General at Commission
DNEL: Derived no-effect level
DONC: Decision Of Non-Compliance
DU: Downstream Users
ECHA: European Chemicals Agency
ECJ: European Court of Justice
ES: Exposure Scenario
EU: European Union
FTR: Failure to respond
ICSMS: Information and Communication System for Market Surveillance
MSCA: Member State Competent Authority
NEAs: National Enforcement Authorities
OC: Operational conditions
OEL: occupational exposure limits
OR: Only representative
POP: Persistent Organic Pollutants
PNEC: Predicted no effect concentration
RAC: Committee for Risk Assessment
REACH and REACH Regulation: Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals
REEG: REACH Exposure Expert Group
REF: REACH-EN-FORCE, Coordinated Enforcement Project of the Forum
RIME: Risk management and evaluation
RMM: Risk Management Measure
PD-NEA: Portal Dashboard for National Enforcement Authorities – the successor system to RIPE
SCC: strictly controlled conditions
SDS: Safety Data Sheet
SEAC: Committee for Socio-economic Analysis
SEV: Substance Evaluation
SVHC: Substance of very high concern
UVCB: unknown or variable composition, complex reaction products or biological materials
WG: Working Group of the Forum