



**Forum-46/M/2024 – Public**  
**Adopted on 7 June 2024**

**Minutes of the  
46<sup>th</sup> meeting of the Forum for Exchange of Information on Enforcement  
Remote meeting**

**19-21 March 2024**

<b>Contents</b>		
<b>I.</b>	<b>Summary record of the proceedings</b>	<b><a href="#">2</a></b>
<b>II.</b>	<b>Main conclusions and action points</b>	<b><a href="#">10</a></b>
<b>III.</b>	<b>List of attendees</b>	<b><a href="#">15</a></b>
<b>IV.</b>	<b>List of annexes</b>	<b><a href="#">18</a></b>

# I. Summary record of the proceedings

## Item 1 – Welcome and introduction

### 1.1 Welcome and opening by the Forum Chair

The Forum Chair welcomed all the participants and opened the meeting. He announced that the Forum members from 27 EU Member States with voting rights and the three EEA countries were attending. The Chair informed that the quorum requirement was met.

### 1.2 Adoption of the agenda

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

### 1.3 Declarations of conflicts of interest with regard to agenda items

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

### 1.4 State of play with action points from Forum-45

Forum members took note of the status of the action points from Forum-45 as listed in the meeting document.

### 1.5 Results of the written procedures and other issues between Forum-45 and Forum-46

The Chair referred to the document with the results of the written procedures between Forum-45 and Forum-46.

The Chair reported he attended the “Shaping tomorrow” conference, on 28 February in ECHA, in which ECHA’s stakeholders and general public (e.g. consultants, representatives from Industry) participated. There was a high-level discussion on the direction of developments of the chemicals legislation and enforcement was mentioned as highly relevant.

Additionally, he attended also in ECHA, on 29 February, the Head of Chemical authorities (HCA) meeting. Several speakers expressed the importance and their appreciation for the Forum projects and that the increase of private imports and e-commerce remained an issue. The enforcement activities in small countries were increasingly burdensome and needed to be targeted. The Member States reported they were struggling with recruitment and with finding people with the right expertise.

In both meetings, Forum had a stand with information about the Forum’s work and where participants could talk with HET staff and Forum Chair during the breaks. There was high interest during the ECHA Conference, mainly from consultants and ASOs, but lower interest during the HCA.

## **Item 2 - Forum's new projects and tasks**

### **2.1 Next Forum pilot project on Poison Centre Notifications - Mandate set-up**

The Forum set up the mandate of the WG on pilot project on notifications to the Poison Centres. The WG would prepare the project manual until the end of 2024 and the inspections will run from January until June 2025. It is expected for the project report to be finalised by the end of 2025.

## **Item 3 - Forum's enforcement activities - Ongoing projects**

### **3.1 REF-13 on online sales II**

#### **3.1.1 Scope of the project**

The WG Chair highlighted to the Forum the current timeline of the CLP revision and the possibility that the new CLP version would not be enforceable during the operational phase of REF-13. Therefore, the Forum voted and agreed for REF-13 to focus on duties enforceable by that time, i.e. the "old" CLP provisions.

The Forum also agreed to cover the proposed articles of the other regulations to be checked in the project.

#### **3.1.2 Mandate amendment**

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

### **3.2 Pilot project on classification of mixtures focusing on detergents and cleaning products**

#### **3.2.1 Enforcement Guide**

The WG Chair informed the plenary that the draft guide for the enforcement of mixture classification was consulted with the Forum members between November 2023 and January 2024. The WG members together with the ECHA experts will finalise the document in the coming months and launch its written adoption.

#### **3.2.2 Mandate amendment**

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

### **3.3 Projects not for discussion**

The Forum addressed and confirmed the mandates of the WGs that were not discussed at the meeting:

*3.3.1 Prioritisation of REF projects.* The Forum adopted the updated mandate ([Annex 2d](#)).

*3.3.2 REF-10 in integrated controls:* The Forum adopted the updated mandate ([Annex 2e](#)).

*3.3.3 REF-11 on SDS:* The Forum adopted the updated mandate ([Annex 2f](#)).

*3.3.4 REF-12 on the compliance of imported substances, mixtures and articles:* The Forum adopted the updated mandate ([Annex 2g](#)).

*3.3.5 Pilot project on enforcement of PFCA and related substances focusing on cosmetics.* The operational phase is running until 30 April 2024. The Forum adopted the updated mandate ([Annex 2h](#)).

*3.3.6 WG for examining the enforcement-related impacts on the Forum of the future REACH and CLP revision.* This WG will be kept dormant until it is relevant to start its work. The Forum adopted the updated mandate ([Annex 2i](#)).

3.3.7 *Train the enforcement trainers 2024*: The Training 2024 event will take place on 4-5 December 2024 in ECHA premises. The Forum members were invited to nominate two participants per Member State. The Forum adopted the updated mandate ([Annex 2j](#)).

## **Item 4 - Forum's enforcement activities - Projects under finalisation**

### **4.1 Train the enforcement trainers 2023**

#### **4.1.1 Final report**

The WG prepared and delivered the training in ECHA premises on 22-23 November 2023 on the enforcement of the imports. The WG Chair presented the summary of the training, which 97,6 % of the core participants rated as "good" or "excellent". The WG also outlined some recommendations for future trainings especially on involvement of the remote participants.

The Forum adopted the WG report.

#### **4.1.2 Mandate amendment**

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

## **Item 5 - Suggestions for improvement of the inspectors' training on best practices identified in Forum projects**

The Forum Chairs and HET presented their suggestions how inspectors can be better trained in the learnings and best practices identified in the Forum projects. It was proposed to start by inviting inspectors and national coordinators to participate in the workshop prepared for ASOs in the follow-up phase of each project. There would be an open session where the results of the project are presented and stakeholders can share their issues. In the same workshop but on a separate closed session, inspectors and national coordinators only will have an opportunity to convey their experiences about the project.

The Forum agreed to try this approach for the REF-10 Workshop on 24 April 2024.

The Forum members were invited to consider the proposal and re-discuss it at Forum-47.

## **Item 6 – Interlinks**

### **6.1 Enforcement of ECHA decisions**

#### **6.1.1 Enforcement of Failure to respond (FTR) letters**

The Forum took note of the experiences in the enforcement of Dossier Evaluation Decisions and in particular with the cases of cease of manufacture. The presenter welcomed the views of other Forum members if such cases have been encountered and if they agreed with the actions taken by the presenter's authority.

#### **6.1.2 Improvement of the DEv decision's process**

The Forum was reminded of the follow-up of the DEv process and on the status of the follow-up decisions currently sent for enforcement.

It was highlighted that the review of the Interlinks guide was being finalised and needed time to be implemented. Therefore, it was suggested for the cases on-hold from last year to be sent out at a later stage.

## **6.2 Interlinks guide update**

The Forum took note of the current state of the update of the guide, where all the comments received were implemented. The status report was simplified and there was clarification on some of the DEV/SEV processes.

The drafting group will continue the review and it was expected to be finalised for adoption in June.

## **6.3 Documents only for information: *Follow-up of ECHA Decisions***

The Forum took note on the statistics about the cases sent to the Member States Focal points until 1 March 2024.

## **Item 7 - Enforcement in the Member States (part I)**

### **7.1 Chemicals legislation in Iceland and the role of the Environment Agency**

The Forum took note of the organisation of the enforcement authorities in Iceland.

### **7.2 Enforcement practices in Italy**

The Forum took note of the Italian organisation and trend of activities, as well as the experience in cooperation between customs and NEA, on a Classification/Labeling Platform for inspectors and the experiences with end-of-waste.

Some Forum members welcomed the classification and labelling platform and wanted to receive more information. It could be explored whether it could be shared and be available in other languages.

### **7.3 Follow-up from the Dutch case on SCC registration dossiers**

The Forum took note of the Dutch case that potentially affected several Member States.

## **Item 9 - Forum's enforcement activities - Ongoing projects**

### **9.1 Enforceability of Restrictions**

#### ***9.1.1 WG progress report***

The WG Chair presented the plan of the activities of the WG for the year.

#### ***9.1.2 Mandate amendment***

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

### **9.2 Member States on Partnership for Assessment of Risks from Chemicals (PARC) project on analytical methods**

The Forum took note of the project being developed by PARC on analytical methods, part of its activity 6.4.3 "Developing information transfer structures and enforcement methodology for chemicals in articles to support the transition to a circular economy". This project would generate reports aimed at regulators and the Forum members welcomed to be consulted. The PARC project was invited to provide regular updates to the Forum on the status of its project.

The Forum members shared the importance of this work and how it could be of interest to the WG Restrictions and its compendium of analytical methods.

## **Item 10 - Potential Forum advice on the enforceability of new restriction under the Battery regulation**

ECHA presented the objectives of the Battery Regulation and the anticipated tasks ECHA will be mandated under this regulation. It was not clear in the Battery regulation whether there is a legal mandate for the Forum enforceability advice in the Battery Regulation restrictions process, hence ECHA was exploring this with the COM.

## **Item 11 – Update on relevant developments by the Commission**

The COM representative presented the status of the CLP revision and the potential changes included in the legal text, as well as the planned next steps towards finalisation.

Another COM representative suggested to have a presentation of the Forum's work in one of the future CARACAL meetings. He also proposed a new topic for a Forum project and was advised to submit it as proposal to be assessed by the WG Prioritisation when selection the topics for REF-14.

The Forum took note of the updates on several restriction proposals (Chromium, DMAC/NEP) and entries (formaldehyde, Diisocyanates, Microplastics), on the status of the Basic Regulation and on potential joint actions under the Market Surveillance Regulation.

The Chair welcomed clarification and application of the new Taric codes introduced to indicate compliance with POPs restrictions.

## **Item 12 – Practical issues for enforcement of REACH, CLP, PIC and POPs**

Forum discussed three practical issues relevant to enforcement in break-out groups, issues *46.1 on PFOAs in firefighting foam*, *46.2 on labels on tattoo ink* and *46.3 on SDS provided via QR code*.

The comments gathered from the discussions will be processed by HET to generate the next versions of the draft conclusions of the issues, which will then be consulted with the Forum members.

Forum members were invited to submit new practical issues by 22 April 2024.

## **Item 14 - Enforcement in the Member States (part II)**

### **14.1 Enforcement practices in Liechtenstein**

The Forum took note of the organisation of the enforcement authorities and their activities in Liechtenstein.

### **14.2 Enforcement practices in Luxembourg**

The Forum took note of the organisation of the enforcement authorities and their activities in Luxembourg.

### **14.3 Enforcement in Norway**

The Forum took note of the organisation of the enforcement authorities and their activities in Norway.

## **Item 15 - Enforcement of specific REACH restrictions entries**

### **15.1 Experiences from the enforcement of the diisocyanate restriction**

An alternate member presented the experiences of the national labour inspectors on assessing the training requirements of this restriction. This restriction raised a lot of interest and it was found some disparities in the trainings provided. Further solutions might need to be addressed.

### **15.2 Input from France for the future guidance on the formaldehyde restriction**

The Forum member from France presented the result of the study performed in a French scientific centre and would welcome that these findings were taken into consideration for the guidance on the formaldehyde restriction.

#### ***15.2.1 ECHA's plans for the guidance on the formaldehyde restriction***

ECHA informed that they received mandate from the COM to prepare a guideline on formaldehyde releases from articles and formaldehyde concentration in the interior of vehicles. The guideline will be developed by ECHA (starting April-May 2024), in close collaboration with the European Commission. Forum members were invited to express interest to collaborate as an expert in the preparatory phase of the guideline.

## **Item 16 – Updates from the ECHA Secretariat**

### **16.1 Visibility of the communication of Forum's outputs**

ECHA's Communication officer presented the statistics related to the communication of the Forum's latest projects REF-10 and BEF-2. Additionally, he raised some ideas to improve the cooperation and the visibility of Forum's outputs.

The Member States Communicators Network was seen as a body to be more active as a multiplier of ECHA's publications. Forum members were invited to contact their national communication officers to promote Forum's work.

It was also highlighted that projects targeting consumer products have the potential to reach a broader audience. Hence, while drafting the report, the Forum could emphasise information (and examples) of such products as well as include some recommendations to the consumers.

### **16.2 Activities of the Regulatory Support team**

The Forum took note of the support provided to companies via the ECHA Helpdesk and the national Helpdesks as well as the main issues discussed in the Helpnet. The most recent activity of the regulatory support team was to assist the instrument for pre-accession (IPA) countries to enhance the readiness of the beneficiaries to assume their role in their path towards EU membership in the area of EU legislation for chemical management.

### **16.3 New ECHA dissemination website**

Forum took note of ECHA's new system ([ECHA CHEM](#)) that will gradually replace the current dissemination website and was launched on 30 January 2024. A demonstration was given of how the information was displayed. The first release included only information on registered substances. There will be further releases by the end of the year when more data will be included.

## **16.4 Forum plenary dates in 2025**

The Forum took note of the weeks of the plenary meetings planned for 2025:

- Forum-49: 17-21 March
- Forum-50: 9-13 June (back-to-back with BPRS) (Helsinki)
- Forum-51: 17-21 Nov

## **Item 17 – Cooperation with other networks**

### **17.1 Forum's contribution to the EU Product Compliance Network (EUPCN) and the ADCO Chairs' meetings**

The Forum took note of the meeting document with the summary of the various meetings attended by the Forum Chair and Vice-Chair.

### **17.2 Updates from SLIC-CHEMEX**

The Forum took note of the information presented in the meeting document.

## **Item 18 – Debriefing of the meeting with ECHA Directors**

The Chair informed the Forum about the discussions that took place during the meeting with ECHA management on 19 March 2024.

On the issue of the physical meetings and ECHA's commitment to the target of becoming carbon-neutral by 2030, some Forum members stressed the importance of the physical meetings and the need to increase its frequency in order for the network to continue to be functional and active. The Forum members were invited to suggest ways in which the Forum could increase the number of physical meetings without increasing the carbon footprint.

## **Item 19 – Updates from BPR Subgroup**

The Forum took note of the activities of the BPRS in their last meeting (BPRS-21).

The BPRS endorsed the BEF-3 scope and the WG will start the preparation of the project manual. BEF-3 project is to focus on the enforcement of the Summary of Product Characteristics (SPC) and elements of SDSs.

The Training for national inspectors 2024 was merged with the training for National Coordinators of the BEF-3 and the event will be delivered in late November 2024.

The BEF-2 WG was finalising the practical guide and preparing for the ASO workshop on 25 March 2024.

There were presentations on national BPR enforcement from CY and CZ and a discussion on the labelling of biocides products with food images, similar with a practical issue discussed in the Forum.

## **Item 20 – A.O.B.**

### **20.1 Round Robin Testing**

The German Forum alternate shared the interest in exchanging information about round robin tests that laboratories in other EU Member States have already performed or would be interested in performing jointly in the future. The aim of this exchange was to further harmonise the methods used for analysing REACH substances.



The Forum members were invited also to provide contact details of laboratories that might be interested in setting up such interlaboratory tests in the future and to participate in laboratory comparisons (organised by Member States) for substances for which round robin tests were not commercially available.

### **20.2 Enforcement of Entry 28 of Annex XVII of REACH in the Member States**

The Austrian Forum member presented a conclusion from the NEAs related to the enforcement of Entry 28 and welcomed the views of the Forum members on the issue.

In particular, this entry is related to "Cumene" (over 0.1 % w/w) which cannot be supplied to the general public and whether private pilots can or cannot be considered as professional users.

### **20.3 Nordic project**

The Forum took note that the Nordic exposure group was conducting a project on the use of SVHC (during 2024, final report in Feb 2025). The focus would be on professional uses only and the use and exposure profiles for substances in different sectors. The Forum members were invited to share information on professional uses of SVHC on their own.

### **20.4 Diisocyanates**

It was raised at the meeting that a presentation from SME United was given at the open session of CARACAL on the issue of Diisocyanates and service providers for the training. The COM recommended to contact the Forum on this issue. The Forum was still discussing this issue and HET would explore with the Regulatory Advice Team in ECHA to develop an advice for SMEs based on the recommendations on the requirements for the training identified by the Forum so far.

### III. MAIN CONCLUSIONS & ACTION POINTS - Forum-46

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
<b>Item 1- Welcome and introduction</b>		
1.2 Adoption of the Agenda	Agenda was adopted.	
1.3 Declarations of conflict of interest with regard to agenda items and quorum		
1.4 State of play with action points from Forum-45		
1.5 Results of the written procedures and other issues between Forum-45 and Forum-46		
<b>Item 2 – Forum’s new projects and tasks</b>		
<i>2.1 Next Forum pilot project on Poison Centre Notifications - Mandate set-up</i>	The Forum established the new WG for the pilot project on PCN.	Forum members and alternates are invited to volunteer to join the new WG or nominate the invited experts by 5 April 2024  Forum members are invited to nominate the National Coordinators by <b>14 June 2024</b> .
<b>Item 3 – Forum’s enforcement activities - Ongoing projects</b>		
<i>3.1 REF-13 on online sales II</i> <i>3.1.1 Scope of the project</i>	The Forum agreed on the specific scope of the REF-13 project.	Forum members are invited to nominate the REF-13 National Coordinator by 7 June (one of the trainees for the Tft2024).
3.1.2 Mandate amendment	The Forum revised the mandate.	
<i>3.2 Pilot project on classification of mixtures focusing on detergents and cleaning products</i>  3.2.1 Enforcement Guide		<b>WG Pilot project on classification of mixtures</b> is invited to send the guide for adoption by the Forum by 14 May
3.2.2 Mandate amendment	The Forum revised the mandate.	
<i>3.3.1 Prioritisation of REF projects</i>	The Forum revised the mandate.	
<i>3.3.2 REF-10 on integrated controls</i>	The Forum revised the mandate.	
<i>3.3.3 REF-11 on SDS</i>	The Forum revised the mandate.	
<i>3.3.4 REF-12 on control of imports</i>	The Forum revised the mandate.	

<b>Agenda point</b>	<b>Conclusions / decisions / minority opinions</b>	<b>Action requested after the meeting</b>
<i>3.3.5 Pilot project on enforcement of PFCA and related substances focusing on cosmetics</i>	The Forum revised the mandate.	Forum Members, alternates and national coordinators are invited to join the WG by 12 April
<i>3.3.6 WG for examining the enforcement-related impacts on the Forum of the future REACH and CLP revision</i>	The Forum revised the mandate.	
<i>3.3.7 Train the trainers 2024</i>	The Forum revised the mandate.	Request for the nomination of two trainees for the training event (one of them will be the REF-13 coordinator) by <b>7 June 2024</b> .
<b>Item 4 – Forum’s enforcement activities - Projects under finalisation</b>		
<b>4.1 Training for enforcement trainers 2023</b> 4.1.1 Final report		HET to explore if it would be possible to invite three participants to physical Forum trainings in the future.
4.2.2 Closure of the mandate	The mandate was closed	
<b>Item 5 - Suggestions for improvement the inspectors’ training on best practices identified in Forum projects</b>		
		HET will ask the ASOs participating in the REF-10 workshop if they consider the WS would benefit from having broader audience.  Forum members to comment on the proposals in the presentation by 19 April.  HET will schedule a discussion at Forum-47
<b>Item 6 – Interlinks</b>		
<b>6.1 Enforcement of ECHA decisions</b> 6.1.1 Enforcement of Failure to respond (FTR) letters		
6.1.2 Improvement of the DEv decision’s process		
<b>6.2 Interlinks guide update</b>		Drafting group and HET will come with a proposal for preparing the training on interlinks at Forum-47  Forum members are invited to express interest in contributing case studies to the interlinks training by 19 April

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
6.3 Follow-up of ECHA Decisions		
<b>Item 7 – Enforcement in the Member States (Part I)</b>		
7.1 Chemicals legislation in Iceland and the role of the Environment Agency		
7.2 Enforcement practices in Italy		Forum members are invited to send feedback on whether they are interested in the IT Classification and Labelling Platform and wish to learn more about it by 19 April
7.3 Follow-up from the Dutch case on SCC registration dossiers		
<b>Item 9 – Forum’s enforcement activities - Ongoing projects (cont.)</b>		
9.1 <i>Enforceability of Restrictions</i> 9.1.1 WG Progress report		Forum members are invited to nominate member to the working group by 12 April
9.1.2 Mandate amendment	The Forum revised the mandate.	
9.2 Member States on Partnership for Assessment of Risks from Chemicals (PARC) project on analytical methods	Forum expressed interest in cooperating with the PARC project on analytical methods for enforcement (6.4.3).	PARC project group is invited to consult its outputs with the Forum via the ECHA Harmonised Enforcement Team.
<b>Item 10 – Potential Forum advice on the enforceability of new restriction under the Battery regulation</b>		
		HET will update the Forum on the results of discussion with the Commission.
<b>Item 11 – Update on relevant developments by the Commission</b>		
	Forum Chairs will report on the Forum work on enforcement to the CARACAL.	
		COM is invited to send in a project proposal by 2 April to be assessed by the WG Prioritisation.  The COM is invited to brief the Forum on the new TARIC codes for POPs at Forum-47
<b>Item 12 - Practical issues for enforcement of REACH/CLP/PIC/POPS</b>		
12.1 Break out groups discussion		
12.2 Wrap-up		HET will revise the conclusions of issues F-46.2 and F-46.3 based on the feedback from the break out

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
		<p>groups and send it for consultation with the Forum.</p> <p>HET will send the reports from the Break Out Groups and draft practical issue F-46.1 to the COM for the consideration by the POP CA.</p>
		<p>Forum members are invited to submit new practical issues by 22 April</p>
<b>Item 14 – Enforcement in the Member States (Part II)</b>		
14.1 Enforcement practices in Liechtenstein		
14.2 Enforcement practices in Luxemburg		
14.3 Enforcement in Norway		<p>Forum member from NO is invited to respond to the questions raised during the plenary.</p>
		<p>Forum members from Lithuania, Latvia, Malta, the Netherlands and Poland are invited to make a presentation on their enforcement practices for Forum-47</p>
<b>Item 15 – Discussion on the enforcement of specific REACH restrictions entries</b>		
15.1 Experiences from the enforcement of the diisocyanate restriction		
15.2 Input from France for the future guidance on the formaldehyde restriction		<p>SE alternate member is invited to share the Swedish report on comparing methods 717-1 and 717-2 with the FR Forum member</p>
15.2.1 ECHA's plans for the guidance on the formaldehyde restriction		<p>Forum members are invited to seek experts to contribute to the ECHA work on the guidance and communicate them to ECHA by 29 March</p>
<b>Item 16 – Updates from the ECHA Secretariat</b>		
16.1 Visibility of the communication of Forum's outputs		<p>WG REF-11, REF-12, REF-13 and pilot project on cosmetics are invited to consider if they can collect relevant information to strengthen impact of communication, such as specific examples or recommendations for consumers.</p>

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
		<p>ECHA Secretariat is invited to inform the MS Communication Network about the plan for publication of the Forum projects.</p> <p>Forum members are invited to liaise with the MS Communicators Network to encourage spreading the word about future Forum projects.</p> <p>ECHA Secretariat will share contact details to journalists working on topics related to chemicals legislation with the DE Forum member.</p>
16.2 Activities of the Regulatory Support team		
16.3 New ECHA dissemination website		
16.4 Forum plenary dates in 2025	Forum-49: 17-21 March Forum-50: 9-13 June (b2b BPRS) (Helsinki) Forum-51: 17-21 Nov	
<b>Item 17 – Cooperation with other networks</b>		
17.1 Forum's contribution to the EU Product Compliance Network (EUPCN) and the ADCO Chairs' meetings		
17.2 Updates from SLIC-CHEMEX		
<b>Item 18 – Debriefing of the meeting between Forum Chairs and ECHA Directors</b>		
		Forum members are invited to suggest ways in which the Forum could increase the number of physical meetings without increasing the carbon footprint by 12 April (using the satisfaction survey)
<b>Item 19 – Updates from BPR Subgroup</b>		
<b>Item 20 – AOB</b>		
20.1 Round Robin Testing		Forum members are invited to share with the DE Forum member

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
		<p>results of round robin tests on REACH substances by 30 April.</p> <p>Forum members are invited to share information on laboratories that would like to compare results of round robin tests with DE laboratories for substances for which round robin tests are not commercially available by 30 April.</p>
<p>20.2 Enforcement of Entry 28 of Annex XVII of REACH in the Member States</p>		<p>Forum members are invited to share any experiences in enforcing Entry 28 of Annex XVII with regard to airplane fuels sold to private pilots by 19 April</p> <p>Forum members are invited to share whether the use of fuels containing "Cumene" by private pilots is considered to be "professional use" by 19 April.</p> <p>COM is invited to provide, if possible, preliminary feedback on whether private pilots could be considered as members of general public as defined in entry 28 by 19 April.</p>
<p>20.3 Nordic project</p>		<p>Forum members are invited to share information on professional uses of SVHC on their own with the NO alternate by 30 April.</p>
<p>20.4 Diisocyanates</p>		<p>ECHA secretariat will explore if the recommendation on the requirements for the training could be turned into advice for SMEs and also what other support could be provided.</p>

#### IV. List of Attendees

##### Forum members

	Country	Name
1	AT	FUCHS Michael
2	BE	VAN DEN HOLE Chris
3	BG	ZIDAROVA-ANGELOVA Elena
4	CY	ORPHANOU Maria
5	CZ	JAROLIM Oldrich
6	DE	VOM HOFE Katja
7	DK	SCHARFF Ida
8	EE	HONGA Aljona
9	EL	FOUFA Eleni
10	ES	CÓRDOBA Rubén
11	FI	MÄKI Markus
12	FR	ABDELHAFIZ Sam
13	HR	VULJANIC Kristina
14	HU	KOVACS Tamas
15	IE	WALSH Caroline
16	IS	BRAGASON Ísak
17	IT	SCIMONELLI Luigia
18	LI	RELLA-QUADERER Maria Rosaria
19	LT	ŠPURIENĖ Otilija
20	LU	ENGELS Kim
21	LV	KAMERADE Kristine
22	MT	MIFSUD Shirley
23	NL	VAN DEN MEER Mirjam
24	NO	HAGEN Gro
25	PL	MOCZULAK Aleksandra
26	PT	SANTOS Andrea
27	RO	MIJA Maria
28	SE	HEDLUND Henrik
29	SI	HAJRLAHOVIC MEHIC Semira
30	SK	POČAROVSKÁ Miriam

##### Invited experts/Advisors

	Country	Name
1	AT	ANWANDER Eugen
2	BE	TANGHE Philip
3	CZ	MARKI Martin
4	CY	PALEOMILITOU Maria
5	DE	TSCHECH Guenter
6	DE	FRENZEL Stefan
7	DK	NIELSEN SCHULEIT Linda
8	DK	MIKKELSEN Sonja
9	EE	LEEMET Kristi
10	ES	ZAMORA NAVAS Laura



	Country	Name
11	FI	TALASNIEMI Petteri
12	FR	MAUPETIT Francois
13	FR	SIMBELIE Karine
14	HR	SKUGOR Dunko
15	IE	ROCHFORD Maeve
16	LI	FRICK Manfred
17	LT	ŠIUPIENĖ Julita
18	LU	WEBBER Jill
19	LV	VOITKEVIČA Lilita
20	NL	HELLEMA Peter
21	NL	SIJENS Jelle
22	NO	SULEIMAN Abdulqadir
23	PL	STULCZEWSKI Dawid
24	PL	OBERBEK Przemyslaw
25	PT	OLIVEIRA Elsa
26	PT	MARMELO Ricardo
27	SE	RUMAR Karin
28	SE	WOOD Alexander
29	SE	FISSIHAIE Yohanna

#### European Commission representatives

	DG	Name
1	ENV	FABRE Julien
	ENV	KIRIAZIS Alexandros
2	GROW	TOSETTI Patrizia
3	GROW	JEZSO Veronika

#### PARC project representative

	Name
1	WICKMAN Tonie
2	VESTERGREN Robin

	ECHA	Unit
1	ANNYS Erwin	Support and Enforcement
2	BARANSKI Maciej	Support and Enforcement
3	BIGI Elena	Support and Enforcement
4	CALVO TOLEDO Juan Pablo	Support and Enforcement
5	DI BASTIANO Augusto	Risk Management I
6	DI BLASI Roberta	Data availability
7	FAST Anni	Data availability
8	MATEUS Tania	Support and Enforcement
9	NIKULA Terhi	Support and Enforcement
10	TECCE Nicola	Support and Enforcement
11	TŁOCZEK Magdalena	Support and Enforcement
12	VAANANEN Mikko	Communications
13	VERSONNEN Bram	Dossier Evaluation II

## V. List of Annexes

ANNEX 1. Final agenda Forum-46

ANNEX 2. Revision of the mandates of the Forum WGs

ANNEX 2 a – “Pilot project on Poison Centre notifications”

ANNEX 2 b – “REF-13 on online sales”

ANNEX 2 c – “Pilot project on classification of mixtures”

ANNEX 2 d – “Prioritisation of REF projects”

ANNEX 2 e – “REF-10 on Integrated chemical control of products”

ANNEX 2 f – “REF-11 on SDS”

ANNEX 2 g – “REF-12 on imports”

ANNEX 2 h – “Pilot project on PFCA”

ANNEX 2 i – “Impact on enforcement of REACH/CLP review”

ANNEX 2 j – “Train the trainers 2024”

ANNEX 2 k - “Train the trainers 2023”

ANNEX 2 l - “Enforceability of restrictions”

ANNEX 3. Glossary of acronyms and abbreviations

Annex 1 – Final agenda Forum-46

Agenda

Forty-sixth meeting of the  
Forum for Exchange of Information on Enforcement  
(Forum-46)

19-21 March 2024  
Remote meeting

**DAY 1** Tuesday, 19 March 2024 (10:30 – 17:00 EET)

**Item 1 – Welcome and Introduction** 10:30-11:00

- 1.1 Welcome and opening by the Forum Chair
- 1.2 Adoption of the agenda
- 1.3 Declarations of conflict of interest with regard to agenda items and quorum
- 1.4 State of play with action points from Forum-45 – *ECHA HET*
- 1.5 Results of the written procedures and other issues between Forum-45 and Forum-46 - *ECHA HET*

*ECHA/Forum-46/2024/dA*  
*ECHA/Forum-46/2024/1.4*  
*ECHA/Forum-46/2024/1.5*

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

**Item 2 – Forum’s new projects and tasks** 11:00-11:30

- 2.1 *Next Forum pilot project on Poison Centre Notifications - Mandate set-up (30') - ECHA HET*

*ECHA/Forum-46/2024/2.1*  
*ECHA/Forum-46/2024/Draft\_mandates*

**For adoption**

**Item 3 – Forum’s enforcement activities - Ongoing projects** 11:30-12:30

- 3.1 *REF-13 on online sales II (30')*
  - 3.1.1 *Scope of the project – WG Chair*
  - 3.1.2 *Mandate amendment - ECHA HET*

*ECHA/Forum-46/2024/3.1.1\_room\_doc*  
*ECHA/Forum-46/2024/Draft\_mandates*

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

*3.2 Pilot project on classification of mixtures including detergents and cleaning products (15')*

- 3.2.1 Enforcement Guide – *WG Chair*
- 3.2.2 Mandate amendment - *ECHA HET*

*ECHA/Forum-46/2024/Draft\_mandates*

**For information  
For adoption**

*3.3 Mandate amendment of WGs not addressed at the meeting (no progress report) (15')*

- 3.3.1 Prioritisation of REF projects
- 3.3.2 REF-10 on integrated controls
- 3.3.3 REF-11 on SDS
- 3.3.4 REF-12 on the compliance of imported substances, mixtures and articles
- 3.3.5 Pilot project on enforcement of PFCAs and related substances focusing on cosmetics
- 3.3.6 WG examining the enforcement-related impacts of the future REACH and CLP revision on the Forum
- 3.3.7 Training for Trainers 2024

*ECHA/Forum-46/2024/Draft\_mandates*

**For adoption**

**Item 4 – Forum’s enforcement activities - Projects under finalisation**

*12:30-12:50*

*4.1 Training for enforcement trainers 2023 (20')*

- 4.1.1 Final report – *WG Chair*
- 4.1.2 Closure of the mandate - *ECHA HET*

*ECHA/Forum-46/2024/4.1.1  
ECHA/Forum-46/2024/Draft\_mandates*

**For adoption**

**Break (12:50-13:50)**

**Item 5 – Suggestions for improvement the inspectors’ training on best practices identified in Forum projects**

*13:50-14:15*

**For discussion**

**Item 6 – Interlinks** 14:15-15:30

6.1 Enforcement of ECHA decisions

6.1.1 Enforcement of Failure to respond (FTR) letters – *FR Forum member*

6.1.2 Improvement of the DEv decision's process - *ECHA*

6.2 Interlinks guide update - *HET*

***For discussion***

6.3 Document for information: Follow-up of ECHA Decisions

*ECHA/Forum-46/2024/6.3*

***For information***

**Break (15:30-15:45)**

**Item 7 – Enforcement in the Member States (Part 1)** 15:45-17:00

7.1 Chemicals legislation in Iceland and the role of the Environment Agency  
(30') – *IS Forum member*

7.2 Enforcement practices in Italy (30') - *IT Forum member*

7.3 Follow-up from the Dutch case on SCC registration dossiers (15') – *NL  
alternate member*

***For information***

**End of day 1** 17:00

**DAY 2** Wednesday, 20 March 2024 (10:30 – 17:00 EET)

**Item 8 - Adoption of conclusions from day 1** 10:30-10:45

**For adoption**

**Item 9 – Forum’s enforcement activities - Ongoing projects (cont.)** 10:45-12:00

9.1 *WG Enforceability of Restrictions (15')*

9.1.1 Progress report – *WG Chair*

9.1.2 Mandate amendment - *ECHA HET*

9.2 Member States on Partnership for Assessment of Risks from Chemicals ([PARC](#)) project on analytical methods (60')

*ECHA/Forum-46/2024/9.1.1*  
*ECHA/Forum-46/2024/Draft\_mandates*

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

**Item 10 – Potential Forum advice on the enforceability of new restriction under the Battery regulation** 12:00-12:50

*ECHA/Forum-46/2024/10\_room\_doc*

**For discussion**

**Break (12:50-13:50)**

**Item 11 – Update on relevant developments by the Commission** 13:50-14:50

**For information**

**Item 12 – Practical issues for enforcement of REACH/CLP/PIC/POPs** 14:50-17:00

12.1 Break out group discussions :

12.1.1 Introduction (10')

12.1.2 Discussion in groups (60')

**Break (30')**

12.2 Wrap-up (30')

*ECHA/Forum-46/2024/12*  
*ECHA/Forum-46/2024/12\_room\_doc*

**For discussion**

**End of day 2** 17:00

**DAY 3** Thursday, 21 March 2024 **(10:30- 17:00 EET)**

**Item 13 - Adoption of conclusions from day 2**

10:30-10:45

***For adoption***

**Item 14 – Enforcement in the Member States (Part 2)**

10:45-12:15

14.1 Enforcement practices in Liechtenstein (30') - *LI Forum member*

14.2 Enforcement practices in Luxemburg (30') – *LU Forum member*

14.3 Enforcement in Norway (30') - *NO Forum member*

***For information***

**Break (12:15-13:15)**

**Item 15 – Discussion on the enforcement of specific REACH restrictions entries**

13:15-14:05

15.1 Experiences from the enforcement of the diisocyanate restriction (20') –  
*NO Alternate*

15.2 Input from France for the future guidance on the formaldehyde restriction  
(30') – *FR Forum member*

15.2.1 ECHA's plans for the guidance on the formaldehyde restriction-  
*ECHA*

*ECHA/Forum-46/2024/15.2*

***For discussion***

**Item 16 – Updates from the ECHA Secretariat**

14:05-15:25

16.1 Visibility of the communication of Forum's outputs (30')

16.2 Activities of the Regulatory Support team (30')

16.3 New ECHA dissemination website (20')

16.4 Forum plenary dates in 2025

***For information***

**Break (15:25-15:45)**

**Item 17 – Cooperation with other networks** 15:45-16:05

17.1 Forum's contribution to the EU Product Compliance Network (EUPCN) and the ADCO Chairs' meetings (20') – *Forum Chair*

*ECHA/Forum-46/2024/17.1*

17.2 Document for information: Updates from SLIC-CHEMEX

*ECHA/Forum-46/2024/17.2*

***For information***

**Item 18 – Debriefing of the meeting between Forum Chairs and ECHA Directors** 16:05-16:20

***For information***

**Item 19 – Updates from BPR Subgroup** 16:20-16:30

Update on the coordination of the BPR enforcement – *BPRS Chair*

***For information***

**Item 20 – AOB** 16:30-16:45

20.1 Round Robin Testing – *DE Forum member*

20.2 Enforcement of Kerosene containing cumene, Entry 28 of Annex XVII of REACH, in the Member States – *AT Forum member*

20.3 Nordic project

20.4 Diisocyanates

*ECHA/Forum-46/2024/20*

***For information***

**Item 21 – Adoption of conclusions from day 3** 16:45-17:00

***For adoption***

**End of meeting** 17:00



## Annex 2a "Pilot on PCN"

### Forum Working Group 'Pilot project on Poison Centre Notifications' (mandate created at Forum-46)

#### Composition

**Chair:** Chris VAN DEN HOLE (BE)

#### Forum Members and Alternates

- Tamas KOVACS (HU)
- Elena ZIDAROVA-ANGELOVA (BG)

#### Invited Experts

- Andreas ELLMANN (DE)
- Ronald de GROOT (NL)
- Leander OTTO (BE)
- Francesca RAVAIOLI (IT)
- Grigorios REKLEITIS (EL)
- Marius ŠULGA (LT)
- Timea TARNOCZAI (HU)
- Sofia WALLESE (SE)
- Eirini ZERVOLEA (EL)

#### COM

- Aléxandros KIRIAZIS (DG ENV)

#### ECHA

- Magdalena TŁOCZEK
- Tommy HAGG
- Pedro ROSELLO VILARROIG

#### Objective:

- Conceive and manage the small-scale pilot project on enforcement of CLP notifications to the Poison Centers.

#### 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 inspectors (tips and hints for inspectors)
6. Prepare and organise remote WebEx workshop for ECHA ASOs to present the results and recommendations from this project

#### Timeline:

- Project manual: Q4 2024
- Prepare and deliver the training for project national coordinators: Q4 2024
- Operational phase: 1 January 2025 – 30 June 2025
- Reporting phase (National Coordinators): 1 July – 15 August 2025
- Project report: 16 August – 31 December 2025
- Workshop with ECHA ASOs: May 2026
- Adoption of the practical enforcement guidance for inspectors (tips and hints for inspectors): May 2026

**Annex 2b “REF-13”**

**Forum Working Group**

Work Package A.1

**“Coordinated enforcement project REACH-EN-FORCE-13 on online sales II”**  
(mandate created at Forum-46)

**Composition**

**Chair:**

- Karin Rumar (SE)

**Vice-Chair:**

- Chris Van den Hole (BE)

**Forum Members and Alternates**

- Petteri Talasniemi (FI)
- Maria Paleomilitou (CY)
- Eugen Anwander (AT)
- Caroline Walsh (IE)
- Luigia Scimonelli (IT)
- Sam Abdelhafiz (FR)

**Invited Experts**

- Kristina Karlsson (SE)
- Karine Simbelie (FR)
- Andreas Ellman (DE)
- Loella Bakka (NO)
- Alois Stanek (CZ)
- Celsino Govoni (IT)
- Ingrida Stulgienė (LT)
- Agnė Sukovienė (LT)

**COM (Observers)**

- Julien Fabre (DG ENV)
- Veronike Jezso (DG GROW)
- Svetlana Skrynikova (DG GROW)

**ECHA**

- Tania MATEUS

**Objective:**

- Conceive and manage the thirteenth major Forum project REF-13 on the enforcement of chemical products sold on-line.

**Mandate:**

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project;
2. Liaise with the WG ‘Training for trainers 2024’
3. Define the specific duties to be covered in the project;
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
8. Prepare and organise remote WebEx workshop for ECHA ASOs to present the results and recommendations from this project

**Timeline:**

- Project manual: Q4 2024
- Prepare and deliver the training for project national coordinators: Q4 2024
- Operational phase: 2025
- Reporting phase (National Coordinators): Q1 2026
- Evaluation phase: Q3 2026
- Draft report: Q3 2026
- Adoption of the report: Q4 2026
- Tips and hints for inspectors: Q2 2027
- Workshop with ECHA ASOs: Q2 2027

**Annex 2c “Pilot on Classification of mixtures”**

**Forum Working Group**

**“Pilot project on classification of mixtures including detergents and cleaning products”**

(mandate adopted at Forum-46)

**Chair:** Eugen ANWANDER (AT)

**Forum Members and Alternates**

**Invited Experts**

- Kristina KARLSSON (SE)
- Sibylle WURSTHORN (DE)
- Gaetano Abate (DE)
- Erik BARSEGHIAN (NL)
- Maria ALESSANDRELLI (IT)
- Sonia D'ILIO (IT)

**ECHA**

- Nicola TECCE; Kirsi MYOHANEN

**Objective:** Conceive and manage the pilot project on classification of mixtures including detergents and cleaning products

**Mandate:**

1. Develop the criteria for national example cases on mixture classification that go beyond standard summation or additivity approaches for the execution of the pilot project
2. Consider whether the WG needs to collect input from ASOs or COM, and if so, liaise with the ASOs or COM to obtain it
3. Management of the analysis of the cases on mixture classification as submitted to the WG
4. If needed, follow-up the assessment phase of the pilot project with supplementary analysis of national cases on mixture classification as submitted to the WG
5. Elaborate a project report including a guidance for national inspectors focusing on the challenges/biases in the interpretation of CLP and mixture classification
6. Prepare and conduct a remote workshop for ECHA ASOs to discuss the project results and recommendations for the industry

**Timeline:**

- Preparatory phase: January 2022-June 2022
- Analysis of submitted cases: July 2022-December 2022
- Drafting of project report/guidance: May 2024;
- Follow-up: September 2024.

## Annex 2d “Prioritisation of REFs”

### Forum Working Group Work Package A.1 “Prioritisation of REF Projects” (Mandate adopted at Forum-46)

**Chair:** Maria ORPHANOU (CY) - rotating Chair

**Vice-Chair:** Jenny KARLSSON (SE) – for BPR topics

#### Forum Members/Alternates

- Semira HAJRLAHOVIĆ MEHIĆ (SI)
- Oldrich JAROLIM (CZ)
- Abdulqadir SULEIMAN (NO)

#### Invited Experts

- Tamas KOVACS (HU)
- Laura WILMS (DE)
- Andrea SANTOS (PT)

**Ad-hoc invited experts from BPRS** (cooperating in the elaboration of the Registry of legal obligations subject to previous enforcement projects and BEF-3 topics):

- Helmut DE VOS (BE)
- Anna GRONWALD-MACEDO (DE)

**ECHA:** Kaisu RONTY; Nicola TECCE

**Objective:** Propose annually the subject for the next harmonised enforcement project coordinated by the Forum and BPRS (i.e. REF and BEF Projects)

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

1. Review annually a list of proposals for REF and BEF, when needed, 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 and BEF projects
3. Draft a recommendation proposing the subject for the next REF and BEF project
4. Elaborate and update an inventory of project recommendations and a registry of legal obligations subject to previous enforcement projects in the following regulatory areas: REACH, CLP, PIC, POP, BPR.
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 and BEF projects and implementing its working procedures to be adopted by the Forum.

The WG will operate from Forum-45 (November 2023) until the end of 2024 (end of the Forum MAWP 2024 – 2025). 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-14 by Forum-47
- Shortlist of subjects for BEF-4 by BPRS-28

## Annex 2e "REF-10"

**Forum Working Group**  
Work Package A.1  
**"Coordinated enforcement project REACH-EN-FORCE-10"**  
(mandate adopted at Forum-46)

### Composition

**Chair:** Karin RUMAR (SE)

#### **Forum Members and Alternates**

- Kaca PILETIC (HR)
- Eugen ANWANDER (AT)

#### **Invited Experts**

- Eric BARSEGHIAN (NL)
- Mieke CONICKX (BE)
- Anneli PÄRNÄNEN (FI)
- Emilie ROGERS (NO)
- Michel LEYNEN (BE)
- Frank VILSMEIER (DE)

#### **ECHA**

- Juan Pablo CALVO TOLEDO
- Ignacio GONZALEZ RODRIGUEZ
- Telmo VIEIRA PRAZERES

### **Objective:**

- Conceive, manage and evaluate the tenth major Forum enforcement project REF-10 'Integrated chemical control of products'.
- Present the relevant project recommendations to ECHA ASOs to promote compliance
- develop practical enforcement guidance for enforcement authorities based on the lessons learnt from the project

### **Mandate:**

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project;
2. The WG will consider whether it needs to cooperate with other public enforcement networks and authorities such as customs, RoHs, Market Surveillance, environment and if so, liaise with them to facilitate this cooperation and coordinate the project accordingly
3. The WG will consider whether it needs to collect input from ASOs and if so, liaise with the ASOs to obtain it
4. Prepare and deliver the extended training for project national coordinators and inspectors (conditional on the availability of sufficient number of experts to prepare it)
5. Management of the Operational phase
6. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
7. Prepare and conduct a remote workshop for ECHA ASOs to discuss the project results and recommendations for the industry
8. Elaborate a guideline and training to tackle the question related to the verification of the notification to the SCIP database and liaise if necessary with IMPEL to assist on this task
9. Elaborate tips and hints for inspectors based on the relevant outcomes from the project

## Timeline

- Project manual: Q4 2021
- Prepare and deliver the extended training for project national coordinators and inspectors: Q4 2021
- Operational phase: 2022
- Reporting phase (National Coordinators): Q1 2023
- Evaluation phase: Q3 2023
- Draft report: Q4 2023
- Adoption of the report: Q4 2023
- Workshop with ECHA ASOs: Q2 2024
- Tips and hints for inspectors: Q2 2024



## Annex 2f "REF-11"

**Forum Working Group**  
Work Package A.1  
**"Coordinated enforcement project REACH-EN-FORCE-11"**  
(mandate adopted at Forum-46)

### Composition

**Chair:** Abdulqadir SULEIMAN (NO)

#### **Forum Members and Alternates**

- Ana CENTENICO (PT)

#### **Invited Experts**

- Shara SMITH (IE)
- Linnea KANNING (SE)
- Sonja HAGEN MIKKELSEN (DK)
- Barbara Schmid (DE)
- Milena ORSO GIACONE (IT)
- Carlo MUSCARELLA (IT)
- Antonietta COVONE (IT)
- Marius SULGA (LT)
- Anu MATILAINEN (FI)
- Tamás KOVÁCS (HU)
- Erik BARSEGHIAN (NL)

#### **ECHA**

- Juan Pablo CALVO TOLEDO
- Fesil MUSHTAQ
- Outi TUNNELA
- Amandine JOMIER

### **Objective:**

- Conceive and manage the eleventh major Forum enforcement project REF-11 on SDS and checking the conformity with the requirements of the new Annex II of REACH.

### **Mandate:**

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project;
2. Liaise with the WG 'Training for trainers 2022'
3. Define the specific duties to be covered in the project;
4. The WG will consider whether it needs to collect input from ASOs and if so, liaise with the ASOs to obtain it
5. Prepare and deliver the training for project national coordinators
6. Management of the Operational phase
7. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
8. Elaborate tips and hints for inspectors based on the relevant outcomes from the project
9. Prepare and organise a short WebEx workshop for ECHA ASOs to present the results and recommendations from this project

**Timeline:**

- Project manual: Q4 2022
- Prepare and deliver the training for project national coordinators: Q4 2022
- Operational phase: 2023
- Reporting phase (National Coordinators): Q1 2024
- Evaluation phase: Q3 2024
- Draft report: Q4 2024
- Adoption of the report: Q4 2024
- Tips and hints for inspectors: Q2 2025
- Workshop with ECHA ASOs: Q2 2025.

## Annex 2g “REF-12”

**Forum Working Group**  
Work Package A.1  
**“Coordinated enforcement project REACH-EN-FORCE-12”**  
(mandate adopted at Forum-46)

### Composition

**Chair:** Henrik HEDLUND (SE)  
**Vice-Chair:** Maria ORPHANOU (CY)

#### Forum Members and Alternates

- Luigia SCIMONELLI (IT)
- Chris VAN DEN HOLE (BE)
- Markus MAKI (FI)
- Eugen ANWANDER (AT)

#### Invited Experts

- Marcus HAGBERG (SE)
- Jörgen ROSBERG (SE)
- Johannes LEOPOLDT (DE)
- Erik BARSEGHIAN (NL)
- Alfred EBNET (DE) (customs)
- Sabrina MERTEL (DE) (customs)
- Joris ROBYN (BE) (customs)
- Doris ASSAYAG-SOURY (FR) (customs)

#### COM

-

#### ECHA

- Tania MATEUS

### Objective:

- Conceive and manage the twelfth major Forum project REF-12 on the enforcement on the compliance of imported substances, mixtures and articles.

### Mandate:

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project;
2. Liaise with the WG ‘Training for trainers 2023’
3. Define the specific duties to be covered in the project;
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
8. Prepare and organise remote WebEx workshop for ECHA ASOs to present the results and recommendations from this project

### Timeline:

- Project manual: Q4 2023
- Prepare and deliver the training for project national coordinators: Q4 2023
- Operational phase: 2024
- Reporting phase (National Coordinators): Q1 2025
- Evaluation phase: Q3 2025
- Draft report: Q3 2025
- Adoption of the report: Q4 2025
- Tips and hints for inspectors: Q2 2026
- Workshop with ECHA ASOs: Q2 2026

## **Annex 2h “Pilot on enforcement of PFCAs”**

### **Forum Working Group**

#### **‘Pilot project on enforcement of PFCAs and related substances focusing on cosmetics’**

(mandate adopted at Forum-46)

#### **Composition**

**Chair:** Henrik HEDLUND (SE)

#### **Forum Members and Alternates**

- Eugen ANWANDER (AT)
- Michael FUCHS (AT)
- Petteri TALASNIEMI (FI)

#### **Invited Experts**

#### **ECHA**

- Magdalena TŁOCZEK
- Ignacio GONZALES RODRIGUEZ

#### **Objective:**

- Conceive and manage the small-scale pilot project on enforcement of restrictions of PFCAs (including PFOAs) and related substances focusing on cosmetics.

#### **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 inspectors (tips and hints for inspectors)
6. Prepare and organise remote WebEx workshop for ECHA ASOs to present the results and recommendations from this project

#### **Timeline:**

- Project manual: 31 October 2023
- Prepare and deliver the training for project national coordinators: 31 October 2023
- Operational phase: 1 November 2023 – 30 April 2024
- Reporting phase (National Coordinators): 31 May 2024
- Project report: 31 October 2024
- Workshop with ECHA ASOs: Q1 2025
- Adoption of the practical enforcement guidance for inspectors (tips and hints for inspectors): Q1 2025

## Annex 2i “Impact of REACH/CLP revision on the Forum”

### Forum Working Group

#### Work Package A.1

### “Examining the enforcement-related impacts of the future REACH and CLP revision on the Forum”

(mandate adopted at Forum-46)

#### Composition

**Chair:** Katja VOM HOFE (DE)

**Vice-Chair:** Chris VAN DEN HOLE (BE)

#### Forum Members and Alternates

- Henrik HEDLUND (SE)
- Luigia SCIMONELLI (IT)
- Ida SCHARFF (DK)
- Mirjam VAN DER MEER (NL)

#### Invited Experts

- DK (?)
- Gunter TSCHECH (DE)

#### COM

- Julien FABRE

#### ECHA

- Maciej BARANSKI

#### Objective:

- Assess the impact of future REACH/ CLP revision and the Basic Regulation on the Forum and enforcement and propose a roadmap for the Forum to adjust its priorities and practices to align with potential changes in its mandate.

#### Mandate:

- Examine the proposals for the REACH Revision and Basic Regulation as well as the revised CLP Regulation and identify potential impacts on the Forum mandate and workload.
- Examine whether the existing Forum priorities and practices are fit for purpose of its potential new mandate and identify any needs for change
- Prepare a roadmap for updating the priorities and practices of the Forum to fit the potential new mandate.
- Collect the views of the NEAs about the enforcement-impacts of the REACH/CLP Revision and Basic Regulation

#### Timeline:

- Forum-47 (June 2024)

## Annex 2j “Train the enforcement trainers 2024”

**Forum Working Group**  
Work Package C.2.  
**“Training for enforcement trainers 2024”**  
(mandate adopted at Forum-46)

### Composition

**Chair:**

- Sam Abdelhafiz (FR)

**Vice-Chair:**

- Mirjam van der Meer (NL)
- Eugen Enwander (AT)

**Forum Members/Alternates:**

- Kristine Kamerade (LV)

**Invited Experts:**

- Daniel Ahlström (SE)
- Johannes Leopoldt (DE)
- Uwe Licht-Klagge (DE)
- Carlo Muscarella (IT)
- Alois Staněk (CZ)
- Regina Wagner (DE)

**ECHA:**

- Magdalena Tłoczek

**COM:**

-

### Objective:

- Prepare and deliver the training for trainers on the enforcement of chemical products sold on-line in the fourth quarter of 2024.

### Mandate:

1. Specify as early as possible the envisaged level of the content of the training
2. Prepare materials necessary for the training such as presentations or documents
3. Liaise with the WG REF-13
4. Actively conduct the training event with support from other Forum members, ECHA and COM and other experts in specific topics as necessary
5. Collect, summarise and evaluate the recommendations and reactions of participants

### Timeline:

- Final report - Q1 2025

**Annex 2k “Train the enforcement trainers 2023”**

**Forum Working Group**  
Work Package C.2.  
**“Training for enforcement trainers 2023”**  
(mandate closed at Forum-46)

**Composition**

**Chair:** Chris van den Hole (BE)

**Vice-Chair:** Gro Hagen (NO)

**Forum Members/Alternates:**

- Otilija Spuriene (LT)

**Invited Experts:**

- Angelina Angelova (BG)
- Uwe Licht-Klagge (DE)
- Ricardo Marmelo (PT)
- Johannes Leopoldt (DE)
- Regina Wagner (DE)

**ECHA:**

- Magdalena TŁOCZEK
- Christina LOUKOU
- Istvan MAK
- Thierry NICOT

**COM:**

- DG TAXUD: Alessandro EL KHOURY, Renato LAZZARONI, Francesco SIANO, Herve SCHEPERS, Wilhelmus VAN HEESWIJK, Ino VEI

**Objective:**

- Prepare and deliver the training for trainers on the enforcement of imports in the fourth quarter of 2023.

**Mandate:**

1. Specify as early as possible the envisaged level of the content of the training
2. Prepare materials necessary for the training such as presentations or documents
3. Liaise with the WG REF-12
4. Actively conduct the training event with support from other Forum members, ECHA and COM and other experts in specific topics as necessary
5. Collect, summarise and evaluate the recommendations and reactions of participants

**Timeline:**

- Final report - Q1 2024



## **Annex 2I “Enforceability of restrictions”**

**Forum Working Group**  
Work Package B12  
**“Enforceability of restrictions”**  
(mandate adopted at Forum-46)

### **Composition**

**Chair:** Peter HELLEMA (NL)

**Vice-Chair:** Eugen ANWANDER (AT)

#### **Forum Members/Alternates**

- Michael FUCHS (AT)
- Philip TANGHE (BE)
- Katja VOM HOFE (DE)

#### **Invited Experts (advisory process)**

- Leonello ATTIAS (IT)
- Tone Line FOSSNES (NO)
- Uwe LICHT-KLAGGE (DE)
- Gernot WURM (AT)
- Andreas ELLMANN (DE)
- Charlotte RAHM (SE)
- Caroline NILSSON (SE)
- Raffaella CRESTI (IT)
- Regina WAGNER (DE)
- Edwin HEUVELING (NL)

#### **Invited Experts ad-hoc (advisory process) [only under specific circumstances]:**

-

#### **Invited experts (analytical methods) (TBC)**

- Nadja GOETZ (DE)
- Carolina FERRANTI (IT)
- Julia GONZÁLEZ GUTIÉRREZ (ES)
- Durk SCHAKEL (NL)
- Timokleia TOGKALIDOU (EL)
- Andromachi KATSONOURI (CY)

#### **COM**

- BERTATO Valentina (ENV)
- PIRSELOVA Katarina (ENV)

#### **ECHA**

- Juan Pablo CALVO TOLEDO

**Mandate:**

**Advisory process (only task of the WG)**

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.
  - c) Develop the Forum advice on enforceability of the anticipated restriction for CMRs in Childcare articles based on the description in ECHA Investigation Report.

**Analytical methods**

[the task can be discussed on an ad-hoc basis depending on the needs]

2. Review in 2024 the information on analytical methods provided by the stakeholders and by the Member States by Q3 2024 and revise the compendium of analytical methods recommended for the enforcement of REACH Annex XVII restrictions by the end of Q3 2024).

**Other**

3. The WG shall report to the Forum plenary the results of its findings and its actions between the plenaries.
4. The WG shall implement the action points from the Forum meeting F-45 (November 2023) that have resulted in specific duties for the WG

**Timeline:**

- Examination of proposals for restriction and support to RAC and SEAC according to plans
- 31 December 2025, reporting at each plenary meeting

### **Annex 3- Glossary of acronyms and abbreviations**

ADCO: Administrative Cooperation Groups  
ASO: ECHA's Accredited Stakeholder Organisations  
BEF: BPR-En-Force, Major Harmonised Enforcement Project of the BPR Subgroup of the Forum  
BPR: Biocidal Product Regulation  
BPRS: Biocidal Product Regulation Subgroup of the Forum  
CARACAL: MSCA Committee for REACH and CLP  
CLP or CLP Regulation: Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures  
C&L: Classification and Labelling  
CMR: Carcinogenic, mutagenic and reprotoxic  
COM: European Commission  
CSS: European Commission's Chemicals Strategy for Sustainability  
DG: Directorate General at Commission  
DG ENV: European Commission Directorate-General for Environment  
DG GROW: European Commission Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs  
DG TAXUD: European Commission Directorate-General for Taxation and Customs Union  
ECHA: European Chemicals Agency  
EU: European Union  
EUPCN: EU Product Compliance Network under the Market Surveillance Regulation  
HET: ECHA's Harmonised Enforcement Team, supporting the Forum  
ICSMS: Information and Communication System for Market Surveillance  
MSCA: Member State Competent Authority  
NEAs: National Enforcement Authorities  
OR: Only representative  
PARC: Partnership for Assessment of Risks from Chemicals  
POPs: Persistent Organic Pollutants  
RAC: Risk Assessment Committee of ECHA  
REACH and REACH Regulation: Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals  
REF: REACH-EN-FORCE, Major Harmonised Enforcement Project of the Forum  
SEAC: Committee for Socio-economic Analysis of ECHA  
SLIC: Senior labour inspectors committee  
TARIC: integrated Tariff of the European Union, is a multilingual database integrating all measures relating to EU customs tariff, commercial and agricultural legislation  
WG: Working Group of the Forum