REACH Workshop

Opening by the Chair

Erwin ANNYS (ECHA), the Chair of HelpNet, opened the REACH Workshop by welcoming the representative of the European Commission, national helpdesks (NHDs) and observers.

The Chair presented the draft agenda of the day, which was approved without comments. No participant claimed a conflict of interest for any of the agenda items.

This document summarises the topics discussed[1] during the workshop (Annex I) and the follow-up action points (Annex II). The names of the participants attending the event are listed in Annex III to these minutes.

1. Morning session

1.1 Update from the European Commission

Miriam STAHLHACKE and Riccardo ZORGNO's joint presentation (European Commission, DG GROW) provided updates on the relevant developments with regards to Annex XVII and XIV of REACH; authorisation decisions adopted or on the way to adoption; on the REACH revision; and an overview of the relevant court cases since the HelpNet REACH Workshop of May 2023.

Firstly, the Commission briefly outlined the recent microplastic restriction adopted in September 2023; the restriction was subject of further discussions under the agenda item 2.1 *Questions related to the restriction on microplastics.*

Then, the Commission mentioned the restriction of formaldehyde and formaldehyde releasers, adopted in July 2023. Additionally, the entries from 28 to 30 – appendices 1 to 6 of Annex XVII of REACH – were also updated to include substances newly categorised as CMR categories 1A and 1B.

The restrictions under preparation (RAC and SEAC opinions received and at the stage of drafting the legal proposal) were also outlined: the proposed restrictions of 2,4 DNT, PAHs in clay targets, lead in outdoor shooting and fishing, terphenyl hydrogenate and PFAS in firefighting foams.

The proposed restrictions of calcium cyanamide and skin sensitisers in textiles were under discussion by the Commission to identify the best way forward. The proposed restriction of D4, D5 and D6 regarding leave-on products was prepared for written vote, after the judgments of the court cases on this substance were published. The proposal for the restriction of PFHxA, its salts and related substances had been published in the Comitology register and was still under discussion with the MS. A vote was expected for the first quarter of 2024.

The Commission reminded how the universal PFAS restriction proposal was at the stage of RAC and SEAC opinion development. The public consultation was closed on 25 September and over **5 800** comments were received, indicating the high level of interest.

On the candidate list front, two substances were added for reprotoxic and vPvB properties. In addition, an amendment of the substance bis(2-ethylhexyl) phthalate (DEHP) entry in medical devices was adopted, postponing the latest application date and sunset date to align with the medical devices' regulation.

Regarding authorisation decisions, it was noted that several authorisations were granted for uses of 4-(1,1,3,3-tetramethylbutyl) phenol, ethoxylated (OPE) and 4—Nonylphenol, branched

[1] Disclaimer: Note that the text of the BPR, CLP and REACH regulations is the only authentic legal reference and that the summaries in this document do not constitute legal advice. For further advice, contact your national helpdesk.

and linear, ethoxylated (NPE), chromium trioxide and 2,2'-dichloro-4,4'-methylenedianiline (MOCA).

Several applications for authorisations were on the way of adoption for Chromium (VI), MOCA, Trichloroethylene (TCE), OPE/NPE and 1,2-Dichloroethane (EDC).

The Commission also gave a preview of the authorisation files that would be discussed at the following REACH Committee meeting and announced that that meeting would take place on the 13th and 14th of December.

The Commission noted that the REACH revision was not included in the Commission Work Programme for 2024. It was outlined how it would more likely come later under the new EP and Commission composition. The Commission was assessing at that point if it was possible to move forward with the ECHA basic regulation and the amendments of REACH Annexes separately. Discussions on data transparency regulation and the attribution of tasks to the Agency would come independently to the REACH revision.

Further, the Commission gave a brief update on court cases, notably two judgements that were published on cyclosiloxanes D4, D5 and D6 – both appeals were dismissed by the court and the judgements confirmed that the determination of 'unacceptable risk' was within the Commission's discretion that the Commission may rely on the scientific assessment in the Annex XV dossier and that a precise quantitative estimation of the risk was not necessarily required as part of an Annex XV dossier. Two judgements on the interface between REACH and the Cosmetic Products Regulation were also published with regards to testing requirements in which the Court confirmed that the substances, although they are exclusively used in cosmetics formulations, can still be subject to animal testing under REACH if required to ensure workers' protection.

Finally, the Commission presented the developments concerning Court Case C-144/21[2] annulling the 'Chemservice' decision authorising certain uses of Chromium trioxide (the broadest ever granted), as well as concerning the potential future restriction of Cr(VI) substances.

The core findings of the previous ruling were confirmed, and some clarifications were made, both on the risk assessment and on the analysis of alternatives (AoA).

On the first point, the Court recalled that large upstream applications need to be representative in terms of risk data and for the burden of proof to be discharged. On the second point, applicant need to provide a sufficiently granular use description as to ensure a meaningful AoA, including, where relevant, the required functionality and relevant level of performance. ECHA and the Commission need to be very thorough in assessing those justifications.

Following the court case, the Commission will need to issue two decisions: a decision on the original application, and another one on the submitted review report, the second being separate from the original application, which will be considered a new application. Use can continue until those decisions will be adopted.

In parallel, the Commission sent a mandate[3] to ECHA to develop several restriction options for Cr(VI). In October 2023, ECHA published it in the relevant registry of restriction intentions[4].

The Commission announced that a call of evidence would be launched in December 2023. Member States were invited to promote it within their networks and to their national industry.

The final opinions from ECHA's committees would be expected in Q1 2026. The regulatory package from the Commission (amending regulations delisting from Annex XIV and listing in Annex XVII) would then be prepared by the end of 2026.

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[2] https://curia.europa.eu/juris/liste.jsf?language=en&td=ALL&num=C-144/21
[3] https://echa.europa.eu/-/echa-to-prepare-restriction-proposal-on-chromium-vi-substances
[4] Registry of restriction intentions: https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18971243a

A dedicated Q&A[5] document has been developed by the Commission to address the most frequently asked questions concerning the risk management of Cr(VI) substances under REACH.

Discussion

One NHD thanked the representatives of the Commission for the Q&A paper, which was very helpful for the helpdesk to clarify situations in which companies can use chromates.

Considering the intention to initiate the restriction procedure, the NHD added that several companies, which are owners of AfAs that will expire before the restriction comes into force, will need to submit AfA review reports. This could be perceived as unfair to AfA holders who need to use resources for a review that will become obsolete. The correspondent asked if any transitional arrangements were envisaged.

An industry observer asked if a difference was made between derogated use from the proposed restriction and granted authorisation for use, and if the agreed exemption from Annex XIV would be reflected in the restriction proposal.

The Commission replied that they were aware about this exceptional situation. However, the Commission cannot pre-empt the outcome of the work conducted in ECHA's committees, the REACH Committee and the EU Parliament. It was also apparent that some fees may need to be reimbursed. This matter would need to be discussed and agreed upon, before being included into the Q&A document. One NHD asked whether this could be already communicated to industry. As there was no agreement reached yet, the Commission recommended to mention that discussions are ongoing on this topic.

There will be a change of regulatory framework, and the package will need to include transition measures. The scope of the derogations was still uncertain at this early stage as the Commission cannot foresee the outcome of the work in ECHA's committees.

The Commission has thoroughly assessed the legal provision and Article 55 in particular, as an obstacle for restriction substance in Annex XIV with the conclusion that this exercise is legally sound.

Finally, the Commission invited participants to send any questions on the Q&A concerning the Commission's risk management of Cr(VI) substances through the functional mailbox[6].

One NHD noted that they had already received questions on the REACH revision, specifically on polymers registration However, the Commission could not clarify a timeline at the moment of the event. Another NHD asked what the current status of the skin sensitisers restriction is. The NHD was invited to send questions in writing to the Commission.

1.2 Update from the ECHA Helpdesk

Eduardo BARRETO TEJERA (ECHA) gave an overview of key REACH topics and activities addressed by the ECHA helpdesk in 2023. With a total of over 3 700 regulatory questions received by mid-November, the majority (over 2 700) were related to REACH and SCIP.

REACH regulation emerged as the most prevalent, followed by BPR, CLP, and others like Persistent Organic Pollutants (POPs), drinking water, and batteries regulations. Notably, the total number of questions has returned to pre-COVID levels, with a highlighted increase in their complexity.

He discussed the distribution of inquiries from both EU and non-EU companies forwarded to NHDs, providing a brief overview of the specific questions directed to each NHD. He then outlined the hot and recurrent topics within the different areas of REACH, including

[5] Questions & Answers - REACH and Chromium(VI) substances: https://ec.europa.eu/docsroom/documents/56174
[6] GROW-F1@ec.europa.eu

Registration, Evaluation, Authorisation, and Restriction.

Under the section on 'Cooperation', Eduardo emphasized the videoconferences conducted throughout the year, addressing main discussion topics. He encouraged participants to submit questions for future videoconferences. Additionally, he summarised HelpEx questions and FAQs, highlighted Q&A updates on REACH topics, and reported on the activities of the working group assessing borderline cases between articles and substances/mixtures during the year.

The speaker introduced new onboard topics, specifically the Batteries Regulation and Drinking Water Directive, concluding this section with an outlook on upcoming events. He extended an invitation for continued collaboration in the upcoming year.

Discussion

During the meeting, one NHD inquired about the frequency of consultation of the BWG catalogue from the HelpNet page. The Chair clarified that the specific number is not currently available and suggested including this as an action point for future reference.

Another NHD raised a question regarding the expectations from the HelpNet network in connection to the ECHA Conference scheduled for February 28, 2024. Elena BIGI addressed this query by stating that the ECHA helpdesk plans to gather input from the NHDs through the annual activity survey by the end of 2023.

Action point

AP 1: Investigate how frequently the Catalogue of borderline cases between articles and substances/mixtures has been consulted from the HelpNet web page.

1.3 Questions received by NHDs on selected topics – Discussion in smaller groups

Discussion

The most common questions the NHDs had received in 2023 related to:

- Imports: duties of importers and how to work with the only representative (OR) if there was one.
- Registration in general, and in particular registration of polymers and how to comply with the registration duties.
- Safety Data Sheets (SDS): many types of questions, mainly from consultants, of theoretical nature. Questions relating to the phone number to be indicated in section 1.4. of the SDS[7] were also indicated.
- Restrictions in general (in preparation or already in application): PFAS; microplastics; lead in shots; diisocyanates.
    - Microplastics: Many questions were received at the time of the restriction entry entering into force.
    - Universal PFAS restriction proposal: NHDs noted that the interest was very broad, and questions were also asked by actors who are not normally involved directly in REACH, e.g. food sector.
    - Diisocyanates: very detailed questions, in particular in relation to the qualification of the trainer. It seems that it is not possible to obtain the certification courses in non-EU languages such as Russian, which is an issue in EU countries where there are Russian speaking who may not master another national language or English.
- Chromium VI annulment (i.e. related to the European Court of justice decision of for certain uses of chromium trioxide).
- Questions from hospitals about authorisation for *in vitro* diagnosis (IVD) and the need to notify oxyphenol ethoxylate. The NHD acknowledged there was an ongoing discussion in HelpEx.

[7] https://echa.europa.eu/support/helpdesks/

- REACH revision potential impact on industry.
- Nanomaterials and nano specific information requirements.
- Substances in articles.
- EU sanctions.

One NHD highlighted a need for some 'crisis management' process in cases where FAQs or Q&As are not harmonised or agreed yet (e.g. microplastics restriction entry into force).

1.4 Safety Data Sheets updates and synergies between Member States - Discussion in smaller groups

Cornélia TIETZ (Cefic) introduced herself and her role in Cefic, amongst other things in the Safe Use Communication group.

The Cefic group members identified information gaps on safety data sheets (SDSs), which lead to questions to NHDs and national industry associations. The sections of the SDS in question are sections 1.4 – emergency telephone number, section 8.1 - available OELs and section 15.1 – reference to national laws and measures. Cefic started a pilot project on the digitisation of selected sections of the SDSs and Cefic has been asked by ECHA to consider section 15 as a priority. It is also noted that the *Guidance on the compilation of safety data sheets*[8] refers to outdated references and national laws.

Industry has prepared an excel file with the currently available information that they believe is correct. Cefic requested to consider if there is a way to complete and/or check the excel table compiled by industry, whether a place to store this information can be found and a process could be agreed upon to update the information on a regular basis.

Discussion

The NHDs received questions on these sections of the SDSs. There is an agreement that the contact information to be entered in section 1.4 is the Poison Center in the case of mixtures that are hazardous to human health.

NHDs indicated receiving many questions on the information to be provided in section 1.4 requiring the **emergency telephone number**. However for mixtures hazardous to the environment or non-hazardous mixtures or substances, the emergency telephone number to be included under section 1.4 of the SDS is not as straightforward. There was a proposal to rely on the list[9] published on the ECHA website.

Some NHDs proposed that for the other sections, information could be included in a similar format, although the information on occupational exposure limits (OELs) will not be easy to prepare and update. NHDs supported the usefulness of the *Guidance on the compilation of safety data sheets* to address industry questions.

Some NHDs indicated that sections **8.1 issues with current workplace limit values have been identified** and **15.1 reference to national laws/measures** are not necessarily in the scope of work of the NHDs, depending on which authorities are in charge of these legislations. ECHA website could contain links to this information. Some NHDs have published a guideline containing the information at national level. They indicate that it helps limiting queries received on these topics.

Whilst the initiative is considered a nice idea, NHDs hint that it will be difficult to organise such a document for NHDs. The NHDs highlighted the difficulty of setting up the process and taking

[8] https://echa.europa.eu/guidance-documents/guidance-on-reach
[9] https://echa.europa.eu/support/helpdesks/

the responsibility of updating such a list because information would come from different sources, some of them may not be in the NHD's scope of work. It may require contact with other ministries or institutes.

The Chair indicated that there is an intention from ECHA to integrate the national occupational exposure limits (OELs) in the European Chemicals Legislation Finder (EUCLEF)[10].

Action point

AP 2: ECHA to share excel file from Cefic with national-relevance information for SDS with HelpNet REACH correspondents.

AP3: ECHA to reflect on the possible ways to keep the SDS national related information up to date and share it with national helpdesks for discussion.

1.5 REACH and Eco-design for Sustainable Products Regulation

Samira GALLER (Austria) gave a presentation and introduction of the main provisions of the proposal for the Ecodesign for Sustainable Products Regulation (ESPR) and the REACH Regulation.

She outlined potential problems they have identified for the practical implementation of future chemicals risk management due to possible regulatory inconsistencies, and a lack of coordination with other legislations and actors (REACH, SCIP, etc.). In particular, she emphasized some open questions related to enforcement, how to jointly organise enforcement, and what could be the role of the Forum in that context. She also informed about their proposal to establish a working group on the interlinkages between REACH and ESPR that will analyse the interlinkages, come forward with possible solutions for potential inconsistencies and incoherences, and exchange ideas about enforcement.

Discussion

One correspondent also shared their concerns and highlighted that, beyond enforcement, the helpdesks would also be affected. They foresaw many questions coming to NHDs related e.g., to interlinking, threefold regulations, unclarities regarding thresholds. It was mentioned that NHDs established for REACH, CLP and BPR would be not competent to answer such enquiries.

Maciej BARANSKY (ECHA) emphasized that there should be interest and possibility to involve the Forum, and he reminded that the Forum had already been working together and cooperating with other authorities on various regulations such as Waste, Toys, or RoHS.

The Chair confirmed the strong interest in this topic and invited Samira GALLER to share any further news on this topic with the HelpNet.

2. Afternoon session

2.1 Questions related to the restriction on microplastics

Sanna HENRICHSON (ECHA) provided an overview of the microplastics restriction, emphasizing its aim to regulate intentionally added microplastics, specifically polymers meeting defined conditions that identify them as microplastics and may lead to environmental releases. The presentation highlighted the extensive preparation process, commencing in early 2018 and culminating in adoption in September 2023.

The restriction stipulates that synthetic polymer microparticles meeting defined criteria should

[10] https://echa.europa.eu/information-on-chemicals/euclef

not be marketed as substances on their own or in mixtures exceeding 0.01% by weight if intended to confer a sought-after characteristic. She underlined that derogations are described in paragraphs 4 and 5, while paragraph 6 stipulates the transitional periods for uses requiring additional time to phase out intentionally added microparticles. Furthermore, additional company requirements are found in paragraphs 7-14, and test requirements, such as degradability and solubility (Appendices 15 and 16) in paragraph 15.

The presentation continued to focus on the primary questions or trending topics which has been received by the Agency in the past months. These covered solid/liquid mixtures incorporating microplastics like glitter, the occurrence of glitter/microplastics in articles, concerns which are associated with placing products on the market, derogations, and instructions for use, disposal, and reporting requirements for products containing the microparticles. She concluded by highlighting the availability of supportive materials on the ECHA website.

Subsequently, a NHD addressed questions related to the microplastics restriction, highlighting a dedicated webpage regularly updated with examples of addressed questions. The common topics discussed included distinctions between substance/mixture and article, exemptions (paragraph 5), transition periods (paragraph 6), and the sale of glitter before 17 October 2023.

The key takeaways included the essential need for further guidance, especially for complex aspects like the 'glitter-industry', and the acknowledgment that harmonisation among NHDs would be not possible before the publication of the Q&A document which was under preparation by the Commission.

Discussion

During the meeting, one participant expressed concerns about handling inquiries related to the inclusion of glitter in nail products, particularly when there is a top layer involved. Seeking clarification on effectively addressing such questions, the participant raised a valid point on the complexities surrounding glitter usage in these products.

Another participant shared their experience dealing with queries specifically tied to microplastics and suggested utilizing the Q&A section available on the Commission's website for valuable guidance in navigating such inquiries.

A third participant echoed these thoughts, recounting challenges in interpreting the Commission's Q&As, especially concerning glitter and its release from articles, and inquired about the existence of published guidance.

A NHD also emphasized the applicability of transitional periods regarding glitter in nail products, suggesting addressing related questions similarly to any other article. The Chair, as also the Chair of the 'Borderline Working Group of substances in articles', indicated that the group had communicated its viewpoints to the Commission concerning articles containing glitter.

The Chair also highlighted that ECHA would share a Commission's presentation on microplastics presented in the enforcement Forum-45 meeting. In conclusion, participants were encouraged to collaborate and share insights on overcoming challenges linked to glitter and microplastics in articles, and to discuss the harmonization in the upcoming REACH video conferences.

Action point

AP 4: Share the presentation given by the Commission in the Forum-45 meeting on restriction entry 78 (synthetic polymer microparticles).

AP 5: Discuss harmonisation of responses/lines to take to 'new' questions, e.g. on entry into force of new restriction. This topic could be discussed with NHDs in an upcoming video

conference.

2.2 Substance sameness in the context of recovered substances

Rosella DEMI (ECHA, Chemistry Unit) gave a presentation on substance sameness in the context of recovered substances. She explained how substance identification is a key element for recovery operators to benefit from an exemption and gave some general guidelines and examples on how to perform a substance identity assessment, and to which extend.

She stressed that it remains the responsibility of the recovery operators to determine the numerical identifiers of their recovered substances, and they are expected to do so by following the principles of the guidance on substance identity. Recovery operators have to identify their substances as any other actor with registration obligations under REACH. They have a lot of information available, but the identification remains a complex task starting from all the streams from the wastes (raw material) up to the recovered substance.

Once recovery operators correctly identify their substance and the relevant numerical identifier, they can establish substance sameness, and must check whether the same numerical identifier has been already registered to benefit from the exemption. Information is available from the ECHA website, from the joint submission, or they may also have information on already registered substances, scientific information, or market information.

After this introduction on the basics of substance identification and sameness, NHDs were encouraged to share experience, cases, and questions they have received in that regard.

Angelina GADERMAN (Germany) presented a few examples of cases and questions the German helpdesk received in relation to substance sameness and the exemption for recovered substances under Article 2(7)(d) of REACH. The examples included polymer recycling, PVC waste, soft PVC, steel, different steps of wastepaper recycling, and lithium batteries.

Nathalie HAYAUD (France) presented a general question that they received several times in relation to plastic and polymer recycling, and how to deal with impurities coming from the waste and that are present in the recovered substance. She insisted on the difficulty to know the exact composition and the presence of hazardous impurities. She also asked about available guidance other than the ECHA guidance on substance identity, and the Chair pointed out the IMPEL[11] guide.

Majella COSGRAWE (Ireland) presented a question received from the Irish Environment Protection Agency (EPA) in relation to an application for end of waste criteria for recycled mattresses. After presenting the case, she highlighted that, to their knowledge, recovery operators seem to have very little information on the monomers and any other substances recovered in the recycled polyester. More generally, she indicated that recovery operators seem to lack knowledge on the substances they recover and the related obligations. When EPA assesses EOW application, they often come to the Irish helpdesk to ask about REACH obligations.

Discussion

One correspondent mentioned that they were facing similar issues and that it is often unclear what recovery operators have recovered. They do not always get the same chemical substance out of the recovery process, and it is difficult to define the substance identity of their recovered substance. The correspondent also asked if it would be possible to review and update the existing guidance on substance identity to add further information and details. The Chair highlighted that the guidance update process depends on the priorities set by the management, but it was clear that this topic would gain interest in the near future.

Rossella DEMI clarified that indeed, recovery operators may not be aware of all the guidance

[11] The European Union Network for the Implementation and Enforcement of Environmental Law

available. However, they must know what their obligations are as soon as they enter REACH. They must act as chemical manufacturer in terms of understanding their substances.

Action point

AP 6: Share the link to the IMPEL guide.

2.3 Cosmetics and SVHC

Majella COSGRAVE (Ireland) introduced the topic of substances identified as SVHCs and used in cosmetic products, specifically a question received on karanal, which is a substance included in Annex XIV for environmental concerns (vPvB properties).

The Irish helpdesk received a query relating to existing stocks of cosmetic products containing Karanal, whether the authorisation application applied and if the products could be placed on the market after the sunset date. The customer had received an initial response from the Irish Cosmetics Authority was that the substance could be placed on the market.

The Irish helpdesk would like to confirm their understanding of the authorisation requirements, that after 27 August 2023, cosmetic products containing Karanal at > 0.1%w/w cannot be placed on the market for a use without an authorisation and that remaining stocks can no longer be sold. The Irish helpdesk also asked whether other NHDs have been confronted to similar questions. They also ask whether other NHDs have similar experience with Cosmetic authorities and how communication between the authorities can be improved, or awareness created.

Discussion

NHDs confirmed the understanding of the Irish helpdesk. One NHD indicated that they had received the same question a few days ago, whilst another mentioned that consumer uses would also be requiring authorisation.

Several NHDs transfer questions about cosmetic products to the authority in charge. In some case, the authority in charge of the cosmetic products regulation is also in charge of REACH, which simplifies the communication.

Several NHDs also mentioned a lack of proper communication channels between authorities.

One NHD has published a webpage covering the chemicals regulations applying to cosmetic products and another one mentioned that considering that the Cosmetic Products regulation was revised recently and with the upcoming REACH review, it could be interesting to consider an updated specific information page on chemicals regulations applying to cosmetic products.

The Chair added that this raises the topic of the new legislation coming into ECHA's responsibilities and for which NHDs will not have a mandate. ECHA hopes that the legislation will be clarified soon as well as clarification on potential resources for support.

2.4 IUCLID cloud replacing online dossiers

Terhi RANTALA (ECHA, Submission and Processing Unit) gave a presentation on online dossiers that are moving from REACH-IT to the ECHA Cloud service. She gave a brief demo on how to create online dossiers for downstream users' notifications in the ECHA Cloud services and provided some information on the support material that will be made available to companies.

Discussion

A correspondent asked clarification about the two lists of substances available in the tool. ECHA explained that, when creating a dossier, a user can use either substances listed in their 'own' list that they created manually in their local application, or substances listed in the ECHA's list of substances that come from the ECHA's own database and that cannot be modified nor edited.

Closing of the REACH Workshop

The Chair listed the action points (Annex II) resulting from the REACH Workshop and thanked all participants for their active participation and contribution to the discussions.

Annex I – Agenda of the REACH Workshop

Chair: Erwin ANNYS

REACH Workshop (10:30-16:30, Helsinki time)

Opening by the Chair

1. Morning session

1.1 Update from the European Commission, including the REACH review
(DG GROW, Riccardo ZORGNO and Miriam STAHLHACKE)

1.2 Update from the ECHA Helpdesk
(ECHA, Eduardo BARRETO TEJERA)

1.3 Questions received by NHDs – Discussion in smaller groups

Coffee break

1.4 SDS updates and synergies between Member States
(Cefic, Cornélia TIETZ) – Discussion in smaller groups

1.5 REACH and Ecodesign for Sustainable Products Regulation
(Austria, Samira GALLER)

Lunch break

2. Afternoon session

2.1 Questions related to the restriction on microplastics
(ECHA, Augusto DI BASTIANO and Germany, Angelina GADERMANN, Raimund WEIß)

2.2 Substance sameness in the context of recovered substances
(ECHA, Rossella DEMI)

Coffee break

2.3 SVHCs identified for environmental hazards and used in cosmetic products
(Ireland, Majella COSGRAVE) – Discussion in smaller groups

2.4 Creation of dossiers online: from REACH-IT to ECHA Cloud services
(ECHA, Terhi RANTALA)

A.O.B.

Conclusions of the day

Closing the REACH Workshop at 16:30

Annex II - Action points

No.	Action	Agenda item	Who	Status
1.	Investigate how frequently the BWG Catalogue is being consulted[12] from the HelpNet page.	1.2	ECHA	Closed
2.	Share the excel file from Cefic with national-relevance information for SDS with HelpNet REACH correspondents.	1.4	ECHA	Closed
3.	Reflect on the possible ways to keep the SDS national related information up to date and share it with national helpdesks for discussion.	1.4	ECHA	Ongoing
4.	Share presentation[13] given by the European Commission (DG GROW) in the Forum-45 meeting about restriction entry 78 (synthetic polymer microparticles).	2.1	ECHA	Closed
5.	Discuss harmonisation of responses/lines to take to 'new' questions, e.g. on entry into force of new restriction. This topic could be discussed with NHDs in an upcoming videoconference.	2.1	ECHA	Closed
6.	Share the link to the IMPEL guide[14].	2.2	ECHA	Closed

[12] Post meeting note:
The Catalogue of borderline cases between articles and substances/mixtures has been downloaded 4063 times from the publication date in March 2023 until 7 March 2024.
[13] Presentation given at Forum 45 (7-10 November 2023) was uploaded in S-CIRCABC.
[14] Guidance Making the Circular Economy Work - Guidance for regulators on enabling innovations for the circular economy (prevention and recycling of waste: https://www.impel.eu/en/tools/guidance-making-the-circular-economy-work

Annex III - List of participants

Country	Name
Austria	Barbara WETZER, Martin WIMMER, Samira GALLER, Stephanie CASTAN
Belgium	Daphné HOYAUX
Bulgaria	Margarita GAIGUROVA
Cyprus	Maria ORPHANOU
Croatia	Tajana KOVAČEVIĆ
Czech Republic	Jan KOLAR, Jarmila SLADKOVA
Denmark	Maria THESTRUP JENSEN
Estonia	Anna AMELKINA
Finland	Sari TUHKUNEN
France	Nathalie HAYAUD, Stephanie COPIN
Germany	Suzanne WIANDT, Paransothy NIRTHARSAN, Raimund WEISS
Hungary	Tamas KOVACS
Ireland	Annija LACE, Majella COSGRAVE, Margarete HOULIHAN
Italy	Francesca CARFI
Latvia	Elīna LAZDEKALNE
Lithuania	Agne JANONYTE, Beata VOLUJEVIC, Jurgita BALCIUNIENE, Monika AVIZIENE, Otilija SPURIENE
Luxembourg	Laurène CHOCHOIS
Netherlands	Floris GROOTHUIS, Maarten NEDERVEEN
Norway	Cecile BLOM, Mohamad Suleiman ABDULQADIR
Poland	Krzystof DOMANSKI
Portugal	João ALEXANDRE, Isabel LAGINHA
Romania	Nicoleta CAROLE
Slovakia	Anna SLIMÁKOVÁ, Karol BLESAK
Slovenia	Karmen KRAJNC, Simona FAJFAR
Spain	Ángela SÁNCHEZ CONDE, Laura ZAMORA NAVAS
Sweden	Helena DORFH, Jenny Sophie VIRDARSON

European Commission

DG	Name, surname
DG GROW	Miriam STAHLHACKE
DG GROW	Riccardo ZORGNO

Candidate countries observers

Country	Name, surname
Montenegro	Tatjana MUJIČIĆ
Serbia	Snezana JOKSIMOVIC

Industry observers

Organisation	Name, surname
A.I.S.E.	Jan ROBINSON, Julie JANSSIS, Giulia SEBASTIANO
Cefic	Cornélia TIETZ
IMA-Europe	Roger DOOME
ORO	Kevin HOBAN

ECHA staff

Unit[15]	Name, surname
A2	Amandine JOMIER
D3	Augusto DI BASTIANO
E2	Cyril JACQUET
A2	Eduardo BARRETO TEJERA
A2	Elena BIGI
A2	Erwin ANNYS
A2	Evelyne FRAUMAN
E2	Fausto COMANDE
B4	Fesil MUSHTAQ
A2	Iustin-Gabriel TURCU
R3	Kostantinos ANAGNOSTAKIS
A2	Laure PAIN
A2	Maciej BARANSKI
ED0	Minna STROMBERG
B4	Outi TUNNELA
A2	Pedro ROSELLO VILARROIG
A2	Peter SIMCIC
B1	Rossella DEMI
A2	Roxana MARIA BROASCA
A2	Sofiya KOVALYSHYN
A2	Tania MATEUS
A3	Terhi RANTALA
A2	Viorica NAGHY

[15] ECHA – organisation: https://echa.europa.eu/about-us/who-we-are/organisation