

Outcome report of the mid-term review of ECHA's strategy 2019-23

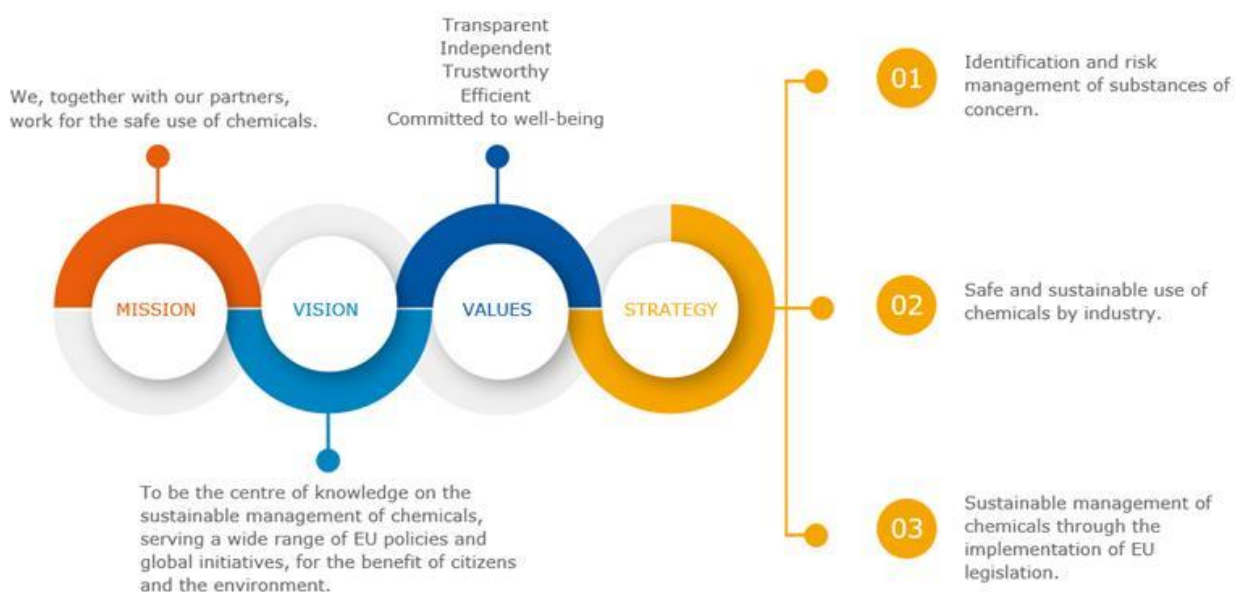
Following the mid-term review of ECHA's strategy 2019-23, ECHA's Management Board confirms that the Agency's strategic direction, as set out in its Strategic Plan 2019-2023, remains largely valid.

The Board, however, notes that ECHA's context in terms of policy framework, stakeholder expectations and ways of working has evolved. Further reflection on ECHA's mission and vision will be needed when opening ECHA's next strategy cycle. The change of context, together with lessons learned from implementing the strategy so far, requires adjustments to be made for the remainder of the strategy period 2022-23.

The Management Board considers that ECHA should continue focusing on delivering on its core mandate to achieve high quality regulatory outputs, invest smartly into getting ready for changes to ECHA's tasks that result from policy developments, enhance its close collaboration with partner authorities and institutions, and commit to sharing its expertise in an impactful manner.

1. Background of the strategy review exercise

The Management Board initiated the mid-term review of ECHA's Strategy 2019-2023 in March 2021 and set up an ad hoc Subgroup to assist in this work. The exercise aimed to support ECHA and provide guidance for the remaining period of the current strategy, in the spirit of integrated management of the Agency and the associated principle of continuous improvement. The gathered input and analysis are also significant building blocks for ECHA's next full strategy development cycle.



The reasons for reviewing the strategy were threefold. First, the significant evolution of ECHA's organisational and policy context following the publication of the European Green Deal and the Chemical Strategy for Sustainability. Second, the development of ECHA's mandate and ways of

working due to new tasks entrusted to the Agency and the impact of the pandemic. Further, the opportunity to learn from the experience of how the three strategic priorities have so far been implemented.

External insights from ECHA's regulatory partners and stakeholders were collected with the help of Management Board members. The members reached out and consolidated a wealth of input from their respective bodies and institutions in the Member States, and respective sectors of interest. The insights were evaluated by the ad hoc Subgroup and complemented with additional analysis on internal factors, such as ECHA's progress in implementing the current strategy. Furthermore, the Management Board conducted a workshop during the review, to reflect on the input received and develop a common view on the Board's expectations towards ECHA for the remaining period 2022-23 of the current strategy. This report provides the summary of the Management Board's insights and guidance.

2. Expectations on ECHA and changes in context

ECHA is the EU knowledge and data hub on the safety of chemicals. Its role, as an independent and transparent agency, is to achieve high quality regulatory outputs by providing scientific-technical advice, coordination and support within its mandate and areas of expertise.

ECHA's current Strategy 2019-23 was adopted in December 2018. The strategy responds to three broad expectations on ECHA that remain largely valid. First, to speed up the work on finding and regulating chemicals that can cause harm for people and the environment, while making the best use of limited public resources. Second, to get ready to work on new tasks entrusted to the Agency. Third, to proactively use ECHA's expertise and the data it holds to contribute more broadly to the advancement of chemicals policy and implementation.

Since the strategy adoption, the policy context in the EU and expectations on ECHA have changed due to policy initiatives set out in the Green Deal. While these initiatives do not directly affect ECHA's mandate, they are being deployed into legislative actions that are relevant to ECHA, mostly through the Chemicals Strategy for Sustainability. The REACH and CLP reviews, and the preparation of a proposal for ECHA's founding regulation are – among others – policy initiatives within the Chemicals Strategy that are relevant to ECHA's future.

3. Lessons learned from strategy implementation 2019-20

When looking at ECHA's strategic priorities and enablers, differences in progress emerge. In general, maximum progress and impact is observed in activities where the Agency has a direct legal mandate, handles most of the process and has sufficient resources available. Where the legal mandate is less explicit, multiple actors are involved and resources are limited, ECHA's efforts to promote chemicals safety have had less impact than expected.

Under the new Multiannual Financial Framework, budgetary limits have required tasks to be prioritised, by continually reassessing how much ECHA can realistically deliver.

ECHA needs to find the right balance between being a service provider and being an Agency that promotes regulatory measures.

Thanks to the efficiencies and synergies achieved through the Integrated Regulatory Strategy, ECHA has been able to deliver on its legally required core tasks. Integrated data management and the evolution of IT tools have been equally instrumental. Looking ahead, the shift to working on group of substances needs to continue, and data needs to be better integrated and made available to authorities and stakeholders in general. Digital collaboration on regulatory processes also needs to be enhanced, while considering the needs of the actors involved.

Other areas of operation in ECHA's strategy were broader and more ambitious, requiring ECHA to go somewhat beyond its clearly defined tasks, such as activities on substitution, sustainability, and convergence of regulatory implementation with other agencies. The strategy review recognises that the lack of an explicit legal mandate, the involvement of multiple actors, resource constraints and stakeholder expectations are among the root causes for the more limited progress seen in such areas, given that resources were prioritised for core tasks. At the same time, the Chemicals Strategy for Sustainability has brought a renewed policy focus and allowed for a clearer definition of ECHA's advisory role on individual topics, where ECHA, thanks to its expertise and the data it holds, can provide valuable input.

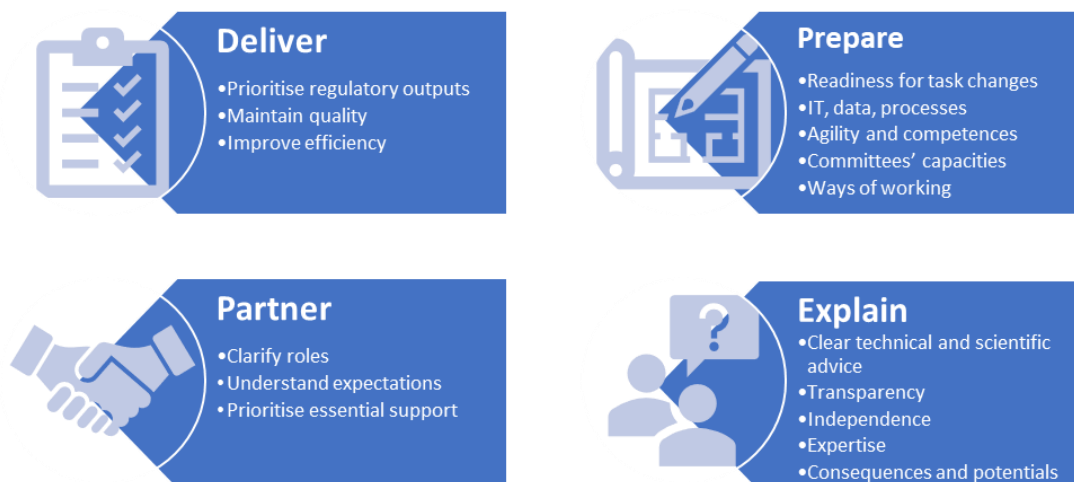
Past investments in developing the Agency's organisational structure and agility, as well as improving staff competence and empowerment, have supported the work on core tasks as well as the successful onboarding of new tasks. The level of success has been dependent on the tasks being carefully planned, scoped with legal clarity and resourced appropriately. Success has also relied on ECHA's IT tools and processes being adaptable and modular.

The strain on workload and resources due to the implementation of new tasks has, however, raised concerns over the long-term sustainability of ECHA's portfolio of tasks and ways of working, in particular, the pressure on delivering core regulatory outputs and the work of the committees.

4. Management Board guidance for 2022-23

The Management Board confirms the validity of ECHA's strategic priorities and their enabling components (resources, infrastructure, knowledge and competences). For the remainder of the strategy implementation period 2022-23, the Board considers that the following four themes should provide steer and guidance for work planning, organisation and communication towards stakeholders and staff.

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Deliver: ECHA should prioritise the provision of high-quality regulatory outputs, in particular, for its scientific opinions and decisions. The organisation should continue to build on the efficiencies and synergies achieved so far with the Integrated Regulatory Strategy and communicate on the progress in an understandable way.

Prepare: The Agency should be ready for changes in ECHA's tasks by making targeted and focused investments in IT, data and processes, as well as in organisation development, competences and agility of staff and future-proofing ways of working. Re-evaluating and maintaining the functioning of the committees, especially RAC, with a view to their current and expected workload, emerges as a key area.

Partner: The Agency should invest in developing an open and constructive dialogue on the different needs and expectations of Member States, duty holders, EU institutions, other agencies, as well as civil society organisations. ECHA should further clarify its specific role in regulatory implementation towards these stakeholders, understanding mutual responsibilities and expectations and striving to provide more focused support.

Explain: ECHA's role is to provide clear, transparent and independent scientific-regulatory advice. ECHA should not engage in policy considerations but commit and invest more into sharing expertise and demonstrating the consequences and opportunities of regulatory options to decision, policy and law makers. Through this, ECHA can contribute to further policy development.

The Management Board requests the Executive Director to take this guidance into account when proposing future updates of the Programming Document, and to explain the links to the strategy review conclusions in the relevant proposals for decision making at Management Board level. The wider insights gathered during the review exercise will be kept on file for the development of ECHA's next strategy cycle.