

DIRECTORS' CONTACT GROUP

DCG3/1/2014
1 January 2014

**TERMS OF WORK
OF THE DIRECTORS' CONTACT GROUP (DCG)
ON MEETING THE REACH REGISTRATION DEADLINE OF 2018
BETWEEN
ECHA, THE EUROPEAN COMMISSION AND INDUSTRY ASSOCIATIONS**

1. Objectives:

The Directors' Contact Group (DCG) is an informal group gathered with the objective of mobilising its members to jointly pursue the tasks outlined in this mandate to streamline support and provide orientation to duty-holders preparing for the 2018 REACH Registration deadline, particularly for the benefit of small and medium-sized companies (SMEs). The DCG provides a platform for the informal exchange of views and information between ECHA, the European Commission, and participating Industry Associations. The DCG serves to generate timely input to the design, delivery and consistency of actions, tools and other support provided by ECHA and other DCG partners.

2. Tasks:

The DCG will:

Monitor

- Maintain an overview of the overall preparedness of industry, in particular of SMEs, as to meeting the third REACH registration deadline of 2018, based on a continuous bottom-up analysis of available information; Monitor SIEF formation and management as well as data and cost sharing within SIEFs ahead of the 2018 registration deadline, with particular attention to the burden on SMEs and problems flagged by them;
- Regularly take stock on the progress made by the institutions and bodies implementing REACH (i.e., ECHA, the European Commission, national competent authorities and national enforcement authorities) in resolving the related issues of concern;
- Track the continued relevance for the 2018 registration deadline of the solutions elaborated under its first mandate and included in its "Summary Paper on 28 Issues and Solutions" (namely issues 10, 15, 20 and 21, published on the ECHA website);
- Monitor progress in unifying the entries for the same substances in the C&L Inventory.

Provide advice

- Provide input and feedback on relevant actions, tools and other support provided by ECHA and other DCG partners to industry, in particular to SMEs;
- Compile advice to DCG members representing industry associations on establishing sector-specific guidance or guidance directed at specific groups of companies, consistent with legal requirements and overall ECHA Guidance;
- Advise on meeting the information needs of registrants and downstream users, particularly of SMEs, with regard to the authorisation process.

Promote best practice

- Promote best practice regarding SIEF formation and management as well as data and cost sharing through joint recommendations, paying particular attention to the standing of SMEs in SIEFs;
- Promote best practice regarding communication in supply chains concerning registered or non-registered substances, on the basis of the deliverables of the CSR/ES Roadmap and work of the ENES;
- Promote best practice through joint recommendations on other topics of relevance to registrants and downstream users, in particular to SMEs, which are not covered by ECHA Guidance or other particular means of support;
- Promote best practice to ensure that registration dossiers meet all necessary information needs for subsequent REACH implementation phases, such as evaluation, authorisation, and restriction;
- Promote best practice in raising EU-wide awareness on obligations under the EU chemicals safety legislation.

Address issues of concern

- Identify issues of concern for manufacturers, importers and downstream users in regard of the 2018 registration deadline, and in relation to the agreement of entries in the C&L Inventory under the CLP Regulation, formulate recommendations on how to approach them, and monitor the progress made by all relevant actors in addressing them, with particular attention to issues concerning SMEs;
- Follow-up issues of concern in relation to the classification and labelling of mixtures and the use of the C&L Platform for agreeing on the classification of substances notified to the C&L Inventory, paying particular attention to issues concerning SMEs;
- If appropriate, formulate proposals for addressing the identified issues of concern which then may be taken to the bodies concerned;
- Validate specific concerns raised with regard to the authorisation process, in particular related to SMEs, and bring them to the attention of the bodies involved in the authorisation process, i.e. ECHA and the European Commission.

Communicate

- Issue, when necessary, a draft communiqué for use in external communication

3. Participation:

A maximum of three representatives – of which at least one at Director level – from Directorate Generals Environment, and Enterprise and Industry of the Commission, from ECHA and from Cefic will participate in the Directors' Contact Group, as well as a maximum of two representatives from each of the following Industry organisations: Eurométaux, REACH Alliance, CONCAWE, FECC and UEAPME; and representatives of Orgalime (representing also the interests of ASD, ACEA and

Eurocommerce) and DUCC to represent the interests of Downstream Users, along with a representative of CheMI Platform. DCG members will endeavour to be represented by correspondents who are in regular contact with SMEs and their representatives.

By decision of the Chair, and after consulting existing DCG members, the membership of the DCG can be expanded to include additional representative SME organisations.

4. Preparation of meetings:

The Executive Director of ECHA will chair and draw on the ECHA Secretariat for handling the meetings.

The meetings will be held in the format of video conferences between Helsinki and Brussels. DG Environment and/or DG Enterprise and Industry will take charge of logistical arrangements for these conferences at the Brussels end.

Up to three Sherpas from ECHA and one from each other member will undertake the tasks mentioned above, support the chairmanship in preparing the meetings of the DCG, and monitor the work carried out. Sherpas may be assisted by members of the staff of their organisations, as needed.

The Sherpas will screen issues, particularly those flagged by SMEs, claimed to be of concern for their relevance for the work of the DCG. The Sherpas may describe issues identified as meriting the Group to take a common position in the form of discussion papers. All DCG papers are for internal use within the member organisations only and not meant for publication unless otherwise agreed by the DCG.

The Sherpa meetings will be held in the format of telephone conferences and be chaired by one of the ECHA Sherpas.

5. Term:

The term of the DCG's third mandate will last from 1 January 2014 until 31 December 2018.