

Workshop Proceedings

Accredited Stakeholder Workshop
Brussels, 23 November 2011

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Workshop Proceedings - Accredited Stakeholder Workshop

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1 Summary

The first Accredited Stakeholder workshop focused on strategic discussions on ECHA's work and Stakeholder engagement activities. The aim was to discuss and identify future priorities and development needs.

The participating Accredited Stakeholder Organisations (ASOs) expressed their satisfaction on improvements in ECHA's services and their interaction with ECHA, but also indicated areas where further improvements could be made.

As for short term work priorities, the key topics were related to guidance documents; further development of the IT-tools; support for SMEs and downstream users and training on REACH and CLP. Reducing testing on animals, improving the quality of registration dossiers and providing information about chemical safety to the general public and workers in the waste sector were mentioned as medium to long term priorities. Additionally, Stakeholder observers' roles and participation in the Committee and Forum meetings was discussed and a number of recommendations made to help maximise the value and effectiveness of their input.

The findings of the workshop will feed into ECHA's Multi-Annual Work Programme 2013-2015 and into ECHA's strategy for engaging with its Accredited Stakeholder Organisations. ECHA will study and internally discuss the suggestions made, communicating to the ASOs once an outcome has been reached.

The next Accredited Stakeholder workshop is planned for late 2012.

2 Participants

The workshop was attended by 28 Accredited Stakeholder Organisations, representing the following sectors: industry (22), NGOs (4), academia (1) and social partners (1).

Three Directors from ECHA were present at the workshop: Geert Dancet, Executive Director, Andreas Herdina, Director of Cooperation and Jukka Malm, Director of Regulatory Affairs. Additionally, Lindsay Jackson and Wim de Coen contributed as moderators of the two breakout groups, and the Communications Unit staff were also present for making the practical arrangements and note-taking.

3 Concept

The aim of the workshop was to provide a forum for strategic discussions on future work priorities and to get feedback on the ASOs' involvement in ECHA's work.

The workshop started with an update of ECHA's activities, including reflections on questions provided by the participants in advance. The biggest part of the workshop was dedicated to discussions in two breakout groups. The two topics of the day were Input to ECHA's work and ECHA's stakeholder engagement activities. The groups swapped topics for the afternoon session, so that all participants had the possibility to discuss both topics.

The breakout group sessions consisted of interactive exercises and discussions in small groups. In the closing session, the recommendations were reported by ASO participants who had volunteered to act as rapporteurs.

This was the first strategic workshop ECHA has organised for its Accredited Stakeholder Organisations. The intention is to arrange it as a recurrent event, and the next workshop is planned for late 2012.

4 Outcome of the discussions

Input to ECHA's work

Stakeholders appreciated ECHA's pragmatic approach in addressing upcoming issues and wished for this to continue in the future. Another common theme was the provision of support for Downstream Users in addressing open issues such as the harmonisation of Exposure Scenarios, extended Safety Data Sheets, scaling and how to manage mixtures.

Substances of Very High Concern and the involvement of companies in the Authorisation process, as well as clear communication about these areas, were also important to many participants. Industry felt that it would be good to find a way to enable companies considering applying for an Authorisation to find one another. Such a facility would be important, especially for SMEs. Stakeholders also wanted to see the number of SVHCs on the Candidate List increase and the substitution of these substances to start in the coming years so that the objectives of the legislation can be reached.

High quality registration dossiers and support for industry were listed as important priorities. ECHA should ensure that the IT tools are stable and the guidance documents are clear and easy to understand. Guidance documents were considered valuable, and the participants considered it important to complement the detailed documents with the simple and translated versions. It was noted that guidance should always be prepared in consultation with the stakeholders. In general, the participants noted that consulting the stakeholders should be an open process for all sectors. It should not be done selectively, for example only with industry or only with one or two ASO representatives. They also noted that ECHA should not assume that umbrella organisations represent a whole sector.

ECHA should also publish practical examples e.g. on how to check if an SVHC in an article is covered by a registration dossier or CSRs for UVBC and multi-constituent. Harmonised Exposure Scenario templates would also be welcome. In addition, industry wanted to know more about the dossier evaluation process so that they could better understand if an approach chosen by an industry sector or particular consultants is sound and can also be used in the future. All participants agreed that the evaluation process should add value to the other processes and thus active communication about it is important.

Focused support for SMEs preparing for the 2018 deadline was mentioned as one of the long-term priorities while the facilitation of communication in the supply chain was seen as an immediate need.

Enforcement and Forum activities were also actively commented upon. Stakeholders welcomed the annual Stakeholder Forum sessions but felt that the dialogue between the Forum and stakeholders could be enhanced. They were also very interested in ECHA publishing more information about enforcement activities across Europe.

In respect to CLP, the focus was in raising awareness about the legislation (e.g. pictograms) and increasing the number of harmonised classifications in addition to the public launch of the C&L inventory. The longer term priority in CLP was the cleaning of the inventory so that it serves companies and consumers as a source of information on the C&L of substances on the EU market.

The only point raised in relation to the Biocide Regulation was that ECHA should ensure effective integration of this new task into its operations.

The discussions on science saw endocrine disrupters, the use of conservative approaches for tools like Chesar and the latest science used in the regulatory process as the short-term priorities. Increased use of risk assessment as the bases for all decisions and better clarity between hazard vs. risk based approaches were the priorities for the medium and long-term. The need to reduce testing on animals and develop alternative methods was shared by all participants.

Additionally, Stakeholder observers' roles and participation in the Committee meetings was discussed and a number of recommendations made to help maximise the value and effectiveness of their input. Overall, the possibility to contribute to the meetings was considered valuable and the importance of transparency, including access to documents was emphasised in the discussions. The participants also suggested improvements in the practical arrangements, for example through timely agendas and offering the possibility to participate remotely to the meetings.

Medium to long-term priorities included improving the safe working environment and consumer products, providing information on chemical safety to the general public and to workers in the waste sector and harmonising exposure scenario templates for the 2018 registration. The participants also stated that ECHA should continue playing a role in setting best practise for safe use of chemicals at a global level and continue its international activities.

Stakeholder engagement activities

The participants expressed their satisfaction with many of ECHA's past and ongoing activities and appreciated the efforts made in terms of transparency and the involvement of stakeholders. Some new initiatives were suggested, but the discussions concentrated mainly on the continued improvement needs of present services.

In respect to engaging the ASOs, the participants suggested some improvements to the communications between ECHA and the ASOs. For example, ASOs would appreciate getting advance notice of key developments in order to be prepared for further distributing the information. In order to develop the process for updating contact information, an electronic form for updating contact information and areas of interest was suggested.

A network of communications/press officials was considered a potential future initiative for developing joint communications activities. Concrete joint communications activities were discussed only very briefly since the participants wished to first discuss the issues internally in their organisations. Initial ideas of joint activities included producing communications material for a targeted audience or on a specific topic, for example for consumers or on CLP.

Open dialogue and face-to-face events with the stakeholders were considered highly important, and the Stakeholders' Day and the Accredited Stakeholder Workshop were mentioned as good concepts. Additionally, the participants appreciated the possibility to get speakers from ECHA to their events.

As future activities, the participants suggested awareness-raising targeted towards the SMEs. This could include simple and translated information material or training to the SMEs directly or via consultants who would be preparing the dossiers on the SMEs' behalf.

The participants also discussed the possibility to make REACH and CLP better known in the Member States, and to arrange Stakeholders' Days in local languages in the Member States. They also suggested increasing communications targeted to the general public. One of the concrete ideas was to join forces to spread the word about the importance and impact of REACH. The participants suggested collecting messages about the positive effects of REACH from different perspectives and to use them to promote the positive image of the legislation and chemicals in general. The possibility to work more actively through media was discussed and the participants also highlighted the need for REACH and CLP related training in academia, for example through an online learning module.

It was noted that ECHA's communication vehicles are essential for keeping up-to-date with the developments, and the participants especially appreciated ECHA's weekly eNews. However, the possibility of using parts of the content according to their own needs would be beneficial. In respect to other publications, some of the participants expressed an interest in being involved in producing the content of the material in addition to distributing it further. ECHA's website was considered an important source of information and the participants were looking forward to the revamped website, to be launched on 15 December 2011.

A full list of the topics raised on both topics is available in Annex 4.

5 Feedback from the participants

As a follow-up action of the workshop, ECHA asked participating organisations to provide feedback and to give the chance for participants to share any concerns or suggestions for future workshops. A total of 17 participating organisations answered the feedback questionnaire.

The first part of the feedback focused on the practical organisation of the workshop (including the breakout sessions) and the quality of the service provided by ECHA and the Commission (see Figure 1). Based on the feedback received, the majority of participants ranked all areas as either "Excellent" or "Good".

Concerning the reoccurrence of the workshop, the majority of participants (over 64%) felt it should be organised once a year with nearly 30% suggesting twice a year. When asked whether participants would be ready to travel to Helsinki for the workshop, nearly 83% said yes. The remaining 17% explained that time and resource constraints were the main reasons for them not to attend a workshop in Helsinki.

When asked for topics for the next workshop, the suggestions included transparency in committee meetings, simplicity of guidance and tools for SMEs, the functioning of the Forum and working with ECHA/stakeholder engagement activities. A complete list of suggested topics is available in the attachment.

Suggestions for the future concept of the workshop included having ECHA staff take over the role of rapporteurs to ensure a balanced reporting of what was discussed during breakout sessions. Participants also felt that important topics and information about the breakout sessions should be asked for by ECHA in advance to give stakeholders more time to prepare and to allow them to better internally coordinate their organisation's input.

Annex 1. Agenda

A strategic look at cooperation with ECHA

Workshop for ECHA's Accredited Stakeholder Organisations

Time: 23 November 2011

Venue: European Commission, DG Enterprise, Breydel building
Avenue d'Auderghem 45, Brussels

09:15 Registration and coffee

09:30 **Opening**, Geert Dancet, Executive Director, ECHA

09:50 **Update on ECHA's activities**

Operation of REACH & CLP and the way forward
Jukka Malm, Director for Regulatory Affairs, ECHA

ECHA's approach to engagement with its Accredited Stakeholder Organisations
Andreas Herdina, Director for Cooperation, ECHA

11:00 Coffee

11:15 **Breakout session 1**

Group 1: Input to ECHA's work

Moderator: Wim de Coen

- Priorities in relation to ECHA's work
- Stakeholders' involvement in ECHA's bodies and networks

Group 2: Stakeholder engagement activities

Moderator: Lindsay Jackson

- Discussion on ECHA's approach to engagement with its Accredited Stakeholder Organisations
- Discussion on joint communications initiatives

12:45 Lunch

13:45 **Breakout session 2**

Group 1: Stakeholder engagement activities

Moderator: Lindsay Jackson

Group 2: Input to ECHA's work

Moderator: Wim de Coen

15:15 Coffee

15:45 **Recommendations** from the breakout groups and next steps
Stakeholder rapporteurs

16:30 Closing remarks and next steps, Geert Dancet

Annex 2. List of participants

Name	Organisation		Group
Annys, Erwin	Cefic	European Chemical Industry Council	1
Bartley, Ross	EFR	European Ferrous Recovery and Recycling Federation	2
Bisazza, Oliver	EDANA	European Trade Association for the Nonwovens and Related Industries	2
Carmichael, Neil	ECETOC	European Centre for Ecotoxicology and Toxicity of Chemicals	1
Claes, Inneke	CEMBUREAU	The European Cement Association	2
Claes, Walter	EuPC	European Plastics Converters	2
Coroama, Manuela	COLIPA	European Cosmetic, Toiletry and Perfumery Association	1
D'haese, Alain	FEA	European Aerosol Federation	2
Dmytrasz, Bohdan	CONCAWE	The oil companies' European organisation for environment, health and safety in refining and distribution	2
Doome, Roger	IMA -Europe	European Industrial Minerals Foundation	2
Drielsma, Johannes	Euromines	European Association of Mining Industries	1
Elmassi, Adil	EURATEX	European Apparel and Textile Organisation	1
Favaro, Nicola	CPIV	Standing Committee of the European Glass Industries	1
Fischer, Thomas	UEAPME	The European Association of Craft, Small and Medium-sized Enterprises	1
George, Steve	ASD	Aerospace and Defence Industries Association of Europe	1
Johnson, Eric	Eurometrec	European Metal Trade and Recycling Federation	2
Koppe, Janna	WECF	Women in Europe for a Common Future	1
Leenaers, Joeri	Eurometaux	European Association of the Metals Industry	1
Lemoine, Sylvie	A.I.S.E.	International Association for Soaps, Detergents and Maintenance Products	2
Maurer, Sylvia	BEUC	The European Consumers' Organisation	1
Musu, Tony	ETUC	European Trade Union Confederation	2
Rasselet, Anne Claire	Orgalime	European Industrial Minerals Foundation	1
Schaible, Christian	EEB	European Environmental Bureau	2
Smith, Michael	CLEPA	The European Association of Automotive Suppliers	2
Taylor, Katy	ECEAE	European Coalition to End Animal Experiments	2
Warnon, Jacques	CEPE	European Council of Producers and Importers of Paints, Printing Inks and Artists' Colours	1
Vinas, Mercedes	Cefic	European Chemical Industry Council	2
Zullo, Lorenzo	ETRMA	European Tyre and Rubber Manufacturers' Association	1

Annex 3. Pictures from the workshop



Annex 4. Breakout group suggestions

Input to ECHA's work

REACH	Short-term	Medium-term	Long-term
<i>General</i>	<ul style="list-style-type: none"> ECHA to maintain its pragmatic approach in addressing upcoming issues Support "regulatory science" training Safer consumer products Safety of unborn babies Decrease bureaucracy in ECHA's processes; improve standard letters, give contact persons in draft decisions and introduce a switchboard 	<ul style="list-style-type: none"> Continue the transparent way of operating Support REACH training in academia Ensure retention of experienced ECHA staff Safer consumer products Safety of unborn babies Providing information on chemical safety to workers in the waste sector 	<ul style="list-style-type: none"> Provide more information to the public Play a role in the global, safe management of chemicals Simplify the chemicals regulation Do not change the legislation ECHA to be relocated to Brussels Harmonisation of chemicals legislation globally (SAICM) Safety of unborn babies Safer consumer products Ensure sufficient communication
<i>Authorisation</i>	<ul style="list-style-type: none"> Ensure early participation of stakeholders in the authorisation process Add more substances to the Candidate List Promote the duty to communicate about SVHCs Improve the information flow on the decision making on SVHCs Consider EU "substance strategies" or safety data in the priority setting 	<ul style="list-style-type: none"> Early contact with companies in the authorisation process Facilitate the consortium formation for authorisation applications Simplify the authorisation process Substitution of SVHCs Improve understanding about the authorisation process 	-
<i>Evaluation</i>	<ul style="list-style-type: none"> Speed up the processing of evaluating testing proposals Provide information on substances in 	<ul style="list-style-type: none"> Evaluation of substances to ensure good quality dossiers 	-

	compliance check so that companies can better understand if the approaches taken in a sector or used by contractors are acceptable		
Enforcement	<ul style="list-style-type: none"> • Harmonised enforcement • Enforcement of pre-emptive testing • List of enforcement questions (REF-2) should be made available in line with the freedom of information act 	<ul style="list-style-type: none"> • Ensure more visibility and transparency on how enforcement takes place 	-

REACH	Short-term	Medium-term	Long-term
Downstream users and supply chain communication	<ul style="list-style-type: none"> • Support DUs by address open issues such as extended Safety Data Sheets, scaling and mixtures • Ensure harmonisation of Exposure Scenario formats • Improve the communication in supply chain 	-	-
Guidance and tools	<ul style="list-style-type: none"> • Ensure clarity and stable IT tools and guidance • Update Substance in Articles guidance so that it provides examples on how to check if a substance is covered by an already made registration so as to avoid notification • Avoid publishing guidance that will make it even more difficult to understand the requirements than the regulation itself - pragmatism • Publish examples of good CSR for different type of substances (UVBC, multi 	<ul style="list-style-type: none"> • Improve IT tools for SMEs • Improved access to information on SVHCs for consumers • Improved access to information on registered substances • Chesar also to include mixtures 	-

	constituent etc.) <ul style="list-style-type: none"> • Publish a web page that will help SMEs to find SDS tools • Give a contact person for all new items published (e.g. SVHC list) 		
Registration and dissemination	<ul style="list-style-type: none"> • Provide information on substances intended to be registered by 2013, Lead Registrants for those substances and who to contact to provide information or ask questions • Allow companies more possibilities to contact ECHA in relation to their dossiers • Registrants should include the function/s of a substance in their registration dossier (e.g. a softener in plastics) • Introduce search functionality to the ECHA-CHEM database on registered substances • ECHA should facilitate communication in the supply chain • ECHA should promote best practice for quality of data and high quality registration dossiers • ECHA should reduce bureaucracy • ECHA should ensure a timely response to enquiries 	-	<ul style="list-style-type: none"> • Ensure improved support to SMEs for the 2018 registration

REACH	Short-term	Medium-term	Long-term
Science	<ul style="list-style-type: none"> • Endocrine disruptors • Use latest science • Identify areas of scientific controversy • Introduce procedures for nano-materials under REACH • Ensure consensus on interpretation of requirements and scientific data • Consider how conservative approaches in tools like Chesar will impact data rich substances • Increased transparency of the authorisation process • More non-animal testing methods 	<ul style="list-style-type: none"> ▪ Risk assessment - ensure that new information is integrated into the dossiers ▪ Shift to more risk based approach ▪ Lead development of alternative approaches for animal testing ▪ Ensure that risk assessments are of sufficient quality ▪ Use risk assessments efficiently ▪ Address endocrine disruptors 	<ul style="list-style-type: none"> • Ensure that data generation is not relying only on animal testing • Introduce new techniques to the regulatory approaches on testing
Committees	<ul style="list-style-type: none"> • Ensure that input from stakeholder experts is part of the process by having right experts in meetings • Involve stakeholder experts in working groups 	-	-
CLP	<ul style="list-style-type: none"> • Training on the new pictograms • Publish C&L inventory • ECHA to facilitate/enable dialogue between notifiers 	<ul style="list-style-type: none"> • Clean C&L inventory - harmonisation of C&L • Tools for cleaning up the inventory 	-
Biocides	-	<ul style="list-style-type: none"> • Ensure effective integration of biocide activities in ECHA 	-

Stakeholder engagement activities

	Start	Continue	Stop
ASO engagement	<p>Communication to ASOs</p> <ul style="list-style-type: none"> Tailored information; more refined list of ASO interests Explain the reasons for decisions so that ASOs do not feel that their input is not taken into account. Use examples to illustrate More open dialogue on scientific issues (e.g. weight of evidence) Communications network of ASO colleagues to help advance knowledge and develop joint messaging Involve stakeholders in formulating messages, not only in distributing material Give ASOs advance notice of key issues, e.g. C+L inventory <p>More interaction between ASOs and enforcers/inspectors</p> <ul style="list-style-type: none"> Top 10 tips for inspectors/companies Enforcers should have a communications channel to reach small companies <p>Ideas for joint initiatives</p> <ul style="list-style-type: none"> Communications products for targeted audience or a specific focus (e.g. for consumers, on CLP or on Competitiveness and innovation) <p>Define indicators for ECHA's values</p> <p>SH webpage</p> <ul style="list-style-type: none"> Include links to ASO websites Tailored information for stakeholders 	<p>Communication with ASOs</p> <ul style="list-style-type: none"> Flexibility and phone contacts Updating of contact information; including expressions of areas of interest; more flexible practise for updating contact information (e.g. as with Commission's transparency register) Improve ASOs' access to ECHA Helpdesk Open dialogue with ASOs (e.g. on registration, evaluation) <p>User tests</p> <ul style="list-style-type: none"> Testing of IT tools 	<p>Selective consultations</p> <ul style="list-style-type: none"> e.g. consulting only industry <p>Relying on umbrella organisations</p> <ul style="list-style-type: none"> It is not correct to assume that European Industry organisations represent all sectors Recognise diversity e.g. amongst industry sectors. e.g. Eurometaux does not represent all metals industry and DUCC does not represent all downstream users

Awareness-raising	<p>Raising awareness of REACH and CLP in the Member States</p> <ul style="list-style-type: none"> • Arrange Stakeholders' Days in the Member States <p>Promotion of REACH to the general public</p> <ul style="list-style-type: none"> • Gather positive messages on the impact of REACH • Promote the positive image of chemicals • Work through the general press to change views on chemicals • Develop an online learning module on REACH for general public/companies/universities <p>Press activities</p> <ul style="list-style-type: none"> • More active presence in media; ECHA view communicated • ECHA spokespersons to speak out on chemical issues 	<p>Communications vehicles</p> <ul style="list-style-type: none"> • e-News: Include a possibility to forward only part of the articles • Website: Links to ASO websites • Events: Involvement of ECHA staff in ASO events • Training • Interactive Stakeholders' Days; include practical tips, on what to avoid; provide funding for SMEs and NGOs to attend • ASO workshops • Surveys; but rationalised and maybe call meetings to discuss instead 	
SMEs	<p>Support for SMEs</p> <ul style="list-style-type: none"> • Training (e.g. for consultants) • Targeted communications e.g. through website and simple leaflets • Use Chambers of Commerce, employers' associations at national level, Enterprise Europe Network and HelpNet as intermediaries • Webinars repeated by helpdesks in local languages • Free places for Lead Registrant SMEs in workshops • Simplified processes and IT tools for SMEs 		

ECHA's bodies and networks		Committees <ul style="list-style-type: none"> • Improve remote access; experts to participate via videoconference; webstreaming (e.g. via Commission video conference room) • Improve efficiency of meetings (timed agendas for observers, better organisation of meetings to reduce unnecessary waiting) • Clarity on confidentiality rules; ASOs need to be able to represent and consult • Increase transparency <ul style="list-style-type: none"> ○ Could all ASOs have access to documents? ○ Full access to documents, e.g. even draft decisions in MSC ○ Could observers be allowed to pass on the documents? ○ Scientific experts need to see the documents in advance to prepare for the meetings • Publish main conclusions of the meetings faster (instead of waiting for full minutes) Forum <ul style="list-style-type: none"> • Continue to increase transparency 	Changing agendas at last minute <ul style="list-style-type: none"> • Send documents in time (2 weeks in advance)
Guidance	Increase transparency <ul style="list-style-type: none"> • Use pools of experts • Revisit the selection of PEG observers • Increase clarity on how Guidance in a Nutshell documents are produced, by whom and how selected 	Improve guidance <ul style="list-style-type: none"> • Continue with translations • Make guidance material as simple to understand as possible • Produce in-depth versions in addition to simple versions • Include stakeholders in validation of guidance 	Doing guidance without consultation

Annex 5 – Feedback figures

FIGURE 1: Please rate the organisation and the quality of the service provided

Number of respondents: 17

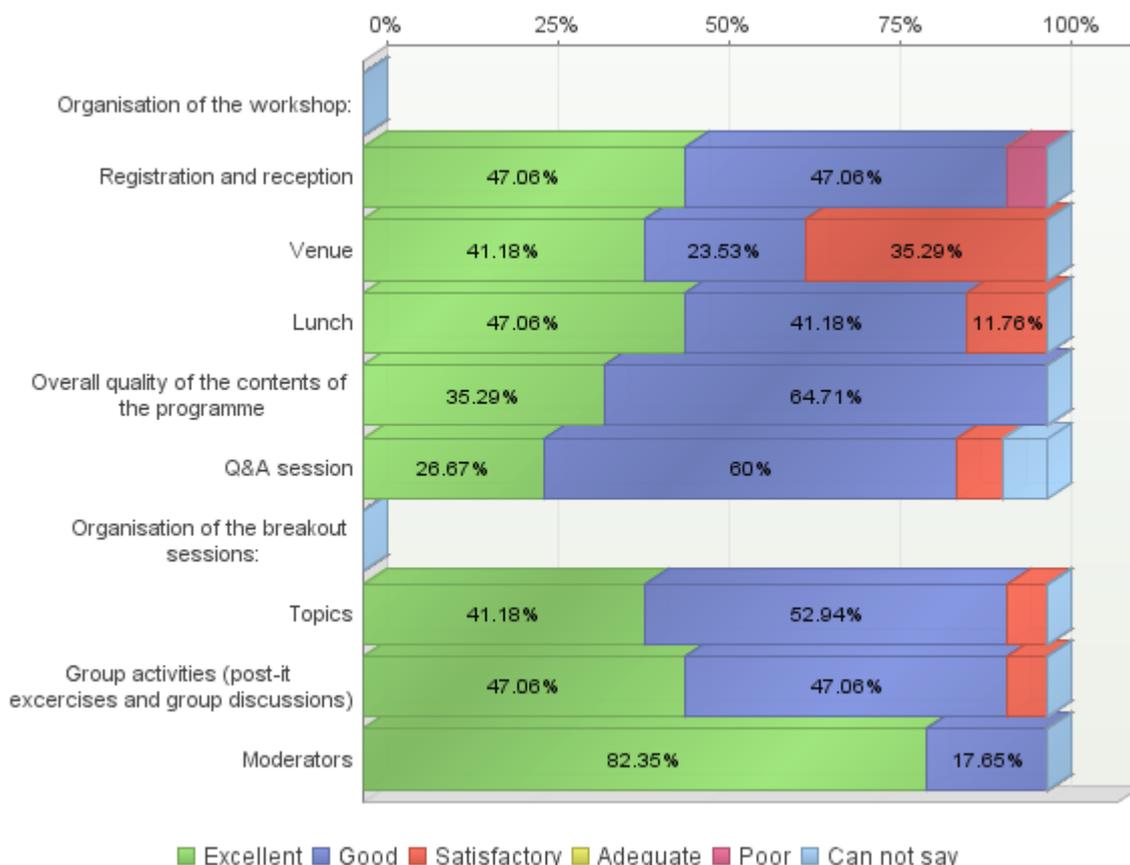


FIGURE 2: Please give an overall rating for the two breakout groups.

Number of respondents: 17

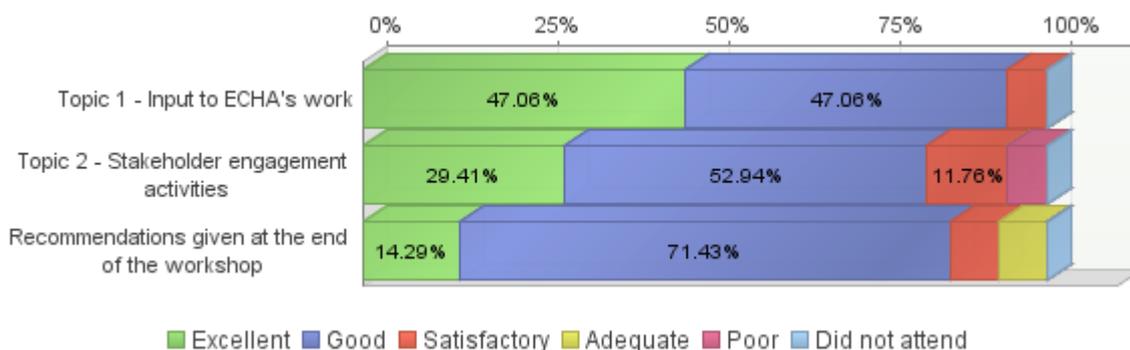


FIGURE 3: What was your perception of ECHA after the workshop?

Number of respondents: 17

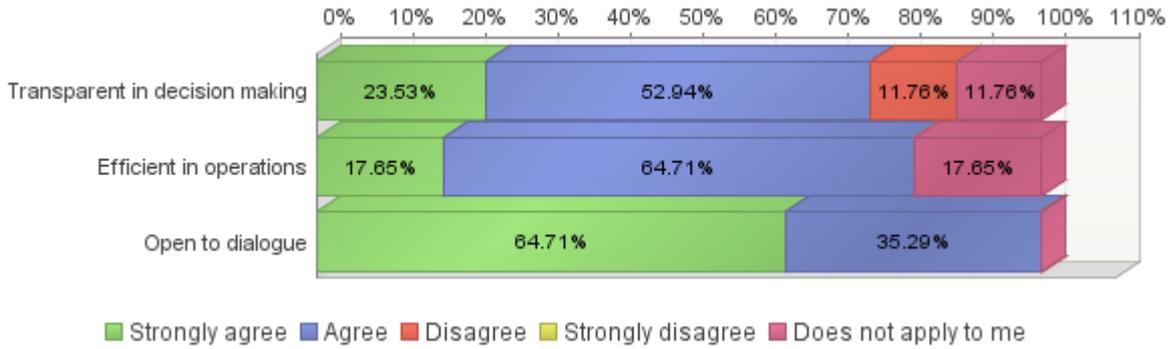


FIGURE 4: In your opinion, how often should a workshop for Accredited Stakeholder Organisations be organised?

Number of respondents: 17

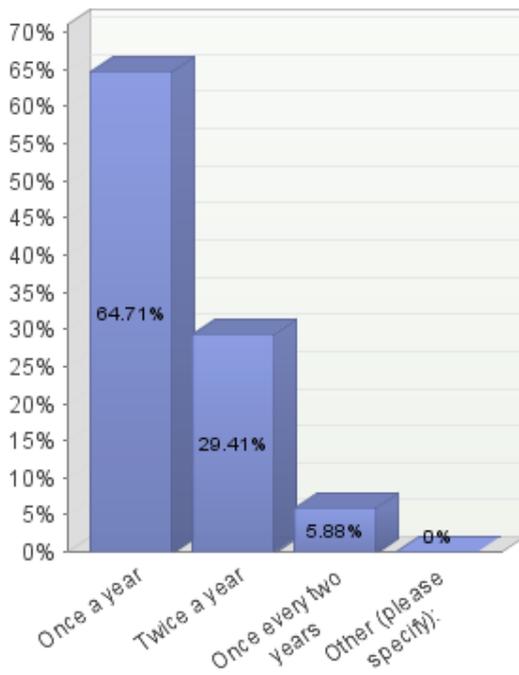


FIGURE 5: Would your organisation be willing to participate in the Accredited Stakeholder Workshop if it was organised in Helsinki?

Number of respondents: 17

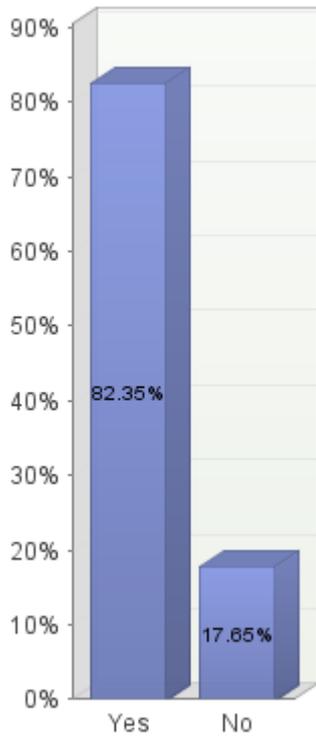
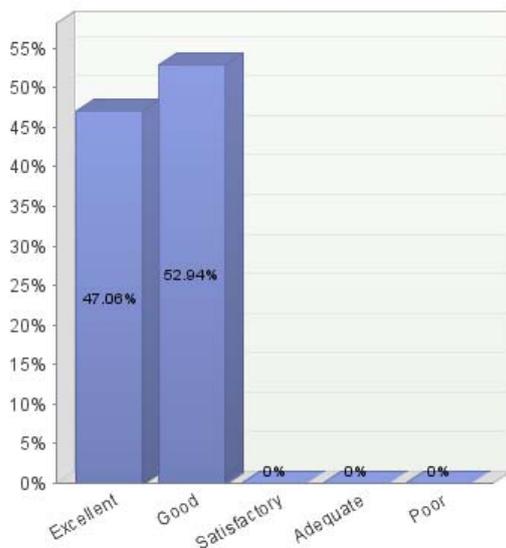


FIGURE 6

Please give your overall rating for the Accredited Stakeholder Workshop

Number of respondents: 17



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