

Management of the relations with ECHA's stakeholders

1. Purpose

This procedure describes the overall responsibilities and mechanisms for understanding and addressing the needs of ECHA's stakeholders, and to thereby increase transparency and improve the value of the Agency's services.

2. Scope

This procedure applies to the activities linked with the relations between ECHA and its main stakeholder groups, including the stakeholders of the environment management system.

3. Description

ECHA interacts with a broad range of internal and external stakeholders. Its regulatory functions concern actors across the industrial supply chains, in Europe and beyond. The scientific and technical outputs are produced with the support of networks composed of experts and representatives from EU institutions, Member States, third countries, non-governmental organisations representing industry, workers, environment, public health or animal welfare interests and academia. The regulatory work is facilitated by the staff of the ECHA secretariat.

This policy outlines the main stakeholder groups identified by the Agency, the internal responsibilities and the tools used for stakeholder engagement and management.

3.1. Stakeholders

3.1.1 Stakeholder groups

ECHA has identified and grouped its stakeholders as follows:

1. **Industrial duty holders:** Companies and other legal entities, including consultancies, interact with the Agency as duty holders. Their regulatory obligations are either described in the EU legislations assigning tasks to ECHA or result from implementation work carried out by ECHA under specific cooperation agreements with the European Commission.
2. **Institutional partners:** These stakeholders have a role in ECHA's governance and regulatory operations as defined by the EU legislation, or through specific agreements with ECHA. They are EU institutions (such as the European Parliament, the European Commission or the Council of the European Union), the European Ombudsman, the Data

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Protection Supervisor, other EU agencies, national authorities of EU Member States, EEA/ EFTA and third countries (in particular OECD Member States and EU accession countries) and multilateral organisations (for instance, the OECD and UNEP) as well as parties to and bodies serving international conventions, such as the UN Rotterdam, Basel or Stockholm Conventions. The State of Finland and the City of Helsinki are local stakeholders.

- ECHA Bodies, Networks and Expert Groups:** These stakeholders, individuals and/ or their organisations, form part of ECHA's statutory ECHA bodies (Management Board, Committee for Risk Assessment, Committee for Socio-economic Analysis, Member State Committee, Biocidal Products Committee, Forum for Exchange of Information on Enforcement and Board of Appeal) or informal networks and expert groups established by ECHA or the European Commission.
- Third parties:** The EU regulations managed by ECHA specifically provide for the right of third parties to bring to the attention of ECHA information on chemicals and other scientific information. These stakeholders therefore have an interest in ECHA's work but not necessarily regulatory obligations. They can be citizens, the local community, individual companies, non-governmental organisations representing consumer, public health, environment, workers or industry, academia, or research institutes.
- Staff:** This stakeholder group includes all ECHA employees, including the Staff Committee, seconded national experts and trainees.
- Service providers:** This stakeholder group includes contractors working in ECHA premises, the Landlord, service providers and suppliers.

3.1.2 Accredited Stakeholder Organisations

ECHA operates an accreditation scheme for stakeholder organisations. Close cooperation with accredited stakeholders (ASOs) contributes to an efficient information flow both from the field to ECHA and vice versa. ASOs support ECHA's work through various bodies and networks. The eligibility criteria for the accreditation scheme are adopted by the Management Board in agreement with the European Commission.¹

ASOs are European level umbrella organisations representing a variety of interests. Candidate organisations, fulfilling the eligibility criteria set by the Management Board (MB/34/2011), are accredited as outlined in WIN-0074. ASO representatives may be invited to attend meetings of the scientific Committees, provided that they are registered in the European Commission's Transparency Register.

The Communications Unit manages the applications, maintains the ASO register, and organises events and communicates to stakeholders, by providing increasingly targeted information for the different stakeholder groups.

3.2. Roles and responsibilities in ECHA's stakeholder relations

The **Executive Director** ensures the management of the relations with stakeholders and approves the relevant high-level documentation

¹ REACH Regulation (EC) 1907/2006, Art. 108

Process Owners and staff members are in charge of engaging the stakeholders that are involved in the processes under their responsibility (PRO-0008). The relations are managed in line with ECHA's organisational values (transparent, independent, trustworthy, efficient and committed to well-being). In relations with the public all staff members respect ECHA's Code of Good Administrative Behaviour, the Public service principles for the EU civil service established by the European Ombudsman as well as other relevant internal rules, policies and strategies.

The **Communications Unit** supports the process owners at defining and implementing the communication aspects of the stakeholder procedure, in particular through a common Communications strategy as described in PRO-0055.

The **Governance, Strategy and Relations Unit** supports the Executive Director and the senior management team with the engagement of institutional partners and the Management Board, where important stakeholder groups are formally represented vis-à-vis the Agency (Member States, EEA/ EFTA countries, European Commission, European Parliament, industry, trade unions and environment and public health NGOs).

The **Human Resources Unit** supports the Executive Director in managing staff relations.

3.3. Stakeholder engagement aspects

3.3.1. Planning

Identify stakeholders and define stakeholder needs

Stakeholders are identified and grouped according to their nature and the type of their involvement in the activities of the Agency, including those that are relevant for the environmental management system, as outlined in ECHA's process and activity structure.

Stakeholder requirements, needs and expectations are taken into account by process owners in the design, development and improvement of the Agency's work programme deliverables (PRO-0008).

Compliance obligations

The Agency's compliance obligations related to stakeholders are laid down in the applicable legislation. This includes the EU legislations which assign regulatory tasks to ECHA as well as the set of governance rules applicable to EU agencies in general, such as the EU Financial Regulation, the EU Staff Regulations and Conditions for the Employment of other servants, as well as the EU environmental legislation.

Examples of formal compliance obligations resulting from EU legislation are consultations of third parties, the duties of Executive Director to establish and maintain a regular dialogue with the European Parliament and of the Management Board to establish contacts between the Agency and relevant stakeholder organisations or the duties of staff as public servants under the Staff Regulations. The Management Board, the senior management team and the process owners determine based on identified needs and expectations of stakeholders' additional requirement that may become part of the Agency's compliance obligations (e.g. ECHA's multi-lingual practice or the ECHA transparency approach).

Plan actions according to ECHA Programming Document and unit-level plans

The needs and expectations of internal and external ECHA's stakeholders are considered in the planning and reporting cycle as established in PRO-0013.

Define stakeholder strategies where necessary

Stakeholder strategies (including action plans) can be defined by ECHA management and process owners to steer the work with specific stakeholder groups.

3.3.2. Implementing

Carry-out activities according to work programmes and involve stakeholders

Stakeholders are regularly involved in ECHA's activities, ranging from participation in events to formal consultations. They are either involved individually or via existing networks such as the HelpNet, ECHA's Committees or the ECHA NGO platform. Stakeholders are also engaged in bilateral meetings with senior management and targeted communications, including social media or topical sections on the Agency's website.

Stakeholders are regularly consulted on different aspects of ECHA's activities and timely alerted to relevant regulatory initiatives through e.g. PACT, CoRAP and/ or identification of SVHC.

ECHA process owners use common tools to coordinate their work with stakeholders, for instance the events and logistics management (ELM) tool, which is a one-stop shop for event and logistics management and also serves as a central database for ECHA's external contacts within all its main stakeholder groups.

ECHA pre-warns the relevant stakeholders in case of crisis prevention and handling, and for business continuity reasons, according to the steps defined in the Crisis Communications plan (PLA-0017). The tools such as ELM can be used for mass emailing to contact accredited stakeholders, or Twitter messages to contact other stakeholder groups.

3.3.3. Collecting and using stakeholder feedback

Review the progress of the fulfilment of work programme objectives based on stakeholder feedback

Process owners collect feedback from relevant stakeholders by gathering and analysing the information from several different sources, such as suggestions and complaints, surveys, general inquiries, web forms, stakeholder workshops, webinars and stakeholder events.

Direct feedback is collected by relevant process owners during the year through the usual interaction. General feedback is collected via the web form available to the general public. Complaints are recorded as outlined in PRO-0015.

Process owners and staff are responsible for taking into account suggestions and complaints from stakeholders. If relevant, feedback can be brought to the attention of senior management, foremost via the Directors' meeting (DM). The outcome from all the relevant sources on ECHA stakeholder relations is reviewed by the Executive Director and senior management in the DM. A standing item "reputational and strategic matters" is included in

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the agenda of each meeting. The DM may also be used by the Executive Director and the senior management team to seek input from other services in advance of stakeholder engagement activities, such as key conferences or high level bilateral meetings with Commission services, Member State or third country representatives or stakeholders, and to report from these activities.

Feedback from stakeholders and relevant insights are reported to the Executive Director also during monthly updates with the Governance, Strategy and Relations Unit, the Human Resources Unit or the Communications Unit.

Moreover, high level feedback from key stakeholders on the Agency's performance and services is provided in the context of the quarterly report on ECHA's activities in the meetings of the Management Board. Furthermore, ECHA's performance is discussed by the European Parliament and the Council on an annual basis, based on input from the Management Board and the European Court of Auditors, during the institutional discharge process (these public reports discuss important aspects for stakeholders, such as transparency, independence, sound financial management, efficiency or staff policy. The Executive Director reports to the European Parliament and the Management Board on the follow-up of the recommendations). Once a year, the Executive Director is invited to an exchange of views with the European Parliament Committee for Environment, Public Health and Food Safety. The Committee is formally responsible for ECHA and appoints one of its members as liaison MEP for ECHA. The annual public exchange with the Committee as well as bilateral meetings with the liaison and other MEPs are sources for stakeholder feedback and insights reviewed by the DM.

ECHA's stakeholder relations are also considered in the context of the annual assessment of Framework where Integrated Management System and Framework (IMSF). This happens with a view to one of the principles of the IMSF to maintain an open and transparent, two-way dialogue with the Agency's regulatory partners and stakeholders. The assessment is provided to the DM, the Management and integrated into ECHA's public annual reports.

Surveys are conducted to provide process owners with feedback on their services from their internal and external customers.

Some ECHA units may carry out satisfaction surveys among their internal customers (other ECHA units) to collect information on their satisfaction with the internal services they provide.

3.3.4. Improvements and corrective/ preventive action

Based on the feedback received, improvements are decided at the relevant level after analysis by Management: they may consist of the need to develop and or update processes, or to carry out new projects and evolutions to provide new services, or to enhance current operations. They are then used for the planning for the next work programmes and unit-level plans.

The aggregated information about the stakeholder satisfaction is an input to the Management Review exercise, described in PRO-0016.

In case the targets in terms of stakeholder satisfaction are not met, nonconformities can be recorded as outlined in PRO-0015.

4. Flowchart

N/A

5. Definitions

Term or abbreviation	Definition
ECHA's stakeholder	All organisations and individuals interested in or affected by the chemicals regulations and ECHA's activities.
Stakeholder/ Interested party	Person or organisation that can affect, be affected by, or perceive itself to be affected by a decision or activity [ISO 9000:2015]
Process Owner	Role in charge of the end-to-end management of an ECHA Process, including the identification, analysis and engagement of the stakeholder(s) that are involved in, or affected by the process.
IMS	Integrated Management System
DM	Directors' Meeting
ASO	Accredited stakeholder organisation
IMSF	Integrated Management System and Framework
PACT	Public Activities Coordination Tool
SVHC	Substances of Very High Concern
CoRAP	Community Rolling Action Plan
OECD	Organisation for Economic Co-operation and Development
UNEP	United Nations Environment Programme
ELM	Events and logistics management

6. Records

Record name	Security level	Comments
Annual discharge reports and ECHA's replies	Public	

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Record name	Security level	Comments
Annual Assessment of ECHA's Integrated Management System Framework	Public	

7. References

Associated document code	Document name
(EC) No 1907/2006	REACH Regulation
(EC) No 1272/2008	CLP Regulation
(EU) No 528/2012	Biocidal Product Regulation
98/8/EC	Biocidal Product Directive
(EU) No 649/2012	PIC Regulation
ISO 9000:2015	Quality management systems – Fundamentals and vocabulary
ISO 9001:2015	Quality management systems – Requirements
ISO 9004:2009	Managing for the sustained success of an organization – A quality management approach
ISO 14001:2015	Environmental management systems – Requirements with guidance for use
MB/32/2013	Code of Good Administrative Behaviour for the Staff of the European Chemicals Agency
MB/34/2011	Revised eligibility criteria for ECHA's Accredited Stakeholder Organisations
MB/05/2008	Proactive engagement with all ECHA's stakeholders
-	ECHA's Communication Strategy 2019-2023

8. Annexes

N/A