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with Stakeholder Organisations
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RIPE & Enforcement of REACH / CLP Experience with REACH-IT Data

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RIPE for Enforcement Authorities

Introductory remarks:

- Intensive involvement of Enforcement Authorities (EAs) during development of RIPE at ECHA
- Resources invested have been valuable for good usability of RIPE in inspectorates
- Resources invested have ensured a very practical and helpful software tool for accessing REACH-IT data

RIPE for Enforcement Authorities

Introductory remarks:

- RIPE is suitable for easy use on a daily base in routine inspection work in REACH and CLP
- In the moment RIPE does not give complete access to all data from REACH-IT and experience on RIPE is limited to the current data availability
- REACH-IT data out of the scope of RIPE is accessed via the Member State Competent Authorities

First Experience with RIPE in Inspectorates

Current use of RIPE in daily routine checks:

- Validity check of (Pre-)Registration Numbers provided in the documents (Safety Data Sheets) used in the supply chain
- Cross check on proper identity of economic operators provided in the data sets of REACH-IT (dossiers)
- Check of matching substance identities (REACH-IT versus substance in the market)

First Experience with RIPE in Inspectorates

Use of RIPE in the in-depth investigations of companies

- Desk studies on data submitted in REACH-IT (replacing on-site actions)
- Preparation of on-site visits in the office
- Cross-check of data available / situation identified on-site versus data provided in REACH-IT
- Post processing and follow-up investigations after on-site visits

Impact of Industry Data Quality on Reliability of RIPE Data

Difficulties in finding / identifying REACH-IT data sets

- Mismatch in name of company provided in REACH-IT versus official name of company
- Multiple languages / language mix in data sets (city names Cologne, Koeln, Köln, substance names)
- RIPE concept of regionalisation of data hampered by inconsistent use of formats for postal ZIP codes

Impact of Industry Data Quality on Reliability of RIPE Data

Difficulties in finding / identifying REACH-IT data sets

- Non-relevant trial submissions (mainly as pre-registration data sets)
- Substance names not in line with recommendations of ECHA: e.g. maleic acid / fumaric acid given as Butenedioic acid without steric information
- Typing mistakes in data (e.g. company names)

Impact of Industry Data Quality on Reliability of RIPE Data

Difficulties when using / investigating REACH-IT data

- Name of company provided in REACH-IT versus official name of company according to national registers (“who can claim the data submission”)
- Dossiers lacking information on production site locations
- Empty data entries in submitted data sets (e.g. IUCLID endpoint study summaries)

Impact of Industry Data Quality on Reliability of RIPE Data

Difficulties when using / investigating REACH-IT data

- Complete pieces of data left empty in REACH-IT
- Submissions having different substance names at the level of the REACH-IT data set, the name of the IUCLID dossier or the substance name in the IUCLID dossier

Impact of Industry Data Quality on Reliability of RIPE Data

Consequences of data quality for the enforcement work

- Uncertainty about the validity of the data in RIPE / REACH-IT
- No full reliance on the data provided in RIPE / REACH-IT
- Increase in inquiries of inspectors at companies with regard to data validity

Impact of Industry Data Quality on Reliability of RIPE Data

Consequences of data quality for the enforcement work

- More burden on inspectors AND on inspected industry for additional clarifications and validation of the data in REACH-IT
- Disputes on compliance / incompliance of data between inspectorates and industry
- Worst case consequence: sanctioning and penalisation

Outlook

- More comprehensive experience on REACH-IT data quality issues will be available in future
- Proposals for relevant improvements in data quality (e.g. as part of recommendations in ECHA guidance)
- Adapted RIPE functionalities capable of handle typical defects and inconsistencies in REACH-IT data
- Adapted use strategies for RIPE