



The problem with SoNC
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SoNCs: two problems



- **ECHA level**
 - **Should be the end, not the start**
- **NEA level**
 - **Is this handled in the same way in different countries?**

ECHA sends out SoNCs



- **To the NEA**
- **Registrants just put in copy**
- **According to the information I get from industry this is/was done without contacting industry in advance**
- **According to the Forum secretariat, SoNCs are not send automatically but various contacts in various forms took place before issueing**
- **The word non-compliance is emotionally loaded, essentially if it is caused outside the responsibility of registrants**



NEA's receiving SoNCs



- **Some consider industry as guilty**
- **Some others see it as to be checked what caused the formal statement of non-compliance and what is the defence of the company in question**
- **Some may have even doubts on the SoNC**

Recommendations



- **Cefic believes that ECHA should contact formally the registrant, if the registrant has been informing ECHA of delays, before formally sending out a SoNC**
- **NEAs are asked to have an open minded interaction with the registrant, without considering guilty without defence**
- **In an ideal world SoNCs will be the end-of-pipe solution clearly being an indicator that something fundamentally is wrong**



Thanks for your attention