

Policy for the publication of study author's names contained in documents submitted to ECHA and in ECHA's scientific outputs, including scientific opinions¹

Principles

1. With respect to documents published on its website, ECHA shall make public the names of authors of <u>published or publicly available</u> studies.

2. Names of authors of <u>unpublished</u> studies are deemed confidential and shall not be made public.

3. ECHA assesses requests for public access to documents containing personal data on a case by-case-basis in accordance with the relevant provisions of Regulation (EC) 1049/2001, read in conjunction with Regulation (EU) 2018/1725.

4. Personal data made public shall only be used to ensure the transparency of ECHA's scientific process and outputs and shall not be further processed in a manner that is incompatible with these purposes.

Roles and responsibilities

1. Dossier submitters remain responsible for the content of the documents submitted by them and for the proper redaction of personal data in line with the legal provisions. For this purpose ECHA shall invite dossier submitters to prepare the non-confidential version of dossiers/reports and any other documents intended to be published on ECHA's website in accordance with the above-mentioned principles.

2. The dossier submitter and ECHA shall, as joint controllers, carry a joint responsibility for the processing of personal data in regulatory processes in line with the General Data Protection Regulation (and for EU institutions and agencies Regulation 2018/1725).

Therefore, the dossier submitters are reminded to follow the above redaction principles before submitting dossiers to ECHA.

¹ As presented to the 42nd Meeting of Competent Authorities for REACH and CLP (CARACAL) on 17-18 November 2021 (*Doc. CA/52/2021, Reminder on personal data protection – redaction of author names of unpublished studies*): <u>https://circabc.europa.eu/ui/group/a0b483a2-4c05-4058-addf-</u>2a4de71b9a98/library/ddab0afe-12b9-4d89-b40c-840ac60d644a/details