ECHA Newsletter

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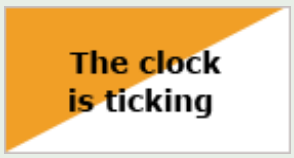

Editorial

No 4 - July/August 2009

Now that the pre-registration of phase-in substances is eight months behind us, producers and importers should be actively preparing for registration. However, industry alerted us in the spring that most SIEFs are not yet formed as companies struggle to get communication going, especially in large-sized pre-SIEFs. We agreed with industry that SIEFs which have members that ought to register by the first deadline should be formed and operational by the end of this summer in order to be able to submit well prepared dossiers next year. To meet this challenge we launched the new awareness campaign 'The clock is ticking - form your SIEF now' at our second Stakeholders Day on 27 May.

I feel it is worth reminding readers of the registration tasks. Pre-registrants must co-ordinate with others members in the pre-SIEF to make sure the chemical identity really is the same and then form a SIEF. They must nominate a Lead Registrant. Under their leadership, safety data have to be shared within the SIEF, so that studies are not repeated. Time is needed to collect the available information and decide how to fill data gaps, taking the opportunity to predict properties because new studies using animals are to be conducted only as a last resort. The Lead Registrant and the members need also to agree on the classification and labelling of the substance and, if possible, on the Chemical Safety Assessment that describes for the various uses how the substance needs to be managed to adequately control any risks for human health and the environment. To get information on the uses, the Lead Registrant or other SIEF members need to be in contact with downstream users with the utmost urgency. Then the Lead Registrant has to prepare and submit the 'joint' dossier with a Chemical Safety Report to ECHA as early as possible next year to allow time for the other members to submit their dossiers before the legal deadline.

As part of the SIEF awareness campaign, there is now a specific SIEF section in our website in all EU languages designed to help explain and promote the roles and duties of Lead Registrants. The next key event is a workshop in Brussels on 11 September 2009 for companies who have already taken on the role of Lead Registrant and informed ECHA (nominated using the webform). This workshop, which is held in cooperation with the European Commission, will allow industry to share their experience to encourage others to proceed in forming SIEFs. At that occasion ECHA will also launch a series of webinars, a special helpdesk-service and an electronic discussion platform - all for signed-up Lead Registrants.

I am confident that by working together, the challenges presented by the deadline for registration next year can be met.

Geert Dancet

View of the Baltic Sea. Photo by Rupert Simon.

From *the Executive Office*

From the ECHA Management Board

At its meeting 25-26 June 2009, the ECHA Management Board elected Mr Antonello Lapalorcia whose term of office was due to come to an end on 27 June 2009 for a second term as Deputy-Chair. The term of office of the Deputy-Chair is two years and is renewable once.

The Board discussed the access to REACH-IT for Member State Competent Authorities (MSCAs) and the Commission services. The Board noted that this access is of high interest for many Member States, in particular for work in ECHA's scientific committees. Some clarifications are still necessary, but the first MSCAs can now ask for connection after signing a security declaration.

The Board also received a presentation on an IT tool which will provide enforcement inspectors with direct access to the relevant data. The tool should be available at the end of 2010. Board Members expressed their overall support, and ECHA will start the development of the tool.

Executive Director reported on the progress on ECHA's Integrated Quality Management System. The Board congratulated the Executive Director and his staff on the progress made. Efforts should in particular focus on customer orientation, ownership of processes and compliance with the REACH and CLP regulations.

ECHA presented its plans on how to technically ensure the public dissemination of non-confidential information on chemicals from the end of 2009 onwards. The Board was informed in particular about the progress on a "filter tool" that, in accordance with preset criteria defined by ECHA, would allow for the automated dissemination of information, available in the IUCLID 5 format, on ECHA's website. Board Members called on ECHA to ensure the equal participation of all stakeholders and to take the views of the general public into account.

The Board appointed the following new Committee members:
- Mr Marian Rucki, nominated by the Czech Republic, as a Member of the Risk Assessment Committee;
- Mr Marko Susnik, nominated by Austria, as a Member of the Socio-Economic Analysis Committee;
- Mr Mark Faherty, nominated by Ireland, as a Member of the Socio-Economic Analysis Committee.

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info@echa.europa.eu

Disclaimer: The views presented in the Newsletter do not necessarily represent the official position of the European Chemicals Agency. All the links are up to date at the time of the publication.

Head of Unit appointed for Scientific IT Tools

Mr Hannu Hirvonen has been appointed as the Head of Unit for Scientific IT Tools. Mr Hirvonen is Finnish and has a master's degree in environmental sciences.

Mr Hirvonen has over 20 years of experience in development, implementation and support of scientific IT applications. He comes to ECHA from a private sector pharmaceutical company.

A visit from MEP Satu Hassi

Ms Satu Hassi, Green Member of the European Parliament is the contact person between the Environment Committee and ECHA. She visited ECHA on 18 June 2009.

Ms. Hassi, after five years in the European Parliament, you were recently re-elected. What are your priorities for this term?

"My priority number one is the climate policy. I will do everything that is in my hands that there will be a good global climate agreement at the climate conference in Copenhagen in December. There are other issues, following the implementation of the REACH legislation, which of course also are my priorities.

MEP Satu Hassi wants to stress the importance of the consumer's right to know about hazardous chemicals. Photo by ECHA Communications.

One big challenge is the economic crisis, and I want to promote the so-called Green New Deal which means that the political measures and the investments made to overcome this economic crisis also help environmentally sustainable development and especially climate protection."

What does the European Parliament expect from ECHA?

"First of all, you have a huge and very challenging job. So I respect very much the work that is being done. I think that a good advice to authorities which are implementing new legislation is: try to keep in mind what the purpose of the legislation was, because you always interpret the legal text.

You can interpret the legal text in a more bureaucratic way or you can try to think more about what the legislators wanted when they created it. I always hope that people who implement any legislation try to keep in mind the purpose and not just look at the text as it is written in the law.

An issue I have raised when visiting ECHA has been the consumer right to know about hazardous chemicals in consumer products. The so-called Candidate List of substances which might go to the authorisation is crucial for this consumer right to know. I was very disappointed when I learnt that the first Candidate List was really short, just 15 substances.

I know that ECHA is not the main responsible body; so it is up to the Commission and the member countries to put substances on this list, but I see that ECHA should be active in encouraging both the Commission and the member countries and facilitating the process, etc. And I have understood that at least to some extent, ECHA has taken this role.

I am certain that everybody who participated in the legislative process thought that ECHA should be active also in informal ways."

In your opinion, what is important when communicating about REACH?

"The more you can illustrate your work in ways which are relevant for everybody´s life, the better. "

News from *ECHA*

Testing proposals for animal tests under REACH

The first call for information on the human health effects of a particular substance is about to be published by ECHA (**http://echa.europa.eu/consultations/test_proposals/test_prop_cons_en.asp**) and anyone with useful information that may ultimately help to avoid the two experimental animal tests that are proposed is invited to respond within 45 days. Testing proposals from registrants that involve animals are published on the website. This is to invite third parties such as industry, academic institutions & NGOs to provide information, not limited to the specific studies proposed on the substance but also scientifically-valid alternative information. This information will help ECHA in its final decision on whether the proposed animal test needs to be conducted or not. There will be many such calls for information over the next few years. This article on testing proposals intends to give some explanation and background.

Under REACH, registrants must provide information in their dossier on the properties of their substances - the precise data requirements depend on the tonnage manufactured or imported. Considerable resources and scientific judgement are needed when producing the dossier and ECHA has issued extensive guidance to help registrants.

> Guidance on registration data and dossier handling

> Guidance on information requirements and chemical safety assessment

The standard information on the physicochemical, toxicological and environmental properties required is listed in Annexes VII to X of the REACH Regulation. The Annexes also give rules on the circumstances in which data may be omitted or when additional studies are triggered. For the lower tonnage substances, the standard requirements are in Annex VII, and every time a new tonnage level is reached, the requirements of the corresponding Annex have to be added.

There are different ways to fulfil the information needs for registration, but new studies with vertebrate animals may have to be conducted. If so, they should be conducted according to the standard EU test methods and have to be compliant with Good Laboratory Practice.

The studies are intended to model the effect of the substance on human health and the environment. In terms of human health, a substance will invariably enter the body through the mouth, the skin or the lungs. The toxic effects may be either acute or chronic, local or system wide and reversible or irreversible. In terms of the environment, the effects relate to the ecosystems for air, soil or water, including groundwater, and hence are influenced by the environmental fate of the chemical and any substances that it degrades into.

Any standard Annex VII to X studies can be omitted if they are impossible to conduct for technical reasons. In addition, under the provisions of Annex XI of the Regulation, registrants can 'adapt' the standard requirements and instead provide equivalent information, such as non-standard existing tests, results from valid *in vitro* (non-animal) tests or by predicting or calculating the properties of the substance. There is also the possibility for data to be omitted as unnecessary for risk assessment if, based on exposure assessment, there is no exposure to humans or the environment ('substance-tailored exposure-driven testing' in Annex XI). Explanatory justifications must be given in the technical dossier for each standard data element that is varied.

Registrants can follow alternative ways to collect the necessary (eco) toxicological data to understand the effects of chemicals on human health or the environment:

1. Gather and share existing information on the properties, use, exposure and risk management. This may mean that new tests are unnecessary.
2. Consider whether 'surrogate' data may be applicable. For example it may be appropriate to 'read across' test results between similar substances or the substance might be made a member of a 'chemical category'. It may be possible to use quantitative structure-activity relationships (QSARs) to estimate results, if there are valid models for the substance and for the endpoint concerned. Finally, a weight of evidence approach might enable data gaps to be filled.
3. If necessary generete new data. For each missing property of the substance the registrant needs to decide how to generate the necessary information most efficiently. If testing is needed, a first option is to consider if an *in vitro* test is adequate. For new tests listed in Annexes IX and X of REACH the registrant needs to submit a testing proposal to ECHA. The aim is only to conduct new *in vivo* (animal) testing using laboratory animals as a last resort.

In this particular case the company is proposing to collect information on the reproductive toxicity of the new high-volume chemical substance by undertaking the two animal tests prescribed in Annex XI of REACH. It may however be possible that third parties can provide information on this property of the chemical in any of the three alternative ways.

Taking account of the information collected by the call, ECHA will take a decision which involves consulting the registrants that submitted the testing proposal, the Member States' competent authorities and, if necessary, ECHA's Member State Committee.

Two new Guidance in a Nutshell

ECHA is producing a series of shortened versions of the REACH Guidance Documents. These documents explain in simple terms the main elements of the full guidance to industry managers including managers of small and medium sized enterprises.

So far the Agency has published two Guidance in a Nutshell documents:

- Guidance in a Nutshell on requirements for substances in articles and
- Guidance in a Nutshell on registration data and dossier handling.

To access the documents, please visit: **http://guidance.echa.europa.eu/guidance2_en.htm**

The Director of ECDC visited ECHA

The Director of the European Centre for Disease Prevention and Control (ECDC), Mrs Zsuzsanna Jakab, visited ECHA on 12 June to discuss collaboration between the agencies.

The Executive Director Geert Dancet and Mrs Jakab discussed cooperation in areas like risk communication, contact management and procurement.

The Executive Director Geert Dancet and the Director of ECDC Zsuzsanna Jakab met in Helsinki in June. Photo by ECHA Communications.

RAC News

The RAC will prepare opinions on proposals for harmonised classification and labelling (CLH) for chemical substances (including biocides and pesticides); proposals to restrict the manufacture, placing on the market and use of a substance; and applications for authorisation of substances placed on Annex XIV (the authorisation list).

CLH Dossiers are now steadily rolling in from the Member States. Around 30 have been submitted so far to ECHA, and at its seventh meeting in the first week of July, the RAC adopted its first opinion on a proposal for harmonised classification and labelling. The subject of the opinion was a proposal for harmonised classification and labelling of diantimony trioxide as a skin irritant. The opinion of the Committee, adopted by consensus, was that the data available were insufficient to justify classification.

Joint session on restrictions

The July meeting was a special one not only because of the adoption of the first opinion by the Committee but also because there was for the first time a joint session with the RAC's sister Committee, the Committee for Socio-economic analysis (SEAC).

Since RAC and SEAC are each required to formulate opinions on a restriction proposal in parallel, the need for good communication between the two Committees, and particularly the respective rapporteurs, when drafting opinions is essential.

The working procedure foresees meetings between the rapporteurs from each Committee with the dossier submitter and a shared background document supporting the views of both Committees. Consequently, the opportunity for a joint meeting of the Committees was taken in order to allow the members to get to know each other, discuss the common elements and interlinkages of their work and agree on the shared procedures and format of the final opinions together.

The meeting marked the end of the preparatory phase and the beginning of the Committees' work on restrictions following the entry into effect of the Restrictions Title of REACH on the 1st of June and the publication of the intentions of some Member States to prepare restriction dossiers on certain substances for submission to the Agency in 2010 (see **Registry of Intentions**).

The meeting was also an occasion to say goodbye to the outgoing Chair Sharon Munn and welcome the incoming Chair, Mr Jose Tarazona, already a serving member of the RAC.

Message from the outgoing Chair Sharon Munn

After a two year secondment from the European Commission, Sharon Munn, current Chair of the Committee for Risk Assessment (RAC), will return by the end of August to the EC's Joint Research Centre in Ispra, Italy. Sharon has chaired the first seven meetings of the Committee in which the members have been introduced to their tasks, drawn up their Rules of Procedure and agreed on the principles of the content and on the working methods by which they will formulate opinions on dossiers which they will receive.

"The foundations for the future work of the Committee have been laid down, but this is just the starting point, and the practices and procedures will inevitably need to be fine-tuned and further developed to respond to the situations that will be encountered along the way. The growing number of dossiers from the different REACH processes will be very demanding on the Committee's resources, especially when the applications for authorisation begin to come in, on top of the CLH and restrictions dossiers.

The view that membership of the ECHA Committees is pretty much a full time occupation has only been reinforced over the last 2 years. Future plenary meetings need to be carefully scheduled every quarter from September 2010 to fit to the very tight timeline of the working procedure in order to adopt an opinion within 9 months for RAC and 12 months for SEAC on a restriction dossier. There may be the need for up to six plenary meetings per year to ensure enough meeting time to discuss all restriction and CLH dossiers, depending on the total number of dossiers RAC receives per year. Additional meetings between the rapporteurs from the respective Committees that are drafting the opinions on restriction proposals are also foreseen. The main work of course takes place before and after the meetings so there has to be sufficient time allocated in between the meetings for the rapporteurs and co-rapporteurs to carry out the work on their dossiers whist at the same time providing their views as a Committee member on the draft opinions from other rapporteurs!

There is a good working atmosphere in the Committee, members being enthusiastic, open-minded and motivated to carry out the work and deliver results. With this spirit I'm confident that the Committee will be able to meet the challenges to be faced over the coming years."

The outgoing Chair of RAC Sharon Munn received a certificate of appreciation signed by the members of RAC and SEAC at the committees' joint meeting in July. Stavros Georgiou (left) from SEAC and Helmut Greim from RAC handed her the certificate. Photo by ECHA Communications.

Interview: *Pilar Rodríguez Iglesias*

Help and Guidance on REACH

At ECHA, the guidance team and the helpdesk provide information and advice on REACH to stakeholders and authorities. The ECHA helpdesk received in the first half of 2009 around 600-700 REACH related questions per month. The Unit is preparing for an expected peak at the end of 2010. Pilar Rodríguez Iglesias, Head of Unit, faces the challenges with proactive information campaigns and well organised activities and looks ahead with confidence.

As Pilar Rodríguez Iglesias joined the European Commission nine years ago, she liked the work and the European environment and decided to stay in the public administration and to give up her career as a medical doctor. In January this year, she joined the European Chemicals Agency in Helsinki and is heading the Guidance and Helpdesk Unit at ECHA.

"I am still in touch with science and scientific matters and with people, and this I like very much," says Pilar happily.

The guidance and helpdesk teams are usually the first contact point for stakeholders in ECHA and they provide information, advice and help with the REACH requirements.

"We try to advise on what the legislation indicates, rather than addressing individual matters – usually, we do not have all the elements at hand to be able to provide very specific answers," says Pilar.

Meeting high quality standards

The questions received at the helpdesk range from REACH requirements over registration, authorisation, evaluation and restriction to the IT tools which ECHA is using for implementing the regulation.

"In some cases we do not have an answer right away. Our colleagues in other units are a very important source for us, and if the question concerns legal interpretation of REACH and it is out of the remit of ECHA to reply, we might need to consult the European Commission," says Pilar.

"Industry is often fully aware of their obligations, but every day we find out that still someone has never heard about REACH and discovers it now and has missed the pre-registration."

The helpdesk encodes the questions in a specific IT tool which allows ECHA to know at any time where a specific question is and what the deadline is. The objective is to carry out the work to high quality standards and in a timely manner.

Consistency is important

To ensure that information is provided in a consistent manner at European level, a network of the national helpdesks was created. The ECHA helpdesk provides the secretariat and coordinates the network.

The national helpdesks and ECHA hold regular meetings, exchange information via IT tools and discuss online difficult questions. The ECHA helpdesk staff also pays visits to national helpdesks.

"Currently we are trying to extend the network also to the CLP regulation*; to create a network on national helpdesks for CLP. It will be formally established by the end of this year. Some helpdesks are already functioning individually," explains Pilar.

Pilar Rodríguez Iglesias faces the future challenges with confidence. Photo by Esko Jämsä.

Generally accepted guidance

The guidance documents produced reflect the common view on a particular matter, extracted in a consultation procedure. They also help to share best practice among industry on matters related to REACH requirements.

The guidance activities were first carried out by the European Commission. "The process has now been finalised. We have taken over the production of guidance and put in place measures for the specific consultation procedure."

"We consult our stakeholders in a transparent way, preserving our independence and making our own judgements," stresses Pilar.

ECHA starts a revision of a guidance document either based on feedback from industry, the authorities or the users, or ECHA may come across with issues that have to be amended."

Also the revised document goes into consultation by stakeholders and authorities.

Heavy workload in sight

Last year the ECHA helpdesk received more than 15 000 questions, and 23 percent of them were submitted in the last two weeks before the pre-registration deadline. However, the year was a big success for the unit. This year, around 600-700 REACH related questions were received and answered per month.

In 2010, the first registration deadline and the CLP notification deadline will nearly coincide. "We intend to be proactive and are planning accurately and well ahead. We probably will have more work and more difficult topics," estimates Pilar.

"Particularly as regards the CLP, there are more companies that might not be at all aware of the fact that they have an obligation to fulfil by the end of 2010."

Positive impressions

Pilar Rodríguez Iglesias is Spanish "half Galician and half Catalan". However, she also feels well in the north of Europe. "I love Helsinki since I came. It is very easy to live here, very pleasant."

The busy work does not leave her much time for her hobbies: painting and travelling around the world. Pilar Rodríguez Iglesias also loves animals and has a cat, an excellent companion.

She sees the future in a quite positive light. "REACH is a huge task and there are many challenges in front of us, but ECHA is very much advanced after only two years. My unit is very motivated and enthusiastic. The future is very promising and very interesting."

"I am very happy and very satisfied."

*Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures

Stakeholders

Making information available to the public

REACH requires ECHA to establish and maintain databases with information on: all registered substances; the classification and labelling inventory; and the harmonised classification and labelling list. ECHA must also make information publicly available, free of charge, over the internet and other information available on request.

The European Chemicals Agency organised a one-day Round Table on the dissemination of registration data on 6 July 2009. This event provided an opportunity to stakeholders to share their views on rules to filter confidential data and to discuss with Agency staff and other stakeholders the critical factors that have been taken into account in establishing these rules. Some 20 participants from industry, NGOs, trade unions, the OECD, the European Commission and the European Parliament attended the event.

The discussion was lively and productive. Its focus was on the scope of the information to be published according to Articles 118 and 119 of REACH and the approach taken by ECHA to develop rules for publishing this information. The debate also addressed the relations with other Community legislation such as the Aarhus Convention.

Also other topics were addressed, such as criteria for accepting confidentiality requests according to Article 119(2), data ownership concerns, fee payment aspects e.g. in case of joint submissions, and specific sections of the registration dossier such as the description of the uses, the Chemical Safety Report and Classification & Labelling.

The stakeholder organisations can now provide feedback until the end of August. This feedback will be reviewed by ECHA before finalising the filtering tool that will automatically extract the public information from registrations.

Lead Registrants Workshop, Brussels 11 September 2009

The European Chemicals Agency and the European Commission are organising a workshop for Lead Registrants on 11 September 2009 in Brussels. The workshop aims to provide a platform for industry to share best practice with one another on the issue of getting started and keeping going with their SIEFs.

Companies which have notified the Agency of their status as Lead Registrants through the form available on our website are being invited to participate together with industry associations and representatives.

ECHA acknowledges that many SIEFs have not yet managed to nominate a Lead Registrant and is therefore offering Candidate Lead Registrants (CLR) an opportunity to follow the workshop via webstreaming. A CLR is a company which is a member of a SIEF and has not yet been nominated as a Lead Registrant but would like to take on this task. CLRs need to register on the **ECHA website**.

ECHA welcomes companies who would like to provide presentations on best practice.

An industry roundtable was organised by the European Chemical Industry Council (CEFIC) in Brussels end of July in order to indentify the priorities of the industry for the Lead Registrants Workshop.

Feedback received from ECHA's second Stakeholders' Day

Over 500 representatives of stakeholder organisations around the world participated in ECHA's second Stakeholders' Day held in Helsinki 27 May 2009. Around 300 were present at the event and a further 270 joined in via web stream. The participants discussed the urgent need for companies to work together and share data in order to prepare joint dossiers for the registration of each chemical substance.

At the event ECHA collected feedback from the stakeholders in a form of a questionnaire which was distributed to the participants. The stakeholders were asked to answer 11 multiple choice and open questions on three main topics: the content of presentations and usefulness of information desks; the organisation of the event; and an overall assessment and suggestions. The response rate was 39 %.

The contents of the event and the overall organisation in general were perceived good. There was an improvement compared to the first stakeholders' event. The stakeholders found that the way the event was conducted contributed to involving most of them in the discussions, and to making them feel part of ECHA's activities. The event also contributed to improve the overall image of the Agency. In particular the long time reserved for questions and answers was appreciated.

The stakeholders expressed their desire for better coordination of presentations to reduce duplication and to give more consistency. They also wanted more in-depth sessions and up-to-date topics as well as more focus on REACH implementation technical problems and best practice.

The stakeholders also expressed that they would like ECHA to give more precise lines to help them comply with the REACH provisions.

The participants were asked what topics they would consider of interest for the next stakeholders' day to be held in autumn 2009. The five main topics suggested were registration process and best practices; classification and labelling; chemical safety assessment/ chemical safety report; the functioning of SIEFs; and the enforcement process.

All the presentations and the video recording of the second stakeholders' day can be accessed at:
http://echa.europa.eu/news/events/2nd_stakeholders_day_en.asp

Statistics

Table 1 shows the number of dossiers received by ECHA between 1 June 2008 and 4 August 2009.

The pie chart (1) shows the number of registration dossiers submitted by country in 2009 by 4 August.

Table 2 shows the registration dossiers by tonnage, submitted in 2009, also by 4 August.

Table 2. Registration dossiers by tonnage, submitted in 2009 (by 4 August)

Tonnage band	Submitted	Complete
1 - 10	272	48
10 - 100	85	15
100 - 1 000	38	8
1 000 +	89	26
Total	484	97

LEAD REGISTRANT NOMINATIONS

As of 5 August 2009, ECHA has received the contact details from 1118 Lead Registrants. Most of them indicated their intention to register by the 2010 deadline.

HELPDESK STATISTICS

Table 3 shows the number and percentage of questions received in June 2009 and table 4 the number of questions received from Community and non-Community companies in June 2009. Chart 2 shows the number of questions received at ECHA and the topics they covered during the last seven months.

Table 3. Number and percentage of questions received during June 2009

ECHA Info	21	3.0 %
ECHA Web	9	1.3 %
IUCLID 5	101	14.7 %
REACH	108	15.7 %
REACH-IT	364	52.8 %
Submissions	86	12.5 %
TOTAL	689	100.0 %

Table 1: Dossiers received since 01/06/2008

Dossier type	Total submitted	*Non phase-in substances*	Accepted for processing*	Complete	*Non phase-in substances*
Inquiry	1883	*n.a.*	1319	602	*n.a.*
Intermediates on-site	137	*92*	73	43	*31*
Intermediates transported	442	*405*	230	159	*149*
Registration dossiers	578	*430*	207	109	*67*
PPORD notifications	700	*n.a.*	456	332	*n.a.*
C & L notifications	9	*n.a*	8	*n.a*	*n.a*
TOTAL	**3749**	***927***	**2293**	**1245**	***247***

**Accepted for processing: number of dossiers containing the necessary information for processing them, i.e. perform a completeness check. Examples of dossiers not accepted for processing are: dossiers without submission form, submission form not filled in correctly, information mismatch between the submission form and the IUCLID 5 dossier, company not signed up in REACH-IT, same dossier submitted twice, no substance information etc.*

Chart 1: Submitted registration dossiers by country in 2009 by 4 August (total 484).

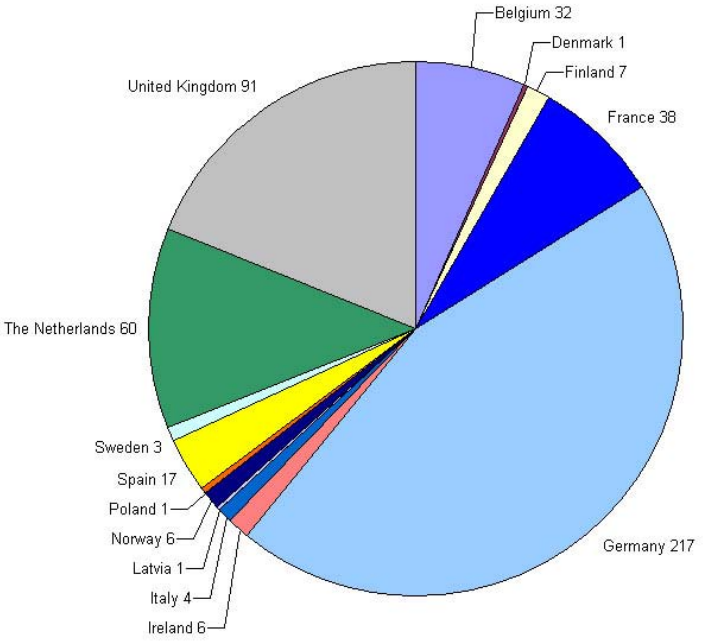
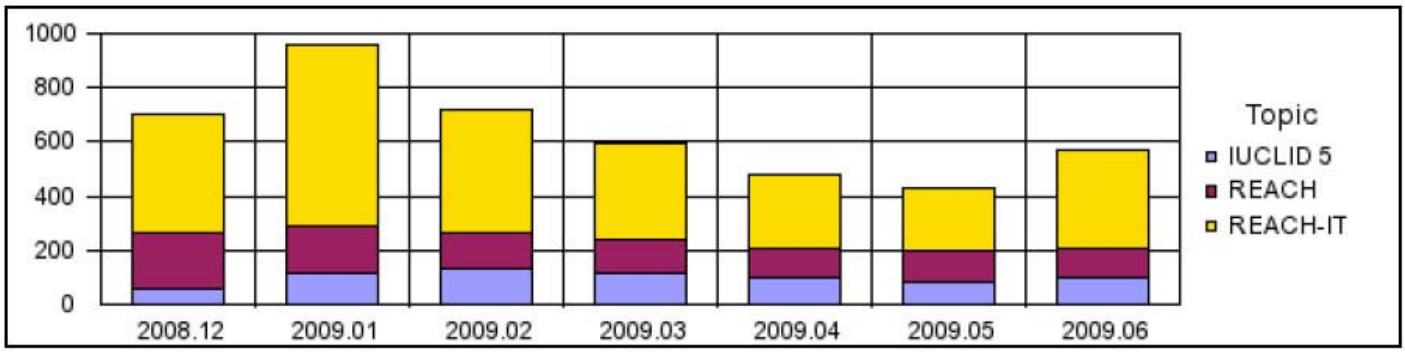


Table 4. Number of questions received from Community and non-Community companies during June 2009

	EU incl EEA	non-EU	Total
ECHA Info	19	2	21
ECHA Web	9	0	9
IUCLID 5	80	21	101
REACH	66	42	108
REACH-IT	335	29	364
Submissions	83	3	86
TOTAL	592	97	689

Chart 2. Number of questions received during the last seven months on REACH Advice, REACH-IT Support and IUCLID 5 Support



Living in *Helsinki - Water sports*

Kayaking

If you would like to explore watery wonders but avoid getting soaking wet in the meantime, the sport for you is kayaking. When you're gliding in the sea with nothing but the sound of your paddle disappearing in the tranquil water and the waves splashing, you can't help but feel at one with the water.

Unlike what you might suspect, this sport can make an excellent whole body work out too. With the right technique, it is not merely the arms you use to paddle, but the whole upper body as well as your legs. For an office worker who sits all day in front of a computer, kayaking would be an ideal form of exercise.

The best way to start is to rent a kayak for a few hours. You don't need a beginner's course to do that – just hop on a kayak and head out to sea. Neither is any particular gear a prerequisite. For example a life jacket and a waterproof cover to keep you dry are usually included in the service.

Maria O'Shea, Junior Scientific Officer at ECHA, tried kayaking and found it to be a fun outdoor activity. The shores of the Helsinki area are full of nice little islands in between which you can spot seabirds and maybe swans out with their young, or make a stop in between paddling and have your hot chocolate and snack. Maria enjoyed her time kayaking and is now considering taking it up a notch and embarking on a white water paddling course in River Kymijoki in August.

Sailing

Andreas Herdina, ECHA's Director of Cooperation, started sailing 35 years ago in the Adriatic – "the place where Austrians mostly start sailing on the sea". According to Andreas, Finland offers a great opportunity to enjoy such an outdoor activity as sailing – with fresh air and wind, sometimes sun, but always a nice coastal landscape.

"The sea teaches you a lot of patience", Andreas says. "You may already see your goal, but when sailing it may still take you considerable time to get there". When sailing, the elements play the main roles – sailors are always dependent on the wind and waves. Sailing teaches Andreas both to plan things well in advance and to prepare the boat according to the weather forecast, but to remain flexible and be able to change his plans based on the behaviour of the sea. "I do like sailing as a pastime, as it takes my mind completely off the job", Andreas adds.

According to Andreas, navigation in Finnish waters, which are full of rocks, is really demanding. "I have learned that here, as the Finns say, there are only two kinds of sailors: those, who have hit a rock and those, who lie", Andreas laughs. "However, I prefer to be included in either of these two groups and therefore I continue to develop my navigation skills".

In many cases sailing and maintaining your own boat become core leisure time activities, thus it may result in a protest by other family members – is this the case? "I sail a lot with my wife", Andreas explains, "and she likes it – but only when the wind is not too strong and the conditions are not too harsh". "It is nice to sail in Finland - you always can go to a destination such as a little island, where you can stay and enjoy a sauna, or to visit a small cosy harbour. Otherwise I try to put together a crew of enthusiastic sailing men and to fight more with the sea - sailing is a life-long learning experience!", Andreas smiles.

In Finland, the sailing season is both short and intense. "You must be able to make the best of it", Andreas stresses, "and to pursue some other hobbies during the long autumn and winter months, when the boat is resting in a hangar."

Sailing takes Andreas Herdina's mind off work. Photo by Andreas Herdina.

Rupert Simon is an experienced diver with over 500 dives. Photo by Rupert SImon.

Diving

ECHA's Scientific Officer *Rupert Simon* started diving while working in Belgium. In six years he registered over 500 dives reaching the level of Assistant Instructor.

"I was mostly diving in Belgian fresh water lakes and an unique ecosystem formed by the Schelde river mouth located in Zeeland, a south-west province of the Netherlands called Oosterschelde. One could call this the Mecca of Dutch and Belgian divers. Now and again I enjoyed the beauty and the wrecks of the Mediterranean and of the North Seas", Rupert says.

Rupert thinks that every place has it's own charm. "You cannot say this diving spot is better than the other one", he adds, "they are just different!".

As Rupert moved to Finland just recently, his diving experience in the country is quite limited - the inland waters are still waiting to be explored. "I may only refer to the diving in the Baltic Sea close to Helsinki. Based on what I have learned so far, these beautiful small islands and hidden rocks remain to be the main reason why there are so many wrecks in the water. You may find very different wrecks – from small pieces of old wooden boats to the leftovers of huge metal container ships. I would like to alert our colleagues who like sailing – please be careful, otherwise we may start diving on your boat!" Rupert smiles.

Rupert recommends diving in Finland wearing a dry suit. "When you dive here, you always feel cold – more in winter, less in summer", Rupert summarises. Finally, if you are ready to face 4-5 °C temperature in 20-30 meters depth, if you know how to deal with the waves and seasickness – be sure, you'll have enough fun. Diving is a nice hobby, good exercise and lovely escape from the dusty office to the fantastic underwater world", Rupert concludes.