

Evaluation: lessons learnt

Eighth Stakeholders' Day 2013

26 March 2013

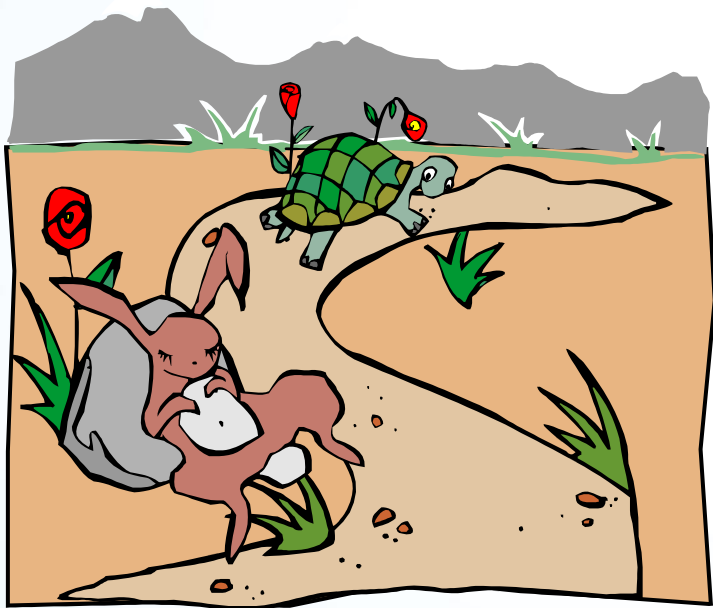
Kaihsu Tai

Junior Scientific Officer

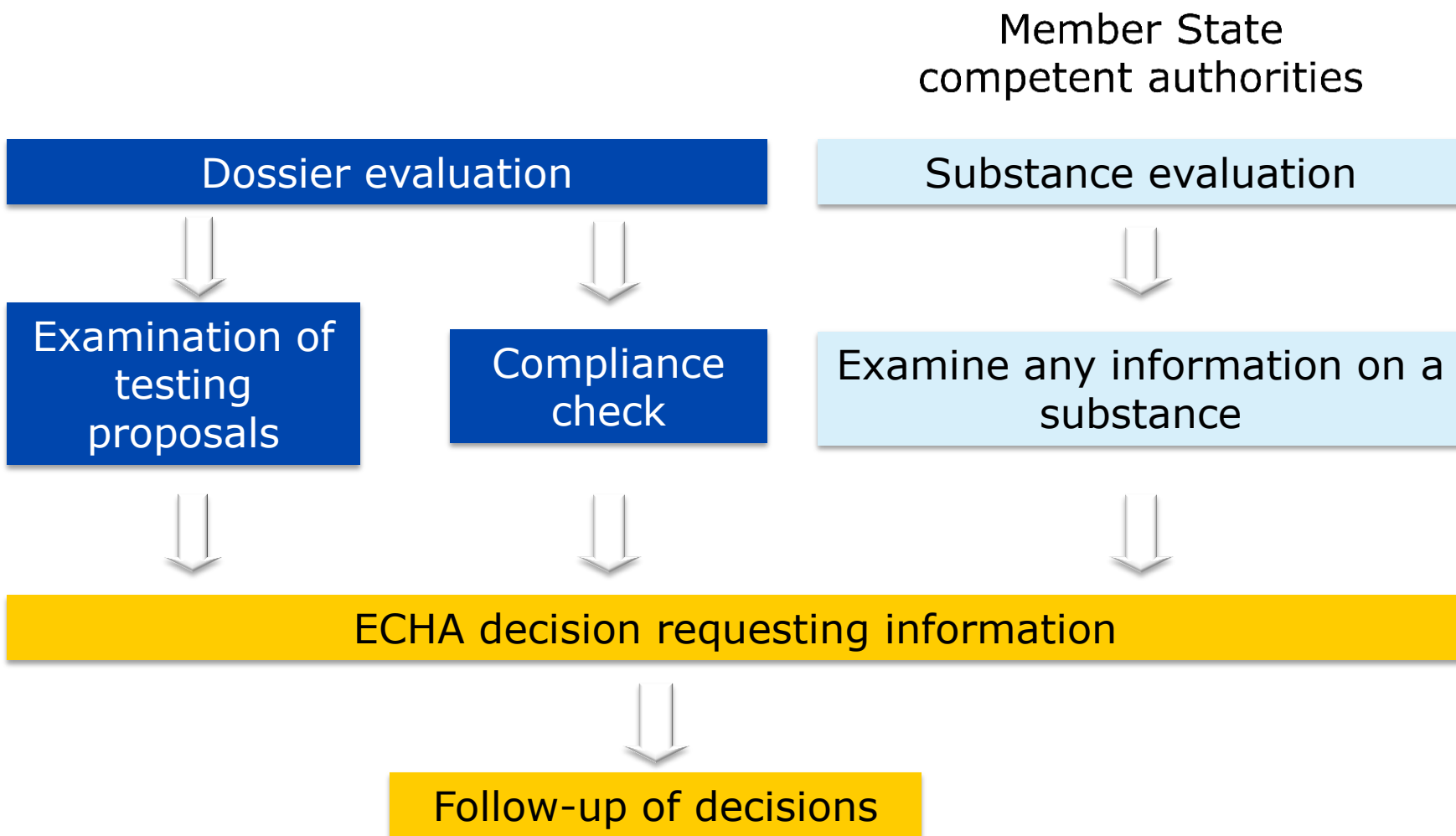
European Chemicals Agency



Life after the registration number ...

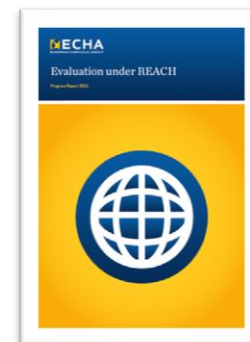


Evaluation: overview



Proactive in keeping the dossier compliant with REACH

- Understands the registrant's responsibility to ensure safe use
- Follows ECHA guidance in preparing the dossier
- Reads the recommendations in ECHA's evaluation progress report **every year**



Proactive in keeping the dossier compliant with REACH

- Enjoys the edge offered by ECHA webinars
 - ECHA's **compliance check priorities**
 - Correct way of reporting study results



Proactive in keeping the dossier compliant with REACH

- **Spontaneously** update dossiers
- Able to plan own schedule of work
- Less likely to receive draft decisions



Thinks that the dossier is compliant forever

- Wrongly assumes that no update is needed after receiving the registration number
- Did not allocate resource for update of dossiers



Waiting for a draft decision?

- More likely to receive draft decisions under compliance check
- Needs to react quickly in formal decision-making process under REACH (30-day commenting period)



Needs to run to avoid a decision

- ECHA helps with:
 - Draft decision, pointing out **how to improve** for compliance
 - Informal communication may be offered in complicated cases
- If they react appropriately, it is still possible to avoid a decision



Life after the registration number ...

... Update the dossier proactively

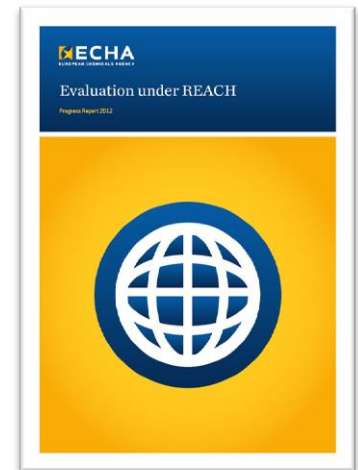


Update the dossier proactively: why?

- **Good quality, up-to-date** information on the substance is needed to ensure the **safe use of chemicals**
- REACH places the responsibility on manufacturers/importers to ensure safe use of their substances
 - Article 22 REACH: “Following registration, a registrant shall be responsible on his **own initiative** for updating his registration without undue delay with relevant new information ...”

Update the dossier proactively: how?

- The registrants have to provide adequate information on their registered substances
- Evaluation is here to **help** registrants do that
 - The annual evaluation reports may be considered ECHA's **reminders**
 - If we check and find non-compliance: (draft) decision ... to ask for improvement

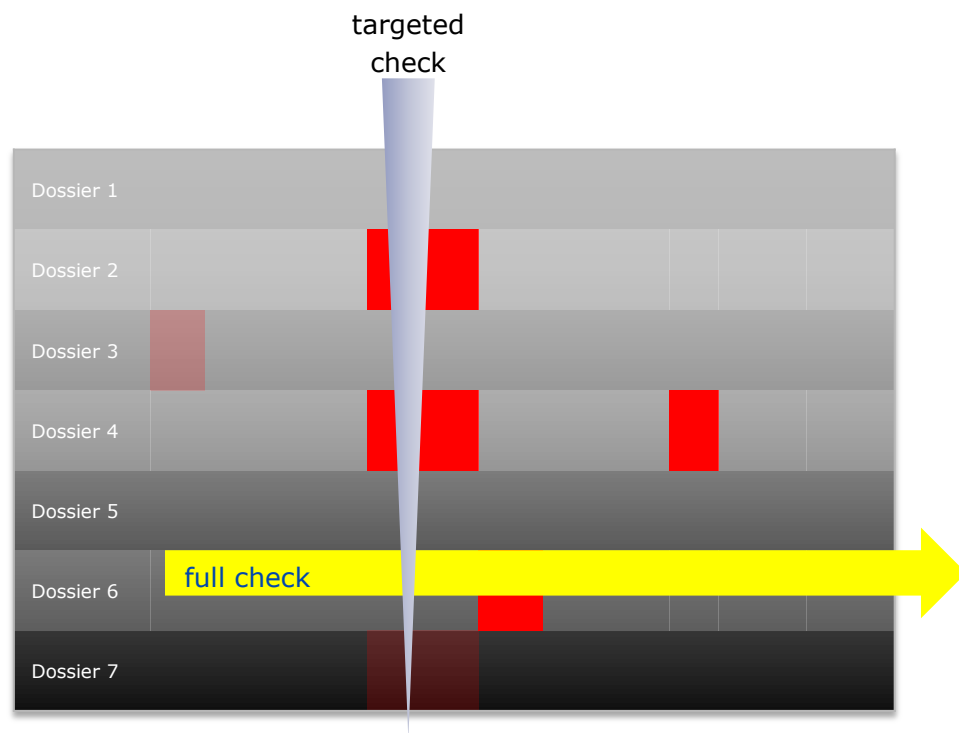


**Targeted compliance
checks to improve
dossier quality**



Targeted compliance checks

- Aimed at having **maximum impact on safe use** of chemicals
- ECHA will target compliance checks to specific dossier issues where safety matters



Targeted compliance checks to improve dossier quality

- ECHA scientists check dossiers more efficiently with data-mining tools
- **Poor entries will be caught**
- Complements other compliance check activities
- Most efficient use of ECHA evaluation resources

ECHA evaluation webinars

Old ones available for viewing on ECHA website:

- What should every registrant know about substance evaluation?
- Tips and Hints – How to bring your registration dossier in compliance with REACH (parts 1 and 2)

ECHA evaluation webinars

Ones to look forward to:

- Tips and Hints – How to bring your registration dossier in compliance with REACH (part 3), April
- Tips and Hints (part 4), September
- Tips and Hints (part 5), November

Evaluation progress report 2012

- Annual report
 - Maybe your yearly reminder?
- On ECHA website
- Progress in our activities
- Information on common pitfalls
- **Recommendations for you**



High quality information is required for REACH compliance

Recommendations on how to fulfil these REACH requirements:

- Identifying your substance clearly
- Making sure test material is representative
- Making intelligent use of all available information
- Providing clear use and exposure information

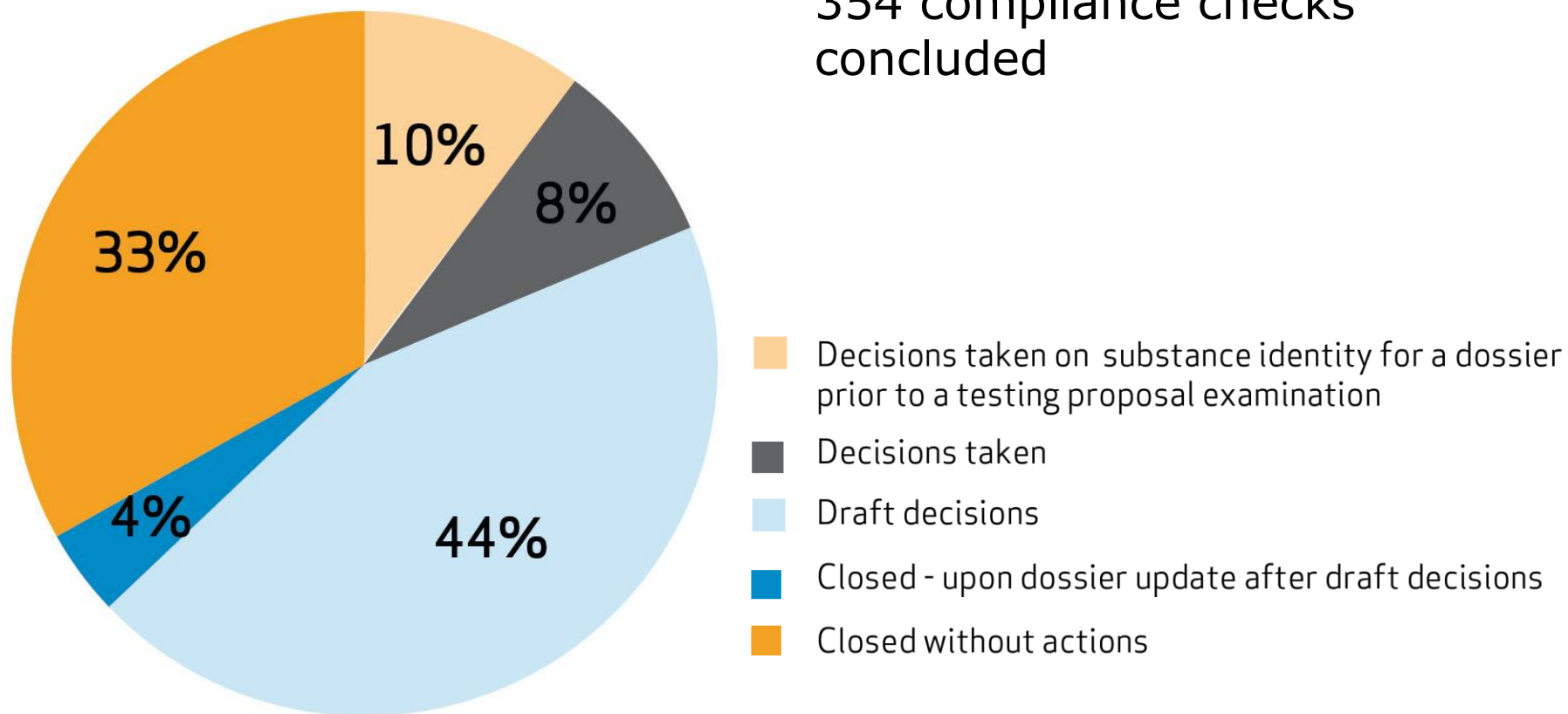
How to make use of ECHA support: Read the report

Questions?



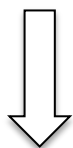
Compliance checks 2012

354 compliance checks concluded

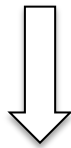


Follow-up of dossier evaluation decisions

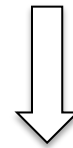
After the deadline in the decision, ECHA looks at the latest dossier.



Requests not fulfilled: ECHA notifies Member States of non-compliance.
May lead to enforcement.



New information leads to further concerns: another compliance check.
Article 42(1) REACH



Requests fulfilled: ECHA notifies Commission and Member States.
Article 42(2) REACH

Thank you

