

18 June 2015

Minutes of the 10th meeting of the HelpNet Steering Group - Helsinki 18 March 2015

1. Welcome and opening

The Chair of HelpNet, Andreas Herdina (ECHA), welcomed all BPR, CLP and REACH national helpdesks (NHDs) and HelpNet observers to the 10th HelpNet Steering Group (SG) meeting. Based on the good feedback from last year, only one SG meeting will take place in 2015 back to back with three workshops on REACH, CLP and BPR; with additional BPR, CLP and REACH workshops later in the autumn.

2. Speech by Geert Dancet, the Executive Director of ECHA

Geert Dancet (ECHA) greeted the participants in the meeting and focused on the fundamental principles of BPR, CLP and REACH. He reminded them of the support to registrants and duty holders that ECHA and national helpdesks have to provide according to the three Regulations. Without well-placed advice and assistance companies may not know or understand their tasks and the safe use of chemicals may remain unattainable. He highlighted that many SMEs use consultants for registration activities. It is estimated that the costs of consultants can correspond to even up to 25% of registration costs. Therefore it is important that the consultants used have good knowledge of the requirements and understand the situation of the SME.

Geert Dancet was glad about the creation of the Communicators' Network of which the kick-off meeting had taken place the previous Monday, 16 March. The Executive Director moved on to the 1 September deadline for the publication of Article 95 list of Biocides. He insisted on the split responsibility of ECHA and national biocides helpdesks in dealing with questions related to their own areas of competence. He encouraged the HelpNet members to help each other and share their experience. He also encouraged national helpdesks to inform him if their resources are not adequate as this would be an issue to raise to the Management Board.

Geert Dancet pointed out that ECHA had just changed the structure of the Helpdesk Unit looking for increased efficiency in an atmosphere of staff cuts and that it would therefore need to rely more on other networks, national helpdesks and communication means to continue offering adequate support to duty holders.

3. Approval of the draft agenda and the draft minutes of HelpNet 9, follow up of action points

The Chair presented the draft agenda, the draft minutes of HelpNet 9 and the follow up actions, all of them completed. All three documents were approved without comments.

4. Reorganisation of the ECHA Helpdesk

Andreas Herdina (ECHA) explained the changes experienced by ECHA due to resource constraints, with a view to obtain savings and improve efficiency and synergies within the organisation. These changes were already visible in the published organigram of ECHA and affected the previous Helpdesk and HelpNet Secretariat as well as Classification and Labelling Unit. Johan Nouwen (Head of Unit of Support, Forum and HelpNet Secretariat) and Orion Andrews (Head of Unit IT Infrastructure & Support) detailed the expected synergies and expressed their confidence on the positive results that this decision will produce.

In the context of administrative savings the Chair announced that ECHA could no longer provide daily allowances to BPR correspondents. This new policy was also being considered to be applied to the REACH and CLP correspondents in the coming year.

5. HelpNet update

Henna Piha (ECHA) introduced the HelpNet update: a bi-monthly publication which covers the gap created by the discontinuation in the use of the Fabasoft Cloud. She explained that the basis of the update was the Accredited Stakeholder Organisations' (ASO) newsletter, and invited the correspondents to provide ideas and material.

The correspondents showed their appreciation for the new means of information. They also requested to study the opportunities that Secure CIRCABC could offer in terms of news groups or similar, insisting on their fear that the HelpNet update would turn out in a one-way means of communication.

6. HelpNet handbook

Iris Briat (ECHA) presented the HelpNet handbook as an exercise of integrating all documents now in use which describe the functioning of the network. She insisted that it was only a formatting and visual change as the content remained unchanged. The document would remain classified as internal as there was no perceived need to make it available to the public.

The correspondents expressed the good impression they received by this initiative.

7. Towards the Secure CIRCABC

Piotr Sosnowski (ECHA) explained the reasons to use again CIRCABC and the roll-out plan for the Secure CIRCABC. He explained the need to use a PIN sent via the phone as a different means to confirm the identity of the person logging into the system. The developers were aware that this can be an issue in certain countries yet for the time being no other technical solution (such as e-mail to a functional email box) was available. This was a technical requirement from the platform thus having to be used by all users of the platform, not only ECHA ones. He pointed out that the Secure CIRCABC was not expected to have further changes in respect to the previous version. Piotr Sosnowski clarified that the plan presented was only for ECHA accounts and that other accounts provided by Commission would be moved under their own plans.

8. Questions on meeting documents

8.1. Updates from the European Commission on CLP and REACH Implementation

In spite of the absence of the Commission correspondent the Chair allowed the participants to raise their questions to have them recorded.

One correspondent pointed out that the 8th ATP should have been published already and asked for clarifications. They also questioned why there was no reference to the awareness raising activity for consumers in the presentation provided. Another correspondent asked in relation to nanomaterials if the information about amendments expected by the end of 2015 was correct.

Outi Tunnela (ECHA) informed that to her knowledge the European Commission (COM) had cancelled the event on consumer awareness based on other initiatives being planned, although no more details had been provided on them.

8.2. Update from ECHA on REACH and BPR implementation

ECHA provided an update on REACH and BPR implementation. The main topics addressed in relation to REACH included: the interface between REACH and Cosmetics Regulations; Changes on administrative charge levied in the context of SME verification procedure; Scope of the obligation to apply for authorisation; and Board of Appeal decision on data sharing. For BPR, the update covered the practical guide: special series on data sharing; the Review Programme Regulation; and developments under Article 95. No questions were raised for this agenda point.

8.3. Guidance updates

An overview of the current status and recent developments in ECHA's guidance activities for the BPR, CLP, PIC and REACH Regulations was provided covering the period March 2014 – February 2015. No questions were raised for this agenda point.

8.4. Update from the Forum Secretariat

ECHA confirmed that management were considering how to best use the inspectors network to raise awareness, provide information and support specifically to SMEs.

8.5. NHD report 2014

Henna Piha (ECHA) thanked the correspondents for their contribution and encouraged them to continue doing so. She clarified that the document was considered internal and was circulated within the Agency as it was of interest for other operational Units.

The correspondents appreciated the document. One correspondent pointed out that the Webropol tool created extra burden when the trying to report by teams as it can be filled in only by one person. The participants were requested to provide comments to the draft report by 15 April.

9. Developing HelpNet

9.1. Enhancing collaboration of HelpNet with observers and EEN

Henna Piha (ECHA) presented the proposal to enhance the collaboration of HelpNet at different levels with different partners or networks. The proposals were:

- Expand observer criteria to include candidate countries and ASOs who have a network through which they can disseminate advice on BPR, CLP and/or REACH; and include EEN as observer.
- Allow observers from candidate countries to have read access to HelpEx.
- Allow Forum members read access to CLP and REACH sections of HelpEx.

She asked for feedback in order to present the amended Rules of Procedure (RoP) for written procedure.

The Chair clarified that the number of interested Accredited Stakeholders' Organizations (ASO) was quite low yet their profile was of high interest, such as the Only Representatives Organization (ORO). He pointed out that the frequency of meetings and workshops would not be altered by the inclusion or participation of these new partners. The Chair also confirmed that the RoP cover the possibility of having closed sessions in case any correspondent would have reservations.

There was a general agreement to enhance collaboration with observers, Enterprise Europe Network (EEN) and other stakeholders as long as they have the means, not necessarily a helpdesk, to provide advice and spread the message of HelpNet. A correspondent expressed their reservations towards Candidate Countries having read-only access to HelpEx. The reservations were later withdrawn in a written communication to ECHA.

An Observer pointed out that access to HelpEx was not asked for as they saw themselves rather as a sounding board for what is happening in the implementation of the Regulations.

9.2. HelpEx access for Forum members

ECHA explained that this new access would not prevent the regular communication between the Forum and HelpNet Secretariats but rather add to it. Even more, as both Secretariats had been included in the same Unit due to the internal reorganisation, information flow would also include the Guidance team.

A correspondent asked for a timelier and formalised circulation of decisions: some opinions in the Forum are based on conclusions from the HelpNet and so on.

The Chair announced that the written procedure will be initiated once all the feedback provided had been reflected in the reviewed RoP.

10. HelpNet FAQ update

Iris Briat (ECHA) explained the background and process that led to this point of reviewing how the Frequently Asked Questions (FAQ) are updated. She demonstrated live how the two proposals included would look like in practice in the Remedy tool. The FAQ would be handled

in a different platform to that of the regular HelpNet Q&A in which only the final FAQ would appear. She then asked for comments and reactions.

The participants expressed their interest in changing the procedure and generally agreed on a batch approach. Both correspondents and Industry observers pointed out that sequential (may be monthly) cut-off dates for each Regulation would make the process more transparent and predictable, allowing for proper resource planning in their offices.

ECHA thanked the feedback which would then be incorporated in the "HelpNet FAQ update" document and circulated for further commenting.

11. Guide for SME Advisers

Francesca Gianotti (IT) presented the opportunities created by the collaboration with EEN and more precisely the product of a fruitful cooperation which was the "Guide for SME advisers". Virginia Mercouri (ECHA) explained the importance of such cooperation which allows, for example, increasing the number of actors reached by HelpNet messages. The Chair announced that a derivative document would follow in the second quarter of the year named "Chemical safety in your company": a bridging document targeted for the Small and Medium Enterprises (SMEs) themselves and therefore fitter for translation. He asked for feedback on national funding and possibilities for indirect support.

The correspondents had a positive reaction to this announcement showing their willingness to further distribute these documents. ECHA clarified that the first document was very precisely targeted to the SME advisers rather than companies and used the occasion to present the project of a "Newcomers" section under the "Support" tab in ECHA's website which will try to welcome duty holders which are completely unaware of the Regulations and their terminology.

The Chair thanked the document "Addressing REACH costs for SME" published by the Netherlands. He also announced that the publication of the document "Chemical safety in your company" would be widely announced and then distributed, counting on the support from the National Helpdesks (NHD).

12. Quality and style of helpdesk replies: observations and discussions

Outi Tunnela and Nicola Tecce (ECHA) played the role of a customer and a Helpdesk member replying to his question both in a long and complex manner, and in a short and straight forward one. They then open a debate on the quality and style of helpdesk replies.

One of the aspects discussed was the lack of clarity of the questions received and how to deal with it, either by considering plausible situations or phoning back the customer to seek such clarification needed. One correspondent mentioned a training course followed by all their Helpdesk staff on "How to communicate in plain English" and considered it would be a good moment to reflect on its effectiveness.

Along this discussion other topics emerged. A correspondent asked for more time in the written procedures for BPR FAQ agreement. ECHA announced that the Austrian member of EEN had communicated its willingness to participate in the Communicators' Network and other REACH related activities.

13. Closing of the meeting

The Chair announced the launch of an SME awareness programme later in 2015. This would include ECHA staff members visiting SME companies for two days. NHD could be involved in order to find SME volunteers.

The last round of questions and answers was used by the participants to raise the issue of too tight commenting deadlines in HelpEx. One correspondent asked if it would be technically possible to relate more strongly the priority of questions to their deadline in HelpEx. Another correspondent suggested using the longer deadlines also when ECHA asked for feedback from NHD when preparing a reply to a customer that had already contacted the NHD.

ECHA announced the tentative dates for the HelpNet events to come:

- 2 September: BPR workshop back to back with the Stakeholders' Day on Biocides.
- 23 September: CLP workshop, back to back with the Forum event of Training for trainers.
- 10 November: REACH workshop.

The Chair thanked all correspondents and observers for their participation. He was particularly pleased on the good response from HelpNet members to the Communicators' Network project launched the previous Monday. The Chair encouraged the correspondents to provide their comments on the documents that would be made available to them (see Action Points list – Annex II). The Chair wrapped up by inviting the participants to come back again to Helsinki for the following workshops and the 2016 HelpNet SG meeting.

Annex I List of participants

Members of HelpNet

Austria:	KRATZ Karin
Belgium:	CLAES Kristof, FEYAERTS Jean-Pierre
Bulgaria:	GAIGUROVA Margarita, ZIDAROVA Elena
Croatia:	KAJIC Silva, LOVRIC Zdravko
Cyprus:	ORPHANOU Maria
Czech Republic:	HRUSKOVA Katerina, KOLAR Jan
Denmark:	ANDERSEN Trine Thorup, DYEKJÆR Sidsel
Estonia:	AMELKINA Anna, LAHE Aigi
Finland:	KORKOLAINEN Tapio, TUHKUNEN Sari, TOLSA Leni
France:	DUFFORT Gaëlle, PIGANIOL Nathalie
Germany:	FLEISCHER Andreas, WIANDT Suzanne
Greece:	CHATZIANTONIOU Dimitrios, SKAFIDA Panagiota
Hungary:	BURAI Erika, NYITRAI Viktor
Ireland:	COLLINS Karen, WALSH Caroline
Italy:	GIANNOTTI Francesca, IZZO Paolo, PERRONE Raffaella
Latvia:	BROVKINA Julija, LAZDEKALNE Elina, RUBENE Liga
Lithuania:	PETUKAUSKIENE Dovile, GRINCEVICIUTE Otilija, JANONYTE Agne
Luxembourg:	BIWER Arno, CHOCHOIS Laurene
Malta:	ANASTASI Audrey Anne
The Netherlands:	KOMEN Cornelia, WOUTERS Margaretha
Norway:	GORDON Suzanne, LARSEN Ann Kristin, TVERMYR Marianne
Poland:	DOMANSKI Krzysztof, KAMINSKA Renata
Portugal:	LAGINHA Isabel
Romania:	CAROLE Nicoleta, DRAGUSANU Mihaela
Slovakia:	PORUBIAK Michal, SKULTETYOVA Maria, SLIMÁKOVÁ Anna
Slovenia:	HUMAR-JURIC Tatjana, MENARD SRPCIC Anja
Spain:	MARTIN ARRIBAS Judit, SANCHEZ DIAZ Maria Elena, ZAMORA NAVAS Laura
Sweden:	FALCK Jonas, KRAMER Helena
United Kingdom:	JOHNSON Amy

Representatives of the European Commission

DG ENV: Absent

Candidate country observers

Serbia:	RASOVIC Aleksandra, GRUJIC Jelena
Turkey:	OZGUN Pinar, TIRYAKI I.Özlem

Observers

EUPC: TILLIEUX Geoffroy
CEFIC: AMAYA Jànosi
CEPE: TURKENBURG Luc

ECHA staff

Representing the Units: A0, A2, B2, C2

Annex II Action points

Nr	Action	Actor	Contact	Due date
1	Correspondents can correct and add information on the Draft NHD report for 2014	HelpNet correspondents	Draft available in CIRCABC	3 April
2	Launch written consultation on RoP with changes related to enhancing collaboration of HelpNet with observers, EEN and Forum.	HelpNet Secretariat		16 April
3	Circulation in CIRCABC of draft "HelpNet FAQ update" based on comments received	HelpNet Secretariat		31 March
4	Question owners provide long enough response times for HelpEx questions	HelpNet correspondents		