Key findings and recommendations from an evaluation of the CSR/ES Roadmap and ENES

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Process

- initial ECHA-administered Web survey
- blind analysis of responses by contractors
- blind choice of respondents for follow-up
- development of additional questions for telephone interviews
- interviews undertaken : typically 30-45 minutes each
  - questions based on web-based response together with selection from follow-up questions
- analysis of responses
- report written

Nature of Respondents - Industry

- 56 respondents to questionnaire
- the smallest group were distributors. Sector organisations were the largest. M/I/Formulators, end users, consultants were equally represented
- the nature of the respondents reflected a good balance across type, size and sector

- 18 follow-up interviews conducted
- 1 written submission

Nature of Respondents - MSs

- questionnaire
  - 15 respondents to questionnaire
  - from 7 different MSs
    - 6 Enforcement Authority
    - 6 CA – varying specialisms
    - 2 CA and Enforcement Authority
    - 1 Technical Support to CA – environmental specialist
- 9 respondents selected blind for follow-up interview
- 7 follow-up interviews conducted
  - from 5 MSs
    - 4 Enforcement (1 x env, 1 x supply, 2 x hh)
    - 1 CA – technical (OSH)
    - 1 CA – Policy
    - 1 Technical Support to CA (env)
- non-responders contacted
  - 6 MSs contacted by e-mail by ECHA
  - no response

Common Findings

- the CSR Roadmap/ENES is considered relevant by both MSs and Industry
- there is a lack of knowledge of what's happening now at ENES, except for those who attend the meetings
- outside of ENES attendees there is limited knowledge and understanding of what tools are available, how they work and how they can be used to aid the work of stakeholders
- stakeholders, who attend, value ENES as a forum for discussing problems concerning the workability of the CSR/ES processes with stakeholders with the aim of developing practical and agreeable solutions to these problems
- resources issues exist across all stakeholders that could impact the scope and intensity of future activities

Industry Specific Findings - 1

- industry views many Roadmap products as being critical in ensuring that current ESs are relevant and consistent
  - although many SME DU groups consider that further simplification of the communicated ES and ext-SDS information would be beneficial
  - and many DU groups see ENES as being dominated by the interests of (larger) suppliers
- many industry groups would wish to see Roadmap products being giving more 'force' e.g. by reference to being 'preferred approaches' to CSA/ES development
- there is a frustration that the ENES tools are not been being consistently adopted, worked and/or maintained by different industry sectors/companies/consortia
- many DUs consider that the translation of Roadmap products into other EU languages will enhance implementation

Industry Specific Findings - 2

- industry is divided in its support for expanding the Roadmap to embrace SDS topics:
  - Such an extension is supported more by larger organisations. Smaller companies (SMEs) are more focused on ES relevance, understandability and harmonisation (across suppliers)
- the resources committed to support ENES by ECHA/stakeholders are considered adequate and appropriate
- the relationship between REACH ESs and the position they occupy in EU safety, health and environmental legislation continues to remain unclear for most of industry
  - And this is reported to be compounded by differences in MS enforcement approaches

Member State Specific Findings

- limited response to questionnaire and interview
- all respondents think that 'if applied by enough companies, the CSR/ES Roadmap products will improve the use and exposure information available in the ECHA database'
- some MSs see ENES mainly as a forum for industry to discuss problems and to identify and develop solutions
- where resources are scarce, CSR Roadmap/ENES is not prioritised by MSs
- there is limited sharing of knowledge gained between different parts of individual CAs
- limited knowledge and understanding of tools available, how they work and how they can be used to aid the work of MSs
- different functions within a CA have different needs from the outputs of the tools
- MSs need to have confidence in the outputs of the tools in order to encourage their use
- MSs are also divided on the need to extend the Roadmap into SDS topics
  - 47% thought it may be useful to do this; 33% thought it important to extend the scope and 20% believed it should not be extended in this direction.

Recommendations

- Implementation and consolidation
- Communication
- Targeted marketing
- Expanded skills

Implementation and consolidation - 1

- A strategy should be developed aimed at maximising the take up and use of ENES products. Attention should be directed to those sectors not engaged in ENES or which are slow adopters of the tools.

- Work should be carried out to simplify the often, very technical language used in Roadmap products. It would also be very helpful if key documents and products were translated into other EU languages beyond English.

- Testing and potential further development of methods/tools (for mixtures) should be undertaken to ensure that the ES information arriving at end-users is in a form that is helpful to them.

Implementation and consolidation - 2

- There needs to be a programme of evaluation and review of the tools and their outputs, both in terms of the technical content and in their capacity to meet the needs of the users, in order to promote confidence and encourage wider use.

- Suitable case studies and other training materials should be developed to illustrate how the Roadmap products can be identified, applied and their added value.

- All actors in ENES should contribute to producing a matrix showing how/when the different products can be used by different actors within the REACH processes, both Industry and MSs. This should make it easier for all actors to understand how to use the products and in turn promote wider use.

Communication

- All actors in ENES to produce and deliver a Communication Plan to actively promote the work of ENES/CSR Roadmap to MSs and Industry, particularly those currently not involved. Such a plan should look to include national (and sector) initiatives.

- Partnership working, with groups already active in this area, e.g. Forum, RIME, CARACAL, Helpnet, SLIC would enhance the effectiveness.

Marketing and Skills

- **Targeted marketing**
  - To introduce targeted marketing of the currently available products and the added value they bring. The information should be directed at the level the different actors need and for the different activities different actors in REACH have to perform;

- **Expanded skills**
  - Consider enhancing the skill set of ENES consistent with the requirements of targeted marketing and should the scope extend to SDSs, hazard assessment and Classification and Labelling.

Thank You

Questions?