REACHing the 2020 goals

Break-out group 3

Regulatory Risk Management (1)

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Key areas

• Data quality and availability;
  → do we get the information we need?
• Supply-chain communication;
  → is this information being used?
• Regulatory Risk management;
  → do we address substances of concern quick enough?

Take stock on the current implementation and come up with tangible ideas for further improvement!
Questions covered

1. Which regulatory risk management measures to be used for which type of case? Can we get policy agreement
2. How to achieve the SVHC Roadmap goals
   ....
6. How to increase the number of CLH dossiers
7. How to improve the convergence of C&L notifications
8. Appropriate resourcing if the Committees
RMOA/understanding impacts

• What: Develop an early ‘impression’ of socio-economic consequences in RMOA phase based on (available) information on uses

• Why: to build step-wise understanding of the wider impacts of the regulatory options

   *Annex XIV inclusion is based on ECHA recommendation and takes into account additional policy aspects, as appropriate.*

   *Assumption: with the Roadmap implementation, it is expected that there will be less new issues coming up in the Annex XIV phase*

• How:
  • Define (proportionate) key information and consideration, develop examples and best practices. Make public for transparency. Discussion in RiME as a starting point.
  • Industries’ RMOAs in early phase of the process
  • Time: ongoing, continuous improvement
Information for decision making (1/2)

• What: activate industry to improve the registration information on uses
• Why: ensure that authorities can identify appropriate substances for regulatory action
• How:
  • Continue informing early of substances in authorities’ radar screen; using letter campaigns, art 36 etc
  • Develop further approaches to have a wider focus and ‘spotlight effect’ e.g., per function, use or sector (rather than per substance) which complements the common screening approach; identify an example sector: RiME to discuss
  • Initiate discussion with industry to identify incentives for spontaneous improvement of data, make use of industry with experience on regulatory processes
Information for decision making (2/2)

• What: Use of other information sources (enforcement, authorities responsible of other legislation, other databases)

• How:
  • more interaction between authorities responsible for different legislation on EU (COM) and national level
  • Complement common screening with information from other databases (non-EU, EU), projects, monitoring data
Make full use of CLH

What: More CLH where harmonised classification has biggest impact on safe use.
Why: to increase number of substances for SVHCs identification and achieve the SVHC Roadmap goal and beyond. To make full use of CLH as a RRM.

How
• MSCAs to make full use of common screening which identifies candidates also for CLH process, consider the regulatory impact
• Ensure that manual screening/CCH/SEv conclusion that CLH is needed is followed up
• Consider to give higher priority to CLH
• Explore possibilities to encourage industry CLH dossiers following self-classifications, understand the reasons for low number of industry dossiers
Make full use of CLP

What: achieve increased convergence of self-classification

How

• Explore needs to amend CLP to strengthen the notification approach
• Address in combination with other item (e.g., work on supply chain communication, SDS)
• Combine the message to other awareness raising activities
• Consider specific awareness raising activity (MSCAs, COM, ECHA, industry associations)
Functioning of the Committees

• Plea for more economic expertise to support SEAC
• Increase awareness at policy level that the workload of the Committees will remain after 2018 registration deadline