

ECHA's Transparency Approach – update on actions for 2019-2020

53rd Meeting of the Management Board 28-29 March 2019

Proposal

The Management Board is invited to:

- take note of a report of the actions undertaken in 2017-2018 to improve transparency of the Agency's work;
- endorse the foreseen actions 2019-2020 for continual improvement in transparency.

Background

Linked to [ECHA's Approach to Transparency](#) ECHA has for some years already committed to an action plan to continuously improve its efforts in transparency.

For the years 2017-2018 three main areas for continual improvement were identified (see also [MB/04/2017 final](#)):

1. Further developing the dissemination of information on chemicals;
2. Improving our communication, including more focus on specific target groups;
3. Continual improvement of the transparency of Committee meetings, regulatory decision making and third party involvement therein.

A lot of effort has been put into implementing improvement in these three areas and therefore the Management Board is presented in Annex 1 with a full report of actions that have been undertaken.

Rationale

While ECHA's performance in the area of transparency has generally been regarded as very good (see e.g. REACH review, discharge, stakeholder survey), it cannot be considered as finished. Therefore it is important to set additional targets for the coming two years to maintain and further enhance ECHA's strong reputation in this field. The ECHA Secretariat has therefore set new goals for improvement for the years 2019-2020, which the Management Board is invited to endorse (see Annex 2).

Alternative options

ECHA could rely on its merits from the past, but without a continued focus there is a risk that stakeholder satisfaction in this area will drop and/or its good reputation would decline.

Drawbacks

While ECHA is already one of the most transparent agencies, it is an impossible task to fully satisfy all stakeholder demands. Transparency is also a moving target, constantly requiring a recalibration of what is expected of an EU institution. In this light, a proactive approach including continual improvement, will help ECHA to remain a frontrunner. Proactively tackling aspects that are known areas for improvement will also give more credibility than a reactive response.

Attachments:

- Annex 1: Report on transparency improvements during 2017-2018
- Annex 2: Goals for continual improvement in transparency 2019-2020

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Annex 1 - Report on transparency improvements during 2017-2018

1) Further developing the dissemination of information on chemicals

- Dissemination of Biocides data greatly enhanced: one can trace more easily where a biocidal active substance is in the EU approval system, whether it is approved, under evaluation by a Member State, or waiting for an opinion by the Biocidal Products Committee. The database currently includes over 300 active substances used in different product-types. For biocidal products, the following information is available:
 - A map of the countries where the product is authorised;
 - Non-confidential assessment reports by national authorities;
 - Authorisation history for each product;
 - Summaries of product characteristics, containing key product information, including:
 - active substances in the product and their concentrations;
 - hazard and precautionary statements;
 - the organisms the product is targeted at;
 - application methods;
 - type of packaging;
 - instructions for use;
- Improvements to the dissemination search functionalities for biocides and nanomaterials;
- Non-confidential information from downstream user notifications published;
- Based on a delegation agreement between the European Commission and ECHA the Agency started hosting in 2017 the EU Observatory for Nanomaterials. The objective of the observatory is to provide publicly available information on nanomaterials in the EU market, their safety aspects, and related research activities. The Nanomaterials Observatory also aggregates, evaluates and interprets the data, and communicates the results to decision-makers, authorities and the general public in a user-friendly and easily understandable way;
- In follow-up to a data value discovery study, ECHA developed a Data Strategy, which aims at developing a roadmap to further extend the data access and to explore use cases for exploiting the data;
- At the initiative of the European Parliament, a pilot project was initiated, through the form of a feasibility study, regarding a common open platform for chemical safety data and to increase the exchange of data across legislative silos.

2) Improving our communication, including more focus on specific target groups

- A new website, specifically for consumers was launched in 2018, to enable consumers and workers to find information on how authorities are working to protect them from hazardous chemicals and enabling them to make safer choices, exercise their rights, and to provoke a demand for more information on chemicals.;
- The option to create an account on the ECHA website was introduced in 2018, giving users access to additional features, such as "save my search" and "follow my substance". More features will follow;
- More focus on targeted multi-media communication campaigns, e.g. on tattoo inks, granules and mulches on sports pitches and playgrounds and on endocrine disruptors;
- More focus on visual communication elements (e.g. the development of an interactive infographic to follow the progress of REACH registrations; production of videos on hot topics, debriefing videos after Committee meetings) and active social media presence;
- More focus on proactive communication at an early stage to raise awareness and give wider context to our work, thus welcoming views and comments from all interested parties before the opinions have been adopted;
- The development of a dedicated web section with Q&As on the withdrawal of the UK from the EU, with aim of supporting transparently affected companies.

3) Improving the transparency of Committee meetings, by providing more explanation and information on the processes and decision making and by reviewing observer and third party involvement

- The Public Activities Co-ordination Table (PACT) offers companies an overview of information on substances that are on an authority's radar for potential regulatory risk management. Users can find a summary of each activity per substance, and be directed to process-specific lists, which give an information on all the substances subject to a particular process. The advance notice enables companies to consider their business strategy and gives all stakeholders more time to prepare their contributions to the public consultations that are ran during the formal risk management processes. The tool was extended further and now gives a substance level overview of 8 key risk management processes: Dossier Evaluation, CoRAP, registry of intention for CLH, for Candidate list of SVHC and for restriction, Endocrine disruptors, PBTs and Risk Management Options Analysis (RMOA);
- For Dossier Evaluation the cases now show the full lifecycle, including follow up actions;
- Automatic notification of substance relevant consultation procedures expanded from registrants to CLP notifiers and any company linked to the substance via any type of dossier (e.g. inquiry);
- Further improvements to the transparency of the work of the (PBT, Endocrine Disruptors and nanomaterials) expert groups with the introduction of public summary reports of the expert group meetings;
- Public agenda of the Executive Director on the ECHA website extended to cover all senior managers (meetings with external stakeholders);
- Outcome of post-employment decisions regarding senior management published on the ECHA website.

Annex 2 – Goals for continual improvement in transparency 2019-2020

1) Further developing the dissemination of information on chemicals

ECHA has a legal duty to make certain information on substances publicly available, free of charge. However, instead of simply disseminating data from the registration dossiers 'as is', ECHA has invested heavily into making this data easily accessible to enhance its usability and transparency. Continued efforts will be invested in further enhancements of the Dissemination Portal (InfoCard, Brief Profile and detailed source data) also in the coming years. ECHA will further strive to integrate the information on substances arising from different legislations and regulatory processes so that users can easily obtain an overview of the available data for that substance and follow the progress on its evaluation.

More in particular, further improvements to the Dissemination Portal will be implemented, such as improvements to the C&L inventory and the extension of the Registry of Intention lists for Restriction and SVHC candidate list. New datasets will also be published or integrated in the Dissemination system: PIC, POP and OEL data, public consultations, articles containing Candidate List substances and the EUON nanomaterials registry (see also below).

Based on the outcome of a feasibility study, the dissemination website will be extended with an "EU chemicals legislation finder" (EUCLEF). The first version, to be developed in 2019 with the view of a launch in early 2020, will have 40 legislations in scope and gives an overview of how a substance is regulated at EU level.

Under the Waste Framework Directive, ECHA has a new task to set up a database of articles containing Candidate List substances. A prototype of the database will be developed by early 2020, while for the dissemination of the information available to waste operators and consumers, and subject to resource availability, ECHA has a vision to integrate such information with the InfoCards, making the link between substances and articles and complex objects.

Further information will be added to the EU Observatory for Nanomaterials, including more visual and dynamic content. The creation of a search tool, to be integrated with the InfoCards will be explored.

In the framework of its substitution strategy, ECHA will publish a new shortlist of safer alternatives to hazardous substances compiled from REACH authorisation applications.

In the framework of its Data Strategy, ECHA will strive to make data more readily available to a wider audience (e.g. academia, companies, researchers, regulators in the EU and third countries) so they can benefit from the vast amount of scientific data contained in ECHA's databases and use it to enhance chemicals safe use, promote innovation and avoid unnecessary testing on animals. ECHA will develop a roadmap and prioritise actions to further extend the data access and to explore use cases for exploiting the data. In this context, ECHA will also participate to a pilot project under the lead of the Commission's DG Environment to undertake a feasibility study on a possible common open platform for chemical safety data and to increase the exchange of data across legislative silos.

2) Open communication and participatory decision making

Transparency on how the Agency reaches its decisions and opinions will continue to be ensured and ECHA will maintain, and where necessary further enhance, its high standards in conflict of interest prevention and transparency about the interests held by its decision-makers.

Also the transparency of the work of the Committees, Forum and expert groups will remain a priority. ECHA's accredited stakeholders can support ECHA's work through various bodies and networks. As observers they can participate to the discussions at the discretion of the Chair. Closed sessions are limited to the extent necessary.

Public consultations are another opportunity to participate in the development of ECHA's opinions. ECHA makes a lot of effort to proactively inform interested stakeholders of ongoing public consultation procedures.

In support of ECHA's strategy 2019-2023 a new communication strategy will be adopted. It defines the various audiences and their special needs as well as the needed changes in stakeholder cooperation. It gives a special emphasis to the tone of voice ECHA uses to be approachable and understandable by the target audiences.

Specific attention will be given to initiatives to reach concerned citizens and workers. Infographs to visualise data and social media campaigns are an excellent way to reach out to consumers and provoke some interest in understanding the impact of chemicals on their lives.

ECHA will continue to invest in direct dialogue with its stakeholders. Accredited stakeholder organisations receive regular updates which gives them advance notice of news and invites their participation and comments. They are invited to an annual strategic workshop and to a variety of events throughout the year. Wider stakeholders are invited to interact with ECHA through workshops and online webinars, where they can directly interact with ECHA in an open forum. These events are all free to attend, and increasingly they are conducted online, or recorded and made available online, so that a wider audience can benefit.

As our window to the world, the ECHA website provides a wealth of information on the chemicals in use in Europe today, the work and decisions of the Agency and the regulations it implements. In view of the growing portfolio of tasks of the Agency, adaptations to the website to reflect these changes and to improve the website's usability will be implemented. The subscription feature of the website will be enhanced to allow tailoring the content and more targeted communication, e.g. by allowing users to subscribe to the news topics and channels of their interest.