



Improved collaboration between enforcement authorities and stakeholders



Joint open session Forum for exchange of information
on enforcement and BPR Subgroup

14 November 2018, Brussels
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Quote of Marco Mensink (Cefic Director General)



- Said after having passed the last registration deadline
- ***From this weekend on, no substance, no mixture and no article should be on the European market without being compliant with REACH***
- We have to create a level playing field to protect European manufacturing

Topics to be covered



- Free riders and those not respecting tonnage bands
- Not sharing costs after having received registration number
- Authorisation and restriction and imported articles

Free-riders and those not respecting tonnage bands



- Many claims are made by companies that certain products enter the market without correct registration
- The cases treated by enforcement authorities show it is more complex, and complaints are sometimes based on information that cannot be verified
- What is needed to be known by enforcement authorities?
- What is the best way to inform authorities?
 - If doubts on valid registration
 - If SDS are not according the REACH legislation
 - If ES are missing or are not correct

Not sharing costs after having received the registration number



- REACH review action 1 is on data quality, and how to push industry to update
- There already difficulties if tests have to be done due to dossier and substance evaluation
- What will these be for spontaneous updates because it is understood that data quality is not sufficient and requiring further testing?
 - Easy to say that it is up to the SIEF and industry
 - If joint submitters are not paying, they are in breach
- Can we talk about a mechanism to inform authorities on such cases?

Authorisation and restrictions



- What's not allowed to be used in the EU, should not enter the EU in articles
- Do we need a database of where legacy chemicals can be expected? Interesting in view of the circular economy
- How can companies and associations be of help for NEA in case of found incompliance?

