

Accredited Stakeholder Workshop 2015

Proceedings
Brussels, 9 October 2015

9 October 2015

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9 October 2015

1 Summary

Once a year, ECHA arranges a strategic workshop for its accredited stakeholder organisations. This is a platform to discuss topical issues and give recommendations for future improvements. All of ECHA's 90 accredited stakeholder organisations were invited and 38 were represented in the workshop this year.

This year, three topics were discussed in a World café format: improving ECHA's efficiency, alternatives to animal testing and reaching the REACH goals. As before, topics were selected on the basis of stakeholder suggestions and strategic importance. Discussions resulted in shared recommendations, which ECHA has committed to follow up. In addition, ECHA's Directors gave presentations about current priorities such as the preparations for the REACH 2018 deadline.

Recommendations from the workshop will be taken into account in the Agency's upcoming work programmes and strategic planning. ECHA will also consider stakeholders' recommendations in the ongoing development of its processes.

2 Participants

The workshop was attended by 40 participants from 34 accredited stakeholder organisations, representing industry, NGOs, trade unions and academia.

The following directors participated from ECHA: Geert Dancet, Executive Director; Jukka Malm, Deputy Executive Director; Jack de Bruijn, Director of Risk Assessment and Leena Ylä-Mononen, Director of Evaluation. In addition, ECHA's Communications Unit staff attended to facilitate the World café session and to take care of practical arrangements.

A list of participants is attached in Annex 1.

3 Concept

The aim of the workshop is to provide a forum for strategic discussions between ECHA and the accredited stakeholder organisations, which represent key interest groups for the chemicals legislation managed by ECHA.

Topics were selected based on the stakeholders' suggestions and their strategic importance. The focus was on the interactive sessions which gave the stakeholders a possibility to openly express and discuss their views.

The discussions took place in parallel tables in a world café format. Each participant was able to join all three groups to brainstorm on the topics. The main outcome of all the groups was reported to the plenary by stakeholder rapporteurs.

The programme also included a follow-up from the recommendations from last year's workshop, where ECHA explained the measures taken so far.

The agenda is attached in Annex 2.

9 October 2015

4 Topics

Three topics were discussed: efficiency, alternatives to animal testing and reaching the REACH goals. In all groups, the topic was shortly introduced by an ECHA Director and the participants discussed the item broadly, giving feedback and proposals for improvement to ECHA. After the sessions, stakeholder rapporteurs presented the outcome and all participants voted on the most important proposals. The voting was done with stickers in different colours. This way, ECHA could see the favoured measures for industry and civil society and take both views into account.

At the end, the following recommendations were chosen:

1) Efficiency - what does ECHA need to do to improve on the value rated lowest by stakeholders?

- Improve consistency and predictability of ECHA's work (3 civil society, 13 industry votes). This included issues like providing advance notice of things that will affect stakeholders (IT changes, Guidance and other publications, changes to the regulation or Annexes, alternative test methods etc), integrating the data sets on chemicals provided by the different pieces of legislation, providing more stability of Guidance and IT tools – notably through the "moratorium" in the middle of 2016, informing companies about delays and explaining the reason for them and providing more consistency and clarity about enforcement measures and the use of limit figures like OEL / DNELs.
- Improve communication and support (7 civil society, 8 industry votes): communicate also about positive cases and developments (there was a feeling that when companies hear from ECHA, it's always bad news), provide more case studies to enable companies to see what a good example looks like (for example, a good read-across argument or a good justification for a proposal to test on animals), improve the communication from ECHA by consolidating the current vehicles into a smaller number of Corporate products, improve the navigability of the website, provide a coordinated joint calendar of meetings with the European Commission to prevent clashing or competing meetings, provide support on read across, respond to the comments received from public consultations and engage with the providers of safer alternatives to SVHCs.

Rapporteur for the group: Sylvie Lemoine, A.I.S.E.



9 October 2015

2) Alternatives to animal testing – what more needs to be done to avoid unnecessary animal testing?

- Provide more information on alternatives: List endpoints and alternatives with links in a consolidated table, provide information in practical guides and practical examples, publish more infographics to enable newcomers to understand how best to avoid testing on animals (4 civil society, 8 industry votes)
- Target consultants and inform them about alternatives. Provide checklists for consultants about alternatives that they could use (2 civil society, 3 industry votes)
- Make sure that ECHA's staff are up-to-date and receive training about alternatives so that there is more consistency on their acceptance (4 civil society, 3 industry votes)

Rapporteur for the group: Gertraud Lauber, IndustriAll European Trade Union



3) Reaching the REACH goals. Food for thought for ECHA's report on REACH and CLP implementation.

- Improve synergy between EU regulations. For example, the EU could be making more use of data generated for REACH also to facilitate other protective legislation (water quality, air quality, worker protection etc). (2 civil society, 12 industry votes)
- Provide examples of the benefits of REACH and consider how these are measured (5 civil society votes)
- Better enforcement of substances of very high concern in imported articles (2 civil society, 4 industry votes)
- Clarify the role of REACH in the sustainable economy (2 civil society, 4 industry votes)

Rapporteur for the group: Julia Baines, PETA International Science Consortium



9 October 2015

5 Follow-up from 2014 workshop

The Executive Director of ECHA, Geert Dancet, reported back on how ECHA has addressed the recommendations from last year's workshop. The Accredited Stakeholder Workshop 2014 concluded with recommendations on three topics: REACH 2018 deadline, involving stakeholders in biocides activities and nanomaterials.

Participants received a document with shared recommendations and ECHA's follow-up. The document is attached in Annex 5.

6 Conclusions

Shared recommendations from the workshop will be taken into account in drafting ECHA's work plans and in the ongoing development of ECHA's processes. ECHA will follow-up on each of the recommendations and report back to the stakeholders. In cases where ECHA does not consider the recommendations feasible or under its remit, it will explain this to the stakeholders.

Communication on the follow-up activities will be channelled through the Stakeholder update, which is sent bi-monthly to the accredited stakeholders. As before, ECHA will also present the outcomes in the next accredited stakeholder workshop.



9 October 2015

Annex 1 - List of participants

	First name	Last name	Organisation
1	Erwin	Annys	European Chemical Industry Council (Cefic)
2	Julia	Baines	PETA International Science Consortium (PISC)
3	Caroline	Braibant	European Association of the Metals Industry (Eurometaux)
4	Francois	Busquet	Center for Alternatives to Animal Testing (CAAT EUROPE)
5	Vito	Buonsante	ClientEarth
6	Lara	Carrier	European Industrial Minerals Association (IMA Europe)
7	Alain	D'haese	European Aerosol Federation (FEA)
8	Chantra	Eskes	European Society of Toxicology In Vitro (ESTIV)
9	Irantzu	Garmendian Aguirre	European Association of Chemical Distributors (FECC)
10	Divina	Gómez	Association of European Adhesives and Sealants Manufacturers (FEICA)
11	Alisdair	Gray	European DIY Retail Association (EDRA)
12	Celia	Gryspeirt	European Industrial Minerals Association (IMA Europe)
13	Marianne	Hedberg	The Swedish Construction Federation
14	Gregory	Howard	European Environmental Bureau (EEB)
15	Jarlath	Hynes	Humane Society International (HSI)
16	Amaya	Jánosi	European Chemical Industry Council (Cefic)
17	Uta	Jensen-Korte	European Association of Chemical Distributors (FECC)
18	Gertraud	Lauber	European Trade Union (IndustriALL)
19	Sylvie	Lemoine	International Association for Soaps, Detergents and Maintenance Products

9 October 2015

			(A.I.S.E.)
20	Ettore	Musacchi	European Tyre Recycling Association (ETRA)
21	Tony	Musu	European Trade Union Confederation (ETUC)
22	Jeannette	Paulussen	Only Representative Organisation (ORO)
23	Christoph	Pescheck	European Federation of Pharmaceutical Industries and Associations (EFPIA)
24	Alan	Poole	European Centre for Ecotoxicology and Toxicology of Chemicals (ECETOC)
25	Kirsty	Reid	Eurogroup for Animals
26	Josephine	Reinaud	European Cement Association (CEMBUREAU)
27	Jori	Ringman	Confederation of European Paper Industries (CEPI)
28	Marianne	Rosborg	European Trade Association for the Nonwovens and Related Industries (EDANA)
29	Tatiana	Santos Otero	European Environmental Bureau (EEB)
30	Elisa	Setien	European Federation for Construction Chemicals (EFCC)
31	Valerie	Shulman	European Tyre Recycling Association (ETRA)
32	Nikola	Svobodova	European Plastics Converters (EuPC)
33	Jean Pierre	Taverne	European Tyre and Rubber Manufacturers' Association (ETRMA)
34	Katy	Taylor	European Coalition to End Animal Experiments (ECEAE)
35	Chantal	Van Den Bossche	Women in Europe for a Common Future (WECF)
36	Nadia	Vinck	Euroalliages
37	Anneli	Weinholt	Aerospace and Defence Industries Association of Europe (ASD)
38	Malte-Matthias	Zimmer	European Committee for Surface Treatment (CETS)
39	Lorenzo	Zullo	European Tyre and Rubber Manufacturers'

9 October 2015

			Association (ETRMA)
	Tiiu	Bräutigam	European Chemicals Agency (ECHA)
	Geert	Dancet	European Chemicals Agency (ECHA)
	Jack	De Bruijn	European Chemicals Agency (ECHA)
	Adam	Elwan	European Chemicals Agency (ECHA)
	Lindsay	Jackson	European Chemicals Agency (ECHA)
	Jukka	Malm	European Chemicals Agency (ECHA)
	Mikko	Väänänen	European Chemicals Agency (ECHA)
	Leena	Ylä-Mononen	European Chemicals Agency (ECHA)

9 October 2015

Annex 2 - Agenda

Time Friday 9 October 2015

Place MCE Conference and Business Centre
Rue de l'Aqueduc, 118 / Waterleidingsstraat 118
1050 Ixelles / Elsene, Belgium

09:15 Registration

09:45 Opening and follow-up from last year's recommendations
Geert Dancet, Executive Director

10:15 Work underway for REACH 2018 – an update
Christel Musset, Director for Registration

10:30 Making sure animal tests are a last resort
Jukka Malm, Deputy Executive Director

10:45 Coffee break

11:00 Interactive sessions in a "World café" format

Topics:

1. Efficiency – what does ECHA need to do to improve on the value rated lowest by stakeholders?
2. Alternatives to animal testing – what more needs to be done to avoid unnecessary animal testing?
3. Reaching the REACH goals. Food for thought for ECHA's report on REACH and CLP implementation.

13:00 Lunch

14:00 Group discussion presentations

15:30 Agreeing on the shared recommendations

16:00 Closing remarks
Geert Dancet, Executive Director

9 October 2015

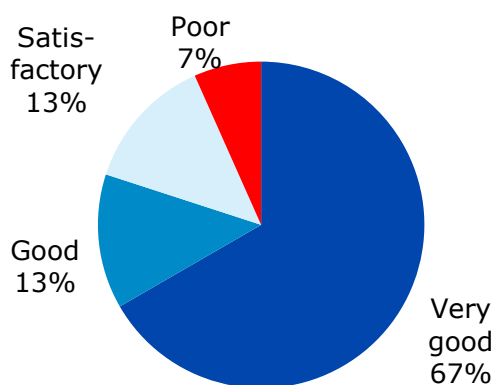
Annex 3 - Feedback Summary

This summary is based on the feedback received from 16 participants, response rate being 40%.

Overall satisfaction

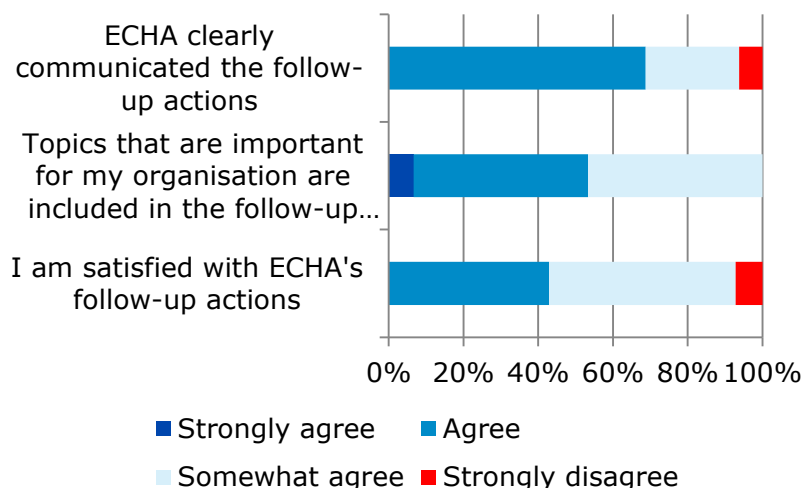
The overall rating of the workshop was very positive, with 80% rating it very good or good.

Based on the open answers, many participants appreciated ECHA's openness to dialogue and the fact that directors were available for discussions. Also the organisation of the conference got positive feedback. They found room for improvement in the quality of some of the directors' presentations as well as in some of the breakout groups' practical arrangements.



Follow-up from 2014

The participants were mostly satisfied with ECHA's follow-up activities from the 2014 workshop. Almost 70% agreed that ECHA had clearly communicated about the follow-up actions. Around half of the participants agreed that important topics were included in the follow-up actions. More than 40% were satisfied with the follow-up actions, and around 50% said that they were somewhat satisfied.

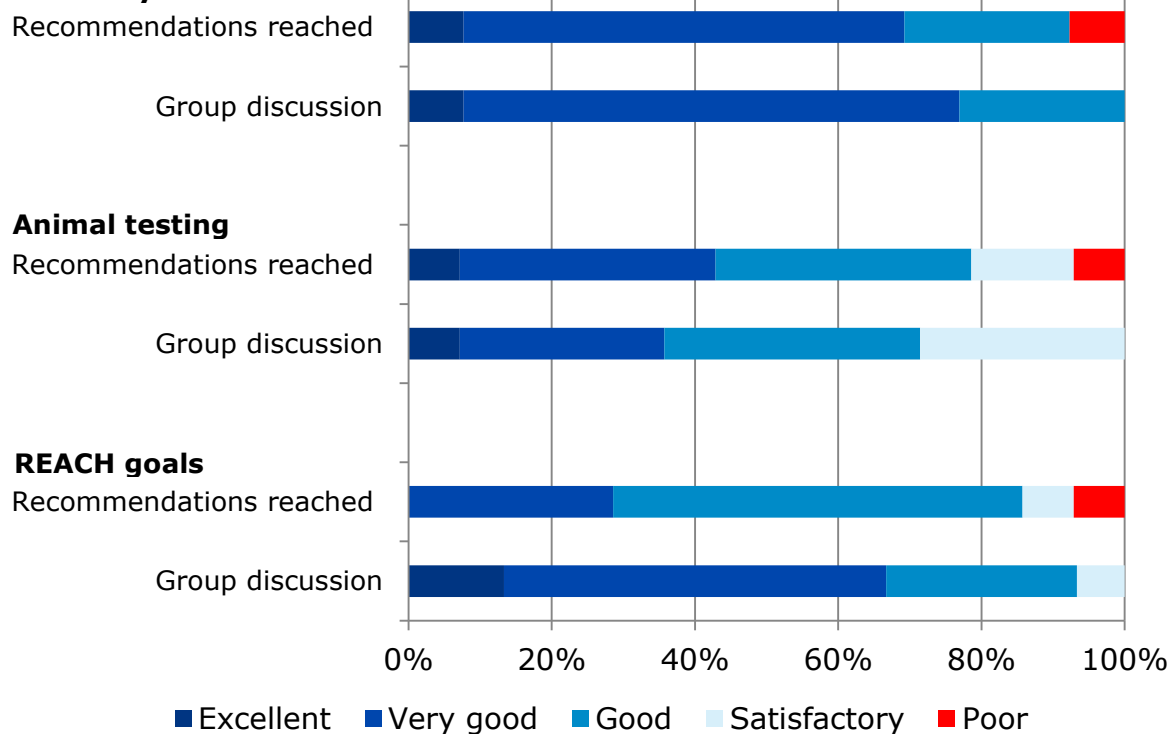


9 October 2015

Breakout groups

The feedback about the breakout sessions is very positive.

Efficiency



In the efficiency group, all participants found the group discussion good or very good and more than 90% were satisfied with the recommendations.

The group about animal testing had 75% of participants satisfied with the group discussion and almost 80% found the recommendations reached good or very good.

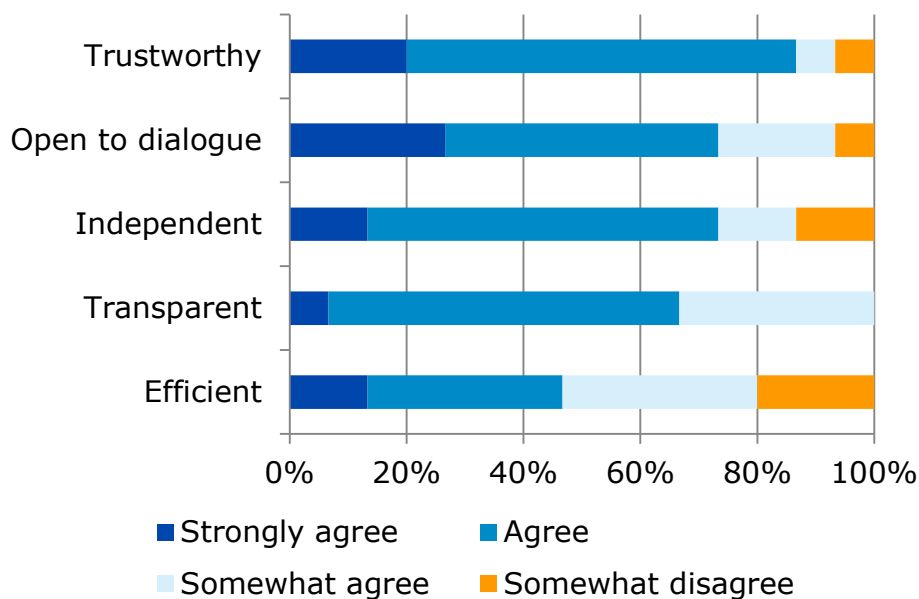
In the discussion about REACH goals, over 90% found the group discussion good or very good and close to 90% were satisfied with the recommendations.

Based on the open answers, stakeholders appreciated the format where they could participate in each group. Some wished to have more time for discussion and for some topics, there was a wish for a more balanced discussion.

Perception

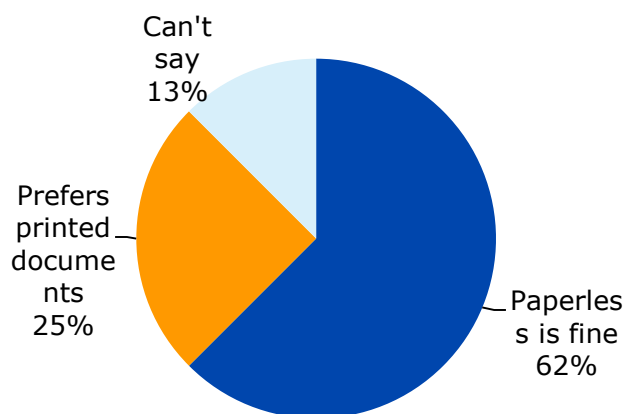
According to the stakeholders, ECHA is seen as trustworthy, open to dialogue and independent. Regarding transparency and especially efficiency, the perception is slightly lower.

9 October 2015



Practicalities

All participants were content with the meeting venue and 62% said that the paperless event was a good idea.



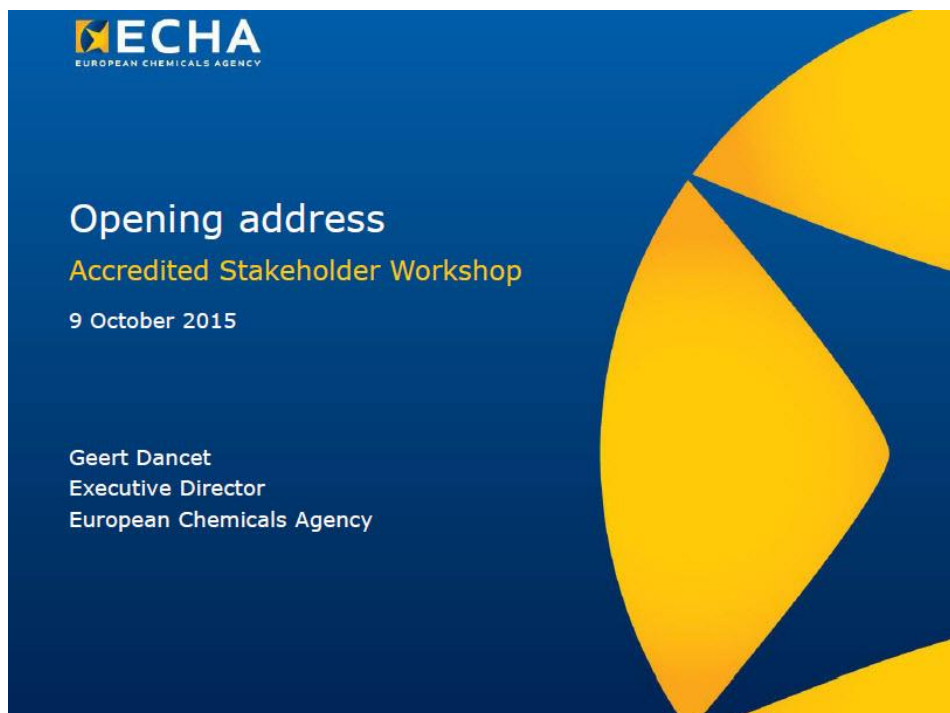
Future topics

The participants gave ideas for future workshops. The topics with the most mentions related to risk management, evaluation, alternatives to animal testing, 2018 deadline and downstream users. In addition, further proposals related to scientific issues, biocides, enforcement, communication topics and ECHA's values.

9 October 2015

Annex 4 Presentations

Click on the image to open the full presentation.



9 October 2015



**Making sure vertebrate
animal testing is a last
resort**

Accredited Stakeholder Workshop

9 October 2015
Brussels, Belgium

Jukka Malm
Deputy Executive Director
European Chemicals Agency



Closing remarks

Accredited Stakeholder Workshop

9 October 2015
Brussels, Belgium

Geert Dancet
Executive Director
European Chemicals Agency

9 October 2015

Annex 5 Follow-up of 2014 shared recommendations

REACH 2018

Establish a clear, uniform, multilingual information campaign, involving the Chambers of Commerce	REACH 2018 communicators network has been established with a kick-off workshop on 16 March. Webex meetings on 12 May and 22 September to encourage the network members to join the communications campaign built around the phase launches of the REACH 2018 Roadmap. Phase 1 launch on 23 June, phase 2 launch on 18 November, phase 3 on 2 March 2016.
Mobilise Member States to use multiple channels to reach SMEs that are not members of professional bodies	REACH 2018 communicators network established with participants from many Member States' authorities as well as Enterprise Europe network. New products to reach out to small companies: getting started web pages and a guide for SMEs launched in September in 23 languages. Increased use of social media to reach out to new companies.
Reinforce national helpdesks for 2018	The importance of providing clear and simple helpdesk replies was addressed with national helpdesks at the HelpNet Steering Group meeting in March 2015.
Provide good, simple guidance on Annex III (including read-across and grouping)	ECHA's strategy for supporting registrants to implement Annex III is being prepared; it will be submitted to the next CARACAL in November 2015.
Speed up provision of simplified guidance, tools etc for SMEs in 23 languages	Helpdesk support: REACH 2018 related Q&As are being reviewed with the goal of providing Q&As in plain English. The style of ECHA Helpdesk replies to regulatory questions has been simplified (action continues). Website: relevant sections under both "Regulations" and "Support" are being reviewed phase by phase.
Give downstream users the possibility to check registration intentions	Industry has repeatedly mentioned that in 2015 it is too early to query the SMEs about their registration intentions. ECHA will take this action up in the second half of 2016.
Create material that can be adapted by Member States and others to reach the target audiences	ECHA has created 1) joint press releases for the phase launches, comms network members may adapt them to local audiences, 2) REACH 2018 leaflet that can be adapted to local audiences by the network members and 3) language versions of the REACH 2018 infograph upon request.
Encourage the commission to screen potential sources of financial help for SMEs and contribute to explaining their existence.	ECHA has discussed opening EU funds to SMEs affected by REACH: - Credit support (interest support, loan guarantees, etc.) for companies facing a cash-flow problem due to REACH related outlays (such as expenditure for access to testing results etc.); - Innovation support (for SMEs developing substitute chemicals). ECHA's SME Ambassador has raised the issue with the Commission's SME Envoys and with Commission officials on a number of occasions. He also attended a seminar organised by Eurochambers on "finance for SMEs" and met decision-makers at the EASME Executive Agency. ECHA has produced a guide for EEN advisors including information about funding. Both the "getting started" web pages and the guide for SMEs include information on EU and national

9 October 2015

	funding possibilities.
Look for best practice in training, mentoring etc. to see if it can be promoted among the member states and professional bodies.	ECHA is raising the issue with national helpdesks at the HelpNet REACH workshop in November 2015.

Involving stakeholders in the biocides work

Give participating stakeholders access to adapted version of working group assessment reports	Currently not possible due to confidentiality reasons. Introducing an early confidentiality check on the draft assessment report is not considered feasible.
Continue and improve interaction between Competent Authority meetings and Biocidal Product Committee meetings. Policy discussions arising from Committee meetings should take place in CA meetings	ECHA organised a workshop in March on the active substance approval process where this was one of the elements discussed. Considered now as closed following the discussions at CA meetings. This is an issue requiring continuous attention.
Use teleconferences for working group meetings	More than 25% of the working group meetings were organised via webex in 2015. It is a normal practice now.
Use online tools for events; web streaming of conferences, webinars and online questions	ECHA webstreams the Biocides Stakeholders' Day conferences, questions can be submitted remotely via web-form. ECHA has organised 4 webinars on biocides, including one to MSCAs, and more webinars are planned.
Ensure that all ECHA's accredited stakeholders are informed and can contribute to substitution work	All accredited stakeholders that have expressed an interest in biocides are informed through ECHA's news and the bi-monthly stakeholder update news bulletin. The Biocidal Product Committee and working groups regularly invite accredited stakeholders to attend their meetings. ECHA launched a joint awareness-raising initiative on substitution in September (webinar, video and web page) with accredited stakeholder organisations involved in the project.

Nanomaterials

Take into account information from international discussions (OECD, CEN, FP7). Make distinction between exploratory research and standardised regulatory requirements	ECHA is actively involved in international discussions and chairs an OECD working group overseeing the development of revising existing test guidelines. News alert and newsletter article published about new nano related information released by the OECD. ECHA recognises the important link between the revision of existing test guidelines and the implementation of REACH, in particular in the context of guidance development. OECD work is important to ensure technical convergence with EU legislation, especially REACH and CLP. The data from the testing program is also welcomed. ECHA believes that this nano specific information will aid ongoing discussions at FP7 projects.
Develop a possibility for tiered testing requirements approach providing robust and agreed	ECHA believes that testing strategies are part of the international work on harmonising methodologies for risk assessment of nanomaterials. ECHA will regularly update the

9 October 2015

<p>scientific justification where studies are not conducted. Identify specific properties or features which may trigger risk management measures. Translate this into IUCLID.</p>	<p>existing tools and IT systems to ensure compatibility. In addition, ECHA is currently developing a working paper together with JRC and RIVM on read across between different nanoforms. This draft will be further discussed with Member States, NGOs and industry before it feeds into ECHA guidance development.</p>
<p>Promote best practices for nanomaterials registration dossiers</p>	<p>ECHA facilitates the dialogue with Member States and stakeholders through the Nanomaterials Working Group. In addition, ad-hoc initiatives have been carried out, e.g. the GAARN project (Group Assessing Already Registered Nanomaterials). Member States, industry and ECHA have discussed best practice for how to assess nanomaterials under REACH. This generated three documents outlining best practice to support registrants. In the future, more best practices will be developed.</p>
<p>Ensure that all guidance documents on safety data sheets address nanomaterials</p>	<p>ECHA assesses needs for guidance update in the context of nanomaterials. The guidance on safety data sheets is part of the evaluation.</p>
<p>Improve access to information on nanomaterials on ECHA's website</p>	<p>Improvements on the website: simplifying the links on the nanomaterials page and adding new sources of information</p>