

# Accredited Stakeholder Workshop 2016

Proceedings  
Brussels, 21 October 2016

21 October 2016

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European Chemicals Agency

Mailing address: P.O. Box 400, FI-00121 Helsinki, Finland

Visiting address: Annankatu 10, Helsinki, Finland

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## 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 100 accredited stakeholder organisations were invited. Altogether, 48 stakeholder representatives registered and 35 participated on the day.



This year, the event's focus was on how to reach the 2020 global goal for sustainable development – the sound management of chemicals throughout their lifecycle. The aim is that by 2020, chemicals are used and produced in ways that lead to the minimisation of significant adverse effects on human health and the environment.

ECHA had prepared a draft document describing the twelve main success factors and nineteen measures that would contribute to the achievement of this global goal. The success factors and measures were critically reviewed and discussed during the workshop. Stakeholders also proposed new success factors and measures where they felt that important issues had been missed. They were then asked to prioritise the five most important ones. The stakeholders also discussed measures that they were committed to take to contribute to the achievement of the goals.

The success factors and measures will be revised based on the feedback from the workshop, and presented to the Member States Competent Authorities and then ECHA's Management Board later in the year. They will then form the basis of ECHA's strategic planning for the coming years.

## 2 Participants

The workshop was attended by 35 representatives from 31 accredited stakeholder organisations, representing industry, civil society and academia.

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

A list of participants is available in Annex 1.

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### 3 Content and conclusions of the workshop

The workshop's main aim was to get an understanding from stakeholders about what success would look like if Europe is to achieve the global goal of the sound management of chemicals and the minimisation of their adverse effects. ECHA had sent in advance a draft document listing 12 success factors and 19 measures that would be necessary for success. The aim was also to get their commitment to measures that they can take to contribute to success. The document is at Annex 5.

The day comprised interactive sessions which gave the stakeholders a possibility to openly express and discuss their views and reach shared priorities.

#### Opening

Jukka Malm opened the workshop. He welcomed the participants, highlighted current hot topics for ECHA and gave an overview of last year's workshop and how its recommendations had been followed up by ECHA. His presentation is available in Annex 3. The 2015 workshop had concluded with recommendations on three topics: improving efficiency, alternatives to animal testing and input to ECHA's report on REACH and CLP. Participants received a document with shared recommendations and ECHA's follow-up. The document is available in Annex 6.

#### Morning breakout groups

The discussions in the morning took place in three mixed breakout groups. The main questions were: Are our success factors and measures the right ones? Do they need to be expressed differently? Are any missing? Which are the five most important to your organisation?



All three breakout groups first discussed the success factors, proposed new ones and then voted for the most important ones for them. Then they discussed the measures, judged their importance and achievability, proposed new ones and finally voted again for their most important ones. The voting was done with stickers in different colours. This way, ECHA could see the favoured success factors and measures for industry and civil society and take both views into account when analysing the results further.

The results (top 5 most important success factors and top 5 measures compiled from all groups) were presented to the plenary after the lunch.



In the stakeholders' view, the most important success factors to reach the 2020 goals were the following:

- Companies experience firm and

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- fair enforcement: 16 votes
- The REACH & CLP experience is shared world-wide: 14 votes
  - Information about substances flows in the supply chain: 13 votes
  - Non-animal testing methods are the standard: 13 votes
  - Information on chemicals is freely available: 12 votes

In addition, they proposed new success factors:

- The innovation and competitiveness of EU companies is ensured and enhanced;
- Companies are supported in their efforts to innovate and substitute dangerous chemicals, to help avoid regrettable substitution; and
- Member States play an active role in promoting and supporting innovation and substitution.

The five most important measures were the following:

- Substitution is promoted: 19 votes
- Promotion of internationally harmonised methodologies and tools at OECD and other international fora: 16 votes
- The use of supply chain communications tools: 15 votes
- Chemicals data used for other EU legislation: 13 votes
- Coordinated and equal enforcement: 10 votes

In addition, new measures were proposed:

- Providing incentives to promote compliance
- Simplifying the effort required to prove a company's SME status
- Including a new category for SME company size
- Level playing fields for all authorisation applicants in terms of review periods
- ECHA, Member State and Commission funded research programmes to promote innovative and sustainable chemicals and processes to avoid regrettable substitution
- Measures to achieve more effective phase-out of chemicals of concern through fit-for-purpose restriction dossiers
- Create a system to share data in the supply chain and follow-up on market disruption

Overall, many stakeholders commented that the current drafting of the measures needed to be much more understandable and less ECHA focussed for non-experts.

### Afternoon breakout groups

In the afternoon, participants were divided into sectoral groups: one breakout group for civil society organisations and two for industry associations. The groups were asked to come up with three measures that their sector could take to contribute to the achievement of the top 5 success factors.



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The brainstorming took place in the breakout groups. Each group appointed a “salesperson” as a rapporteur. The salespersons were asked to present the group’s initial ideas to another breakout group and then go back to the original group to refine their ideas. Finally, all three groups presented their three measures to the plenary.



### Plenary discussion – proposed measures

Civil society organisations (rapporteur: Felix Carvalho from Eurotox):

- 1) Provide recognition of the good work by companies – reward and promote the work of sustainable companies that use non-animal methods, environmentally-friendly processes or that provide excellent working conditions. Companies would be invited to propose themselves for the award, and make their own case.
- 2) Disseminate information on chemicals to the audiences with whom they most connect. For example, by analysing and digesting data on chemicals and presenting their findings to groups like consumers, researchers, innovators etc.
- 3) Cooperate with enforcement authorities and provide consumer product tests. There would be a cooperative approach between industry, NGOs and enforcement authorities in carrying out the tests.

In the following discussion, it was noted that:

- ECHA should make more use of its data in identifying and promoting examples of best practice to inspire companies and give them benchmarks to aim for.
- Downloadable data would enable far more organisations to analyse and make use of it – notably academia.
- Many member states and consumer organisations already conduct consumer tests and so an additional effort by civil society would need to find its own niche.

Industry group 1 (rapporteur: Francesca Angiulli from AISE):

- 1) Industry must promote and use the tools that are already there to support communication in the supply chain. Organisations must also continue the work on CSR/ES<sup>1</sup> roadmap. Practical tools are what companies need.
- 2) A platform is needed to discuss and exchange lessons learned and success stories to promote sustainable substitution.
- 3) If REACH and CLP data is to be shared and used worldwide, then the data provided by industry needs to be credible and reliable. Companies must take seriously the demand for robust and high quality data, and continuously update their dossiers.

Industry group 2 (rapporteurs: Divina Gomez from FEICA and Roger Doome from IMA-Europe):

- 1) Supply chain communication – industry needs to better promote the already available tools. Improve data to make it robust and use existing tools.

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<sup>1</sup> Chemical safety report / exposure scenario

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- 2) Communicate information on safe use – e.g. the SUMIs for workers – but in an easy way. There is an ongoing initiative on QR codes for consumers by IMA-Europe: products would contain information from the safety data sheets, but in an easier format through the QR code that can be scanned with a mobile phone.
- 3) Promote alternatives to animal testing and the OECD guidance.

In the following discussion, it was noted that:

- Tools for supply chain communication have been developed by the ENES<sup>2</sup> network but need to be better promoted, explained and used. They suggested a webinar and the need for them to be translated.
- Companies might need more incentives to use the use maps. To provide the downstream user perspective, DUCC representatives from different countries could participate in ENES meetings and also HelpNet members could be involved more.
- It is regrettable that the substitution support portal Subsport was no longer funded. The participants discussed whether its use could be improved and whether ECHA could play a role in ensuring that it could continue as the only online resource of its kind.
- The IMA-Europe initiative on QR codes providing simplified safety data sheet information for consumers raised a lot of interest among participants. This project would start with a pilot case on substances and mixtures first.
- ECHA informed about an ongoing project application led by the German Environment Agency for a consumer app scanning products to provide information on SVHCs in them. Some stakeholders were interested in contributing to the project if it gets funding. ECHA will follow up through the stakeholder update and inform the stakeholders about the next steps.
- Participants also asked ECHA to be more open in its communication about the weaknesses of registration data.
- Further topics included the ECHA-Japan cooperation agreement that could be made available on ECHA's website.

## Closing and next steps

Geert Dancet closed the event by highlighting the next steps and giving his personal reflections from the day. His slides are at Annex 3. He thanked the participants for the lively discussions and the feedback they provided to ECHA's thinking. The meeting document with the revised success factors and measures will be consulted with the Member States and ECHA's Management Board before it will be used for ECHA's strategic planning 2018-2020.

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.

The 2017 workshop will partly focus on ECHA's 5-year strategic planning and partly on topics proposed by stakeholders.

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<sup>2</sup> ECHA-stakeholder exchange network on exposure scenarios

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## Annex 1 - List of participants

	First name	Last name	Organisation
1	Francesca	Angiulli	International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)
2	Erwin	Annys	European Chemical Industry Council (Cefic)
3	Jan	Backmann	European Federation of Pharmaceutical Industries and Associations (EFPIA)
4	Tobias	Bahr	European Automobile Manufacturers' association (ACEA)
5	Els	Bedert	EuroCommerce
6	Francois	Busquet	European Consensus Platform for 3R Alternatives to Animal Experimentation (ECOPA)
7	Felix	Carvalho	Federation of European Toxicologists & European Societies of Toxicology (EUROTOX)
8	Barbara	Cooreman	Aerospace and Defence Industries Association of Europe (ASD)
9	Leondina	Della Pietra	European Fertilizer Manufacturers Association (Fertilizers Europe)
10	Alain	D'haese	European Aerosol Federation (FEA)
11	Roger	Doome	European Industrial Minerals Association (IMA)
12	Laura	Dos Santos Rego	Cruelty Free International
13	Dunja	Drmac	European Apparel and Textile Organisation (Euratex)
14	Irantzu	Garmendia	European Association of Chemical Distributors (FECC)
15	Divina	Gomez	Association of European Adhesives and Sealants Manufacturers (FEICA)
16	Celia	Gryspeirt	European Industrial Minerals Association (IMA)

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17	Marianne	Hedberg	European Construction Industry Federation (FIEC)
18	Anna Maria	Kaczmarek	European Confederation of Iron and Steel Industries (EUROFER)
19	Padmaja	Kamath	European Tyre and Rubber Manufacturers' Association (ETRMA)
20	Hannu	Keranen	The oil companies' European organisation for environment, health and safety in refining and distribution (Concawe)
21	Michael	Leise	Only Representatives Organisation (ORO)
22	Sean	McPike	European Federation of Pharmaceutical Industries and Associations (EFPIA)
23	Pelle	Moos	The European's Consumer Organisation (BEUC)
24	Laia	Perez Simbor	European Copper Institute (ECI)
25	Kirsty	Reid	Eurogroup for Animals
26	Marianne	Rosborg	European Trade Association for the nonwovens and Related Industries (EDANA)
27	Roderick	Rowe	European Crop Protection Association (ECPA)
28	Tatiana	Santos Otero	European Environmental Bureau (EEB)
29	Mauro	Scalia	European Apparel and Textile Organisation (Euratex)
30	Roberto	Scazzola	International Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)
31	Elisa	Setien	European Association of Chemical Distributors (FECC)
32	Egbert	Stremmelaar	European Committee for Surface Treatment (CETS)
33	Martha	Unterasinger	European Association of Craft, Small and Medium-sized Enterprises (UEAPME)
34	Violaine	Verougstraete	European Association of the Metals Industry (Eurometaux)

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<b>35</b>	Lars	Vogt	Toy Industries of Europe (TIE)
<b>36</b>	Tiiu	Bräutigam	European Chemicals Agency (ECHA)
<b>37</b>	Geert	Dancet	European Chemicals Agency (ECHA)
<b>38</b>	Jack	De Bruijn	European Chemicals Agency (ECHA)
<b>39</b>	Wim	De Coen	European Chemicals Agency (ECHA)
<b>40</b>	Adam	Elwan	European Chemicals Agency (ECHA)
<b>41</b>	Lindsay	Jackson	European Chemicals Agency (ECHA)
<b>42</b>	Jukka	Malm	European Chemicals Agency (ECHA)
<b>43</b>	Christel	Musset	European Chemicals Agency (ECHA)
<b>44</b>	Leena	Ylä-Mononen	European Chemicals Agency (ECHA)

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## Annex 2 - Agenda

### Accredited Stakeholder Workshop agenda

<b>Time</b>	Friday 21 October 2016
<b>Place</b>	MCE Conference and Business Centre  Rue de l'Aqueduc, 118 / Waterleidingsstraat 118 1050 Ixelles / Elsene, Belgium
09:00	Registration and coffee
09:30	Opening and follow-up on last year's recommendations, Jukka Malm, Deputy Executive Director of ECHA
10:00	What are the success factors that we need to achieve in order to reach the World Summit Sustainable Development goals on chemicals? Interactive discussions on the success factors and measures we need to take in order to get there.
12:30	Lunch
13:30	Discussions in sector-based break-out groups (one civil society and four industry groups) about the measures that stakeholders will or should take to contribute to the success factors
15:10	Reporting back from the break-out groups
16:00	Conclusions and closing remarks, Geert Dancet, Executive Director of ECHA
16.30	End

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## Annex 3 - Presentations

Click on the image to open the full presentation.

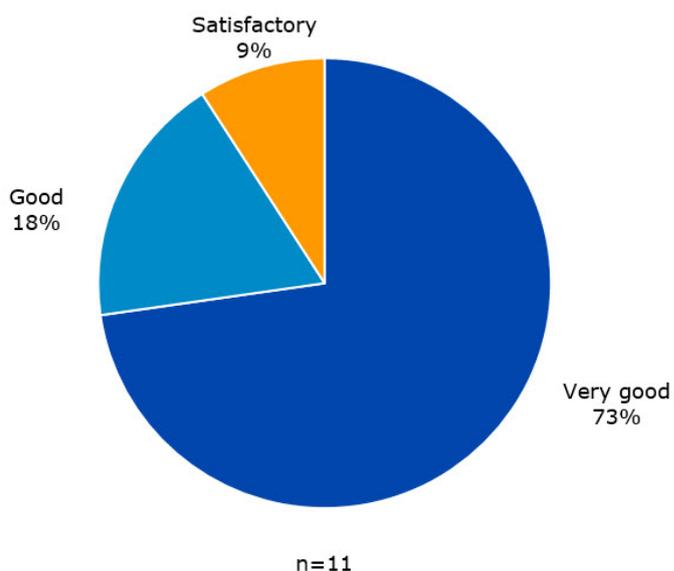


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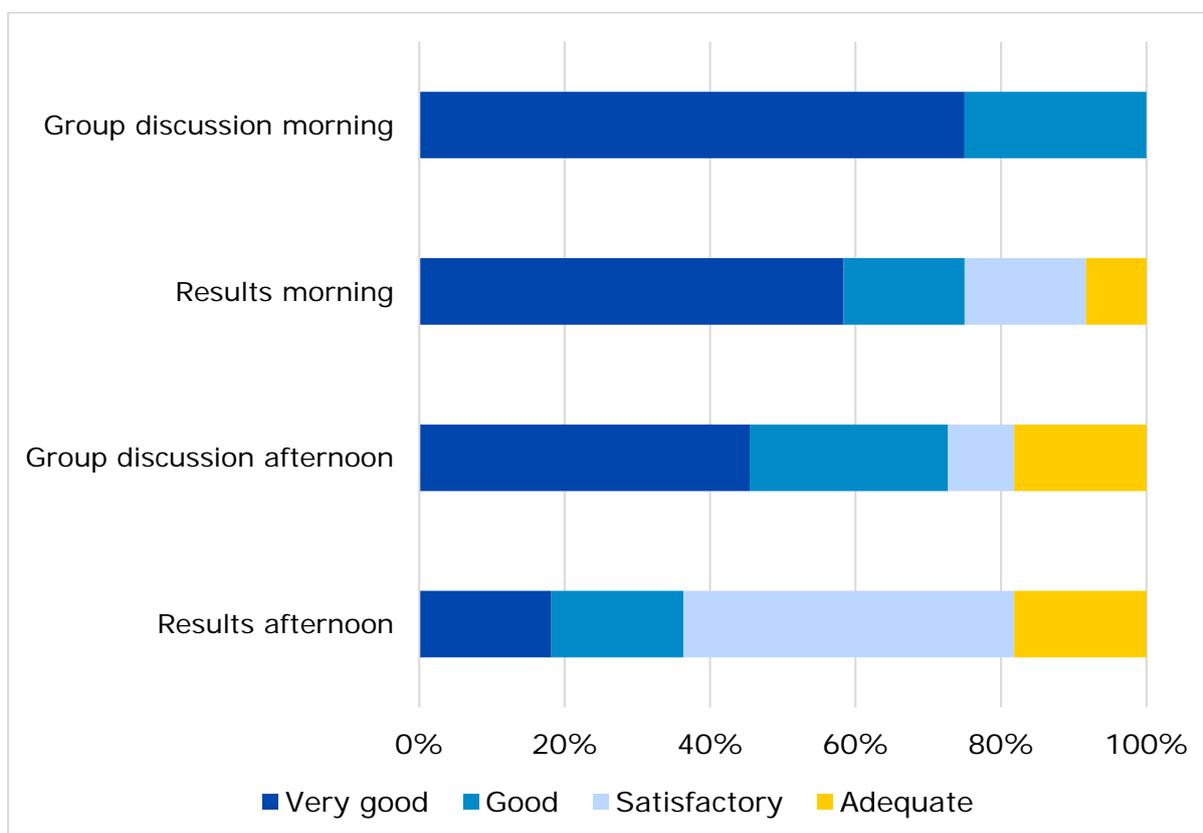
## Annex 4 - Feedback Summary

This is the summary of the feedback that participants provided to ECHA after the event. Altogether 11 participants gave feedback.

### 1. Overall satisfaction



### 2. Breakout groups



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### 3. Positive feedback

- Thanks a lot for the energy invested in this event to achieve dynamic settings, allowing people to exchange and reflect. Very nice day overall!
- The workshop was effectively interactive.
- Coming from a specialised sector we are very encouraged by the openness and willingness of ECHA to work with us. If only Efsa could learn from your example!
- I liked the contact/discussions with the group(s) and I think an interactive event like this helps to bring the best.
- Staff is open to meet and discuss with stakeholders which is very positive. It is good you keep it high level with the presence of different directors.
- It is my first ASO workshop and I am positively surprised that ECHA's staff is friendly, open to dialogue, listen to the problems of its stakeholders.

### 4. Room for improvement

- If possible, a better mix of different stakeholders is preferable: not too many NGOs participated, otherwise it would have been a more vivid discussion in the groups.
- The afternoon session was probably too short to allow a real discussion but it was a good starting point.
- For the afternoon session I would have preferred to have the full range of objectives again as a starting point, as the focus was now on industry measures; hence the 'top 5' might have been different from the perspective of what industry can do.
- The discussions were too much connected to the 20 issues. The real world is not the ideal world. So more realism is a must.

### 5. Feedback on content

- The success factors were well documented and cover the range of activities for ECHA, however the measures seem to be confusing and not always appropriate to any success factor. Where did they come from?
- For some organizations it was challenging to relate to registration, authorization, animal testing because it simply didn't relate to them
- Many measures and success factors were simply not relevant - therefore, for next time it would be good to divide based on upstream/downstream users rather than randomly pick a group.
- I got the impression that more commitment on explicit measures was expected from stakeholders. This is rather difficult.

## Annex 5 – Draft meeting document on success factors and measures

### What will success look like in meeting the WSSD 2020 goals?

The overall goal from the world summit on sustainable development (WSSD) is to achieve the sound management of chemicals throughout their lifecycle. The aim is that by 2020, chemicals are used and produced in ways that lead to the minimisation of significant adverse effects on human health and the environment. In the EU, the REACH Regulation and the CLP Regulation are the main tools for implementing the goal. This document describes what success will look like in meeting the 2020 goal, and the measures needed to achieve that.

#### Success factors:

##### 1) Robust data is available on all chemicals in Europe

- a) All chemicals critical for the supply chain in Europe are registered and the 2018 deadline is successfully managed without significant market disruption.
- b) Companies see the data on their chemicals as their business card and are committed to regularly updating their registration dossiers with new relevant information.
- c) Registration data cover the hazards and uses of substances adequately, also for the nanoform. This allows them to be adequately classified, labelled and used safely and enables the identification of those which need to be managed through regulation.
- d) New hazard data is generated using non-animal testing methods and new approaches wherever possible.
- e) All substances produced in large volumes (over 100 tonnes per year) have been reviewed, and ECHA has concluded, preferably in co-operation with the relevant (sub)sectors, which:
  - i. Are of concern;
  - ii. Are currently not of concern; or
  - iii. Need more data for a judgement to be made.
- f) A plan is in place to identify candidates for further evaluation and/or risk reduction amongst the lower volume substances (1-100 tonnes per year).

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## 2) Effective regulatory risk management of the most dangerous chemicals takes place

- g) Substances of concern are identified and subjected to the most appropriate regulatory risk management measure to protect health or the environment, either under REACH and CLP or other legislation.
- h) The processes for authorisation, restrictions, and harmonised classification and labelling are fully optimised and operate based on fit-for-purpose dossiers that allow efficient opinion-forming in the committees and swift decision-making by the Commission.

## 3) Effective communication takes place about the safe use of chemicals up and down the supply chain

- i) Information about substances flows smoothly and effectively up and down the supply chain. Companies that use chemicals inform their suppliers about what they do, and in return, manufacturers and importers provide information on how to use them safely.

## 4) A step-change for citizens, businesses and the regulators takes place

- j) Information on chemicals is made freely available, to allow individuals, businesses and regulators to make informed choices and to increase their confidence in the safety of chemicals – not just in Europe, but around the world.
- k) The experience of REACH and CLP, the information, methods and tools developed are increasingly used worldwide.
- l) Companies experience firm and fair enforcement, focussing on ensuring the safe use of hazardous chemicals and fostering a level playing field.

### Measures:

Measures for implementation – robust data	
1.	ECHA together with its partners and stakeholders ensures that all actions identified in the 2018 roadmap are carried out according to plan.
2.	ECHA will have concluded, by the end of 2020, at least a further 800 compliance checks on the priority endpoints of the priority substances in the 100-1000 and >1000 tonnes tonnage bands.
3.	In parallel, by the end of 2020, Member State competent authorities (MSCAs) evaluate over 400 priority substances under substance evaluation and ECHA requests necessary data to conclude on suspected risk. MSCAs conclude the evaluations as soon as the necessary data is available and initiate further measures, where relevant.
4.	Targeted campaigns and other complementary measures from ECHA and Member States as well as voluntary actions from industry

	are carried out to increase the overall quality of all registration dossiers with a measurable impact.
5.	ECHA adapts the registration and data sharing processes to prevent submission of low quality dossiers and to prevent the use of these processes for other purposes than they were intended for (e.g. distortion of market).
6.	ECHA increases transparency of compliance check outcomes by completing the tasks under dissemination (i.e. life-cycle of decision making is online, and we have an efficient traceability system in place to be able to report detailed statistics).
7.	ECHA has screened with IT-tools the substances with registrations only in 1-10 tonnes and 10-100 tonnes tonnage bands. A plan is in place for compliance check or substance evaluation for years 2020-2025 and to support the decision whether priority should continue to be assigned to >100 tonnes dossiers.
8.	Registrants implement the revised information requirements for nanomaterials, and ECHA reinforces them via updated guidance and advice, and via compliance checks and/or complimentary measures.
9.	Registrants document their considerations on alternative methods and approaches with adequate justifications before proposing new animal tests in their registration dossiers.
10.	To further reduce the need for animal testing ECHA promotes the use of new alternative methods and approaches developed in the EU and internationally via guidance, advice, awareness raising and training. Where relevant, the Commission is updating the information requirements without undue delay.
<b>Measures for implementation – risk management</b>	
11.	For substances where the need for regulatory risk management measures is warranted or already identified (e.g. via risk management option analysis), ECHA communicates the conclusions to MSCAs and the Commission in an effective manner (mainly through the SVHC roadmap coordination activities and risk management expert meetings). Resulting proposals for CLH, SVHC, authorisation or restriction are developed within a reasonable timeframe.
12.	Substitution is effectively promoted by having all relevant currently known Substances of Very High Concern (SVHCs) included in the candidate list by 2020. Substances on the candidate list are regularly prioritised and recommended for inclusion into the Authorisation list.
13.	The recommendations from both the restriction efficiency and applications for authorisation task forces are fully implemented.
14.	Authorities create a framework to communicate on the need for risk reduction measures under other legislation.

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<b>Measures for implementation – supply chain</b>	
15.	ECHA, Member States, and industry associations keep supporting registrants and downstream users to adopt the methods, tools and standardised formats (such as use maps) developed under the chemical safety assessment roadmap. Registrants and companies further in the supply chain use these tools widely.
16.	ECHA continues to promote the communication and sharing of information among industry and between industry and authorities on the effective implementation of exposure scenarios as a novel communication vehicle that also serves different EU environmental and health legislation.
<b>Measures for implementation – step-change</b>	
17.	ECHA acts as a data hub for safety information on chemicals and further expands this central data management and dissemination role by exploring integration and synergies with other EU legislation in the period post 2018.
18.	ECHA and Member States promote the development and use of common and harmonised methodologies and tools at OECD and other international fora.
19.	Member States and ECHA agree on effective coordinated enforcement projects to address the issues critical to ensuring a level playing field and safe use of substances and all MS's participate in these projects.

## Annex 6 – 2015 recommendations follow-up

Efficiency - what does ECHA need to do to improve on the value rated lowest by stakeholders?		
Recommendation from stakeholders	Actions for ECHA	Follow-up by ECHA
Improve consistency and predictability	Integrate the data sets on chemicals provided by the different pieces of legislation	ECHA launched the new, more user-friendly search for chemicals on its website in January 2016. More is planned in the near future for integrating Biocides information.
	Provide more stability of Guidance and IT tools – notably through the “moratorium” in 2016	ECHA has set a moratorium for guidance in mid-2016 and informed stakeholders about it. Some guidance updates will still be published during the second half of 2016. However, they are already available in draft format on ECHA website if they are relevant to registration. Stakeholders have been informed thereof.
	Provide advance notice of things that will affect stakeholders – e.g. IT changes, guidance, regulatory changes, alternative test methods	ECHA’s stakeholder update bulletin has given pre-notice to stakeholders on such issues. In addition, several news items have been published on upcoming changes.
	Inform companies about delays and explaining the reason for them	To improve the transparency on dossiers, ECHA is planning new web pages in 2017, providing more information about the different stages in dossier evaluation.
	Provide more consistency and clarity about enforcement measures and the use of limit figures like OEL / DNELs.	The Commission has published guidelines related to the use of limit figures like OEL / DNELs.
Improve communication and support	Communicate also about positive cases and developments	ECHA’s newsletter regularly showcases positive case studies from companies. ECHA staff has been visiting SMEs to learn more about their situation and to collect further case studies. New cases about REACH benefits have been published on ECHA’s Chemicals in our life web pages and new substitution cases have been added to the ECHA website.

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	<p>Enable companies to see what a good example looks like (for example, a read-across argument or a justification for a proposal to test on animals)</p>	<p>A new illustrative example for the QSAR Toolbox has been published: <a href="https://echa.europa.eu/support/oecd-qsar-toolbox">https://echa.europa.eu/support/oecd-qsar-toolbox</a></p> <p>The new practical guide on alternatives to animal testing contains practical advice: <a href="https://echa.europa.eu/practical-guides">https://echa.europa.eu/practical-guides</a></p> <p>A webinar on alternatives to animal testing (22 September 2016) provides practical examples.</p> <p>In 2017, ECHA will publish case studies as advice to SME managers, as a follow-up of the publication of the practical guide for SME managers: <a href="https://echa.europa.eu/practical-guides">https://echa.europa.eu/practical-guides</a></p> <p>The new manual How to prepare registration and PPORD dossier also contains examples: <a href="https://echa.europa.eu/manuals">https://echa.europa.eu/manuals</a></p>
	<p>Improve the communication from ECHA by reducing the number of current vehicles</p>	<p>ECHA has been streamlining its news vehicles and discontinued the direct e-mailing to downstream users. ECHA is planning to create a subscription feature on its website in 2017 that allows users to subscribe to different kinds of news, according to their specific interests.</p>
	<p>Improve the navigability of the website</p>	<p>A usability study for the website was conducted in 2015 and first improvements are made in 2016 with more substantial changes planned for 2017.</p>
	<p>Provide a coordinated calendar with the European Commission to prevent clashing meetings</p>	<p>ECHA and Commission colleagues have discussed this and an external calendar was not yet feasible. However, the internal coordination of events will be further improved. ECHA's "open-for-all" events will be published in the EU newsroom calendar (<a href="http://europa.eu/newsroom/events/year_en">http://europa.eu/newsroom/events/year_en</a>) together with other EU events as of Q4 2016.</p>
	<p>Provide support on read-across</p>	<p>The read-across assessment framework (RAAF) for human health endpoints was published in 2015. ECHA plans to complement it with RAAF for environmental endpoints in early 2017. A working paper on nanoforms and read-across was published in March 2016.</p>
	<p>Respond to comments from public consultations</p>	<p>Currently not planned due to work load.</p>

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	Engage with the providers of safer alternatives to SVHCs	Substitution project ongoing with ASOs, new cases have been added to website and newsletter. ECHA commissioned a study on recommendations for enhancing substitution activities from the University of Massachusetts Lowell. The recommendations are currently being assessed by ECHA.
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### Alternatives to animal testing – what more needs to be done to avoid unnecessary animal testing?

Recommendation from stakeholders	Actions for ECHA	Follow-up by ECHA
Provide more information on alternatives	List endpoints and alternatives with links in a consolidated table	An overview table is in the planning for late 2016/early 2017.
	Provide information in practical guides and practical examples	A new practical guide on how to use alternative methods to animal testing was published in July 2016: <a href="https://echa.europa.eu/practical-guides">https://echa.europa.eu/practical-guides</a> A webinar on alternatives to animal testing (22 September 2016) provides practical examples. ECHA also contributed to Chemical Watch's webinar on alternatives. New webpages about alternatives to animal testing were published in July 2016, together with the launching of Phase 4 of the ECHA 2018 Roadmap: <a href="https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals">https://echa.europa.eu/support/registration/how-to-avoid-unnecessary-testing-on-animals</a>
	Publish more infographics to enable newcomers to understand how best to avoid testing on animals	An overview infographic on ECHA's actions to promote alternatives was published in the newsletter 1/2016.
Target consultants and inform them about alternatives.	Provide them with checklists	The practical guide for SME managers provides tips for consultants.
Make sure that ECHA's staff is up-	Capacity-building and training	Ongoing activity.

to-date and receives training about alternatives		
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**Reaching the REACH goals. Food for thought for ECHA's report on REACH and CLP implementation.**

<b>Recommendation from stakeholders</b>	<b>Actions for ECHA</b>	<b>Follow-up by ECHA</b>
Improve synergy between the regulations	For example, the EU could be making more use of data generated for REACH also to facilitate other protective legislation.	In the report, ECHA recommends that the interface between REACH and CLP and other pieces of legislation should be optimised – for example, by making more use of the data generated to comply with other EU legislation.
Provide examples of benefits of REACH and consider how these are measured		The report contains several testimonials on REACH benefits. A further report by ECHA on restrictions calculated the benefits gained so far.  Stakeholder update used several times to collect further REACH benefits from stakeholders.  New cases for ECHA's substitution pages published.
Better enforcement for substances in imported articles; Clarify the role of REACH in sustainable economy		Among the reports' recommendations, ECHA states that the current legislative requirements for substances in articles should be reviewed. This could form part of the work on the circular economy and drive towards a non-toxic environment.