Public
Consultation in relation to the REACH REFIT evaluation

Fields marked with * are mandatory.

1) Purpose and Context of the Consultation

a) The REACH REFIT evaluation

REACH[1] is the European Regulation for the Registration, Evaluation, Authorisation and Restriction of chemicals (EC) No 1907/2006. It is the main EU law on chemicals, covering substances on their own or in mixtures or in articles for industrial, professional or consumer use[2].

The European Commission (DG Internal Market, Industry, Entrepreneurship and SMEs and DG Environment) is conducting an evaluation of the REACH Regulation as part of the regular reporting obligation to monitor progress in the achievement of the objectives of the Regulation according to Article 117 (4) of REACH. Regular monitoring and reporting provides information to identify needs for adjustment and to propose recommendations to improve the implementation of the Regulation or the need to consider modifications.

This evaluation is part of the Commission's Regulatory Fitness and Performance Programme (REFIT)[3] and will cover the five compulsory evaluation criteria: effectiveness, efficiency, relevance, coherence and EU added value, including examining the potential to improve the way in which it delivers on its objectives and the potential for burden reduction and simplification.

The roadmap[4] for the REACH REFIT evaluation outlines the objectives, scope and key evaluation questions to be addressed in the evaluation. Furthermore, the consultation strategy[5] for the REACH REFIT evaluation provides additional details about the consultation objectives, activities and tools planned, including the present open online public consultation.

The objective of the public consultation is to obtain stakeholder views on the general approach to the 2017 REACH REFIT evaluation and to collect stakeholder views on strengths and weaknesses of REACH as well as any potentially missing elements. The responses will be taken into consideration in the preparation of the Commission Staff Working Document, presenting the results of the REACH REFIT evaluation and the Commission general report on the functioning of REACH addressed to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions.

The current open online public consultation is part of a broader stakeholder consultation strategy which includes also an SME panel circulated through the Europe Enterprise Network. Please note that the results may also be used in the context of other studies in the chemicals field.

** The consultation will last for 12 weeks. Responses to the public consultation must be submitted by 28 January 2017. **

b) Structure of this questionnaire

The questionnaire has four parts and you may choose which parts (or questions) you answer depending on your interest and level of familiarity with the REACH legal text and its implementation:

Part I – General Information about respondents (compulsory)

Part II - General Questions for respondents interested in REACH, but who may not be familiar enough with the legal text and provisions to answer more detailed questions (compulsory)

Part III – Specific Questions which require more in-depth knowledge and experience in dealing with the REACH Regulation (optional)

Part IV – Additional Comments

You may interrupt your session at any time and continue answering at a later stage. Once you have submitted your answers online, you can download a copy of the completed questionnaire.

To facilitate the preparation of your contribution, a pdf version of the questionnaire is available here (http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8952).

In view of the limited resources for translation as well as the specialised nature of the topic and technical terminology involved in this consultation, the questionnaire is available in English, German and French. Individual replies may be provided in any EU language.

Privacy Statement: *The information you provide will be used strictly in accordance with the provisions of Regulation (EC) No 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data. The content of your contribution and identity will be published on the Internet, unless you ask to remain anonymous.*

Disclaimer: *This document does not represent an official position of the European Commission. It is a tool to explore the views of interested parties. The suggestions contained in this document do not prejudge the form or content of any future proposal by the European Commission.*

[1] Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) - OJ L 396, 30.12.2006

[2] http://ec.europa.eu/growth/sectors/chemicals/reach/

http://ec.europa.eu/environment/chemicals/reach/reach_en.htm

[3] http://ec.europa.eu/smart-regulation/index_en.htm

2) Questionnaire

Part I – General Information about Respondents (compulsory)

1. Please indicate your name or the name of your organisation.

* Your name or name of the organisation/company:

Ministry of Infrastructure and the Environment (Competent Authority for REACH of the Netherlands)

Contact name (for organisations):

Jochem van der Waals

Transparency Register ID number (for organisations):
(If your organisation is not registered in the transparency register, you have the opportunity to register now (http://ec.europa.eu/transparencyregister/public/ri/registering.do?locale=en#en). If your entity responds without being registered, the Commission will consider its input as that of an individual/private person and as such, will publish it separately.)

*

Country:

The Netherlands

*

E-mail address

@ jochem.vander.waals@minienm.nl

*** 2.**

Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution:

(Please note that regardless the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 (http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1454925130412&uri=CELEX:32001R1049) on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules (http://ec.europa.eu/justice/data-protection/))

- (●) My contribution may be published under the name indicated; I declare that none of it is subject to copyright restrictions that prevent publication
- ( ) My contribution may be published but should be kept anonymous; I declare that none of it is subject to copyright restrictions that prevent publication
- ( ) I do not agree that my contribution will be published at all

*** 3.**

We might need to contact you to clarify some of your answers. Please state your preference below:

- (●) I am available to be contacted
- ( ) I do not want to be contacted

*** 4.**

Please indicate whether you are replying to this questionnaire as:

- ( ) A citizen

- ○ A business
- ○ A non-governmental organisation (NGO)
- ○ A consumer association
- ○ An industry association
- ○ A trade union
- ◉ A government or public authority
- ○ An intergovernmental organisation
- ○ Academia or a research or educational institute
- ○ Third country private organisation
- ○ Third country public authority
- ○ Other (please specify)

5.

Please indicate the level at which your organisation is active:

- ○ Local
- ◉ National
- ○ Accross several countries (e.g. Scandinavia)
- ○ EU
- ○ Global

Part II – General questions (compulsory)

This part is intended for all respondents interested in REACH, including those who may not be familiar enough with the legal text to answer more detailed questions.

6. To what extent do you think REACH is achieving the following objectives?

	1 Not at all	2 Slightly	3 Somewhat	4 Substantially	5 Very much	Do not know / not applicable
*a) Improve protection of consumers	○	○	○	◉	○	○
*b) Improve protection of workers	○	○	○	◉	○	○
*c) Improve protection of the environment	○	○	○	◉	○	○
*d) Free circulation of chemicals on the internal market (Reduce barriers to trade in chemicals across borders within the EU)	○	○	○	○	◉	○
*e) Enhance competitiveness and innovation	○	○	◉	○	○	○
*f) Promote alternative methods to animal testing for hazard assessment of chemicals	○	○	○	◉	○	○

7. To what extent do you think REACH is delivering the following results?

	1 Not at all	2 Slightly	3 Somewhat	4 Substantially	5 Very much	Do not know / not applicable
*a) Generation of data for hazard/risk assessment	○	○	○	◉	○	○
*b) Increase in information on chemicals for risk management	○	○	○	◉	○	○
*c) Increase in information exchange in the supply chain	○	○	◉	○	○	○
*d) Improvement in development and implementation of risk management measures	○	○	○	◉	○	○
*e) Shifting the burden of proof from public authorities to industry	○	○	○	◉	○	○

*f) Fostering innovation (e.g. substitution of SVHCs, development of new substances)	○	○	◉	○	○	○
*g) Promoting the development, use and acceptability of alternatives to animal testing	○	○	○	◉	○	○
*h) Implementation of the 3Rs (replacement, reduction and refinement) in relation to the use of animal testing	○	○	○	◉	○	○
*i) Dissemination of information on chemicals for the general public	○	○	◉	○	○	○

8. The various processes of REACH (e.g. registration, evaluation) are expected to generate data that can be used by public authorities to adopt adequate risk management measures under REACH or in other EU legislation. To what extent do you think that the data generated are adequate for adopting the following measures?

	1 Not useful at all	2 Slightly useful	3 Somehow useful	4 Substantially useful	5 Very useful	Do not know / not applicable
*a) REACH authorisation	○	○	◉	○	○	○
*b) REACH restriction	○	◉	○	○	○	○
*c) Consumer protection legislation concerning chemicals in articles (e.g. cosmetics, toys, food packaging)	○	◉	○	○	○	○
*d) Environmental legislation (e.g. Seveso, Industrial Emissions Directive)	○	◉	○	○	○	○
*e) Harmonised Classification & Labelling	○	○	○	◉	○	○
*f) Occupational Exposure Limits (OEL) in the context of worker protection legislation	○	◉	○	○	○	○

9. To what extent do you agree with the following statements in relation to the European Chemicals Agency (ECHA)?

	1 Strongly disagree	2 Disagree	3 Neutral	4 Agree	5 Strongly agree	Do not know / not applicable
*a) ECHA has handled the registrations of chemical substances effectively (i.e. support for registrant, access to IT tools)	○	○	○	◉	○	○
*b) ECHA has established a strong and trustful relationship with its stakeholders	○	○	○	◉	○	○
*c) ECHA has contributed to reducing the impact of REACH on SMEs	○	○	○	◉	○	○
*d) ECHA's activities and guidance have facilitated an innovation-friendly framework	○	○	◉	○	○	○
*e) ECHA has been successful in facilitating the implementation of the last resort principle concerning animal testing.	○	○	◉	○	○	○

Part III – Specific questions that require more experience with REACH

This part contains more detailed questions related to the five evaluation criteria and to REACH procedures.

You may further explain your answers at the end of the consultation.

Part III. A

Effectiveness

The following questions explore the extent to which the objectives of the REACH Regulation have been met, and any significant factors which may have contributed to or inhibited progress towards meeting those objectives.

10. In your view, to what extent have the REACH Regulation and its various chapters been implemented successfully?

	1 Not at all	2 Slightly	3 Somewhat	4 Substantially	5 Very much	Do not know / not applicable
Registration	○	○	○	◉	○	○
Data-sharing and avoidance of unnecessary testing	○	○	○	◉	○	○
Information in the supply chain	○	○	◉	○	○	○
Evaluation – dossier	○	○	○	◉	○	○
Evaluation – substance	○	○	◉	○	○	○
Authorisation	○	○	○	◉	○	○
Restriction	○	◉	○	○	○	○
Overall implementation of REACH	○	○	○	◉	○	○

11. Do you agree that the REACH legal text presents requirements regarding the following chapters in a clear and predictable manner?

	1 Strongly disagree	2 Disagree	3 Neutral	4 Agree	5 Strongly agree	Do not know / not applicable
Registration	○	○	○	◉	○	○
Data-sharing and avoidance of unnecessary testing	○	○	○	◉	○	○
Information in the supply chain	○	○	○	◉	○	○
Evaluation – dossier	○	○	○	◉	○	○
Evaluation – substance	○	◉	○	○	○	○
Authorisation	○	○	○	◉	○	○
Restriction	○	○	○	◉	○	○

12. In your view, to what extent are the following elements of REACH working well?

	1 Not well at all	2 Rather not well	3 Neutral	4 Rather well	5 Very well	Do not know / not applicable
Transparency of procedures	○	○	○	◉	○	○
Speed with which hazards/risks are identified	○	◉	○	○	○	○
Speed with which identified risks are addressed	○	◉	○	○	○	○
Time to allow duty holders to adapt	○	○	○	◉	○	○
Predictability of the outcomes	○	○	○	◉	○	○

13.

Please identify unintended effects of REACH, indicating whether you consider those to be positive or negative. Please provide evidence to quantify such effects or a qualitative description.

(max.

5.000 characters)

- positive: reinforcement of implementation of existing legislation for worker protection and CLP (see study Panteia, 2013)
- negative: compliance costs are a concern, particularly for SMEs
- the effects of REACH on innovation are both positive and negative. On the one hand, REACH creates pressure for development and application of safer alternatives. On the other hand, we receive signals from suppliers of safer alternatives that they are discouraged by the REACH registration obligations and (perceived) costs.

14. In your view, to what extent are the following elements of REACH enforcement satisfactory?

	1 Not at all satisfactory	2 Rather unsatisfactory	3 Neutral	4 Rather satisfactory	5 Very satisfactory	Do not know / not applicable
Overall REACH enforcement in the EU	○	○	○	○	○	◉
REACH enforcement at Member States level	○	○	○	○	○	◉
REACH is enforced uniformly across the EU	○	○	○	○	○	◉
Prioritisation of enforcement activities at EU level (by Forum)	○	○	○	◉	○	○
Communication on enforcement activities from Member States and Forum	○	○	◉	○	○	○

14.1.

If you answered 3 or less for any of the above, please explain how the relevant aspect of REACH enforcement could be improved.

(max.

5.000 characters)

The Forum of enforcement authorities under REACH functions well to coordinate enforcement, through joint projects and stimulating consistency in the interpretation. However, priority setting in enforcement is still a matter of national authorities, and enforcement capacity of the inspectorates is rather limited in relation to the large number of companies with duties under REACH. These factors cannot easily be improved. Cooperation with inspectorates responsable for OSH legislation and consumer legislation remains very important at both national and EU level. An overall picture of REACH enforcement in the EU is not available.

15. Have you, in the past 5 years, experienced a REACH inspection/control or have your products been controlled for REACH compliance? - To be answered only by companies (REACH dutyholders).

- ○ Yes
- ○ No
- ○ I don't know

Efficiency

The following questions explore the costs and benefits of implementing the REACH Regulation. The legislation was designed to deliver benefits in terms of protection of human health and the environment, better functioning of the EU internal market (e.g. facilitating trade between EU Member States) and fostering competitiveness and innovation of EU industry (e.g. better and safer chemicals). Costs can relate to costs for businesses, public authorities and society as a whole.

16. In your view, how significant are the following benefits generated for society by the REACH Regulation?

	1 Not significant at all	2 Rather not significant	3 Neutral	4 Rather significant	5 Very significant	Do not know / not applicable

Reducing the exposure of citizens in general to hazardous chemicals and, therefore, avoiding healthcare costs, lost productivity, etc.	○	○	○	◉	○	○
Reducing the exposure of workers to hazardous chemicals and, therefore, avoiding healthcare costs, lost productivity, etc.	○	○	○	◉	○	○
Reducing damage to the environment and to eco-systems and, therefore, avoiding the costs of treating contaminated water, restoring impacted fisheries, cleaning-up contaminated land, etc.	○	○	○	◉	○	○
Encouraging research and innovation, generating new jobs, and improving the competitiveness of EU manufacturing industry by encouraging/supporting a shift towards green, sustainable chemistry and a circular economy	○	○	◉	○	○	○
Stimulating competition and trade within the EU single market	○	○	○	◉	○	○
Stimulating international trade between the EU and other countries	○	○	○	○	○	◉
For businesses: Increasing the confidence of your clients/customers in your products	○	○	○	○	○	○

17.

In your view, to what extent are the costs linked to the following REACH chapters (for society, companies, public authorities, etc.) proportionate to the benefits (for society, companies, public authorities, etc.) achieved?

	1 Not at all	2 Slightly	3 Somewhat	4 Substantially	5 Very much	Do not know / not applicable
Registration	○	○	○	◉	○	○
Information in the supply chain (e.g. eSDS - extended Safety Data Sheets)	○	○	◉	○	○	○
Evaluation - dossier	○	○	○	◉	○	○
Evaluation - substance	○	○	○	◉	○	○
Authorisation	○	○	○	◉	○	○
Restriction	○	○	○	◉	○	○
Requirements for substances in articles	○	◉	○	○	○	○

18. Is the level of the fees and charges paid to ECHA as provided by the Fee Regulation (Commission Regulation (EC) No 340/2008), still adequate?

	Yes	No, it is too high	No, it is too low	I don't know
Fee for registration	◉	○	○	○
Fee for authorisation	◉	○	○	○
Fee for appeal	◉	○	○	○

19. Do you believe that there are areas where the REACH Regulation could be simplified or made less burdensome?

- ○ Yes to a large extent
- ◉ Yes but only to a minor extent
- ○ No
- ○ I don't know

If yes, you may provide ideas, preferably substantiated with quantitative evidence or qualitative information, at the end of the questionnaire.

Relevance

The following questions explore the extent to which REACH is consistent with current needs.

20. Do you believe that the REACH Regulation addresses the key issues in relation to the management of chemicals?

- (●) Yes to a large extent
- ( ) Yes but only to a minor extent
- ( ) No
- ( ) I don't know

If you answered no, you may provide detailed comments at the end of the questionnaire.

21. How suitable do you consider REACH to be to deal with the following emerging issues?

	REACH is the most suitable EU legal instrument to address the issue	REACH should only play a secondary role and the issues should be addressed by specific legislation	REACH is not a suitable instrument and should not address the issue at all	Do not know / Not applicable
Nanomaterials	◉	○	○	○
Endocrine disruptors	◉	○	○	○
Substances in articles	◉	○	○	○
Combination effects of chemicals	◉	○	○	○
Extremely persistent substances	◉	○	○	○

Coherence

22. Please tell us to what extent you agree or disagree with the following statements:

	1 Strongly disagree	2 Disagree	3 Neutral	4 Agree	5 Strongly agree	Do not know / not applicable
The different chapters (e.g. registration, authorisation, restriction,…) in REACH are applied in a coherent manner (e.g. there are no contradictions, inconsistencies…)	○	○	○	◉	○	○
The different chapters in REACH (e.g. registration, authorisation, restriction,…) are applied in a coherent manner (e.g. there are no contradictions, inconsistencies, they are complementary…) in relation to other EU legislation (e.g. worker protection legislation, consumer protection legislation, environmental legislation)	○	◉	○	○	○	○
The implementation of the SVHC Roadmap, including the Risk Management Option Analysis (RMOA), contributes to coherent implementation of authorisation and restriction under REACH	○	○	○	◉	○	○
The implementation of the SVHC Roadmap, including the RMOA, contributes to coherent implementation of REACH in relation to other EU legislation (e.g. there are no contradictions, inconsistencies, they are complementary…)	○	○	○	◉	○	○

22.1. If you disagree with one or more of the statements above, where do you consider coherence should be enhanced?

(max. 5.000 characters)

Coherence with OSH legislation should be enhanced. In addition to the already recognised need for more alignment of limit values in authorisation/restriction and OSH, there is a need for more alignment in requirements for risk management measures: the OSH hierarchy of measures versus measures prescribed in Safety Data Sheets. More generally, further improvement of the usability of safety data sheets is desirable.

Coherence with environmental legislation could be improved by more explicit references to substances of very high concern in the BREF documents under the Industrial Emissions Directive. Furthermore, coherence with the Rohs Directive, food contact, biocides and plant protection products could be enhanced. REACH should be the overall framework for identifying risks; decisions how to manage risks for specific applications could be left to more specific legislation.

Coherence between REACH and CLP could be improved for carcinogenic substances. It is becoming clear that REACH will hardly provide information that will result in CMR classification. With the current requirements for all tonnage bands, harmonized classification for carcinogenicity is for example not possible, because CLP indicates that information on two species is needed for this conclusion, where no study is required by REACH.

As already recognised, coherence with the Circular Economy package should be enhanced by development of a framework for SVHCs in recovered materials.

When assessing and taking measures on individual substances of concern, or uses of these substances, this can lead to substitution with similarly hazardous substances or to discrepancies in standards on similar uses. Both situations are undesirable. An example is the rubber infill used in synthetic turf in sports fields. The limit value for polycyclic aromatic hydrocarbons (PAHs) is over one hundred times more lenient for rubber infill than for rubber pavement. Such differences cannot be explained from the perspective of exposure. An approach aimed at similar uses or similar chemicals as a group can prevent such inconsistencies or regrettable substitution.

EU Added Value

23. To what extent do you consider that taking action through the different chapters of REACH has added value above what could have been achieved through action by Member States alone at national level? (1= no value, 5= a very high value)

	1	2	3	4	5	Do not know / not applicable
Registration	○	○	○	○	◉	○
Data-sharing and avoidance of unnecessary testing	○	○	○	○	◉	○
Information in the supply chain	○	○	○	○	◉	○
Evaluation – dossier	○	○	○	○	◉	○
Evaluation – substance	○	○	○	○	◉	○
Authorisation	○	○	○	○	◉	○
Restriction	○	○	○	◉	○	○

Part III. B

24.

In your view, how satisfactory are the following mechanisms and procedures of the REACH Regulation?

	1 Not at all satisfactory	2 Rather unsatisfactory	3 Neutral	4 Rather satisfactory	5 Very satisfactory	Do not know / not applicable
Awareness raising for duty holders on key obligations and deadlines	○	○	○	◉	○	○
Support for preparation of registration dossiers	○	○	○	◉	○	○
Participation in Substance Information Exchange Fora (SIEFs) – data sharing	○	○	○	○	○	◉
Dossier submission - IT tools	○	○	○	○	○	◉
Communication of information along the supply chain	○	○	◉	○	○	○
eSDS - extended Safety Data Sheets	○	○	◉	○	○	○
Notification of SVHCs in articles	○	◉	○	○	○	○

Information concerning presence of SVHCs in articles	◉	○	○	○	○	○
Assessment of testing proposals	○	○	○	◉	○	○
Dossier compliance check	○	○	○	◉	○	○
Enforcement/follow-up of compliance check decisions	○	○	○	◉	○	○
Substance evaluation activities by Member States	○	○	◉	○	○	○
Identification of relevant SVHCs for the candidate list	○	○	◉	○	○	○
RMOA (Risk Management Option Analysis) process	○	○	○	◉	○	○
Prioritisation of SVHCs for authorisation	○	○	○	◉	○	○
Amendments to the list of substances subject to authorisation	○	◉	○	○	○	○
Substitution of SVHCs	○	○	○	◉	○	○
Support for applicants for authorisation	○	○	○	◉	○	○
Assessment of applications for authorisation by ECHA	○	○	○	◉	○	○
ECHA public consultations (e.g. in restriction or authorisation)	○	○	◉	○	○	○
Consideration of the availability and feasibility of alternatives	○	◉	○	○	○	○
Decision making by Commission on applications for authorisation	○	○	◉	○	○	○
Preparation of Annex XV dossiers to propose new restrictions	○	◉	○	○	○	○
Assessment of proposals for new restriction	○	◉	○	○	○	○
Decision making by Commission on new restrictions	○	○	◉	○	○	○
Exemptions for R&D activities	○	○	○	○	○	◉
Reduction of fees for SMEs	○	○	○	◉	○	○
Guidance by ECHA	○	○	○	◉	○	○
Guidance by national authorities	○	○	○	○	○	◉
Guidance by industry associations	○	○	○	○	○	◉
Support provided by Helpdesks	○	○	○	◉	○	○
Operation of the Board of Appeal	○	○	○	◉	○	○
Inspections by enforcement authorities	○	○	○	◉	○	○

Part IV – Additional comments

25. If you have any additional comments relevant to this public consultation, please insert them here. You may also upload position papers.

(max. 5.000 characters)

Clarification or additional remarks for some responses:
7e: the burden of proof has shifted considerably compared to the previous chemicals legislation, but there is still much room for improvement
8a: REACH data can be very useful to select substances for authorisation, but in practice lack of information about uses and exposure is a limiting factor
8f: REACH data could be useful for setting OELs but are currently not used by SCOEL
10 - authorisation: it is too early to draw final conclusions about the effectiveness of authorisation
11 - substance evaluation: the fact that there is much discussion about interpretation of the requirements shows that clarification would be useful
17: we interpreted the question in terms of costs and benefits for society as a whole. The benefits outweigh the costs to a large extent, but still a lot of efficiency gains would be possible for the processes of substance evaluation, authorisation and restriction
We interpreted ´requirements for substances in articles´ as articles 33 and 7 of REACH
21 third point: REACH is the suitable instrument to identify risks, and choices to manage the risks could for some areas be left to more specific legislation (for toys, cosmetics etc.)
22 second point: inconsistencies between REACH and other legislation to a large part stem from implementation rather than the legal text
24 - extended SDS: the 'neutral' score concerns only the extended SDS (with exposure scenarios) and not the SDS system in general, which we see as a useful instrument
24 - Amendments to the list of substances subject to authorisation: the additional public consultation on socio-economic aspects before the addition of SVHCs on Annex XIV is not the optimal solution, because socio-economic aspects should be considered earlier in the process. Furthermore, there is no transparent assessment of information brought forward by industry, for instance on information about feasibility of alternatives. In addition, the procedure towards Annex XIV as a whole has become lengthy and burdensome, with four public consultations in different steps.
24 - Preparation of Annex XV dossiers to propose new restrictions: despite improvements made, the work load of preparing restrictions is high because of the information demands from RAC and SEAC. The use of article 68.2 (shorter procedure without formal socio-economic assessment) does is in practice not make the procedure faster or easier.
Additional comment: registration requirements do not fully cover exposure after recycling. Article 2.7d allows for exemption of registration for substances in a recovered materials, but this exemption is irrespective of its use. In many cases this is not problematic. A more problematic example is a substance used in paint which is recycled as a component in ship fuel without an exposure scenario covering the emissions.

Please
upload your additional document(s) (one by one, any format)

Select file to upload

26. Are you interested in being contacted in the context of the ongoing study on the impact of authorisation?

- (•) Yes
- ( ) No

Submit Save as Draft