HelpNet REACH Workshop – WebEx session – 26 May 2020

Summary of discussions

The HelpNet REACH Workshop, organised for the REACH members and observers of HelpNet, took place on 26 May 2020 by web conference. This document summarises the topics discussed during the workshop (Annex I) and the follow-up action points set (Annex II).

Opening of the workshop

The Chair, Erwin ANNYS (ECHA) opened the REACH Workshop and welcomed representatives of the European Commission, REACH national helpdesks, observers from industry, and potential candidate countries (see Annex I – List of participants).

Due to the present circumstances, ECHA has decided to organise remote meetings until the end of September 2020. Being aware of the limitations of online meetings, lacking opportunities for attendees to engage with speakers or interact with one another, the running of HelpNet workshops seems to be increasingly needed and important in the future.

In the same way, the Safer Chemicals Conference organised in the beginning of June will take place online. Some of the presentations given during the REACH Workshop were a preview of the event organised by ECHA on 2 June 2020.

The Chair introduced the agenda of the day, which was adopted without further comments.

Tour de table

The Chair invited the participants to a *tour de table.*

1. Update from the European Commission and national helpdesks

1.1 Update from the European Commission

Riccardo ZORGNO, (DG GROW, European Commission) gave an update on the recent legislative modifications and other acts[1] issued by the Commission, including developments on the REACH authorisation and restrictions processes, REACH Review actions addressed in the REACH Evaluation Joint Action Plan, and an overview of the topics discussed in the past REACH Committee.

The latest amendment of Annex XVII to REACH on 11 June 2019 included restrictions on (3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl) silanetriol and TDFAs (Entry 73). Pending restrictions in the pipeline include carcinogenic, mutagenic or reproductive toxicant (CMR)

[1] Regulations amending Annex II, Annex V, Annex XIV and Annex XVII to REACH.

substances, medical devices, persistent organic pollutants, certain liquid substances or mixtures, nonylphenol, and testing methods for azocolourants[2]. Other pending restrictions include diisocyanates, substances in tattoo inks or permanent make-up, and lead in PVC.

Annex XIV to REACH was recently amended on 6 February 2020[3] to include an additional 11 substances. Other published and upcoming amendments include REACH Annex V and Annex II, respectively.

Riccardo ZORGNO highlighted the recent developments in the authorisation process triggered by the landmark Court Judgment Case T-837/16 (Sweden vs Commission) on lead chromates of 7 March 2019[4]. The Commission appealed on the base of four grounds (Case C-389/19 P). The appeal procedure is ongoing.

The findings of the Court judgment have a strong impact on the authorisation process, e.g. concerning the assessment of the suitability of alternatives and the burden of proof to be discharged by the applicant. Most importantly, the Court ruled that where 'suitable alternatives in general' are available, but are not technically and economically feasible for the applicant, a substitution plan needs to be submitted as part of the authorisation application. The Judgment gave indications on the concept of 'suitable alternatives in general', which, in a nutshell, refers to alternatives that are safer, and technically and economically feasible for other operators in the EU (i.e. not alternatives available only *in abstracto* or in laboratory conditions).

This new interpretation has been immediately applied also to the authorisation applications pending at that time and of course those which are currently in the pipeline (the draft decision template was adapted with new recitals reflecting the new obligations and considerations) and, as a consequence of this new interpretation, the Commission has been sending requests for submission of substitution plans for certain applications where suitable alternatives seemed to be available in general.

Furthermore, two draft Commission implementing decisions were the object of the European Parliament resolution[5] to which the Commission replied, and is expecting another one shortly. The justification is often focused, among others, on the broadness of uses applied for and the related analysis of alternatives.

Current and upcoming work on authorisation decisions by the Commission involves 57 upcoming authorisation applications on octyl-/nonylphenol ethoxylates (mostly medical applications, vaccines, medicines, medical devices); 7 on chromates; 7 on coal tar pitch and one on trichloroethylene (8 are already received and under the Commission drafting phase) and a draft authorisation decision on diglyme.

Riccardo ZORGNO mentioned another landmark Court case on acrylamide (C-650/15 P) related to the intermediate definition[6]. ECHA and the Commission launched a consultation in CARACAL

[2] Better Regulation Portal: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11559-Amendment-of-Annex-XVII-REACH-and-its-Appendices-regarding-CMRs-liquid-substances-or-mixtures-and-testing-methods
[3] Note that a corrigendum to the Annex XIV amendment was published on 5 May 2020.
[4] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62016TJ0837
[5] https://www.europarl.europa.eu/doceo/document/TA-8-2019-0317_EN.html
[6] http://curia.europa.eu/juris/liste.jsf?language=en&num=C-650/15%20P

and once the final interpretation of the intermediate use is concluded, the *Guidance on intermediates* will be updated to reflect the new definition.

Riccardo ZORGNO also gave feedback on the following actions from the second REACH Review[7] and addressed in the REACH Evaluation Joint Action Plan[8]:

- Action 1 – concerning non-compliance of registration dossiers, an increased evaluation target from 5 % to 20 % of dossiers selected for compliance check (Article 41(5)).

- Action 3 – ECHA and the Commission will propose concrete steps to improve the communication of safety information along the supply chain, improved workability and quality of extended safety data sheets.

- Actions 8, 9 and 10 – improvements to the restriction process have been discussed and implemented through the task force established to improve the restriction procedure, and enhance Member State involvement in the restriction procedure. Discussion continues at the CARACAL meeting in June 2020.

- Action 16 – a subgroup of experts[9] are mandated to lead the work for a possible proposal for registration of certain types of polymers under REACH. The subgroup consists of members from EU Member States, observers, and ECHA.

In addition, he gave a brief overview of the topics discussed in the past REACH Committee, including a draft Commission Implementing Regulation on the duties placed on registrants to update their registrations under REACH.

After the presentation, several aspects were further discussed. One national helpdesk asked for an update on the annulment of the authorisation on the lead chromate pigments following the ECJ judgment (T-837/16)[10], and whether this would be interpreted as if there is an authorisation decision in place or not. Riccardo ZORGNO confirmed that the applicant will be able to continue using the substance.

Regarding the draft[11] Implementing Regulation on the duties placed on registrants to update their registration dossiers in line with Article 22 of REACH, he could not give certainties on the progress of the work and future schedule, on top of mentioning that this was an agenda point extensively discussed in the past REACH Committee.

The Chair, suggested that an update on the Green Deal and chemicals strategy for sustainability would be welcome at the following HelpNet REACH workshop, as well as a discussion on the impact on the activities of national helpdesks.

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[7] The second REACH review: https://ec.europa.eu/growth/sectors/chemicals/reach/review_is
[8] https://echa.europa.eu/documents/10162/21877836/final_echa_com_reach_evaluation_action_plan_en
[9] CASG-Polymers – a subgroup of the Competent Authorities for REACH and CLP (CARACAL).
[10] See Section 5.2 in the minutes of the 14th HelpNet Steering Group meeting, and action point no. 4: https://echa.europa.eu/about-us/partners-and-networks/helpnet/2019. After the meeting, the question ID 16424 was posted in HelpEx by one national helpdesk (pending feedback from the Commission).
[11] https://members.wto.org/crnattachments/2019/TBT/EEC/19_7352_00_e.pdf

1.2 Dossier quality and compliance – the German helpdesk perspective

Suzanne WIANDT, from the REACH helpdesk of Germany, presented the experiences and activities on a research project carried out by the Environment Agency (UBA) and the Federal Institute for Risk Assessment (BfR) on the data available in REACH registration dossiers.

In this context, she highlighted that although the German helpdesk was not involved as such in the project, it is the contact point to support companies to fulfil their registration obligations. Consequently, the helpdesk paid close attention to the developments regarding this project.

In the project, three evaluation phases were conducted during 2015 until 2020 to assess the availability and quality of the information provided by registrants to meet the standard information requirements under REACH. This project covered screening – and in-depth evaluations of data in the different tonnage bands as well as in more than 4 000 dossiers. In general, information on eight toxicological and eco-toxicological endpoints, as well as the environmental exposure assessment were reviewed.

The overall results showed a non-compliance rate ranging from 2 – 61 %, respective to different endpoints, tonnage bands, screening and in-depth evaluations. These results raised public concerns on the overall implementation of REACH, since non-compliant dossiers may imply a risk for human health and environment, *inter alia* towards vulnerable groups such as pregnant women and unborn babies. In 2018, the European Parliament (EP) held a debate on the Council and Commission statements concerning the efficiency of REACH[12], and emphasised the need for both authorities and industry to increase their efforts to improve the quality and compliance of registration dossiers.

Suzanne WIANDT described the German helpdesk reaction to these developments, starting from 'no reaction' in the first place, but then continuing by providing specific support to those companies with dossier information, which was assessed in the project. In 2019, the German helpdesk organised an event explaining how to minimise mistakes when updating a registration dossier. The event was planned to be repeated in June 2020, but cancelled due to the coronavirus pandemic. Overall, the helpdesk support and the information provided was deemed constructive and positive.

Suzanne WIANDT concluded that both industry, and authorities are interested that REACH works, to ensure the safe use of chemicals and a healthy environment.

[12] Post-meeting note:
EP debate on 'Grave lack of implementation of the EU Reach Regulation and use of non-tested chemicals in the EU': https://www.europarl.europa.eu/doceo/document/CRE-8-2018-10-24-ITM-025_EN.html
Minutes: https://www.europarl.europa.eu/doceo/document/PV-8-2018-10-24-ITM-025_EN.html
In 2019, following the debate, the European Commission and ECHA agreed on a joint action plan which is presently under implementation:
https://echa.europa.eu/documents/10162/21877836/final_echa_com_reach_evaluation_action_plan_en/0003c9fc-652e-5f0b-90f9-dff9d5371d17

1.3 Life AskREACH project

Oona FREUDENTHAL, from the REACH&CLP Helpdesk[13] run by the Luxembourg Institute of Science and Technology (LIST), introduced the AskREACH project aiming to facilitate the communication of information on substances of very high concern (SVHCs) in articles, between article suppliers and consumers. The project supports companies to easily comply with REACH Article 33, and helps consumers to easily access SVHC article information using a smartphone application[14].

The project, funded by the LIFE Programme of the European Union[15], was launched in September 2017. It is coordinated by the German Environmental Agency (UBA), has 20 project partners[16] in 13 Member States, and LIST is the leading partner of the campaign for companies and the developer of the IT infrastructure. LIST is responsible for dissemination activities, development of the app and database, and has contributed to the social media strategy.

The AskREACH system is available in all participating countries, and the smartphone application for consumers is translated to the languages of each of the participating countries. By the end of August 2022, it is envisaged that the system would be running in further EU Member States, EEA countries and EU candidate countries.

Oona FREUDENTHAL also presented the results of a survey targeted to 183 companies. The survey findings confirm concerns that a large proportion of companies are not well-prepared to respond to consumer's 'right to know' requests in compliance with REACH Article 33(2).

The Luxembourg helpdesk and Oona FREUDENTHAL can be contacted by national helpdesks interested in being part of the AskREACH project.

2. Tracking substances of concern

2.1 How to track hazardous substances in the supply chain[17]

Kevin POLLARD (ECHA) presented how to track hazardous substances for all life cycles stages, and the flow of information accessible and relevant for each actor in the supply chain under REACH, as well as an overview of the obligations resulting from adding substances of very high concern (SVHC) to the Candidate List.[18,19] He also focused on the communication and notification obligations under REACH for Candidate List substances in articles, including the SCIP notification from the Waste Framework Directive.

He introduced the SCIP[20] database, the link between REACH Article 33(1) and SCIP notifications, and the obligation of producers, importers or suppliers placing articles containing

[13] REACH&CLP Helpdesk: https://www.reach.lu/en/
[14] Scan4Chem App: https://www.askreach.lu/consumer/scan4chem-app
[15] 2018/05/13 No. LIFE16 GIE/DE/000738.
[16] https://www.askreach.eu/partners-and-supporters/
[17] Presentation available on the Safer Chemicals Conference 2020 web page: https://echa.europa.eu/-/safer-chemicals-conference-2020
[18] Substances that are intended to be proposed as SVHCs on the Candidate List are available in the registry of intentions on ECHA's website: https://echa.europa.eu/registry-of-svhc-intentions
[19] Candidate List of substances of very high concern for authorisation: https://echa.europa.eu/candidate-list-table
[20] https://echa.europa.eu/scip-database

SVHCs on the Candidate List – in a concentration above 0.1 % weight by weight (w/w) – on the EU market, to submit information on these articles to ECHA, as from 5 January 2021 onwards.

2.2 Get prepared to notify substances of concern in products[7]

Bo BALDUYCK (ECHA) introduced the SCIP prototype and the new release planned for the end of October 2020, which will allow online, offline in company's own IT systems, and system-to-system service SCIP notifications.

He also presented ECHA's recommendations to companies for them to get prepared. Grouping in one notification for complex objects with similar components/sub-components, and articles with similar properties will be possible, as well as re-using the data submitted by an upstream supplier in the supply chain.

2.3 Staying on top of your obligations

Telmo Jorge VIEIRA PRAZERES, (ECHA) presented the obligations for substances in articles (SiA) and the definition of an article, communication duties in the supply chain according to Article 33 of REACH, and the SiA notification duty according to Article 7(2) of REACH – highlighting the challenges for companies and authorities arising from these obligations.

He focused, in particular, on the article definition under REACH, and its impacts on other REACH and CLP obligations. He also stressed that two new obligations are kicking in on January 2021, the Poison Centres Notification and the SCIP notification, which are expected to increase the number of questions related to substances in articles from industry, in particular, concerning borderline cases between substances/mixtures and articles.

National helpdesks were invited to reflect on whether an increased capacity in replying to specific questions on substances in articles would be needed, to support industry to comply with Article 33 of REACH, and the Waste Framework Directive (i.e. the SCIP notification).

He introduced the results and the recommendations of the Forum pilot enforcement project on substances in articles[21]. The project was conducted in 15 participating countries, and has found that 12 % of inspected products contain substances of very high concern (SVHCs). The majority (88 %) of suppliers of these products were failing to communicate sufficient information to their customers about SVHCs in the products they supply. The Forum's report for this project contained specific recommendations to ECHA, the Commission and the national helpdesks.

He clarified the current ECHA approach to address the recommendation on more guidance on what specific information needs to be provided in the supply chain beyond the name of the Candidate List substance(s) and in what cases such information is needed, which is closely linked to the materials developed under the SCIP project: the definition of the SCIP

[21] Forum pilot project report: https://echa.europa.eu/documents/10162/13577/sia_pilot_project_report_en.pdf/f9fc153b-a322-43be-1ba1-44f4e5cb02c8

information requirements and the SCIP format. Concerning the latter, it could be re-used by actors in the supply chain to communicate information on Candidate List substances in articles under REACH Article 33.

Concerning the Forum's recommendation made to ECHA, the Commission and national helpdesks to organise comprehensive awareness-raising campaigns on SiA duties, the speaker invited the representatives of the national helpdesks to reflect on how ECHA could support them on such actions.

Information about chemical substances, particularly hazard information, generated and communicated in the framework of REACH, and its subsequent use in classification according to CLP, is essential for the classification of waste. Further, classification of substances under CLP may also be relevant for waste classification.

2.4 Raising awareness on substances in articles and SCIP

Tiiu BRÄUTIGAM, (ECHA) presented the information material prepared by ECHA on substances in articles and the SCIP database.

She highlighted the key position that national helpdesks have in reaching out to companies in their own countries unaware of obligations related to Article 33 of REACH or the obligation to submit information to ECHA under the WFD as of 5 January 2021.

Interested national helpdesks were asked to use the materials and provide feedback to ECHA:

- Substances in articles – information for companies[22]
- SCIP database[23] including SCIP email alerts
- SCIP support[24] including questions and answers
- SCIP leaflet[25] available in 23 languages
- SCIP prototype[26]
- SCIP notification obligations described in six steps[27]
- social media posts
- awareness raising video[28]
- webinar recording[29]
- targeted mailing on SCIP
- video[30] statement about the findings of the Forum project on SVHCs in products.

[22] Candidate List substances in articles: echa.europa.eu/regulations/reach/candidate-list-substances-in-articles
[23] SCIP database: https://echa.europa.eu/scip-database
[24] SCIP support webpage: https://echa.europa.eu/scip-support
[25] SCIP leaflet: https://echa.europa.eu/documents/10162/28213971/scip_leaflet_en.pdf/d1180cae-aeeb-ac9e-55e5-49a4324def40
[26] Available to support duty holders who want to get familiar with preparing SCIP notifications and test the submission functionalities before the process officially starts at the end of October 2020: https://echa.europa.eu/scip-prototype
[27] Suppliers of articles: https://echa.europa.eu/scip-suppliers-of-articles
[28] Who needs to notify to the SCIP database? https://www.youtube.com/watch?v=Ixiq71L_G-o&feature=youtu.be
[29] Introducing the SCIP database prototype: https://www.youtube.com/watch?v=_VlKWD1ENy0&feature=youtu.be
[30] Companies need to improve communication of hazardous substances in products: https://www.youtube.com/watch?v=b0wNhTYmGmE&feature=youtu.be

Discussion

The Chair opened the floor for suggestions on how ECHA and national helpdesks could work together and reply to an increasing number of SiA-related questions, particularly Article 7(1)(2), Article 33 of REACH, SCIP and borderline cases:

- How can ECHA support the national helpdesks in answering SiA-related questions, instead of sending directly to ECHA? What are the options, in particular, regarding borderline cases? (e.g. webinars, sharing typical replies from ECHA, more frequent use of HelpEx questions, etc.)
- What can national helpdesks do to raise the awareness of companies and to improve the current compliance rate regarding SiA obligations? What can ECHA do to support national helpdesks?
- Are there Q&As on substances in articles that need to be updated?

Despite the link between SCIP and REACH, some national helpdesks explained that promoting the SCIP material prepared by ECHA or replying to SCIP questions is out of their remit, as they were established by law to reply to REACH, CLP and/or BPR questions only. Therefore, questions in the scope of REACH will continue to be replied by national helpdesks, while complex cases on the Waste Framework Directive and SCIP-related questions will be referred to ECHA.

Two national helpdesks providing support on SCIP obligations, and to the local waste authority, indicated their interest in using the ECHA material, taking part in awareness campaigns, and being informed on SCIP developments, including new question and answers.

Representatives of national helpdesks expressed their interest in the outcome of the Forum and CARACAL discussions taking place in June[31], addressing the SCIP database and the Waste Framework Directive[32] (WFD). Due to similar requirements under REACH and the WFD, Member States might still need to discuss where the responsibility to implement, enforce and provide support to companies related to SCIP and WFD will be placed.

Participants showed interest in the outcome of the joint meeting between CARACAL and the waste expert groups on 9 July[33], where the SCIP database will be discussed. One participant stressed that recently, the waste authorities were asked to indicate to the Commission which competent authorities within each Member State would be responsible for the enforcement of the WFD, enquiries and awareness raising activities around the SCIP database.

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[31] Access to CARACAL papers publicly available on CircaBC for users or visitors:
file://echa/data/users/u09166/Roaming%20Profile/Downloads/Access%20to%20CARACAL%20papers%20publicly%20available%20in%20CircaBC%20(2).pdf
CARACAL-35 in CircaBC: /CircaBC/env/caracal/Library/01 - CARACAL/CARACAL-35 (30 June-1 July 2020)
https://circabc.europa.eu/w/browse/fc753bba-b3f6-4472-8b92-fc0a76f842bb

[32] The Waste Framework Directive 2008/98/EC (WFD) is the key legislative document on waste at the EU level: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02008L0098-20180705
Being a Directive, the WFD is transposed into the national legislation of the Member States by means of separate legal acts.

[33] Joint Meeting CARACAL - Waste Expert Groups, in CircaBC:
/CircaBC/env/caracal/Library/01 - CARACAL/Joint Meeting CARACAL - Waste Expert Groups, 9 July 2020
https://circabc.europa.eu/w/browse/ad0630ad-daba-498b-88cc-af67e712f931

National helpdesks were requested to assess if they could increase their capacity in replying to specific questions on SiA, to support industry when the conditions that trigger the obligations of Article 33 are reached, which will facilitate industry compliance with obligations to notify to SCIP. Instead of capacity building, the interpretation of the SiA borderline cases was commented to be of greater relevance in terms of competence building within national helpdesks to facilitate the SCIP task.

Participants consented to discuss borderline cases in focus groups, and eventually in the following face-to-face meeting to start competence building in helpdesks; look into the Forum manual of issues for more complex SiA examples; include more examples in the guidance; and come to a consensus on these issues by using more the HelpEx tool.

Conclusions of the day

The Chair gave a short wrap-up of the meeting, thanking participants and presenters for their active and valuable contributions to the remote meeting. He noted that representatives of the Commission participating in the meeting, could hear useful views which they can use in the following consultations. He then informed that the action points, and a short satisfaction survey will follow after the meeting.

Annex I – Agenda

HelpNet REACH Workshop (Web conference) 26 May 2020

REACH Workshop by WebEx	
10:30-11:00	**Opening by the Chair of HelpNet**
	Tour de Table
11:00-12:30	**1. Update from the European Commission and national helpdesks**
	1.1 Update from the European Commission (Riccardo Zorgno, DG GROW)
	1.2 Dossier quality & compliance – helpdesk perspective (Suzanne Wiandt, Germany)
	1.3 Life AskREACH project (Oona Freudenthal, Luxembourg)
	Discussion
12:30-13:00	Break
13:00-14:55	**2. Tracking substances of concern**
	2.1 How to track hazardous substances in the supply chain (Kevin Pollard, ECHA)
	2.2 Get prepared to notify substances of concern in products (Bo Balduyck, ECHA)
	2.3 Capacity building on substances in articles (Telmo Jorge Vieira Prazeres, ECHA)
	2.4 Raising awareness on substances in articles and SCIP (Tiiu Bräutigam, ECHA)
	Discussion
14:55-15:15	**Conclusions by the Chair.** Closing the REACH Workshop.

Annex II - Action points

No	Action	Agenda item	Who	When	Status
1	Send any clarification questions on the update given by the Commission to Riccardo.ZORGNO@ec.europa.eu	1.1	NHDs	June	Closed
2	Provide an update on Green Deal/Chemicals strategy for sustainability, and the impact on the activities of national helpdesks at the following REACH Workshop.	1.1	COM	October 2020 (HelpNet 15)	Open
3	Contact the helpdesk of Luxembourg if interested in the AskREACH project (reach@list.lu, oona.freudenthal@list.lu)	1.3	NHDs	August 2022	Open
4	Compatibility between AskREACH and ECHA SCIP database is discussed, and analysis on how SCIP database could feed into AskREACH[34].	1.3	ECHA	August 2022	Ongoing
5	How to build capacity (SiA + SCIP) with NHDs due to overlap/potential overspill with regards to queries? i.e. SiA borderline cases, etc.	2.3	ECHA NHDs	July 2020	Open
6	How can SCIP data format be re-used for supply chain communication as required under Article 33 of REACH?	2.3	NHDs	September 2020	Open
7	NHDs are requested to assess if they could increase their capacity in replying to specific questions on SiA, to support industry when the conditions that trigger the obligations of Article 33 are reached, which will facilitate industry obligations to notify to SCIP.	2.3	NHDs	September 2020	Open
8	Discuss borderline cases in the following REACH Workshop, in function of the progress of the discussion on borderline cases.	2.3	NHDs ECHA	September 2020	Open
9	HelpNet competence building as a harmonisation exercise to reach consensus on SiA, for example by using the HelpEx tool.	2.3	ECHA	-	Open
10	Contact ECHA for material on the SCIP database (e.g. print files, images) or support in using the social media.	2.4	NHDs	-	Open

[34] SCIP (ECHA) – AskREACH databases: Separate ways, similar goals: https://www.askreach.eu/wp-content/uploads/2020/05/ECHA-SCIP-AskREACH-databases_Separate-ways-similar-goals.pdf

Annex III - List of participants

HelpNet members/Country	Name
Austria	WETZER Barbara
Austria	NEUWIRTH Erich
Belgium	HOYAUX Daphné
Bulgaria	ZIDAROVA Elena
Cyprus	PALEOMILITOU Maria
Cyprus	ORPHANOU Maria
Czech Republic	SLADKOVA Jarmila
Denmark	THOMSEN Toke
Estonia	AMELKINA Anna
Finland	ASSMANN Mervi
Finland	TUHKUNEN Sari
France	COPIN Stephanie
France	DUFFORT Gaëlle
Germany	BUELTER Heinz
Germany	WIANDT Suzanne
Greece	SKAFIDA Panagiota
Hungary	KOVACS Tamas
Ireland	COSGRAVE Majella
Italy	GIANNOTTI Francesca
Italy	CARFÌ Francesca
Latvia	LAZDEKALNE Elīna
Lithuania	JANONYTĖ Agnė
Lithuania	VOLUJEVIČ Beata
Lithuania	BALČIŪNIENĖ Jurgita
Luxembourg	FREUDENTHAL Oona
Luxembourg	CHOCHOIS Laurène
Norway	SULEIMAN Abdulqadir
Norway	BLOM Cecile
Norway	FOLLESTAD Mette
Norway	SØRENSEN Pia
Poland	DOMANSKI Krzysztof
Poland	WASIAK-GROMEK Monika
Portugal	LAGINHA Isabel
Portugal	ARAÚJO Fátima

Slovakia	KOKAVCOVA Martina
Slovenia	MENARD SRPČIČ Anja
Spain	ZAMORA NAVAS Laura
Spain	SÁNCHEZ Elena
Sweden	DORFH Helena
Sweden	VIRDARSON Jenny
Sweden	KRAMER Helena
European Commission	**Name**
DG GROW	ROEBBEN Gert
DG GROW	ZORGNO Riccardo
Observers from industry	**Name**
Cefic	BARROS Mariana
ORO	HOBAN Kevin
Observers from EU candidate countries	**Name**
Serbia	JOKSIMOVIC Snezana
Turkey	KILIÇ Bektaş
Turkey	ERKAN Dilek
ECHA, Unit	**Name**
Communications, A1	BRÄUTIGAM Tiiu
Support & Enforcement Unit, A2	ANNYS Erwin
	BRILLAS Patricia
	BONNANI Priscilla
	JÄRNSTRÖM Helena
	KRYCHEVSKA Olena
	LOUKOU Christina
	NAEEM Muhammad Umer
	NAGHY Viorica
	ROSELLÓ VILARROIG Pedro
	WATKINS Gary
Submission & Processing Unit, A3	APE Daniele
	SANCHEZ SAEZ Javier
	RASIKARI Heidi
	RIMONDO Claudia
Exposure and Supply Chain, B4	TUNNELA Outi
	VIEIRA PRAZERES Telmo Jorge

Hazard I Unit, C1	MYÖHÄNEN Kirsi
Governance, Strategy, and Relations, E1	BALDUYCK Bo
Legal Affairs, E2	BIGI Elena
	GERBAUD Delphine
Corporate Services Unit, R3	POPOVIC Marko