

Annual Report from the Committees 2021

65th Meeting of the Management Board 29-30 March 2022

Key messages

RAC and SEAC

- The number of members in RAC remains critically low at 45 (down one from 2021 and down 7 from 2018).
- The situation is similar for SEAC, where currently there are 32 EU/EEA members, down from 40 in 2015.
- Member State Competent Authorities (MSCA) are requested to provide further resources to increase the RAC membership to a minimum of 50 and SEAC to a minimum of 40 members by encouraging their MS to appoint members, in case of vacancies, to meet the expected number of rapporteurships in 2022/23.
- The RAC and SEAC workload is expected to grow significantly in 2022/23.
- The working groups of RAC set up under Art 76(2) and the Committee's RoP have been fully operational since Autumn 2021 and their work practices will be further refined in 2022. Plenary meetings have since been reduced to one week.

MSC

- **Commitment** and interest for the work of **MSC remained high**, as MSC smoothly held all its four meetings in 2021 virtually (MSC-73 – MSC-76) and was successful in resolving all its *divergences of opinion* cases unanimously.
- Due to the strong cohesion and capacity built over the years in MSC, MSC found unanimously agreement on 80% of its cases in written procedure.
- **MSC** discussed several general topics, which lead to **consensus approaches** for ECHA to follow in future DEV cases which reduce the Proposals for Amendment (PfAs) coming from MSCAs.
- However, virtual onboarding of the many new members and stakeholder observers has been a challenge, and also virtual exhaustion was expressed in inter alia the MSC survey. In-person meetings could overcome these challenges and rebuild social cohesion and capacity.
- How the **CLP delegated act** planned for **2022**, adding 'new' classification criteria (ED, vPvB/PBT and PMT) to CLP, so far addressed via article 57 (d) (e) (f) of REACH, **will affect the work** at ECHA or the MSC remains unclear.

BPC

The Management Board is invited to take note of the specifics and functioning of BPC. The predictability of the submissions by MSCAs of evaluations for peer review remains uncertain. ECHA will therefore further intensify its contacts with MSCAs in 2022 to get more insight in their planning.

Background

This is the fifth report concerning 2021 from the Committees to the MB since annual reporting began in 2017.

PART I RAC and SEAC

Members' performance

Annex III of the nomination papers to RAC and SEAC contains a requirement that the nominee for appointment by the MB will be available for at least 50% of their time for the work of the Committees. RAC members reported that with a still increasing workload, their contribution was closer to 70-80% in many cases, and that has been the case as well for several SEAC members, who declined to take on rapporteurships in the second half of the year, as they had already exceeded their allotted time. The Chairs of RAC and SEAC consider that the target was well met on aggregate in 2021 across the membership.

Rapporteurships in RAC and SEAC in 2021

Table 1. SEAC and RAC members' rapporteurships¹ during 2015-2021. Including co-opted members from December 2015.

Process	Restrictions (3/4 to 5/6 meetings)		AfA		CLP	OELs	Article 77(3)(c) COM requests		Total	
	RAC	SEAC	RAC	SEAC	RAC	RAC	RAC	SEAC	RAC	SEAC
2015	9	7	38	36	59				106	43
2016	2	3	113	107	57				172	110
2017	8	6	105	104	52		8		181	110
2018	6	6	42	44	107	6	9	1	164	50
2019	6	6	105	119	90	4	2		203	125
2020	12	15	101	117	89	4	4	2	212	134
2021	7	11	38	52	89	4	3	0	141	63

For RAC, the number of rapporteurships needed annually continues to reflect the baseline of CLH (ca. 90 rapporteurs), restrictions, OELs, Art 77(3)c requests plus the peaks in Authorisation evaluations in 2018/17, 2019/20 and expected again in 2022/23, with many additional rapporteurs' appointments as a result. For SEAC, the picture is similar but the AfA peaks have a greater impact. In 2021 the number of rapporteurships needed decreased from its peak in 2019-20, but it's expected to rise again in 2022/23.

It is also important to note that rapporteurships for different processes require very different efforts. Restriction rapporteurships occupy members for a longer period, and they take up a higher proportion of the time they have available for the Committees (most members are not able to take on rapporteurships alongside restrictions, whereas it's common for members to take on several rapporteurships for applications for authorisation simultaneously).

The lower number of cases in 2021 in comparison to previous years allowed some space for capacity-building and to settle/progress various methodological issues, some of which had been pending for a while. This included sessions like a joint RAC-SEAC capacity-building session on assessing representativeness of survey information, a SEAC paper to be published on its approach to assessing changes in producer surplus, and a RAC capacity building session on biomonitoring, as well as several others. This work should help increase the committees' efficiency in dealing with particular cases.

¹ Figures in Table 1 refer to number of rapporteurships and co-rapporteurships of current membership of RAC and SEAC. An additional 16 members in RAC and 15 members in SEAC members that left the Committees during 2013-2017 had rapporteurships or co-rapporteurships.

Numbers, turnover of members, renewals and new nominations

ECHA appreciated being consulted by the MS CAs prior to nominating members, in order for the Chairs to inform on the skills needed and the type of candidate being sought. Proposed nominations which do not involve an appropriate level of support to the member (see Art. 85(7)) are advised against by ECHA.

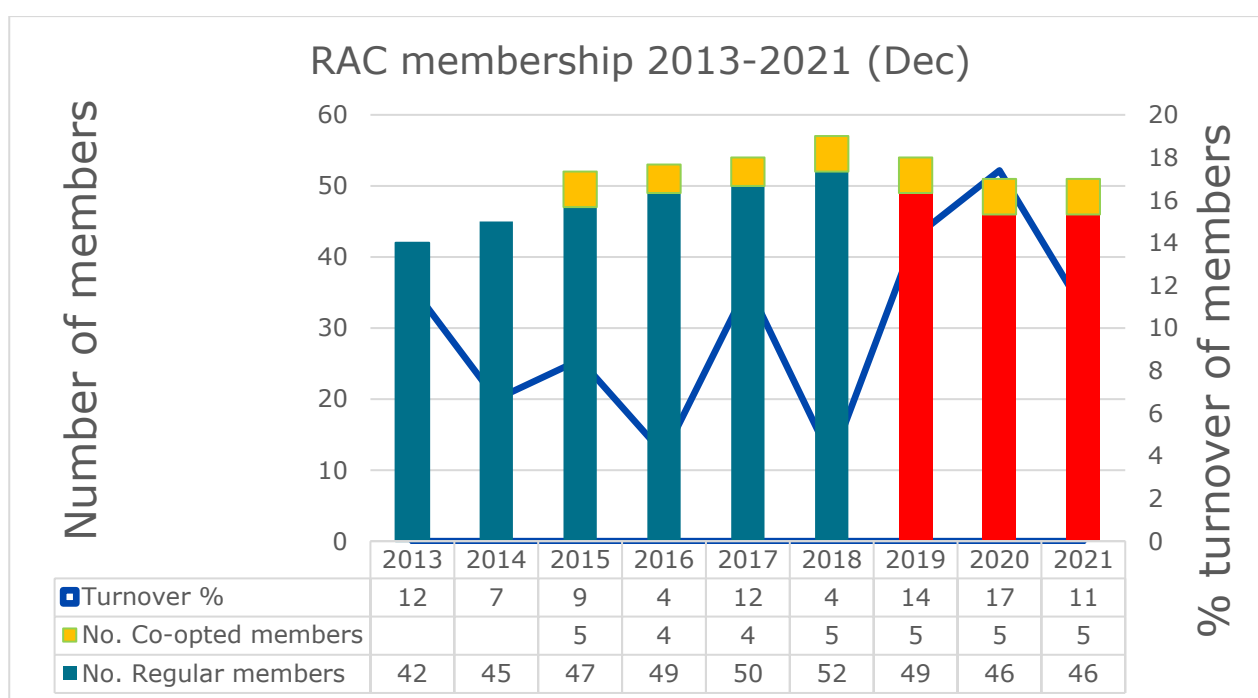
Members are required to:

- take on a number of rapporteurships per year,
- comment on opinions during written RAC and SEAC consultation rounds, and
- play an active role in working groups and plenary discussions in order to achieve consensus on the opinions of RAC and SEAC.

The Chairs of RAC and SEAC note that all these tasks are integral to the work of a Committee member. However, it is only rapporteurships that are remunerated. This can be a problem for those members who do not work for a MSCA or associated institutions, and whose time undertaking those tasks is therefore sometimes not remunerated (depending on their arrangements with the MSCA). MSs are requested to consider this specifically in their arrangements with potential members selected from outside their MSCA.

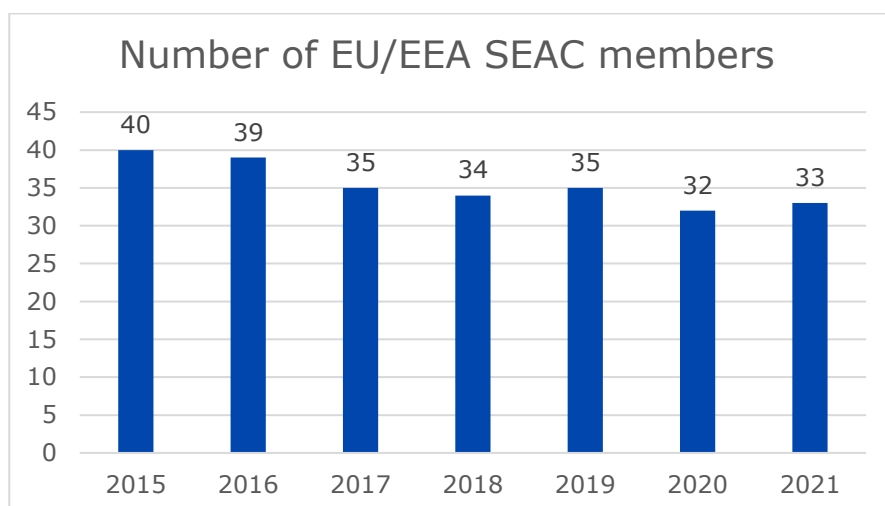
RAC

As the graph below shows, membership in RAC is still on the low side, at 46 regular members in Dec 2021, down from 52 in 2018. With two further resignations and one new nomination in January 2022, we expect to go through 2022 with **45 members**. This remains concerning and as rapporteurships are the limiting factor in RAC's output, urgently needs attention. There are signs of some growth in the numbers of advisors to rapporteurs attending the RAC working groups.



SEAC

SEAC had a total of 33 EU/EEA members in December 2020, and the trend has been in decline since 2015. The chart below shows the numbers of members since that year. Efforts are being made with MSs to increase the membership, and some results were already seen in 2021 (including 4 new members nominated for appointment at this MB meeting). However, there has already been a resignation in 2022, and a couple of retirements are expected, so we expect to be at under 35 members for most of the year.



The turnover of membership in RAC and SEAC remains high. After 8 fully remote meeting cycles, the number of new members who have never met their peers has become concerningly high (27% for RAC and 38% for SEAC, the latter increasing to 50% if the 4 new nominees are appointed) and a return to some face-to-face meetings is essential to catch up on important aspects such as the better introduction of new members and social cohesion in the Committees.

Prognosis and workload management

Looking ahead to 2022 and 2023, the workload projections for RAC and SEAC continue to be challenging. As reflected in the ambition of the Restriction roadmap, a higher number of Restrictions will continue to be in the system (7 to 8), against a previous annual average of 2-3 before 2019). In addition, the scope of many recent restrictions of groups of substances is much larger, requiring teams of members rather than just the rapporteurs to work on developing opinions. They can also result in longer opinion-making through 5 or 6 meetings in RAC and SEAC respectively, so that Rapporteurs are tied up with a single case for a longer period of time. For applications for authorisation, the next peak, including chromates is expected this year.

RAC and SEAC successfully renewed their co-opted members in 2021. RAC was able to renew the full complement of 5 co-opted members, whereas SEAC was able to identify 4 suitable candidates (an increase of 1 co-opted member).

Restructuring of RAC

Art. 76(2) makes provision for the setting up of working groups of RAC, SEAC and MSC; this is further elaborated in Art 85(9) and in the Rules of Procedure of the Committees.

With plenary meetings approaching three weeks long, RAC set up an Authorisation working group in 2019. In addition, working groups for CLH and Restrictions were set up in 2021 and the first full agendas were handled ahead of the November 2021 and March 2022 plenaries. As a result the RAC plenary has now returned to one week per meeting.

The mandates will be reviewed annually. The working groups provide some additional time to focus on opinions and ensure that quality is maintained. The working group reports to plenary are published on-line shortly after the meetings. RAC is free to accept or to rediscuss their recommendations. Members have been encouraged to discuss the fine-tuning of the working groups and in particular how they report to plenary.

The working group structure will be extended to the activities of the Drinking Water Directive (probably in the course of 2023) as that process develops within ECHA.

Remuneration

The Chairs of RAC and SEAC have identified inconsistencies in the level and type of remuneration of members and rapporteurs as an obstacle to filling rapporteurships, particularly in Restrictions but also extending to other processes. The lack of any remuneration for rapporteurships under CLH has also been identified as an issue that needs addressing. A paper on the topic of remuneration of committee members will be submitted to the Board later in the year.

PART II - MSC

Numbers, turnover of members, renewals and new nominations

MSC met exclusively in virtual meetings during its four full MSC-rounds for 2021, due to the pandemic.

In 2021, MSC had 26 voting members with their 23 alternate members at the end of the year. All MSCAs were represented via either the member or alternate member or both. Additionally, NO was represented by its member and alternate member. In 2021 NL appointed a new member to the MSC and their previous member was appointed as alternate member. In addition, a new alternate member was appointed for EL, and for a further 7 MSC members and 4 alternate members their mandates were renewed.

The turnover of MSC during the 9 fully remote meeting rounds in 2020-2021 was quite high - **42% member turn over** with 23% being completely new members and 28% Stakeholder Organisations (StOs) turnover with 17% being completely new observers. As experienced members leave and are replaced by new members, there is a clear dilution of MSC institutional memory and a decline in **group cohesion essential for consensus building**. MSC-Secretariat organized a workshop for newcomers in April 2021, with the option of a buddy system. However, this attracted mostly stakeholders rather than MS representatives who are the ones mainly involved in decision making. Hence **essential onboarding and integration of new members and stakeholders** was one of the main challenges in 2021 (and will be for 2022).

Main achievements and challenges

MSC reached unanimous agreements on all of the DEv), (SEv) and SVHC cases² in 2021 within the legal deadlines of 60 days and 30 days after referral to MSC.

Table1: overall MSC cases in 2021

Process	Referred cases	Agreed cases	Agreed in written procedure	Agreed in Meeting	Referred to Commission
DEv	34	34	28	6	0
SEV	12	12	11	1	0
SVHC	8	8	4	4	0
<i>Sum</i>		<i>56</i>	<i>45</i>	<i>11</i>	<i>0</i>

Efficiency gains in DEv evaluation cases:

Figure 1 provides some further insight in the efficiency developed also at MSC on DEv over the years, notably reflected here 2017 – 2021. Although the number of DEv cases notified to MSCAs over the years increased, the cases referred to MSC decreased significantly. This is the result of a number of efficiency gains put in place in the DEv/MSCA and DEv/MSC interaction, such as:

² Abbreviations: CCH – Compliance Check; CoRAP – MSC opinion on the ECHA draft Community Rolling Action Plan; DEv – Dossier evaluation; SEv – Substance evaluation; SVHC – identification of Substances of Very High Concern; RECOM – MSC opinion on the ECHA draft Recommendation for inclusion of substances in Annex XIV; TPE – Testing Proposal Examination.

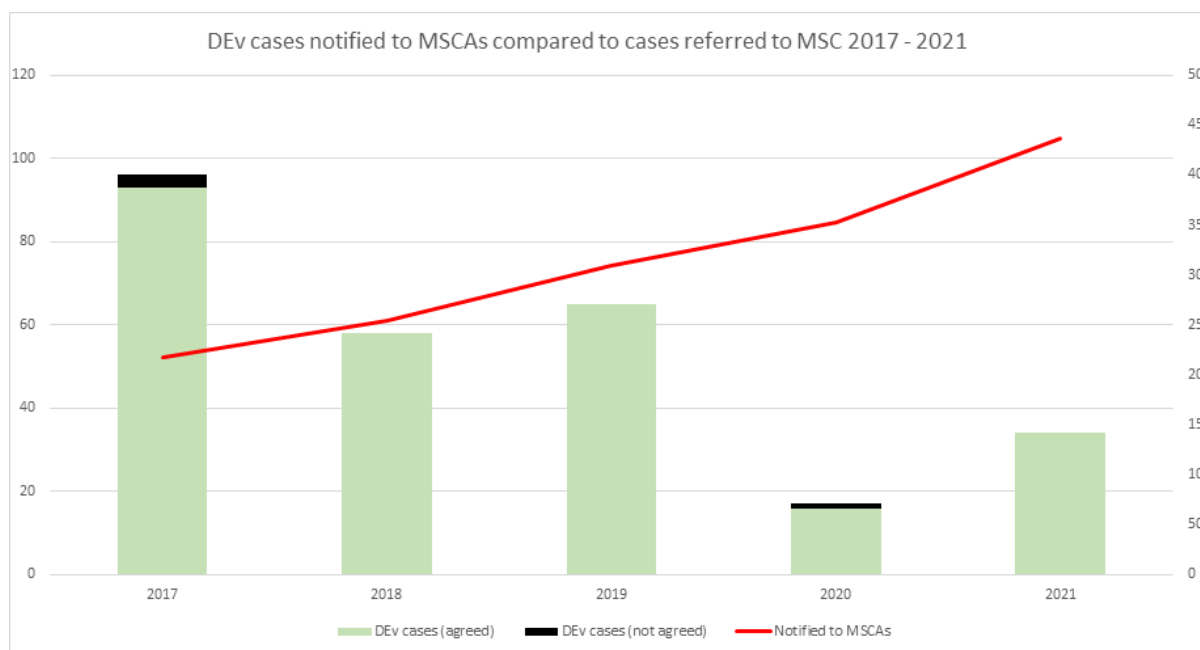


Figure 1: DEv process and MSC agreement 2017-2021 trend

a)

MSC discussed and agreed on general topics:

such as the approach to the Extended One-Reproductive Toxicity study (EOGRTS) for ECHA to follow for future DEv cases to lead to fewer or no PfAs from MSCAs (see further details and topics below).

b)

Unanimous agreement by MSC in written procedure of cases referred to MSC outside the MSC meeting round:

To increase the output of DEv Draft Decisions (DDs) ECHA presented a plan to arrange extra MSC(A) consultations in 2020 and 2021 in the 32nd CARACAL meeting (of 6-7 Nov 2019; [document ref. CACS/33/2019](#)). ECHA implemented the plan and arranged one extra consultation in 2020 (MSC-70bis) and two in 2021 (MSC-73bis and MSC-74bis). These consultations do not need synchronisation with an MSC meeting. MSC involvement was triggered only in MSC-73bis, as PfAs were received two compliance checks which were subsequently referred to MSC. Agreement was sought in written procedure, where they were unanimously agreed.

c)

Possibility to clarify issues before submission of PfAs:

During MSCA consultation the Secretariat offers to clarify rationales applied in the draft decisions bilaterally, leading to a reduced need to submit PfAs and involvement of MSC in the decision-making.

SEv and SVHC identification:

Twelve SEv draft decisions prepared by MSCAs were referred to MSC for decision-making in 2021. Thanks to the early interaction and negotiations lead by the evaluating MS after PFA submission only one case needed discussion at a plenary meeting, all other cases were agreed in written procedure (92%).

In 2021, out of twelve submitted SVHC proposals 8 were referred to MSC for agreement. Under this task MSC discussed and identified for example several substances as endocrine disruptors for human health and/or environment, one as PMT under Art. 57(f) and few as PBT/vPvB or PBT. Half of the SVHC cases were agreed by MSC in written procedure, without discussion at a meeting.

In 2021, MSC adopted two opinions by consensus with no minority views - 1) opinion on draft CoRAP update and 2) opinion on ECHA's draft 10th recommendation for inclusion of priority substances in Annex XIV. Four Rapporteurs and co-rapporteurs contributed to the work and held some smaller meetings preparing for MSC draft opinions.

The members maintained a **high interest and commitment to the work of MSC** albeit having 9 virtual meetings in two years. This is exemplified by their very high participation in both the MSC plenaries and in the written procedures (almost all members participate or are represented). Also, overall interest in the meetings remained high with an average of 70 (ranging between 54-90) participants, including experts and observers, per meeting. Notably, a take-stock survey was launched in October 2021 (after 8 virtual MSC meetings) to which 30 MSC participants replied, indicating that MSC is either managing equally to before-Covid-19 restrictions or reasonably well.

The Committee has a strong history of collaboration, mutual trust and respect, a **capacity** built over the years where MSC members and StOs (for some processes) discussed and negotiated a way forward **producing scientifically and legally sound decision/support documents**. These discussions securing strong cohesion in this group of experts and regulators kept MSC efficient and effective in finding consensus even in this virtual setting. Indicative are the increased bi/trilateral collaboration via email and online meetings before plenary, which remained consistent in 2021, resulting in the high number of cases unanimously agreed in written procedure.

Apart from the processing of cases, in line with the REACH Joint Evaluation Action Plan **MSC** used its **varied scientific and regulatory expertise** to discuss and agree on general topics such as the approach to the EOGRTS, mutagenicity and fish sexual development **resulting in an agreed approach for ECHA to follow for future DEv cases to lead to fewer or no PfAs from MSCAs**. In more detail, MSC:

- Concluded the discussions on the *evidence required* to include Developmental Neurotoxicity and Developmental Immunotoxicity cohorts into the design of the Extended One-Reproductive Toxicity study for substances with sex steroid hormones - related activity.
- As regards information requirements for mutagenicity endpoints, so far MSC agreed on extending the approach on requesting an *in vivo* comet assay combined with micronucleus study when both chromosomal aberration and gene mutation concerns are identified in the *in vitro* tests (further genotoxicity discussions ongoing in 2022).
- Agreed on the approach for using the Fish Sexual Development Test (OECD 234) under compliance check (default scenarios and case specific arguments).

In these discussions, notably for the triggering of the cohorts in EOGRTS, MSC weighed the different lines of scientific evidence against the regulatory boundaries of REACH and unanimously agreed on the level of uncertainty to accept.

The MSC deputy chair, Ms. Charmaine Ajao, played a key role in managing the MSC-75 and MSC-76 rounds and initiating the MSC-77 round, after the MSC Chair Watze de Wolf moved to new challenges within ECHA until the new MSC Chair Katinka van der Jagt's arrival mid-January 2022.

Even though, MSC had another successful year and is a group of experts with a history of strong cohesion, the first signs of **virtual exhaustion** were expressed by the MSC both verbally and in writing in the survey. We anticipate that regular in-person meetings could ease this challenge and the onboarding of new members and stakeholders. For this to be effective, as also recommended by the Meet-ECHA2 advisory group, the Secretariat believes that hybrid (i.e., part online and part face to face) meetings should be avoided where possible.

Other aspects

Outlook 2022

MSC had scheduled four meeting rounds in 2022, one meeting round per quarter. ECHA will continue with additional MSCA notifications for dossier evaluation cases, not synchronised with an MSC meeting, to efficiently cope with the increasing number of draft decisions³. In the absence of general topic discussions and agreement of the DEv cases in written procedure, it was decided not to hold the MSC-77. MSC was pre-notified of this possibility in December. The MSC opinion on the draft CoRAP update for 2022-2024 was therefore adopted for the first time via written procedure in February 2022.

In terms of workload for MSC, more SVHC cases are expected than in 2021 for the Autumn round.

Informal WebEx

In December 2021, the SE MSC member expressed the need to discuss with other MSC counterparts the considerations by the Commission (COM) under the Chemicals Strategy for Sustainability (CSS) on matters related to MSC. As this proposal received support from other MSC members, an informal closed WebEx was requested in writing by the SE MSC member supported by other MSC members.

The objective of this meeting was to exchange the views on: i) the interpretation of the suggestions and options put forward by the COM and/or the Consultant, ii) the identified potential positive and negative consequences of those suggestions and options, and iii) exchange of (scientific) background in support of the arguments/views. There was no intention to exchange national positions, neither to reach any consensus. The role of ECHA was that of a facilitator and SE was the co-host. SE prepared the content for the MSC informal WebEx.

The informal WebEx attracted high interest from Members States (MS) and COM. MSC members/alternates from 24 MS and Norway participated, 8 of which were also accompanied by their experts. COM was represented by 7 participants both from DG Grow and DG Env.

At the end of the WebEx, participants expressed their gratitude for such an initiative as it helped them in developing their thoughts before submitting to the COM their written comments on the CARACAL documents.

CLP delegated act on 'new' classification properties

A question for the nearby future, planned already for 2022, is *how will the CLP delegated act, adding 'new' classification hazard criteria (PBT/vPvB ED and PMT) to CLP, normally addressed via the Article 57 (d) (e) (f) route and MSC, affect the work of MSC, when already entering into effect (planned for) this year, prior to the REACH and CLP revision? The interaction of the old REACH Article 57-59 approach with the new CLP classification status for these hazardous properties remains unclear.*

³ These decision-making rounds, dedicated to dossier evaluation cases, are identified as MSC-xxbis rounds (with the xx being replaced with the preceding MSC round number e.g. MSC-73bis).

PART III - BPC

Numbers, turnover of members, renewals and new nominations

The number of BPC members is 28 where 26 members have appointed an alternate member. Currently all MSCAs except BG are represented in the BPC. In addition, CH and NO are represented in the BPC. Memberships have stayed stable during 2021: the only changes are that EE has appointed a new alternate member and FR has appointed a second alternate member.

For the Working Groups the number of core members has remained the same compared to 2020 with a total of 34 core members. The number of flexible members has slightly increased compared to 2021 with a total of 239 flexible members⁴. In 2021, there were no WG members from BG, LT, LU, MT and PT. Due to the large number of experts, the turnover of flexible members is relatively high. The WG members are nominated until further notice.

Four BPC and four Working Group meetings were organised in 2021. All meetings were virtual.

Performance 2021

The total opinions adopted by the BPC in 2021 increased with one opinion from 38 in 2020 to 39 in 2021. This number is comparable to other years.

The BPC adopted:

- 18 opinions (compared to 15 in 2020) on an application for approval of an active substance of which 14 for the Review Programme. For 5 opinions a non-approval was proposed: silver zinc zeolite, silver zeolite, silver copper zeolite and silver sodium hydrogen zirconium phosphate in PT 4; d-allethrin in PT 18;
- 15 opinions (compared to 10 in 2020) on an application for Union authorisation where for all opinions the BPC proposed to grant the authorisation;
- one opinion following an Article 38 request from the Commission related to a dispute in a mutual recognition process for a biocidal product containing permethrin as an active substance;
- five opinions following an Article 75(1)(g) request from the Commission: assessment of an aspect related to an application for Union authorisation for a biocidal product containing CMIT/MIT; ii) eligibility of peanut butter for inclusion in Annex I; iii) assessment of the principles of assessing efficacy for a guidance on rodent traps developed by the German Umweltbundesamt; iv) assessment of the risks due to the endocrine disruptor properties of DBNPA in PT 4, and v) assessment of the risks due to the endocrine disruptor properties of cyanamide in PT 3 and 18.

The peer review activities in the Working Groups remained stable in 2021 compared to 2020. A number of evaluating Competent Authorities used early WG discussions (around 20 in total) to receive guidance on their assessment. This has in particular been used for the assessment of endocrine disrupting properties and for environmental exposure assessments. The early WG discussions are facilitating the peer review process as issues are solved up-front instead of during

⁴ There are 9 core members in the Efficacy Working Group (WG) representing AT, FR, DE, EL, NL, RO and SI; 2 alternate members representing FR and DE and 71 flexible members. The Analytical methods and Physico-Chemical Properties WG is composed of 6 core members representing FR, DE, EL, NL, PL and SI; 4 alternate members representing FR, DE, EL and NL and 46 flexible members. In the Human Health WG, there are 11 core members representing AT, CZ, FR, DE, EL, IE, NL and SI; 6 alternate members representing FR, DE, EL, IE and NL and 86 flexible members. The Environment WG includes 8 core members representing FR, DE, EL, IE, NL and SI; 6 alternate members representing FR, DE, EL, IE and NL as well as 78 flexible members. Since some members are nominated in more than one WG, the total number of flexible members is 239.

this process. The Working Groups addressed also many guidance related issues, such as: i) new emission scenarios; ii) revision of existing scenarios (PT 11, PT 18, PT 19), iii) specific scientific questions regarding e.g. dermal absorption; iv) efficacy: PT12 – Slimicides draft guidance has been developed and finalised at the WG level, updated draft guidance on disinfectants entered the ECHA consultation phase, and in addition, work on a new draft on resistance has started. Questions on the evaluation of in situ generated active substance was a reoccurring topic for discussion at the WG meetings.

Prognosis and workload management

Looking ahead to 2022 the relevant processes show the following developments:

- For active substance approval it is foreseen that the number of opinions will be slightly higher compared to 2021.
- For Union authorisation, based on the planning of submissions of assessment reports provided by the MSCAs, the workload is expected to increase further in 2022. In view of the foreseen timeline of the submissions and the duration of the peer review the number of opinions will probably be between 25 and 30 which is a considerable increase compared to the 15 of 2021.
- Probably two opinions on an Article 75(1)(g) request will be adopted in 2022: one related to the analysis of alternatives for hexaflumuron in PT 18 and one related to the comparative assessment at EU level for anticoagulant rodenticides. In addition, one or more opinions on an Article 38 request are expected.
- In conclusion, the overall workload for the BPC and the Working Groups will increase but is expected to remain manageable for 2022 for the SECR and the members. It is foreseen that the total number of opinions adopted will be somewhat higher compared to 2021 with an increase in the number of Union authorisations.
- The foreseen significant increase in workload for 2021 and originally foreseen increase for 2022 did or does probably not materialise. The ECHA forecasts are based on the planning of submissions of evaluations received by ECHA from the MSCAs. ECHA is still expecting a significant increase in workload in the future, also due to the foreseen end date of the Review Programme in 2024. Subsequently, for the BPC and the Working Groups the SECR has taken initiatives to discuss this with the members and amend the working processes for the peer review to make them more efficient. An example of this is the introduction of the Interact Collaboration Tool to be used for commenting on the evaluations. The SECR will continue its efforts to streamline and optimise the different work processes in 2022.
- Guidance:
 - Efficacy – in 2022 it is planned to discuss further at the EFF WG the antimicrobial resistance draft, to publish the updated version of PT1-5 (disinfectants), and to finalise the PEG consultation phase on PT11/12 (preservatives).
 - Environment – in the frame of the Chesar Platform development, adjustments of the current guidance Volume IV Part B are triggered, which will be discussed with the Environment WG in 2022 and which will be further worked on most likely in 2023. In addition, an emission scenario repository covering all existing emission scenarios including updates is under preparation.
 - The finalisation of the revision of the recommendations of in situ generated active substances is targeted for Q3 in 2022.
 - Human Health – the Biocides Human Health Exposure Methodology will be revised following the latest commenting round at the end of 2021.

Reflections for the MB

Considering the previous annual report and the current and future developments the following points are brought to the attention of the MB:

- It remains difficult to schedule the meeting agendas for the BPC and the Working Groups due to the unpredictability of incoming draft evaluations by MSCAs. MB members are asked to discuss this with their Competent Authorities with the aim to increase the planning capacities of the MSCAs to allow for a realistic and timely planning. This applies to the active substance approval process as well as Union authorisation. ECHA reports on the progress of both processes on a regular basis at the CA meetings.

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