

## HelpNet REACH Workshop: summary of discussions

**Time: 29 November 2017 (11:00-15:00)**

The HelpNet REACH Workshop, organised for the REACH members and observers of HelpNet, took place on 29 November 2017 by web conference. This document summarises the topics (Annex I) discussed during the workshop and the follow-up actions set (Annex II).

### Opening

The Chair, **Pedro ROSELLÓ VILARROIG** (ECHA, Regulatory Advice Team), opened the workshop by welcoming the representatives of the REACH national helpdesks (NHDs) as well as the observers from Serbia and the Only Representatives Organisation (Annex III).

The overall objective of the workshop was to discuss how HelpNet members can work together towards the REACH registration deadline of 31 May 2018 (DL2018).

### Session 1 – Cooperation for the REACH 2018 registration deadline

#### 1.1. From policy to practice

**Laura WALIN** (ECHA, Directorate of Registration), programme manager of ECHA's internal 2018 REACH deadline programme, presented ECHA's proposals for practical communication on topical issues with the national helpdesks (NHDs) during spring 2018 and for the handling of questions to ECHA in languages other than English.

Regarding the assumption of about 36 000 questions related to REACH and CLP arriving at ECHA before the registration deadline, most of which will be relevant to the deadline, Laura WALIN explained how the number was arrived at. For the 2010 and 2013 REACH deadlines, the ECHA Secretariat predicted the ratio of total figures to be one question received for every four and three dossiers submitted, respectively.

For the 2018 registration deadline (DL2018), when more inexperienced companies are expected to register, ECHA assumes it to be one question per two registration dossiers submitted. The total number of questions includes not only questions on regulatory advice (the type expected to arrive also at the NHDs), but also questions on specific submissions, technical issues with REACH-IT and IUCLID, blocked accounts, etc. The number is used by ECHA for internal preparations such as the recruitment and training of an adequate number of staff to be able to reply to questions and to strengthen the infrastructure for handling the questions.

To further enhance the cooperation between helpdesks and ECHA in the run-up to the registration deadline, regular phone calls will be organised from January to May 2018 on a monthly basis. The standard agenda of the phone calls will be limited to DL2018 issues: emerging issues at the NHD, practical cases, and news from ECHA.

The HelpNet Secretariat will inform HelpNet members about the dates of the phone calls and share the agendas and the notes of the meetings in the dedicated folder 'REACH 2018' already

available on the communication platform<sup>1</sup>. Based on the input received from the NHDs, the agenda for each session will be finalised closer to the time of the conference call.

Between the phone calls, the HelpEx tool, the cooperation platform, and the contact forms will continue to function as the main means of communication and cooperation between NHDs, HelpNet observers, European Commission and ECHA.

Laura WALIN walked the participants through the contact forms on the ECHA website<sup>2</sup>. For NHDs seeking input from ECHA to urgent DL2018-related issues, NHDs were suggested to use the contact form and the keyword 'REACH 2018' so that their messages can be correctly prioritised. HelpEx will remain available to discuss and reach a common understanding of the legal requirements of the regulations in the NHD and ECHA's mandate, and to develop FAQs.

Regarding the handling of incoming questions in ECHA's remit in languages other than English, Laura WALIN explained the current practice and the contingency measure which might be taken.

At present, ECHA replies in English to questions submitted in languages other than English. The reply to the customer includes a standard text translated into the customer's language, and the reply to their query in English. ECHA offers the possibility to have the reply translated into the customer's language upon request in about one week. If the customer makes such request, ECHA relies on the Translation Centre for the bodies of the European Union (CdT) for the translation.

ECHA asked the workshop participants if they would agree that, in case of the amount of such questions increasing significantly, the customer can also be given the option to refer to their NHD for translation of the reply, and in contingency cases for translation of the question as well. Some NHDs expressed their support in case ECHA would face an increased workload. How in practice the customer would be referred to their NHD would be agreed on later.

In responding to a short poll<sup>3</sup>, a great majority of the NHDs replied that resources allocated for spring 2018 are adequate. At the moment, no additional support from ECHA was considered necessary.

## 1.2. REACH questions answered by ECHA and national helpdesks

Participants to the July HelpNet REACH Workshop proposed to clarify the scope of questions replied to by the ECHA Secretariat and the NHDs, defining a clear division of responsibilities in accordance with the REACH Regulation.

**Pedro ROSELLÓ VILARROIG** introduced two scenarios (Annex IV) on how REACH (and CLP) questions are divided between ECHA and the NHDs. In the first scenario, NHDs reply to regulatory and scientific questions from EU-based companies. The second scenario suits those NHDs who feel confident answering on cutting-points between regulatory, processes, submissions and scientific areas and reply to detailed questions (e.g. on substance identity, hazard endpoints, the use of IUCLID or even submission questions), as they have the internal resources and the expertise to be able to do so.

However, for issues exceeding their competences, such as submission-related issues or the use of REACH-IT, NHDs recommend their customers to contact ECHA.

In conclusion, both the NHDs and ECHA agreed on working on the first scenario.

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<sup>1</sup> Path: /CircaBC/echa/HelpNet/Library/REACH 2018

<sup>2</sup> Contact ECHA: <https://echa.europa.eu/contact>

Services to HelpNet: [https://comments.echa.europa.eu/comments\\_cms/MSCA\\_ITsupport\\_form.aspx](https://comments.echa.europa.eu/comments_cms/MSCA_ITsupport_form.aspx)

<sup>3</sup> Results of polls available in Annex I.

## 1.3 Tour de table

The Chair invited the participants to a *tour de table*. In this session, participants shared their feelings about the preparedness of the companies in their country, registration intentions and specific topics companies are struggling with the most.

NHDs reported that they have done their best so far to support their customers, and companies should be aware of their legal REACH obligations and be well prepared. They have no information about the registration intentions of their customers, who are usually hesitant to talk about such matters, but they support the customers by providing the best advice when answering questions or meeting face-to-face.

Most of the NHDs indicated that large companies, ORs and companies using consultants are prepared for the DL2018. Some NHDs felt that there might be a number of companies which are still not even aware of their REACH obligations, and some 'late comers' who are looking for ways to avoid the registration altogether. SMEs are experiencing difficulties mostly related to data and cost sharing, in negotiations, and in contacting the lead registrant (LR). Also, downstream user companies are worried about the possibility of their suppliers (mostly importers) registering at the last minute or not at all.

They provided also feedback on the supporting material provided by ECHA, which in general is perceived as useful and complete. Depending on the country, some formats are preferred to others, yet the guidance documents, questions & answers, practical guides and practical examples tend to be the most popular.

## Session 2 – Updates from ECHA

### 2.1 Directors' Contact Group and the UK withdrawal from the EU

**Andreas HERDINA**, the Chair of HelpNet, informed participants on two issues: the Directors' Contact Group (DCG)<sup>4</sup> work, and the UK withdrawal from the European Union (EU).

The DCG met on 27 November 2017 to discuss solutions for issues that have been raised in relation to the 31 May 2018 REACH registration deadline for low-tonnage chemicals, and decided on the following documents:

- [Recommendation that companies communicate their registration intentions for 2018](#), including their intention not to register, to the whole supply chain to allow their customers to know which substances will be registered and to avoid potential disruptions in supply after the 2018 registration deadline; the DCG also encourages companies to take the Lead Registrant role and make it visible in REACH-IT.
- [Factsheet on access to EU funds](#), giving helpful advice to companies that need to find resources to ensure safe handling of their substances and to those that choose to take action to substitute their chemicals with more sustainable alternatives.
- [Revocation of DCG document on cost-sharing in SIEFs](#), as it has been superseded by the legally binding Commission Implementing Regulation<sup>5</sup> of January 2016.
- [Communiqué of 27 November 2017](#), providing a summary of the meeting of 27 November 2017.

ECHA News<sup>6</sup> and documents published on 29 November 2017 on the ECHA website.

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<sup>4</sup> Directors' Contact Group on the ECHA website at:

<https://echa.europa.eu/about-us/partners-and-networks/directors-contact-group>

<sup>5</sup> Commission Implementing Regulation (EU) 2016/9 of 5 January 2016:

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0009&from=EN>

<sup>6</sup> ECHA News: 'Companies asked to communicate their registration intentions for 2018':

<https://echa.europa.eu/-/companies-asked-to-communicate-their-registration-intentions-for-2018>

Directors will also continue discussions with the aim to endorse an approach intended to ease the financial burden on SMEs preparing to submit registrations in the 1–10 tonnage band.

The DCG will be reviewing the four solutions that were valid for the 2013 deadline at their next meeting on 15 December 2017. Solutions for the 2018 deadline will be made available at ECHA's Stakeholders' Day on 31 January 2018<sup>7</sup>.

Andreas HERDINA also provided an update on the UK withdrawal from the EU according to Article 50 of the Treaty of the EU<sup>8</sup>.

On 25 September 2017, ECHA launched web pages on the UK withdrawal<sup>9</sup> containing specific information on various aspects of interest to companies, competent authorities, ECHA and the European Commission, and with impact on ECHA's bodies and networks, ECHA's regulatory decisions, recruitment of staff, procurements and contracts, etc.

The information provided in the section 'Advice to companies' contains Q&As jointly established by ECHA and the European Commission. On 26 October 2017, this section was updated with two more Q&A pairs related to only representatives establishing their businesses in one of the (other) 27 Member States after the UK withdrawal. The answers contained in these Q&A pairs will be updated with more information as the situation develops.

The matter of the UK withdrawal raised many questions. ECHA asked the HelpNet members to inform the HelpNet Secretariat of new questions that would be worth adding to the already published ones.

## 2.2 HelpNet on ECHA's new web pages

**Pedro ROSELLÓ VILARROIG** made a live presentation of the new HelpNet web pages on the ECHA website, covering guidance documents, translations, Q&A pairs agreed with the NHDs (known before as FAQs), and contact forms.

## 2.3 Update on guidance activities

**Ewa SKOWRON** (ECHA, Guidance team) gave an update on the guidance activities relevant to the 2018 registration deadline. She provided participants with the latest information on guidance publications completed since the last presentation in March 2017 and gave an update on currently CLP and BPR guidance updates.

## 2.4 Phase-in status after 2018

On behalf of the German helpdesk, **Suzanne WIANDT** informed participants about the outcome of the discussion on the phase-in status after 2018<sup>10</sup> at the CARACAL-25<sup>11</sup> meeting held on 15 and 16 November 2017.

According to the interpretation of the German competent authority (BAuA), there should be no difference between the status of phase-in and non-phase-in substances after the 2018 deadline. However, the helpdesk is bound by the legal text, and as there is no passage in the REACH text on the end of the phase-in status. The legal situation is that the phase-in status will be still valid after the 2018 deadline and as a consequence, the term 'per year' as used in

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<sup>7</sup> See communiqué of the DCG meeting of 15 December 2017 and related documents

<sup>8</sup> Article 50 of the Treaty on European Union:

[https://en.wikipedia.org/wiki/Article\\_50\\_of\\_the\\_Treaty\\_on\\_European\\_Union](https://en.wikipedia.org/wiki/Article_50_of_the_Treaty_on_European_Union)

<sup>9</sup> The UK's withdrawal from the EU:

<https://echa.europa.eu/uk-withdrawal-from-the-eu>

<sup>10</sup> Interpretation of the term 'per year' as defined in Article 3(30) of REACH

<sup>11</sup> Paper submitted by the competent authority of Germany to CARACAL-25, available on S-CIRCABC

Article 3 (30) is still applicable.

Being aware that this interpretation may differ from the interpretation of the European Commission and other MSCAs, BAuA is of the opinion that there is an urgent need for clarification and harmonisation regarding the phase-in status after 31 May 2018.

The German and other NHDs stressed the need to conclude on this matter as soon as possible and well ahead of the last registration deadline. This would make the situation clear for all duty holders and allow NHDs to provide to their customers a clear and harmonised reply.

Competent authorities are expected to provide comments on the CARACAL paper regarding the 'phase-in status after 2018' by mid-December. Based on the written comments submitted by the competent authorities, discussions will continue at CARACAL-26; the European Commission may clarify the issue before the next meeting in March 2018.

## Session 3 – HelpEx questions

### 3.1 Updating the FAQ procedure

**The Chair** presented the Frequently Asked Questions (FAQs) calendar for 2018 and made a proposal for shorter commenting rounds and faster publication of useful FAQs.

On the proposal for a revised FAQ procedure, participants agreed on a pilot project aiming at shortening the overall consultation time, and consequently advancing the publication date of the Q&A on the ECHA website. The project will only cover REACH questions related to the registration deadline. Both ECHA and the participants acknowledged that the updated FAQ procedure will demand timely input from all sides. Participants also agreed that earlier publication of Q&A pairs with up to 8 weeks worths the extra effort.

Should the result of the pilot project be satisfactory, the updated FAQ procedure will be proposed also for CLP and BPR HelpNet members.

### 3.2 HelpEx questions proposed by NHDs

One HelpEx question was proposed by the NHDs, specifically on the unlimited amount of substances placed on the market<sup>12</sup>. As ECHA provided its feedback on 6 November 2017 the issue was not discussed during the meeting. The owner is expected to provide the final reply and close the question in HelpEx.

## Session 4 – Topics for information

### 4.1 Stakeholders' Day & HelpNet REACH Workshop

**Veera SAARI** (ECHA, Communications unit) gave a short update on the REACH Stakeholders' Day events, which start with the IT tools training on 29 and 30 January 2018 and continue with the plenary meeting and 'market place' on 31 January 2018.

She explained the concept of the 'market place', in which HelpNet members including EU/EEA NHDs, candidate countries and industry observers are invited to participate. This will be an opportunity to network with stakeholders and promote the services provided by HelpNet.

The HelpNet REACH Workshop on 1 February 2018 will be organised back-to-back with the Stakeholders' Day, and participants were invited to share their ideas for the agenda with the Secretariat by mid-December 2017.

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<sup>12</sup> HelpEx ID 14610: 'A company can rely on the 3 years average rule and the registration deadline would be 31 May 2018. The company will stop import on the 31 May 2018. Can this company import any tonnage from 1 Jan to 31 May 2018 without being subject to registration obligations?'

## 4.2 ECHA Cloud services

The update on ECHA Cloud services<sup>13</sup> since the last July REACH Workshop and the launch of the service on 31 July 2017 is available on the communication platform S-CIRCABC.

Currently, the IUCLID Cloud services have more than 500 subscriptions<sup>14</sup>. Around 40 % of these are to IUCLID Cloud for SMEs, which can be used by such companies to prepare REACH 2018 registration dossiers. The other 60 % are subscriptions to the IUCLID Cloud Trial, which is used mainly for training purposes and to get familiar with the tool.

The ECHA Secretariat highly appreciates HelpNet members promoting the IUCLID Cloud services by sharing all the information available with their national industry contacts.

## 4.3 Promotion of sector use maps to registrants

**Laure-Anne CARTON DE TOURNAI** (ECHA, Classification & Prioritisation unit), presented the sector use maps. The information made available with sector use maps is valuable to registrants preparing for the REACH 2018 deadline and to registrants updating their dossiers.

It was highlighted that HelpNet members can play an important role in promoting the outcomes of sector use map work (i.e. the published sector use maps and the related use maps library) to registrants in their own country. They can promote the efforts of industry stakeholders by: adding a link to the sector use map library to their national REACH helpdesk website; guiding and encouraging registrants to check the published sector use maps and to use the relevant information for the registration of their substances or when updating their registration dossiers; and encouraging key industry sectors in their country to be active in the sector use map development work.

Last but not least, ECHA would be interested in hearing about the experiences of HelpNet members when promoting sector use maps to registrants.

## 4.4 EEN Annual Conference

**Anna AMELKINA**, from the Estonian national helpdesk, informed the participants about the annual conference<sup>15</sup> of the Enterprise Europe Network (EEN), which took place from 20 to 22 November in Tallinn, Estonia. The EEN conference was organised in partnership with the Estonian Chamber of Commerce and industry and brought together business advisers, key stakeholders and representatives from the European institutions.

At the conference, Raili MOLDOV, from the Estonian competent authority, gave an overview of the most frequent and interesting REACH 2018 registration-related questions received by the Estonian HD.

## Conclusions of the HelpNet REACH Workshop

**The Chair** gave a summary of the key issues and action points discussed and thanked participants and presenters for their active participation in the WebEx session of the workshop. He invited the participants to provide their feedback and to respond to the online survey that will be sent to them after the event. The responses will be used to decide on the organisation and format of future meetings held before the 2018 registration deadline.

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<sup>13</sup> ECHA services webpages:

<https://echa.europa.eu/support/dossier-submission-tools/echa-cloud-services>

<sup>14</sup> At the time of publishing this summary report, the number of subscriptions has already reached 800, and 50 % of them refer to IUCLID Cloud for SMEs subscriptions. It is expected that these numbers will continue to grow rapidly as we approach the REACH 2018 deadline.

<sup>15</sup> EEN annual conference: <http://www.b2fair.com/eenconf2017>

## Annex I – Agenda

### HelpNet REACH Workshop (Web conference) 29 November 2017

- 10:30-11:00 **WebEx technical checks with remote participants**
- 11:00-11:10 **Opening of the REACH Workshop** - Pedro ROSELLÓ VILARROIG (ECHA)
- 11:10-12:35 **Session 1 - Cooperation for the REACH 2018 registration deadline**
- 1.1 From policy to practice** - Laura WALIN
  - 1.2 REACH questions answered by ECHA and NHDs** - Pedro ROSELLÓ VILARROIG
  - 1.3 Tour de table**
- 13:00-14:00 **Session 2 - Updates from ECHA**
- 2.1 Updates from the Chair of HelpNet** - Andreas HERDINA (ECHA)
  - 2.2 HelpNet on ECHA's new web pages** - Pedro ROSELLÓ VILARROIG
  - 2.3 Update on guidance activities** - Ewa SKOWRON (ECHA)
  - 2.4 Phase-in status after 2018** - Suzanne WIANDT (Germany)
- 14:00-14:15 **Session 3 – HelpEx**
- 3.1 Updating the FAQ procedure** - Pedro ROSELLÓ VILARROIG
  - 3.2. HelpEx questions proposed by NHDs**
- 14:15-14:40 **Session 4 - Topics for information**
- 4.1 2018 Stakeholders' Day & HelpNet REACH Workshop** - Veera SAARI (ECHA)
  - 4.2 ECHA Cloud services**
  - 4.3 Promotion of sector use maps** - Laure-Anne CARTON DE TOURNAI (ECHA)
  - 4.4 2017 Enterprise Europe Network Conference**
- 14:40-15:00 **Closing the WebEx session** - Pedro ROSELLÓ VILARROIG

## Annex II – Action points

No	Action point	Agenda item	Who	Due date	Status
1.	Invite HelpNet REACH correspondents and observers to regular phone calls starting from January to May 2018	1.1	ECHA	20/12/2017	Closed
2.	Follow up on issue related to customers falsely claiming of having contacted the NHD prior to ECHA for questions within NHDs' scope	1.2	ECHA/ NHDs	20/12/2017	Closed
3.	Forward any questions on the UK withdrawal to the HelpNet Secretariat for updating existing Q&As or creating new ones	2.1	NHDs	01/02/2018	Closed
4.	Provide any editorial suggestions to the HelpNet Secretariat on the UK withdrawal section on the ECHA website	2.1	NHD (UK)	01/02/2018	Closed
5.	Prompt competent authorities to provide comments during ongoing consultation on CARACAL paper regarding the 'phase-in status after 2018'	2.4	NHDs	15/12/2017	Closed
6.	Launch a pilot project for the simplification of the FAQ procedure. Send reminders to NHDs to highlight shorter deadlines	3.1	ECHA	20/12/2017	Closed
7.	Subscribe for regular ECHA Cloud services updates or ask for more information by sending an email to: <a href="mailto:cloud-services@echa.europa.eu">cloud-services@echa.europa.eu</a>	4.2	NHD	-	Closed
8.	Promote the <a href="#">sector use maps</a> and ask for more information by sending an email to: <a href="mailto:echa_enes@echa.europa.eu">echa_enes@echa.europa.eu</a>	4.3	NHD	-	Closed



## Annex III – List of participants

Country	Name	Surname
Austria	Peter	SCHINDLER
Belgium	Daphné	HOYAUX
Cyprus	Maria	ORPHANOU
Czech Republic	Miriam	HUMEOVÁ
Estonia	Anna	AMELKINA
Finland	Sari	TUHKUNEN
Germany	Suzanne	WIANDT
	Claus	HAAS
Hungary	Viktor	NYITRAI
Iceland	Ísak	SIGURJÓN BRAGASON
	Björn	GUNNLAUGSSON
Ireland	Majella	COSGRAVE
	Caroline	WALSH
Italy	Sabrina	MORO IACOPINI
Latvia	Amanda	OZOLA
	Zane	OZOLINA
Lithuania	Monika	KAIRYTE
Luxembourg	Laurène	CHOCHOIS
Poland	Monika	WASIAK-GROMEK
Portugal	Isabel	LAGINHA
Slovakia	Martina	DANIHELOVA
Spain	Laura	ZAMORA
Sweden	Jenny	VIRDARSON
United Kingdom	Lindsay	PEPPIN
	James	LLOYD

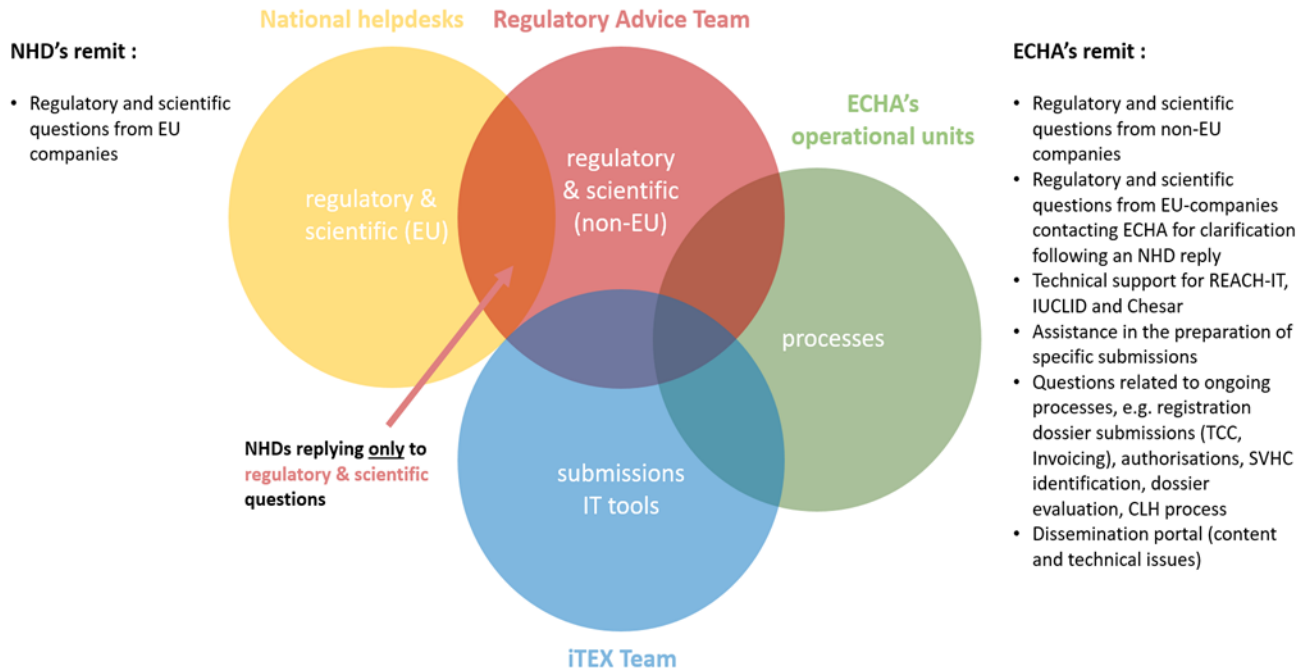
**Stakeholders/Observers of HelpNet**

<b>Organisation / Country</b>	<b>Name</b>	<b>Surname</b>
Ministry of Agriculture and Environmental Protection, Serbia	Aleksandra	RASOVIC
Only Representatives Organisation (ORO)	Kevin	HOBAN
	Maria	O'SHEA

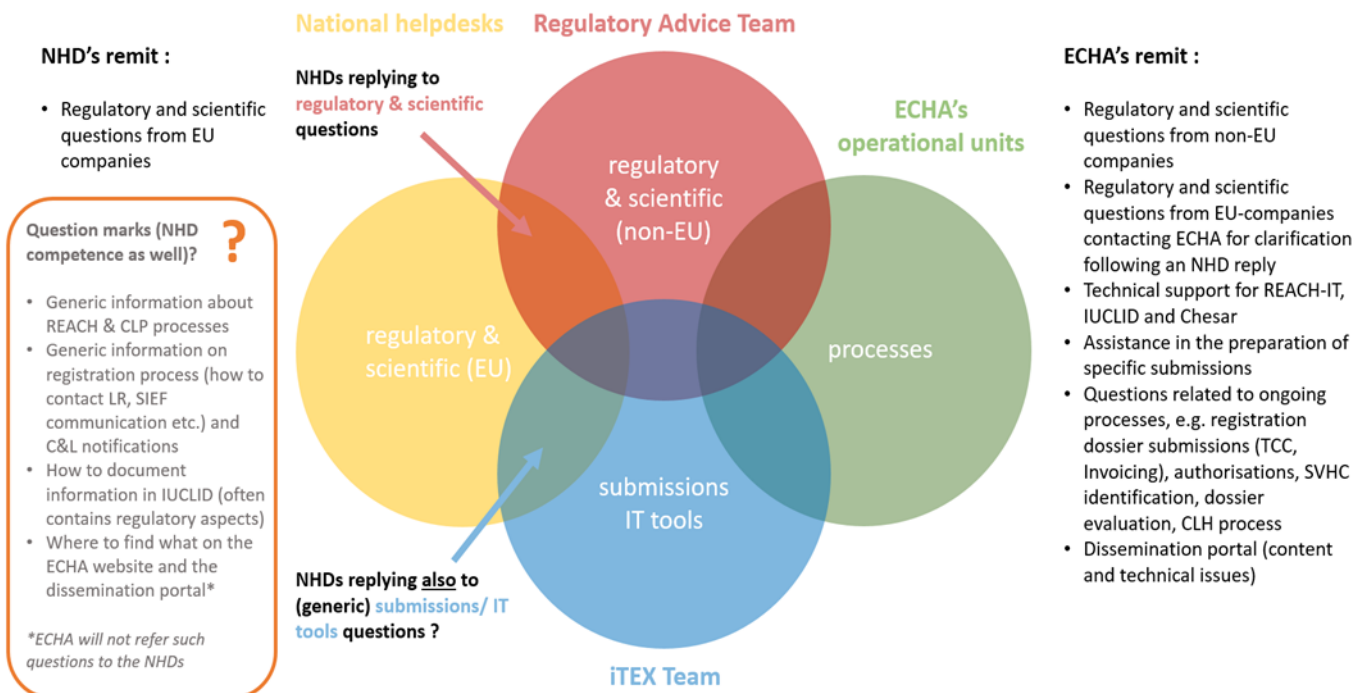
<b>ECHA, directorate/unit</b>	<b>Name</b>	<b>Surname</b>
Cooperation	Andreas	HERDINA
Communications	Veera	SAARI
Support, Forum & HelpNet Secretariat	Johan	NOUWEN
	Pedro	ROSELLÓ VILARROIG
	Charles	DICKINS
	Christina	LOUKOU
	Outi	TUNNELA
	Anisa	KASARUHO
	Anna-Liisa	PIKKARAINEN
	Katarina	CENDIC
	Virve	SIHVOLA
	Patricia	BRILLAS
	Olena	KRYCHEVSKA
Viorica	NAGHY	
Registration	Laura	WALIN
Corporate Services	Marco	POPOVIC
	Matthew	STOCKS

## Annex IV – REACH questions in the remit of ECHA and NHDs

### Scenario 1



### Scenario 2



## Annex V - Results of polls

### Poll 1: Resources, phone calls and support from ECHA

	Yes	No	No answer	Respondents
1. Do you foresee that your resources for spring 2018 are adequate?	16 (80 %)	1 (5 %)	3 (15 %)	20
2. Does your NHD intend to participate in the monthly phone calls?	11 (55 %)	6 (30 %)	3 (15 %)	20
3. Is there anything else ECHA could do to support you during this period?	NHDs found the existing support provided by ECHA sufficient and do not have additional requests.  They are aware of the channels to make support requests if needed.		10	20

Suggested actions from ECHA to support NHDs:

- ✓ Faster reply time to questions from the NHDs
  - ECHA should provide its opinion in HelpEx questions as soon as possible.
  - Ensure queries (via contact form or HelpEx) are answered as quickly as possible.

### Poll 2: Simplified FAQ procedure

	Yes	No	No answer	Respondents
1. Do you agree with the simplification of the FAQ procedure for DL2018 related Q&As?	17 (81 %)	1 (5 %)	3 (14 %)	21

	Option A: Shorter commenting periods	Option B: Possibility to skip the second round of	Option C: Shorter commenting periods + possibility to skip the second round	No answer	Respondents
2. Which option (presented in slides) do you find more reasonable/practicable?	3 (14 %)	6 (29 %)	7 (33 %)	5 (24 %)	21
3. Which will be the criteria to avoid the second round of consultation?	See below the comments provided by the NHDs*			11	21

Under the agenda item *3.1 Updating the FAQ procedure*, ECHA made the following suggestions for conditions to skip the second round of FAQ consultation:

- i) minimum number of agreements,
- ii) no disagreements,
- iii) only editorial comments.

\* By replying to question 3. *Which will be the criteria to avoid the second round of consultation?*, respondents to the poll made the following comments:

- Δ 'The suggested criteria seem reasonable'.
- Δ 'DE helpdesk agrees with the criteria given in the presentation for the shortened process skipping the 2nd round'.
- Δ 'I agree with the criteria as presented by ECHA. A minimum number of MSs agreeing will be required and the proposed changes should just be editorial. We could skip the 2nd commenting round perhaps on a case by case basis, depending on the comments. I agree with shortening the commenting period'.
- Δ 'If there is no disagreement (contradictory comments); it would be good to have an agreed minimum number (e.g. 5 or 6 as mentioned) of contributing (commenting) Member States'.
- Δ 'Clear agreement'.
- Δ 'No disagreement'.
- Δ 'A threshold number of HD agreements, for example a minimum of 50 % NHD agreements. No disagreements at all'.
- Δ 'General agreement between NHDs is a good one. Minimal number of NHD responses is a good idea, but it depends how active the various NHDs are in responding to questions. Still there should be a minimum number necessary to confer 'agreement between NHDs. It may also be acceptable to skip the commenting round if there is an opposing position that is later reversed in a subsequent NHD comment in HelpEx'.
- Δ 'NHDs clearly to express agreement during the first round and most of the suggested editorial changes of the first round to be taken on board'.

### Poll 3: ECHA Cloud services

What is, from your point of view, the most common partnership arrangement between service providers and SMEs in your country?			
A	B	C	No Answer
The consultant does everything for the SME (preparation of the data and dossier submission)	The consultant and the SME work together preparing the data and the SME does the final dossier submission	The consultant prepares the data/dossier and gives it to the SME who sends the dossier to ECHA	
<b>4</b>	<b>5</b>	<b>2</b>	<b>10</b>
19 %	24 %	10 %	48 %