

4 October 2017



HelpNet REACH Workshop: summary of discussions

Time: 7 July 2017, WebEx session (10:00-13:00)

The HelpNet REACH Workshop, organised for the HelpNet REACH members and observers, took place on 7 July 2017, by web conference. This document summarises the topics discussed during the workshop and the follow-up actions (Annex II).

Opening

The Chair, Pedro ROSELLÓ VILARROIG, opened the REACH Workshop by welcoming the representatives of the REACH national helpdesks (NHDs) as well as observers from Serbia and Cefic (Annex III - list of participants). He presented the agenda, which included topics relevant for the upcoming REACH registration deadline and the daily work of the network.

The overall objective of the workshop was to inform NHDs on the 2018 preparations carried out by ECHA, specifically with regard to the collaboration with the NHDs during the peak period in spring 2018 and invite participants to express their views. The workshop thus provided an opportunity to exchange information and best practice and find new and faster ways to collaborate during times where the workload is expected to be high.

Session 1 - Working together

1.1. Working together to support stakeholders engaged in the 2018 REACH registration – ECHA's perspective

In her role as programme manager of ECHA's internal 2018 REACH deadline programme, **Laura WALIN** (ECHA, Directorate of Registration) presented ECHA's plans to support registrants in the run-up to the last REACH registration deadline of 31 May 2018.

The support given by ECHA to stakeholders engaged in the 2018 REACH registration and the NHDs' role in the picture was requested by participants at the HelpNet 12, in March 2017. Thus, ECHA's plans were presented in a policy document, circulated before the workshop.

In her presentation, Laura WALIN focused on the following areas: services covered by ECHA; availability of ECHA's IT tools and support; incoming questions, languages covered by ECHA staff and, most importantly, cooperation with NHDs. For the last topic, the effective exchange of information during the peak period – both from NHDs to ECHA and from ECHA to NHDs – was the main focus.

In preparing for the 2018 registration deadline, ECHA is relying on lessons learnt from the two previous ones in 2010 and 2013 and on the experience of 10 years in supporting companies according to the tasks given in the REACH Regulation. However, ECHA acknowledges that in comparison with the previous registrations, the 2018 registration deadline is different, and has its specificities that pose particular challenges¹.

¹ See ECHA's REACH 2018 Roadmap, page 5.

It is estimated that almost 60 000 dossiers² will be submitted to ECHA and up to 36 000 questions will be received on REACH and CLP, most of which will be relevant for the deadline. This is three times more than the number of enquiries received by ECHA in 2016, and approximately as much as replied by all the NHDs in 2016.

Laura WALIN presented the types of questions that ECHA is expecting to receive and how the infrastructure for handling the questions will be strengthened in terms of resources (interim staff³); availability of IT tools; response time for enquiries; prioritisation; quality and consistency of the support by multidisciplinary teams that can efficiently handle the incoming enquiries.

Considering the 2018 registration particularities, the NHDs' support is becoming even more crucial. Most of the registrants for the 2018 REACH registration deadline are expected to be SMEs; they might feel more comfortable to communicate in their own languages with their own national helpdesk and authorities, than using English and contacting ECHA.

Regarding enquiries to ECHA, Laura WALIN noted that generally they are sent in English, enabling the best experts in-house to contribute to replies, in a timely manner. It was discussed that, whenever needed, ECHA might rely on its close cooperation with the relevant NHD so that an appropriate reply to the enquirer can be provided in their own language by their own national helpdesk. By answering to a short poll, 73% of the participants replied that that ECHA can rely on their support to communicate with a customer in their own country in their national language(s) in the future (results of the poll are available in Annex I).

Regarding tricky issues – e.g. use of PPORD, DCG solutions, charcoal, the UK withdrawal from the EU ('Brexit'), calculation of tonnage band for phase-in substances, etc. – ECHA will agree on lines to take. Some of these issues were addressed by Andreas HERDINA in session 2, under agenda item *Updates from ECHA*.

The ECHA Secretariat will continue to monitor the incoming questions to identify frequently occurring ones for which answers are not publicly available. Messages will be provided through the existing communication channels, i.e. the weekly newsletter, special e-News, news on the REACH 2018 web pages⁴, REACH-IT and social media (ECHA on LinkedIn⁵, Facebook⁶, Twitter⁷). Dedicated webinars will be produced *ad hoc* if needed.

NHDs were invited to provide feedback on particular support activities planned by ECHA through short polls during the webex. The results are available in Annex I.

Key messages: It is important that NHDs inform ECHA as early as possible on specific questions they receive from their customers, that might have distinctive issues related to the 2018 registration deadline.

Actions: Further feedback on the document 'ECHA support for the registrants of the 2018 deadline' is welcome by 21 August 2017 (see Annex II). NHDs are specifically asked to pay attention to section 2.3 were ECHA calls for NHD cooperation on supporting customers that approach ECHA in other languages than English.

 $^{^2}$ Programming Document 2018-2020 (MB/45/2016 Final), page 22, discussed in December 2016, at the 44th Management Board meeting:

https://echa.europa.eu/about-us/who-we-are/management-board/management-board-meetings/2016

³ Information regarding interim staff hired for the REACH 2018 registration is available on ECHA website at: https://echa.europa.eu/about-us/jobs/open-positions

⁴ REACH 2018 support web pages: https://echa.europa.eu/reach-2018

⁵ LinkedIn: https://www.linkedin.com/company/454521

⁶ Facebook: <u>https://www.youtube.com/user/EUchemicals</u>

⁷ Twitter: https://twitter.com/EU ECHA

1.2. ECHA Cloud services

Eduardo VENCESLA JIMENEZ (ECHA, Computational Assessment and Dissemination Unit) presented the ECHA Cloud services, the secure online platform used to distribute ECHA's IT applications in a cloud environment. This included what are and how to subscribe for ECHA Cloud services and the IUCLID Cloud services (trial and SME); how to sign up in the ECHA accounts and create a legal entity (LE) that can be used for any of ECHA's IT tools available online.

Based on ECHA's experience and feedback received from all stakeholders, ECHA decided to provide industry with a simpler version of IUCLID that would facilitate its use, focusing on the needs for the REACH 2018 registration deadline.

One of the most common technical difficulties users have encountered when using IUCLID is installing and upgrading the software, or migrating and maintaining data in IUCLID. The ECHA Cloud services ensure that users are always working with the latest version of the application, reducing any IT cost related to hardware or assistance. Working in the Cloud enables ECHA to provide a better online support and allows users to work from anywhere, also their consultants.

Finally, ECHA takes care of backing up the data (only for the ECHA Cloud for SME service). This reduces the risks of data loss and the need users might have to make local copies, which also increases the security of the data.

To access **ECHA Cloud services**⁸ users need to have an **ECHA account**⁹ with an associated legal entity (LE) which gives access to ePIC, R4BP, REACH-IT¹⁰ as well as to the ECHA Cloud services. Users are responsible to manage their accounts¹¹ and the information related to the LE. There are two possible scenarios for a new ECHA Cloud services user:

- New user logging in for the first time >> Sign up in ECHA accounts >> Fill in your LE information >> Subscribe to the IUCLID Cloud Trial service;
- Existing user, with REACH-IT and/or R4BP 3 credentials >> Contact your LE manager, who needs to subscribe your LE to the IUCLID Cloud Trial service and grant you access rights to it.

He made a live presentation of the ECHA Cloud services platform and the IUCLID Cloud Trial service, explaining the differences between the two:

IUCLID Cloud Trial	IUCLID Cloud for SMEs
 ✓ Designed for users who wish to get familiarised with a trial version of IUCLID in the cloud, do training and play with it; ✓ Up to 100 MB of secure data storage; ✓ 10 MB of file attachment; ✓ No backup services; ✓ Limited helpdesk support; ✓ Available since April 2017. 	 ✓ Aimed for SMEs who are non-frequent IUCLID users to prepare registration dossiers under REACH for the 2018 registration deadline; ✓ Up to 1 GB of secure data storage; ✓ 20 MB of file attachment; ✓ Fully backup support of your data; ✓ Dedicated helpdesk support during office hours; ✓ Coming up this summer!

⁸ https://echa.europa.eu/support/dossier-submission-tools/echa-cloud-services

⁹ Q&A section on ECHA website: Understanding ECHA accounts and Account management

¹⁰ ECHA accounts is a user management technology, transparent to the user, that helps ECHA to manage the user accounts of all its IT tools in a common way. This means that there are no REACH-IT, R4BP 3 or ePIC accounts anymore; they are all called ECHA accounts.

¹¹ Managing your ECHA account: https://idp-industry.echa.europa.eu/idp/applications

He invited participants to join the IUCLID LinkedIn group¹², a platform to exchange, discuss and provide feedback on the use of IUCLID and the future evolution of the product.

Key messages: Subscribe to the IUCLID Cloud Trial and follow IUCLID in the Cloud on Linkedin.

1.3. Discussion

Regarding the assumption of 60 000 dossiers expected to be submitted, the ECHA Secretariat explained that the forecasted estimates are based on the original European Commission assumption back in 2006 and updated with new information that ECHA has gained since then. It was clarified that the number is not a target for ECHA, but a number used for internal preparations.

Laura WALIN clarified that information regarding interim staff hired for the REACH 2018 registration deadline is available under work opportunities on ECHA website¹³. Interims hired – for this historic moment of the EU regulation dealing with chemicals – will work at ECHA's premises but will be employed by temporary-work agencies, not by ECHA.

One NHD asked when a company can contact ECHA through the switchboard. Iris BRIAT explained that the swirchboard is part of the ECHA Info Desk 14 and is taking all calls coming to ECHA. Generally, it is used whenever enquirers do not know where to turn to, or for following up a written enquiry submitted through the webforms.

Regarding nanomaterials, the ECHA Secretariat highlighted that guidance¹⁵ documents on nanomaterials have been updated and NHDs are invited to consult the documents, which could help them in answering questions. If still needed, NHDs are welcome to contact ECHA for further expert advice.

Some functionalities of the IUCLID Cloud services will be enhanced during this year (for example, bulk import capabilities or the help system). These changes will improve the user experience in the cloud and will not affect any data already submitted to ECHA.

If you already have an ECHA account, you can access all of ECHA's IT systems that your LE manager has granted access rights to. Note that if you block your ECHA account, you cannot access any IT tool.

ECHA will follow the general standard procedure and reply to enquiries as soon as possible and not exceeding 15 working days. The iTEX team is responsible for IT and submissions related questions: they will be reinforced with a dedicated team responding to questions on the cloud services.

IUCLID Cloud services allow users to prepare the registration dossier, and REACH-IT is used to submit the dossier to ECHA. Dossiers prepared with IUCLID 6 need to be exported locally in your computer and then uploaded to REACH-IT. Dossiers prepared with IUCLID Cloud for SMEs can be uploaded and then submitted directly to ECHA from REACH-IT.

¹² LinkedIn: https://www.linkedin.com/groups/12043483

¹³ Open positions at ECHA: https://echa.europa.eu/about-us/jobs/open-positions

 $^{^{14}}$ Info Desk acts as a single point of entry for all general enquiries coming from the public. The aim of the service which was established on 1 January 2012 is to provide a more coherent and customer friendly service for ECHA customers.

¹⁵ Nanomaterials: https://echa.europa.eu/regulations/nanomaterials

1.4. Working together to support stakeholders engaged in the 2018 REACH registration – NHDs' perspective

The Chair invited the participants to a *tour de table*. Participants discussed about intermal planning, highlighting the following:

- Many NHDs reported a steady number of incoming enquiries with a few being related to the 2018 registration deadline. Still many questions are basic, coming from companies not knowing what to do. Phone calls were found useful in these cases. Some NHDs are expecting an increase in new questions which might come from importers, other actors in the supply chain, or consultants.
- One NHD reported more incoming questions and more time allocated to these questions, mainly during the first six months of 2018.
- In some NHDs, tasks within the organisation are redistributed and more time is allocated to incoming questions. Existing staff becomes more specialised on particular issues, and reply faster, while new staff is focusing on general questions.
- Some NHDs have additional resources, while others find that the current available resources are adequate for the given tasks.
- Questions are replied to in a timely manner and response times vary from 2 to 5 days.
- One NHD introduced quality checks on outgoing replies, and maintains a close contact with the competent authority & representatives in ECHA committees to keep them up to date.
- Many NHDs are monitoring the ECHA website, and are updating theirs on a regular basis.

 One NHD reported that their website will be totally revamped in September this year.
- Some NHDs requested to have specific contacts within ECHA, particularly with ECHA colleagues dealing with questions posted by NHDs in HelpEx. The HelpNet contact form was found to be useful and more NHDs thought to use it more.
- Many NHDs have contacted the pre-registrants in their countries, and the companies to which the 2018 deadline may apply; some NHDs will contact them again, while others are planning to do that for the first time. For companies who did not pre-register but could have registration obligations, NHDs are looking into ways of reaching out to them.
- NHDs were asked to indicate the number of email addresses that bounced back during email campaigning. ECHA would appreciate hearing about any substances that might not be registered and NHDs would be aware of.
- NHDs would appreciate having *ad hoc* phone calls with ECHA whenever difficult issues arise. They favour more informal means of cooperation in this way.
- To share the support tasks efficiently, participants requested ECHA to clarify the scope of questions replied by ECHA and NHDs.

Key messages: NHDs are invited to encourage companies in their countries, especially inexperienced SMEs, to read the ECHA REACH 2018 web pages¹⁶ which explain the registration obligations in simple terms and are translated into all EU languages.

¹⁶ REACH 2018 webpages: <u>REACH 2018</u>; <u>REACH 2018</u> in your language; <u>Practical help to prepare your registration</u>; <u>Registration deadline for low-volume chemicals</u>; <u>Toolkit for promoting the REACH 2018</u> registration deadline

ECHA is developing a strategy targeted at importers, especially importers that are SMEs, aiming to diminish the number of companies which are unaware of the 2018 registration obligations. The HelpNet Secretariat will inform NHDs about these plans in the coming months.

If not already done so, NHDs that have contacted pre-registrants are invited to share with ECHA¹⁷ any information which could improve estimations of incoming registration dossiers – e.g. email addresses not working and information provided by companies in reply to targeted national campaigns.

Session 2 – Updates from ECHA

2.1 Directors' Contact Group (DCG)

Andreas HERDINA, the Chair of the HelpNet, presented three topics: Directors' Contact Group ¹⁸ (DCG) solutions, charcoal and the UK withdrawal from the EU ('Brexit').

The DCG was set up before the first registration deadline of 2010. In the past, the group became active ahead of registration deadlines and then went dormant. This will also happen in the run-up to the 2018 registration deadline. The aim of the group is to identify and resolve the priority issues of concern for industry.

The topics currently under discussion, but not yet concluded, are: access to EU finance; DCG decisions on the formal revocation of 'Fair, transparent and non-discriminatory cost sharing in SIEFs' available on the DCG website but overcome by the Implementing Regulation¹⁹ of the European Commission; the revision of 'Recommendations on sound SIEF management' which still have valid points in it; SIEFs beyond 2018; existing DCG solutions; and potential upcoming DCG solutions.

Now, one year before the 2018 registration deadline, ECHA encourages all the dutyholders to prepare for a timely submission of their registration dossiers and not to rely on DCG solutions. The DCG solutions are made for companies who have made efforts to fulfil their duties and are acting in good faith, but nonetheless find themselves in emergency situations.

Issues that the DCG might consider to address for the 2018 REACH registration deadline:

- Calculation of tonnage bands and the three-year average rule;
- Pre-registered substances and the grace period after 2018 (linked to Article 21 of REACH);
- No registrant taking up the role of lead registrant (LR);
- Selection of test laboratories for analytical data;
- List of substances without an LR;
- Data-sharing disputes;
- Market intelligence on registration intention for 2018 there is a general unquantified fear that SMEs with niche products might decide not to register their substances; ECHA has recently carried out a survey²⁰ to obtain detailed market segmentation information on the potential SME users of the ECHA Cloud services. The objective of the study was to obtain information on the registration intentions of companies for the 2018 deadline. This helped ECHA to build a map of the SMEs in Europe with REACH registration obligations. The

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

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

²⁰ REACH registration survey: http://rpaltd.co.uk/reach_registration_survey

Insights on the SME market structure published on the ECHA website, after the meeting: https://echa.europa.eu/-/smes-face-financial-challenges-registering-under-reach

¹⁷ reach-2018@echa.europa.eu

¹⁸ DCG on ECHA website:

¹⁹ The Implementing Regulation of January 2016:

- results of the survey are showing different segments of duty holders for the REACH 2018 deadline, broken down by their behaviour towards their registration obligations;
- Communication that companies should not rely on DCG solutions and should not be counted on at this stage.

'Brexit'

- Within ECHA, Andreas HERDINA was nominated to cover this issue and to prepare for the date of 30 March 2019, assuming that the UK will leave the EU on that date, if not otherwise agreed during the ongoing negotiations.
- In preparation for this date, ECHA will publish dedicated web pages later this year (September/October). In this context, Andreas HERDINA is interested in receiving from NHDs including the BPR and CLP ones questions they receive about Brexit.

Charcoal

- Andreas HERDINA addressed the challenges that some registrants of charcoal are facing with their joint registration and data-sharing costs that outweigh their means. 118 individual registrations were found outside the joint submission (JS), out of which 76 received a token to enter the JS because they won a data-sharing dispute. For 22 SMEs, ECHA has exceptionally and temporarily suspended the deadline by when they have to comply with the OSOR principle. The ECHA Secretariat will further analyse the situation.
- The ECHA Secretariat is considering that charcoal registrants deserve similar attention as the lavender sector had, and therefore the ECHA Secretariat is putting together a help package for them.
- NHDs, especially the ones located in Spain, France, Italy, Bulgaria, and potentially Sweden and the United Kingdom, could support the companies against the situation as described in the factsheet²¹ 'Joint submission obligations and data sharing disputes for charcoal'.

Key messages: NHDs can help charcoal registrants in their countries as described in the factsheet 'Joint submission obligations and data sharing disputes for charcoal'. The factsheet is available in English, and NHDs can customise the help-package for their local customers.

Discussion

Participants welcomed the intention of the DCG to look into the calculation of tonnage bands with the three-year average²², which is also an unsolved question in HelpEx. A draft FAQ is currently under consultation with the European Commission. Andreas HERDINA clarified that once the legal interpretation regarding the three-year average rule becomes clear, the answer will apply in both forums, HelpEx and the DCG.

Also, ECHA is in consultation with the Commission services and looking into Article 8 of REACH, and REACH-IT and other IT tools particularly to LE changes that might be triggered by ORs establishing their businesses in one of the (other) 27 Member States, after Brexit. This topic might be included in the Brexit page that ECHA is working on, which will be available on the ECHA website.

²¹ The factsheet will be uploaded on S-CIRCABC after the meeting.

²² HelpEx question ID 14017.

Session 3 – HelpEx questions

3.1 HelpEx 14043

'Does the supplier of a polymer have to supply an exposure scenario for a monomer?'. The question was posted by Poland and the status was 'timed out'. ECHA has provided extensive feedback to the question and asked the owner to consider closing the question. In the absence of the Polish HelpNet correspondent, the discussion on the above HelpEx question did not take place.

3.2 HelpEx 14050

'API purification and registration obligations'. The question was posted in HelpEx by Italy and the status was **'open'**. The question is under informal consultation with the Commission.

Sabrina MORO IACOPINI on behalf of the Italian HD presented a flowchart of the API manufacture process and the two possible options:

- Option 1: The dissolution is considered as a purification step, because the goal is the API production. API is exempted from registration (Art. 2.5.a);
- Option 2: The dissolution is considered as production of the raw material (B). The goal is to obtain the raw material B which is registered as an intermediate. Thus, API has to be registered as an intermediate used in the production of B.

The Italian HD was supporting the first option, together with IE and FR: 'The salt (API) can be considered exempted from REACH registration because the transformation described is a purification step in the production of API'.

At the time of the meeting, ECHA was having internal discussions. From a practical application point of view, the UK considered that the API does not have to be registered. ES supported option one and will provide their feedback in HelpEx.

3.3 HelpEx 14110

'What are the restriction limits for PAHs in synthetic turf and plastic floor made of recycled rubber granules?'. The question and the FAQ proposal were proposed by Cyprus. The status of the question was 'closed' and under informal consultation with the Commission.

Maria ORPHANOU noted that recycled rubber granules used for the production of synthetic turf and plastic floor are considered as solid mixtures, in the bulk state. The substances commonly present in recycled rubber granules are polycyclic aromatic hydrocarbons (PAHs).

She highlighted that the Cypriot HD is receiving questions on this matter from schools, public bodies, municipalities, etc. The draft guidelines on PAHs are not addressing the issue of tiles/mats and turf and they do not have any guidance or information material that can be provided to companies and/or the general public. She asked NHDs to share their experience in responding to such enquiries and any available document/leaflet on this subject.

The ECHA Secretariat will publish the hot topic page on restrictions, but publication timelines are under consideration. A few NHDs and ECHA have expressed their dissenting views in adopting this FAQ, at this point in time, as guidelines for PAHs are not expected to be adopted before November 2017 (CARACAL 25).

One NHD explained that in facilities, such as synthetic sports pitches, the granules are only supplied to professional users who would install them. Similarly, products such as 'playground tiles' are installed by professionals. Whilst the playing field produced using the granules is accessible to and used by the public, the granules are not supplied to the public. Thus, the application of the restriction in this case seems without any solid basis.

If the disagreement persists, the Cypriot HD could liaise with the competent authority, that could bring the topic to the CARACAL-25 meeting. Based on the agreement reached then by the competent authorities, The ECHA Secretariat would draft the FAQ.

Key messages: NHDs were invited to provide their feedback in HelpEx.

Any other business

ECHA's strategy on substitution

The presentation on substitution strategy, by **Denis MOTTET**, was a follow-up of the HelpNet 12 and was available on S-CIRCABC before the meeting. Any questions on the presentation will be sent to the HelpNet Secretariat in writing.

Stakeholders' Day on 30-31 January 2018

Veera SAARI (ECHA, Communications unit) informed participants about the ECHA Stakeholders' Day scheduled for late January 2018, with one day of hands-on training on REACH-IT and IUCLID and a plenary meeting, a market place and a reception on the second day. Subject to budget availability, the HelpNet Secretariat is planning to have the REACH Workshop back-to-back with the Stakeholders' Day, on 1 February 2018. This would be the last physical meeting of HelpNet before the registration deadline of 31 May 2018.

Conclusions of the REACH Workshop

The Chair gave a summary of the key issues and action points and thanked all correspondents, observers and presenters for their active participation in the WebEx session of the REACH workshop. He invited them to provide their feedback and to respond to the online survey that will be provided after the event. This will be used to decide on the organisation and format of future meetings with the REACH HelpNet correspondents until the registration deadline.

4 October 2017



10 (13)

Annex I - Results of polls

Question 1: How to enhance communication between NHDs and ECHA during the anticipated registration peaks in 2018?

Answers:

HelpNet contact form is very helpful.

Having a specific contact for the NHD at ECHA to facilitate efficient communication.

Telephone calls, for specific questions between the NH and ECHA HD, maybe for difficult questions, after the HELPEX reply

HelpEx is a good communication tool for the NHDs and ECHA and should be the first port of call, but the 21 day minimum limit on the replies may need to be changed in the lead up to the deadline. Perhaps consider a chat functionality between the NHDs and ECHA in the months prior to the deadline.

1. A dedicated chat with an expert in ECHA; 2. The possibility to get in contact by email (Helpnet contact form is already a good option). The goal is to get the answer in the shortest time, time is the main issue

Perhaps using HelpEx more as a communication tool, rather than simply sharing complex questions. Alternatively, scheduled frequent HelpEx webinars/conference calls (e.g. if there is an issue). Ad hoc email may work, however there is always the possibility that emails may be missed. Perhaps NHDs can upload frequently asked questons onto HelpEx to support other NHDs who may get the same question.

Communication may not need to be 'enhanced' as such as we have a lot already in place but an important consideration is the speed of any responses required from ECHA to NHDs

Organisation of Webex sessions on known issues.

The means, which are used currently, seems to be sufficient.

Question 2: Do you think HelpEx can be efficient enough?

Ans	swers:
- F	or most issues, yes.
- Y	es, if a reply is provided within 5 working days
- 11	t could be, but might not be great when early response is needed (as above).
- 11	t takes too long to get the final conclusion. Companies that are waiting for an answer, have to wait long time.
- A	ulthough the software can be a bit clunky, I think it could be used so long as all NHDs log in with relative frequency.
- 1	dont think helpex would be efficient enough on its own as it can be quite slow to get a response.
- Y	es, with shorter answer time.
- H	lelpEx should be one the most important communications tolls - sharing knowledge on difficult questions.
- H	lelpEx is difficult to use as the search function is not very efficient and only works with individual words but not with multiple words let alone phrases
- H	lelpEx can be an effective tool
- Y	es but the search tool is not easy to use.
- H	lelpEx is no quick enough, so during registration peaks, cannot be efficient enough
- Y	res

Question 3: Can we rely on your support to communicate with a customer in your country in your national language(s)?

Answer choice	Α	В	С
Answers	Yes	No	No Answer
Results	19/26	1/26	6/26
Percentages	73%	4%	23%

Question 4: Will you be able to participate to the full set of events including IT-tools training for Industry, Stakeholders' Day and REACH workshop from 30 January to 1 February 2018?

a) One day/ First day - IT tools training 5 out of 22 (23%) b) Two days/Second day - plenary, market place 5 out of 22 (23%) c) Three days/ HelpNet REACH Workshop 13 out of 22 (59%)

Did not answer 9 out of 22 (42%)

Annex II – Action points

No	Action point	Agenda item	Who	Due date
1	1 Provide comments on the policy document 'ECHA support for the registrants of the 2018 deadline'		NHDs	21/08/2017
2	2 Share REACH/CLP/BPR/PIC questions received on Brexit with <u>Andreas Herdina/HelpNet Secretariat</u>		NHDs	31/07/2017
3	Share information on contact details/topic area of ECHA with NHDs	1.4	ECHA	15/08/2017
4	Clarify the scope of questions replied by ECHA/NHDs	1.4	ECHA	15/08/2017
5	Inform NHDs about who in the ECHA is dealing with the HelpEx question posted by NHDs	1.4	ECHA	31/08/2017
6	6 Ask your customers to include your reply when submitting an enquiry to ECHA through the contact form		NHDs	As soon as possible
7	Share factsheet on charcoal with NHDs	2.1	ECHA	13/07/2017
8	Provide comments on HelpEx question ID 14050	3.1	NHDs	27/10/2017
9	Share information on PAHs in synthetic turf/plastic floor with Maria Orphanou, owner of HelpEx question ID 14110	3.3	NHDs	As soon as possible
10	Provide comments on the HelpEx question ID 14110 after reopen by Cyprus	3.3	NHDs	tbd

Annex III – List of participants

Country	Name	Surname
Austria	Peter	SCHINDLER
Belgium, Cefic	Amaya	JÀNOSI
Belgium	Daphné	HOYAUX
Cyprus	Maria	PALEOMILITOU
Cyprus	Maria	ORPHANOU
Czech Republic	Jan	KOLAR
Estonia	Anna	AMELKINA
Finland	Sari	TUHKUNEN
Germany	Anja	KNIETSCH
Greece	Panagiota	SKAFIDA
Iceland	Ísak	SIGURJÓN BRAGASON
Iceland	Björn	GUNNLAUGSSON
Iceland	Elísabet	PÁLMADÓTTIR
Ireland	Karen	COLLINS
Ireland	Caroline	WALSH
Ireland	Majella	COSGRAVE
Italy	Sabrina	MORO IACOPINI
Liechtenstein	Maria	ROSARIA RELLA-QUADERER
Lithuania	Agnė	JANONYTĖ
Lithuania	Monika	KAIRYTE
Luxembourg	Anna-Lisa	HEINEVETTER
Netherlands	Margaret	WOUTERS
Poland	Krzysztof	DOMANSKI
Portugal	Isabel	LAGINHA
Portugal	Fátima	ARAÚJO

Country	Name	Surname
Serbia	Aleksandra	RASOVIC
Slovakia	Martina	DANIHELOVA
Spain	Laura	ZAMORA
Spain	Clara	RODRÍGUEZ-SPITERI ENRICH
Spain	Elena	SÁNCHEZ DÍAZ
United Kingdom	James	LLOYD

ECHA, directorate/unit	Name	Surname
Cooperation	Andreas	HERDINA
Communications	Veera	SAARI
Support, Forum & HelpNet Secretariat	Johan	NOUWEN
Secretariat	Pedro	ROSELLÓ VILARROIG
	Iris	BRIAT
	Christina	LOUKOU
	Martin	ALBERT
	Anisa	KASARUHO
	Anna-Liisa	PIKKARAINEN
	Patricia	BRILLAS
	Olena	KRYCHEVSKA
	Viorica	NAGHY
Registration	Laura	WALIN
Dossier submission & PIC	Javier	SANCHEZ-SAEZ
Computational Assessment & Dissemination	Eduardo	VENCESLA JIMENEZ
Corporate Services	Marco	POPOVIC