

Conclusions and action points
Enforcement Workshop with Stakeholder Organisations
06 October 2011
Helsinki, Finland

Action /Conclusions	Responsible	Deadline
Item 2 : Practicalities		
The Agenda together with all the presentations and abstracts submitted to the Forum-S will be made available on ECHA's website	Forum-S	
Item 3 : Forum Activities to coordinate REACH and CLP enforcement		
Stakeholders appreciated the work of the Forum and the improved tools put in place in order to implement the tasks of the Work Program		
The stakeholders welcomed that inspectors are available to use RIPE for their activities. The stakeholders took note of the constraints of using RIPE due to the scope of currently available data and the data quality.		
Item 4 : Registration related issues		
Inspectors have started their controls and there are more and more efforts for the REACH and CLP implementation. Industry has to find methods on how to improve the quality of the SDS.		
Stakeholders are interested in sharing their problems with the Forum regarding enforcement of Article 33. Forum members took note of the presentation from ACEA. Stakeholders will try to make workable the provisions of Article 33 by bringing the problems forward to the relevant policy makers/legislators.		
Stakeholders took note that national inspection programs are performed in parallel with the harmonised enforcement projects organised by the Forum. Stakeholders acknowledged that simple declarations do not fulfil the requirements of the provisions for the registration of intermediates.		
Item 5 : Downstream Users related issues		
Stakeholders recognised the progress of the Reach-en-Force 2 project		
CEFIC to submit to Forum-S the questionnaire on the self assessment tool developed by the Belgium Chemicals Industry.	CEFIC	6 of November
Forum took note of the presentation given by AISE. It was discussed that the calculation of the starting date of the various obligations related to the DU needs to be determined by reference to each substance triggering the obligations.		
Reference was made by stakeholders on the scaling formula as a possible tool.		
The representative of Eurometaux agreed to send to Forum-S the link to the Excel based scaling tool for the DU	Eurometaux	07 October

The representative of AISE offered to share with Forum the presentations from the upcoming workshops (ENES workshop, CEFIC and DUCC workshop)	AISE	End of October (CEFIC and DUCC) and end of November (ENES)
The Forum Chair explained the position of the Forum that the OR is responsible for supplying the appropriate SDS.		
Forum took note of the EUPC presentation on the inspection practices. Forum Members pointed out that the inspections take into account the conditions of the company that is controlled. However Forum Members emphasised that the inspectors may have access to all documents deemed necessary for the purposes of the inspection. Furthermore inspections may take place without prior announcement and they are conducted in the official language of the country.		
Item 6 : Restrictions		
The representative of ETRMA will send the information containing the full technical reports with the details of the finding of their study indicating the non compliant tyre manufacturers to Forum-S. The information shall be distributed only to Forum Members, ECHA and COM.	ETRMA	30 of October
ETRMA will confirm if the organisation will plan other testing.	ETRMA	21 of October
Forum indicated that correct documentation is also important with regard to PAH restrictions. Several Member States are processing further surveillance activities concerning the PAH in tyres. Forum Members admitted that ETRMA results are interesting but that they cannot be used as evidence by authorities.		
Item 7 : Experience from the Member States (market surveillance)		
Forum is looking forward to have further discussions on market surveillance regulation and on its interlinks with REACH and CLP		
Item 8 Enforcement Conference 2012, 01 March 2012		
Stakeholders to give feedback to COM on the proposals of potential speakers and on the topics to be addressed on the agenda.	All stakeholders	31 of October