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## **MULTI-ANNUAL STAFF POLICY PLAN**

**(DOCUMENT ADOPTED BY THE MANAGEMENT BOARD)**

**European Chemicals Agency (ECHA)**  
**Multannual Staff Policy Plan 2010-2012**

**1 - GENERAL OVERVIEW OF THE CURRENT SITUATION OF THE AGENCY.**

**1.1 General information on the AGENCY's activities.**

1.1.1 Description of the agency, its mission and programme tasks.

Established on 1 June 2007, the European Chemicals Agency (ECHA) is at the heart of the new regulatory system for chemicals in the European Union set out in Regulation 1907/2006 of the European Parliament and the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals<sup>1</sup>. REACH has been complemented by the recently agreed Regulation on Classification, Labelling and Packaging of substances and mixtures (CLP Regulation<sup>2</sup>). As European Regulations, these legislative acts are directly applicable in all Member States without the need for transposition into national law. The purpose of the REACH system is to ensure a high level of protection of human health and the environment, promote alternative methods to animal tests to assess the hazards of chemicals, facilitate the free circulation of substances within the single market and enhance competitiveness and innovation.

In practical terms, the new regime is expected to close a knowledge gap for chemicals placed on the European market before 1981, to speed up the placing of safe and innovative chemicals on the market and to make the risk management of these substances more efficient, in particular by shifting the burden of proof for identifying and controlling risks from authorities to companies.

The successful implementation of REACH requires a well-functioning Agency, capable of delivering independent and high-quality science-based opinions within strict legal deadlines, as well as ensuring that the operational aspects of the legislation function smoothly. However, the efficient operation of REACH also depends on ECHA's institutional partners, in particular the Member States of the EU and the European Commission. Indeed, from the very beginning, the credibility of the REACH system will, for instance, be determined by the allocation of sufficient resources and an effective and fair enforcement policy. In addition, since ECHA is responsible for drafting opinions for the European Commission, the successful

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<sup>1</sup> Regulation (EC) No 1907/2006 (hereafter the "REACH Regulation" or "REACH")

<sup>2</sup> Regulation (EC) N° 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures implements in the EU the international criteria agreed by the United Nations Economic and Social Council (UN ECOSOC) for the classification and labelling of hazardous substances and mixtures and known as the Globally Harmonised System of Classification and Labelling of Chemicals (GHS). The Regulation repeals Directives 67/548/EEC and 1999/45/EC with effect from 1 June 2015.

implementation will depend on the initiation and appropriate follow-up of these processes by the European Commission and/or the Member States.

#### *ECHA's Mission*

ECHA's mission is to manage all REACH tasks by carrying out or co-ordinating the necessary activities, in order to ensure a consistent implementation at Community level and to provide Member States and the European institutions with the best possible scientific advice on questions related to the safety and the socio-economic aspects of the use of chemicals. This is achieved by ensuring a credible decision-making process, using the best possible scientific, technical and regulatory capacities and by working independently in an efficient, transparent and consistent manner.

ECHA helps to achieve the aims of REACH and thus to ensure a high level of health and environmental protection, while at the same time fostering innovation and competitiveness. The Agency's founding Regulation stipulates that: *"The Agency should be central to ensuring that chemicals legislation and the decision-making process and scientific basis underlying it have credibility with all stakeholders and the public. The Agency should also play a pivotal role in coordinating communication around this Regulation and its implementation. The confidence in the Agency of the Community institutions, the Member States, the general public and interested parties is therefore essential. For this reason, it is vital to ensure its independence, high scientific, technical and regulatory capacities, as well as transparency and efficiency."*<sup>3</sup>

The core purpose of ECHA is therefore to ensure a credible and sound decision-making process within REACH. Key prerequisites to enable ECHA to achieve this are that it:

- is independent;
- develops a high scientific capacity;
- develops a high technical capacity;
- develops a high regulatory capacity;
- works transparently;
- works efficiently.

One of the main REACH tasks is the management of the registration process for chemical substances; this will gather information on chemicals that is expected to be much more complete and of higher quality than the data previously available.

The REACH regulation foresees a staggered implementation of its provisions for so-called phase-in substances. Depending on their production volume or hazardous properties, phase-in substances which were pre-registered before December 2008 will benefit from the extended registration deadlines of 31 November 2010, 31 May 2013 and 31 May 2018. The run-up to and the aftermath of these deadlines correspond to major peaks in the Agency's work-load and its resource allocations.

ECHA plays a key role in ensuring consistency with regard to the evaluation of such information and decisions to require further information from registrants, and thus ensures the quality of the data collected. Moreover, ECHA manages the process of granting exemptions

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<sup>3</sup> Recital 95 of the REACH Regulation.

from registration for the purpose of Process and Product Orientated Research and Development (PPORD).

Through its Committees, ECHA provides opinions to the European Commission on authorisation applications for substances of very high concern and on proposals for restriction of the manufacturing, import and/or use of substances for which the risks are not otherwise addressed by the REACH processes.

ECHA will create an inventory for the classification and labelling of dangerous chemicals that are manufactured in the EU or placed on the EU market, and has duties relating to the harmonisation of such classifications. The Regulation of the European Parliament and the Council on Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation) gives ECHA certain additional responsibilities in this regard. ECHA is also to assist registrants, Member States and the European Commission in the implementation of REACH, and has important duties with regard to reducing the need for animal tests.

ECHA may be given additional tasks. However, any additional tasks would have to take into account the vast range of activities and strict deadlines for compliance set out in the REACH and CLP Regulations which ECHA has to meet in the first instance.

#### *ECHA's objectives 2009-2012*

ECHA has identified a set of overall objectives that will determine the success of its activities during the first years of its operational activities.

- The most important objective will be **to make REACH work and to carry out the tasks assigned to ECHA** by implementing efficient and transparent procedures in a timely manner for all REACH processes and for tasks arising from the recently agreed CLP Regulation.
- A cross-cutting objective of ECHA will be **to win and retain the confidence of all stakeholders** in REACH and CLP operations, in particular by delivering consistent and high-quality science-based decisions and opinions and providing the best possible guidance, advice and assistance to all parties concerned.
- ECHA will make a **credible start on the evaluation and authorisation procedures**, including a regular update of the “candidate list” of substances of very high concern (SVHC).
- ECHA will **help promote alternative test methods and non-testing approaches** to assessing hazards of chemicals in implementing REACH. When taking decisions on testing and information needs, ECHA will focus on accepted methods which ensure the availability of appropriate hazard information whilst striving to minimise the use of animal testing.
- ECHA will ensure the timely availability and the further development of the **scientific IT tools required**, as well as and their international acceptance.
- ECHA will make efficient and proactive use of its steadily growing databases to **facilitate public access to information on chemicals throughout their lifecycle**, taking into account the legitimate confidentiality concerns of relevant parties.
- ECHA will **monitor its performance**, in order to be able constantly to improve and contribute to the reporting required by the REACH Regulation and evaluate possible synergies with related Community legislation.

- Through the Forum, ECHA will also **contribute to the effective enforcement of REACH.**
- ECHA will ensure the **availability of adequate human resources** to carry out its tasks through the timely recruitment of highly-qualified staff and comprehensive training.

1.1.2 Posts filled at 31.12. 2008 and figures on career development.

Category and grade	Year 2008							
	Establishment plan 2008		promotion / reclassification in 2008		Actually filled 31.12.2008		vacancy notices published externally <sup>4</sup>	
	Perm	Temp	Perm	temp	perm	temp	Perm	Temp
AD 16	-	0	-	-	-	0		
AD 15	-	1	-	-	-	1		
AD 14	-	2	-	-	-	2		
AD 13	-	9	-	-	-	9		
AD 12	-	11	-	-	-	10		
AD 11	-	13	-	-	-	12		
AD 10	-	15	-	-	-	12		
AD 9	-	15	-	-	-	13		
AD 8	-	18	-	-	-	17		
AD 7	-	22	-	-	-	22		
AD 6	-	17	-	-	-	16		
AD 5	-	13	-	-	-	13		
<b>Total AD</b>	-	<b>136</b>	-	-	-	<b>127</b>		
AST 11	-	0	-	-	-	0		
AST 10	-	1	-	-	-	1		
AST 9	-	2	-	-	-	2		
AST 8	-	8	-	-	-	8		
AST 7	-	5	-	-	-	5		
AST 6	-	9	-	-	-	9		
AST 5	-	14	-	-	-	13		
AST 4	-	25	-	-	-	25		
AST 3	-	20	-	-	-	20		
AST 2	-	0	-	-	-	0		
AST 1	-	0	-	-	-	0		
<b>Total AST</b>	-	<b>84</b>	-	-	-	<b>83</b>		
<b>Total</b>	-	<b>220</b>	-	-	-	<b>210</b>		
<b>Total of staff</b>	<b>220</b>		-		<b>210</b>			

<sup>4</sup> See table below. All TA posts in 2008 were filled following external publication of a call for expressions of interest.

Of the 10 posts remaining vacant at end 2008, 2 concern staff members who resigned unexpectedly, 1 staff member who was dismissed at the end of the probation period, 2 candidates who rejected an offer of employment at the last minute, 2 vacancies resulting from internal mobility and 1 seconded official who returned to the Commission before the end of the secondment. These posts will be filled from existing reserve lists or following new selections launched in December 2008. The 2 remaining vacancies concern the posts of Chairman and Legally-qualified Member of the Board of Appeal. These are appointed by the Management Board on the basis of a list of suitable candidates proposed by the Commission. None of the candidates proposed by the Commission for these posts in 2008 would accept ECHA's offer of employment. The posts were republished in November 2008.

The below table shows the TA selection procedures organised in 2008:

NUMBER	SHORT DESCRIPTION	GRADES	Number of successful candidates on reserve list
TA-2008-001	Facility Manager	AD 8	3
TA-2008-002	Junior Secretary	AST 1	29
TA-2008-003	Secretary	AST 2	32
TA-2008-004	Senior Secretary	AST 4	10
TA-2008-005	Legal Assistant	AST 3-5	11
TA-2008-006	Training Manager	AD 7	4
TA-2008-007	HR Policy Officer	AD 6	3
TA-2008-008	Quality Manager	AD 8	4
TA-2008-009	Director Process Support	AD 13	3
TA-2008-010	Senior Scientific Officer Adviser	AD 12	3
TA-2008-011	Head of Unit Human Resources & Facilities	AD 12	1
TA-2008-012	Head of Unit, Finance	AD 12	2
TA-2008-013	Director Resources	AD 13	3
TA-2008-014	Director Assessment	AD 14	2
TA-2008-015	Director Cooperation	AD 13	3
TA-2008-016	Budget Officer AD-5	AD 5	4
TA-2008-017	Finance and Contract Officer	AD 7	1
TA-2008-018	Head of Unit, Executive Office	AD 11	3
TA-2008-019	Head of Unit, ICT	AD 11	Republished
TA-2008-020	Head of Unit, Assessment (3 posts)	AD12	5
TA-2008-021	Financial Assistant AST 3-4	AST 2-4	10
TA-2008-022	Accounting Assistant AST 3-4	AST 3-4	7
TA-2008-023	Procurement Assistant AST 3-4	AST 3-4	4
TA-2008-024	Jr. Scientific Officer AD-5	AD 5	42
TA-2008-025	Jr. Scientific Officer AD-6	AD 6	25
TA-2008-026	Head of Unit, Guidance & Help Desk	AD 11	0
TA-2008-027	Head of Unit, Comms & Reach Training	AD 11	3
TA-2008-028	Head of Unit, Committees & Int. Relations	AD 12	2
TA-2008-029	IT Assistant Solaris-System Administrator	AST 3-5	3
TA-2008-030	IT Assistant Storage Administrator	AST 3-5	2
TA-2008-031	IT Assistant- Windows	AST 3-5	3
TA-2008-032	IT Assistant- Java	AST 3-5	5
TA-2008-033	IT Assistant Database Administrator	AST 3-5	3
TA-2008-034	IT Assistant- Network	AST 3-5	2
TA-2008-035	Junior Socio-Economic Analyst	AD 6	5
TA-2008-036	Senior Socio-Economic Analyst	AD 9	2

NUMBER	SHORT DESCRIPTION	GRADES	Number of successful candidates on reserve list
TA-2008-037	Accounting Officer	AD 11	2
TA-2008-038	Head of Unit Process Support I&II ( 2 Posts)	AD 12	1 (second post to be republished)
TA-2008-039	Team Leader Socio-Eco Analysis	AD 11	1
TA-2008-040	Senior Procurement Assistant	AST 7	5
TA-2008-041	HR Officer - Budget & Fin.	AD 8	2
TA-2008-042	Senior HR Assistant - Payroll	AST 7	2
TA-2008-043	Socio-economic Analysis Committee Chair	AD 11	1
TA-2008-044	Scientific Officer - Risk Management	AD 7-8	Ongoing
TA-2008-045	Senior Scientific Officer - Risk Management	AD 9	Ongoing
TA-2008-046	Head of Unit ICT (republishation)	AD 11	Ongoing
TA-2008-047	Head of Unit Scientific IT Tools (republishation)	AD 11	Ongoing
TA-2008-048	ICT Architect	AD 8	Ongoing
TA-2008-049	Senior Project Manager – Scientific IT Tools	AD 9	Ongoing
TA-2008-050	ITC Business Analyst	AD 7-8	Ongoing
TA-2008-051	Risk Assessment Committee Chair	AD 11	Ongoing
TA-2008-052	Board of Appeal Registrar	AD 11	Ongoing
TA-2008-053	Internal Auditor	AD 11	Ongoing

1.1.3 Current annual staff-related expenditure, in absolute terms and as percentage overall annual expenditure.

The table below illustrates breakdown of the annual expenditure of the Agency:

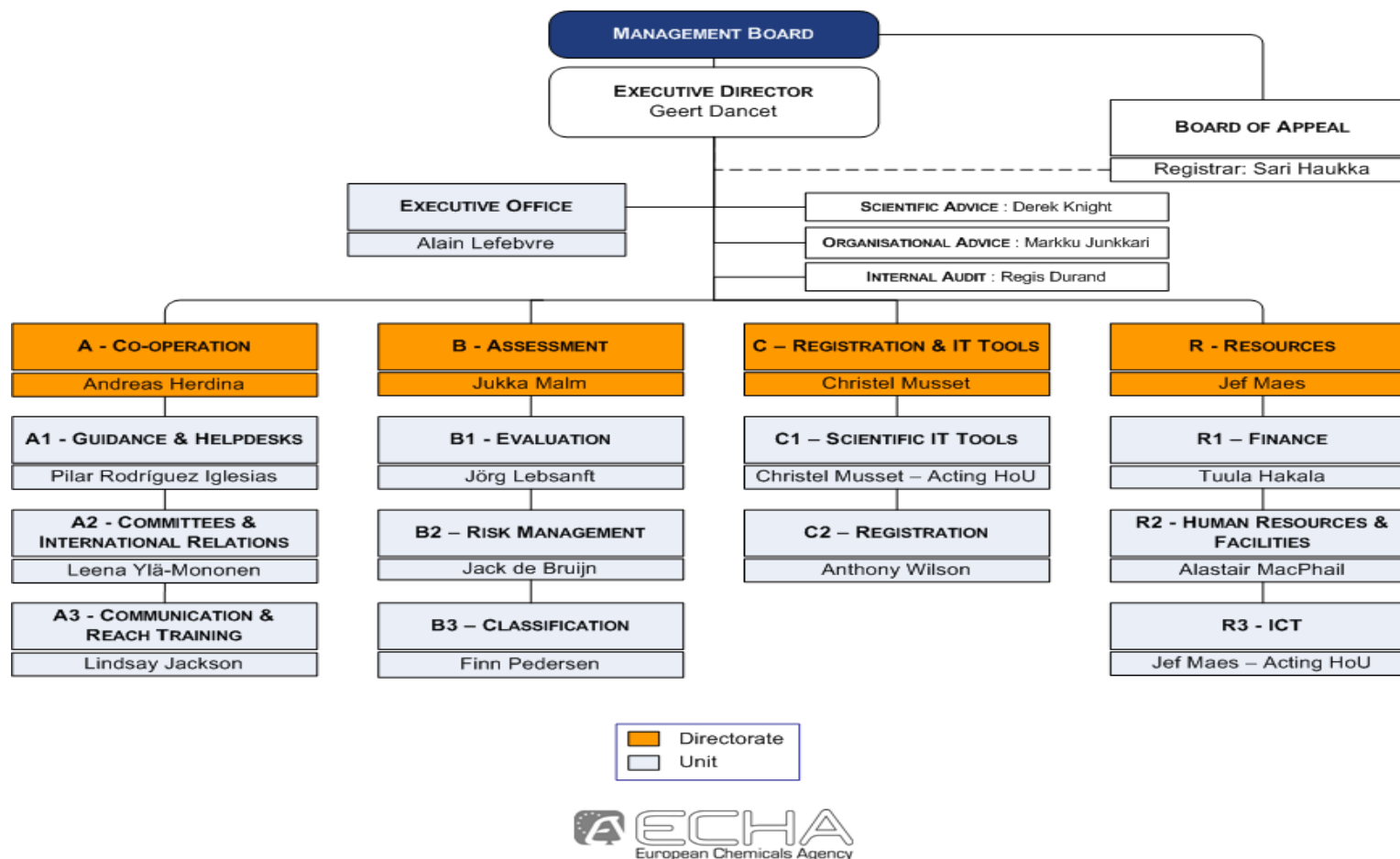
Breakdown of budget allocation	Executed budget 2008		Budget 2009	
	EUR (1 000)	In % of total	EUR (1 000)	In % of total
Title 1 - Staff related expenditure	21 572	42%	38 134	53%
<i>of which salaries and allowances</i>	16 762	33%	31 918	45%
Title 2 - Administrative expenditure	16 849	33%	10 804	15%
Title 3 - Operating expenditure	12 520	25%	22 698	32%
<b>Total</b>	<b>50 941</b>	<b>100%</b>	<b>71 636</b>	<b>100%</b>

The management allowances granted on the basis of Article 44 of the Staff Regulations amounted to some 85 000 euros in 2008, representing 0.4 % of the total salaries of temporary agents. This amount will increase in 2009 when the probation periods of the new managers have been successfully completed.



1.1.4 Organisation and organigramme.

ORGANISATION CHART OF ECHA – February 2009



## **1.2 General presentation of the staff policy followed by the AGENCY.**

1.2.1 Type of staff, type of employment and duration of employment required to fulfil the missions and tasks:

- Officials / temporary agents in long term employment

<b>Agency's activities/tasks</b>	<b>Function</b>	<b>Type and duration of contract</b>	<b>FG and Grades</b>
Management	Executive Director	TA short-term 5 years + 5 years	AD 15
Management	Director	TA long-term 5 + 5 years + indefinite	AD 13-14
Management	Head of Unit	TA long-term 5 + 5 years + indefinite	AD 9-12
Management	Senior Advisor	TA long-term 5 + 5 years + indefinite	AD 12
Board of Appeal	Chairman	TA short-term 5 years + 5 years	AD 12
Board of Appeal	Member	TA short-term 5 years + 5 years	AD 10-11
Board of Appeal	Registrar	TA long-term 5 + 5 years + indefinite	AD 11
Operations	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD 9-11
Operations	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD 7-8
Operations	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD 5-6
Operations	Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST 5-6
Operations	Junior Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST 3-4
Communication	Senior Communication Officer	TA long-term 5 + 5 years + indefinite	AD 9-11
Communication	Communication Officer	TA long-term 5 + 5 years + indefinite	AD 7-8
Communication	Junior Communication Officer	TA long-term 5 + 5 years + indefinite	AD 5-6
Communication	Communication Assistant	TA long-term 5 + 5 years + indefinite	AST 3-4
IT	Senior IT Officer	TA long-term 5 + 5 years + indefinite	AD 9-11
IT	IT Officer	TA long-term 5 + 5 years + indefinite	AD 7-8
IT	Junior IT Officer	TA long-term 5 + 5 years + indefinite	AD 5-6
IT	Senior IT assistant	TA long-term 5 + 5 years + indefinite	AST 5-8
IT	IT Assistant	TA long-term 5 + 5 years + indefinite	AST 3-4
Legal affairs/BoA	Senior legal advisor	TA long-term 5 + 5 years + indefinite	AD 9-11
Legal affairs/BoA	Legal Advisor	TA long-term 5 + 5 years + indefinite	AD 7-8
Legal affairs/BoA	Junior Legal Advisor	TA long-term 5 + 5 years + indefinite	AD 5-6
Legal affairs/BoA	Legal assistant	TA long-term 5 + 5 years + indefinite	AST 3-4
Administration	Senior Financial/Accounting/Audit/Procurement/HR Officer	TA long-term 5 + 5 years + indefinite	AD 9-11
Administration	Financial/Accounting/Audit/Procurement /HR Officer	TA long-term 5 + 5 years + indefinite	AD 7-8
Administration	Junior Financial/Accounting/Audit/Procurement /HR Officer	TA long-term 5 + 5 years + indefinite	AD 5-6
Administration	Senior Financial/Accounting/Procurement /HR/Administrative Assistant	TA long-term 5 + 5 years + indefinite	AST 5-8
Administration	Financial/Accounting/Procurement /HR/Administrative Assistant	TA long-term 5 + 5 years + indefinite	AST 3-4
Administration	Senior Facility Management Assistant	TA long-term 5 + 5 years + indefinite	AST 5-7
Administration	Facility Management Assistant	TA long-term 5 + 5 years + indefinite	AST 1-4

Agency's activities/tasks	Function	Type and duration of contract	FG and Grades
Administration	Senior Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST 3-4
Administration	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST 1-2

- Temporary agents in short term employment

In view of the nature of the Agency's activities, which concern an ongoing regulatory process with a foreseen duration of 15 years, the Agency has no plans to recruit temporary agents on short-term employment, with the possible exception of specific projects or temporary missions that may arise in future. The Agency plans to manage the expected dip in activity in the years 2013-2017 by means of natural wastage.

<b>Number of Contract Agents<sup>5</sup></b>			
	<i>End 2008 (actually filled at the indicated date of drafting the SPP)</i>	<i>End 2009 (envisaged)</i>	<i>End 2010 (envisaged)</i>
<b><i>GF IV</i></b>	0	2	3
<b><i>GF III</i></b>	3	10	12
<b><i>GF II</i></b>	5	20	35
<b><i>GF I</i></b>	1	2	2
<b><i>TOTAL</i></b>	9	34	52

- Contract agents on long term employment

Contract agents in long-term employment are engaged to fulfil basic clerical, technical and manual functions, in particular clerical support, ICT helpdesk and web support and facility management technical and manual functions.

- Contract agents on short term employment

ECHA is preparing for fully automated registrations and workflows, and this for both external and internal processes. However, the experience with the pre-registrations made it clear that failure or insufficient functioning of IT systems can have a dramatic impact on the need for human intervention, specifically for support at technical-administrative level.

While initially it was assumed that technical compliance checks and invoicing would be almost entirely automated procedures, it became clear that only a partial automation was possible. Many technical and administrative verification steps of dossiers are required, especially for the dossiers submitted by the lead registrants of each SIEF. Also additional

<sup>5</sup> These figures refer to the number of contract agents expected to be in employment at the end of the year, not the volume of FTE used during the year.

support resources are needed for data sharing and the processing of substance identity data, and which are higher than the initial estimates.

In view of the uncertainties that ECHA faces and the additional support work that is needed for invoicing and data checking, the Agency has revised upwards its estimates of the number of contract agents. This is also to provide a safety margin to meet possible unexpected upsurge of workflow in the run up to the 2010 registration deadline and in the subsequent evaluation process for the period 2010-2011.

1.2.2 Type and number of posts, job titles, duration of employment, grade corresponding to the tasks and functions (explanation of table I of the annex).

The Agency has only temporary posts on its establishment plan and does not foresee the creation of permanent posts. A significant portion of the Agency's workload is associated with the registration of phase-in substances which is staggered over the three extended registration deadlines set in the REACH Regulation for 30 November 2010, 31 May 2013 and 31 May 2018. The workload of the Agency after 2021 cannot be foreseen.

ECHA is an expert organisation managing a complex and technically challenging registration procedure, which is to a large extent automated. While the development of internal workflow functionalities of the system have been delayed (hence the need to increase the number of short-term contract agents), submissions from registrants are received electronically and loaded directly into the Agency's databases. Subsequent processing of the dossiers, including related committee work is largely conducted by electronic means. ECHA therefore operates with a very low ratio of support staff to specialists.

The REACH Revised Legislative Financial Statement of 12 July 2006<sup>6</sup> showed a lower ratio of AD to AST staff (c. 3:2) than ECHA forecasts for 2010-12. The staffing figures contained in the Revised Legislative Financial Statement were based on a sophisticated model of the Agency's operational activities, which integrated a series of assumptions about the workload associated with the tasks of the Agency and the type of staff required to accomplish them. One assumption used in the operational staff model was that certain scientific/technical tasks relating to the processing of registration dossiers could be entrusted to non-graduate technician-level staff in the AST function group. However, a large-scale and widely publicised selection of Assistant Scientific Officers launched in autumn 2007 aimed at recruiting c. 100 AST-level technicians yielded only 32 suitable candidates. Non-graduates with the scientific/technical training and experience needed to participate meaningfully in content-related work in the Agency's operational services were entirely absent from the pool of candidates. Most of those selected had good generic administrative skills suitable for a variety of support tasks in the operational units, or were graduates in scientific and technological disciplines. Most of the latter have since been successful in external selections for AD posts in the Agency. The Agency plans to repeat this selection exercise in summer 2009, but does not expect to attract more than a tiny number of staff with the requisite profile. Moreover, all ECHA's regulatory activities require high scientific expertise.

Given the absence of suitably qualified non-graduate technicians on the labour market, the Agency has had to revise upwards its estimate of the proportion of AD level staff required to accomplish ECHA's operational tasks.

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<sup>6</sup> SEC(2006)924

ECHA intends to conduct a thorough review of the baseline assumptions underlying its operational staff model in the light of real-life experience since entry into operation and the information that will become available in the coming months on the intentions and behaviour of registrants. The results of this review will feed into the Multi-Annual Work Programme 2011-2013 and the Multi-Annual Staff Policy Plan for that period which will be presented in 2010.

The table below shows the ratio of AD to AST staff in ECHA compared to the figures given in the Revised Legislative Financial Statement (RLFS in the below table).

FG	ECHA 2009	RLFS 2009	ECHA 2010	RLFS 2010	ECHA 2011	RLFS 2011	ECHA 2012	RLFS 2012
AD	210	188	289	258	302	270	302	291
%	65%	53%	68%	59%	66%	59%	66%	61%
AST	114	167	139	179	155	186	155	185
%	35%	47%	32%	41%	34%	41%	34%	39%
Total	324	355	428	437	457	456	457	476

ECHA's mission as a centre of expertise on chemicals and the demands of putting in place the entire mechanism of a complex and technically challenging regulatory system for chemicals at European level as well as setting up a large European Agency from scratch, explain the high proportion of senior experts in both the operational and administrative services of the Agency, particularly in the first years of operation. The need to have a critical mass of experienced experts in the start-up phase accounts for fact that 59% of AD staff and 67% of AST staff were in the senior grades (AD9+ and AST 5+) in 2007 and 49% and 46% respectively in 2008. From 2009, the focus of the Agency's recruitment efforts has shifted towards less senior staff (AD 5-8, AST 1-4). As seen in the following table, the ratio of senior to non-senior AD staff evolves from 3:2 in 2007 to roughly 1:2 from 2010. This represents a natural development in a fast-growing expert organisation like ECHA. From 2010, the impact of promotions starts to be felt.

Type	2007	%	2008	%	2009	%	2010	%	2011	%	2012	%
<b>AD 9-15</b>	44	59%	66	49%	83	40%	108	37%	120	40%	130	43%
<b>AD 5-8</b>	31	41%	70	51%	127	60%	181	63%	182	60%	172	57%
Total AD	75	100%	136	100%	210	100%	289	100%	302	100%	302	100%
<b>AST 5-10</b>	17	65%	39	46%	49	43%	55	40%	63	41%	72	46%
<b>AST 1-4</b>	9	35%	45	54%	65	57%	84	60%	92	59%	83	54%
Total AST	26	100%	84	100%	114	100%	139	100%	155	100%	155	100%
Total Staff	101		220		324		428		457		457	

### **1.2.3 Recruitment policy in regard to the different types of employment.**

A major success factor for the Agency is its ability to attract a sufficient number of highly qualified and experienced scientific, technical and legal experts in the different disciplines relevant to chemicals regulation, including key players at European, national or industry level in the preparatory phase of REACH. In achieving this, the Agency must compete with industry and the national competent authorities, who are also building up their capacity to meet their tasks and obligations under the new regulatory framework. Further challenges are the peripheral location of the Agency with respect to the main European centres of chemical production, research and regulation, and the notable shortage of local employment opportunities for non-Finnish-speaking spouses.

The Agency has been successful in attracting high-quality applicants for most profiles published in 2008, with the exception of posts in the field of ICT, finance and socio-economic analysis. However, there is concern that the pool of suitably qualified scientific and technical experts is drying up, as the Agency, industry and national competent authorities compete to build up their capacity to meet their obligations under REACH.

In the administrative field, the Agency finds itself in competition with the other EU institutions and agencies to attract suitably qualified finance, accounting, procurement and HR experts with EU experience.

The success rate of recruitments is closely related to the grade of the post. In comparison with the selections launched in 2007 for Scientific Officer (AD 7-8) and Senior Scientific Officer (AD 9-11), the selection for Junior Scientific Officer (AD 5 and AD 6) conducted in 2008 yielded only half the required number of candidates. While this should be sufficient to meet the Agency's immediate needs, this resource-intensive exercise will have to be repeated in 2009. Moreover, in the lower grades (AST 1-3 and AD 5-6), some 1:3 successful candidates ultimately reject the Agency's offer of employment. This figure rises to 1:2 for certain profiles (IT, finance, accounting). The corresponding figure for higher grades is 1:5.

In this context, ECHA is obliged to offer comparatively generous conditions in order to attract and retain quality staff.

Temporary agents are recruited by open call for expressions of interest.

For generic profiles and lower-grade staff, the Agency selects as far as possible on the basis of broadly-defined profiles with a view to constituting large reserve lists. In view of the need to have a balanced distribution of staff across the different grades in the establishment plan in the early years of peak growth, the Agency has been recruiting for generic profiles in more than one grade simultaneously. Following the call for expressions of interest, candidates are allocated to a specific grade on the basis of objective criteria relating to the duration of their relevant professional experience. Candidates allocated to a specific grade are then assessed by the selection committee in comparison with other candidates allocated to the same grade, and if successful placed on the reserve list at that grade.

As the Agency progressively fills out its establishment plan, this practice is increasingly replaced by recruitment in the lower grade in the relevant career bracket.

For management and specialist posts, staff are selected for a specific post, or a narrowly defined profile with a view to constituting a restricted reserve list. The Agency uses the

services of a recruitment consultant to assist in the selection of candidates for management posts and certain high-level specialist posts involving supervisory responsibilities. The consultant assists in the initial screening of applicants and in testing their aptitude, in particular their management skills, by means of assessment centres.

In 2009, ECHA conducted 3 selection procedures jointly with the European Environment Agency in Copenhagen with the objective of reducing the administrative burden of recruitment for both Agencies, and increasing the attractiveness of the publication for applicants, in view of the increased employment opportunities on offer.

In 2008, the Agency conducted a Europe-wide advertising campaign, with 4 press advertisements appearing at strategic intervals in a newspaper of record in each EU member state (or more in the countries with more than one official language) and in the international press (FT Europe, Economist, European Voice). The Agency also used the internet (EPSO and ECHA websites and various job websites), as well as the Permanent Representations of the Member States and the Agency's own networks (Management Board, network of national competent authorities, national REACH helpdesks, etc.).

ECHA intends to further develop its publicity effort, with more focus on internet job advertising (e.g. Monster), and specialist publications read by scientific and technical experts in an attempt to reach potential candidates who are not actively seeking employment.

The implementing rules on the employment of temporary agents provides that the selection procedure for temporary agents in long-term employment should include written tests comprising general aptitudes and language abilities, knowledge on European integration, the institutions and the Agency and job-related competencies. Given the huge volume of recruitment and the challenging circumstances of the start-up phase, the Agency has been unable to organise written tests of this type a part of the selection procedures organised to date

The workload associated with organising written tests is considerable and amounts to several person years of work. ECHA is therefore considering to outsource this task and is taking steps in this direction.

However, for all temporary agents recruited following a selection procedure that did not comprise written tests, access to long-term employment in ECHA is dependent on their successful completion of written tests organised at a later date in the Agency. This provision is clearly stated in the vacancy notices and is written into the employment contract of all staff recruited on this basis.

ECHA plans to organise written tests for all staff recruited in the 2007-2009 period at the end of 2009. From 2010 onwards, it is planned to organise written tests systematically as part of the selection procedure. Staff recruited after 31/12/2009 from reserve lists resulting from selections conducted before that date will be required to undergo written tests at the time of recruitment.

Concerning the recruitment of contract agents, ECHA has found the employment conditions for contract agents to be reasonably – though not excessively - attractive with respect to local labour market conditions, but relatively unattractive for non-Finnish staff. As the EPSO contract agent selections have very little visibility locally, the Agency has had little success in attracting candidates from the existing EPSO lists. The presence of the Agency in Helsinki and our information efforts have raised awareness of EPSO as a route to employment in

ECHA and it is hoped that local candidates will be better represented in future EPSO lists. The Agency will also conduct its own selections of contract agents in 2009.

#### 1.2.4 Career profiles in regard to the different types of employment.

Performance appraisal in relation to objectives set in advance is already implemented in ECHA in the context of probation period reporting. The first annual performance appraisal exercise will be organised in 2009 following the adoption of the relevant implementing rules, which are current under development. This will be followed in 2009 by first reclassification exercise. However, as the Agency had only 100 staff in 2007, this will concern relatively few persons. Both exercises will be conducted annually thereafter.

#### 1.2.5 Statistics and general orientations to promote equal opportunities and concrete measures planned in order to ensure equal treatment among the staff members.

The below table shows the gender breakdown of statutory staff at 31/12/2008:

<b>Function Group</b>	<b>Female</b>	<b>Male</b>	<b>% Female</b>
AD	50	73	41%
AST	49	37	57%
CA	4	5	40%
<b>Total</b>	<b>103</b>	<b>115</b>	<b>47%</b>
Management	5	10	33%

ECHA applies a policy of non-discrimination and equal opportunities on recruitment. Selection committees comprise, where possible, representatives of both genders and a balance of nationalities. Where candidates are of equivalent quality, preference in recruitment is given to those less represented among the existing staff of the Agency (whether in terms of gender or nationality).

ECHA will develop an active policy on the promotion of equal opportunities in 2009.



1.2.6 Statistics on geographical balance (situation of statutory staff i.e. temporary and contract agents as at 31/12/2008).

<b>Nationality</b>	<b>Number</b>
AT	2
BE	14
BG	3
CZ	1
DE	24
DK	3
EE	3
ES	7
FI	79
FR	19
GR	5
HU	4
IE	1
IT	11
LT	2
MT	2
NL	4
PL	6
PT	2
RO	5
SE	2
SI	3
SK	1
UK	15
<b>TOTAL</b>	<b>218</b>

### 1.2.7 Learning and development

Learning and development is an integral part of the professional activity and careers of Agency staff, as well as of the overall human resources policy. An assessment of development needs and the setting of professional and personal development objectives is an integral part of the career development review (CDR) and performance appraisal process.

By the beginning of 2009 the Agency will develop a systematic approach to learning and development of staff and to the identification of learning and development needs by finalising a learning and development framework (Training Strategy).

This framework will be based on and support the implementation of the Multi-annual work programme for 2009 – 2012 and the annual work programme for 2009 and the implementation of the Multi-annual staff policy plan for 2010-2012. Because of the high volume of recruitment training will support recruitment and the induction of newcomers to the agency.

The learning and development framework will include general principles for training and annual training priorities and will form the basis for more detailed planning and implementation of training.

### 1.2.8 Mobility policy in regard to the different types of employment.

#### *Mobility within the agency.*

As the Agency is less than 2 years old, the promotion of mobility is not a pressing issue. In 2009, ECHA will adopt procedures for ensuring transparency concerning internal vacancies and internal mobility opportunities. A fully-fledged and active policy on internal mobility will be developed from 2010.

#### *Mobility among agencies (Inter-agency Job Market).*

With the planned implementing rules on the employment of temporary agents by the Agency ECHA will sign up to the Inter-Agency Job Market.

#### *Mobility between the agencies and the institutions.*

In the context of the preparatory measures for the establishment of the Agency, ECHA benefited from the secondment in the interests of the service to the Agency of 38 Commission officials for a maximum period of 18 months up to 31/12/2008. The Commission agreed to extend 7 of these secondments in the interests of the service for a further period in the 2009 (generally 6 months) in compensation for those seconded officials who returned to the Commission before the end of the maximum period. A total of 14 seconded officials were successful in external selections conducted by the Agency and have been granted secondment at own request in order to continue their employment at ECHA. The remaining 17 returned to their posts in the Commission at the end of 2008 or earlier.

A further 10 (approximately) of the Agency's staff are officials of the institutions on secondment (at own request or personal leave. Approximately 25 are former temporary agents or contract agents of one of the institutions or agencies.

A small number of staff members have left ECHA for other Agencies or one of the Institutions.

## **2 - OVERVIEW OF THE SITUATION OVER NEXT THREE YEARS.**

### **2.1 Turnover due to retirement or termination of employment.**

2.1.1 Turnover in the agency because of retirement.

Two temporary agents currently employed by ECHA will reach the statutory retirement age of 65 in this period, one in 2010 and one in 2012.

2.1.2 Turnover in the agency because of termination of employment.

None foreseen in this period.

### **2.2 Career developments in the agency: expected promotion and reclassification.**

A reclassification (promotion) policy is under development and is expected to be adopted in June 2009 after consultation of the Staff Committee and with the agreement of the Commission. The first reclassification exercise will be conducted in 2009. The establishment tables in Annex 2 indicate the foreseen impact of this promotion policy on the basis of the average career proposed in the model Agency decision on promotion/reclassification.

It is expected that a small number of the 88 staff members who were in post at the end of 2007 would be promoted in 2009. These promotions can be accommodated within the approved establishment plan for 2009. It is expected that 56 staff members (30 AD and 26 AST) out of the 210 in post at the end of 2008 would be promoted in 2010 (c. 25%). The figures for subsequent years are purely indicative.

### **2.3 Workload.**

The main medium term challenges are to become ready for dossier evaluations of the high volume substances which will be registered by December 2010 and to become operational to receive and process authorisation applications in 2011 or 2012. The operational activities and the implementation plan of the REACH processes is described in detail in the Multi-Annual work programme 2009-2012 and briefly overviewed below.

1) The staffing capacity for the **registration, pre- registration and data-sharing** is foreseen to grow considerably further in 2010 in the run-up to the November 30 2010 registration deadline (+21 temporary agents including 20 AD and 1 AST). Staff assigned to such tasks will fall in 2011 (-13 AD, +1 AST) after the first registration deadline is past. The main aim is to be able to tackle the expected peaks in workload resulting from the first registration deadline and to process the down-stream user notification for substances that have not been pre-registered. In the absence of any concrete indications to the contrary, the Agency is standing by the Commission's original estimate of 25,000 registration dossiers in 2010. However, the experience of pre-registration and the information received from pre-registrants concerning their intentions would indicate that there is considerable uncertainty about the real volume of registrations to be expected in 2010.

2) The main emphasis for recruitment in 2010 will be in the area of **evaluation** of submitted dossiers and the evaluation of substances (+ 22 Temporary agents including 17 ADs and 5 ASTs). Dossier evaluation is one of ECHA's most demanding tasks due to the very high number of expected dossiers, the volume of information in each dossier and the considerable scientific and technical competence required.

One of the main objectives of the next few years is to build up the necessary capacity for the work following the December 2010 deadline for registration of high-volume chemicals. High volume chemicals are generally the most complex substances to evaluate, on account of the large number of uses and diverse databases. During 2009 and 2010 the focus will therefore be on developing the capacities and scientific competences to take on the challenges of evaluation of these chemicals.

Moreover, in the period 2009-2010 it is expected that the procedures and tools for the implementation of REACH will still require further testing and refinement. The evaluation of dossiers is performed by ECHA, and includes examination of testing proposals and a compliance check.

The objective of the evaluation of testing proposals is to ensure that the proposals are sufficient to achieve compliance of the registration dossier with the relevant Annexes to the REACH Regulation (IX, X and XI). This helps prevent unnecessary animal testing and costs. ECHA has to evaluate any proposal for additional testing (this is obligatory for tests included in Annex IX and X of the Regulation) to ensure that the proposed tests will generate reliable and appropriate data and that all available information and options for alternative testing and non-testing methods to evaluate the hazardous properties have been properly considered.

3) The key targets in the field of **authorisation and restrictions** are to make a credible start on the authorisation capacity, to prepare for new recommendations for priority substances for authorisation and ensure a smooth continuation of the restriction procedures under the REACH Regulation.

The first authorisation applications are expected to be received by ECHA in late 2011 or 2012. The number of applications in a given year will depend on many factors, and will be refined after the first recommendation for inclusion in the above-mentioned Annex has been made. A preliminary estimate for the first few years would be in the order of 100 to 250 applications. As the procedures for dealing with the applications must be finalised in advance, resources will be allocated for this purpose especially in 2010 and 2011.

The Restriction Title of REACH will enter into force on 1 June 2009. It is anticipated that the number of restriction dossiers will be limited (about 4) in 2010 and is expected to rise to an average of 10 per year afterwards.

Restrictions and authorisation represent alternatives for Community-wide risk management measures and both processes are handled by the same staff. To support these activities it is foreseen to bring the number Temporary Agent posts from 8 to 15 in 2010 (+5 AD, +2 AST, in total 12 AD, 3 AST), with a further increase of 6 in 2011 (+5 AD, +1 AST).

4) It is expected that the main peak for **Classification and Labelling** notifications will be in 2010 in the run up to the 30 November 2010 deadline. Capacity to deal with this workload was established in 2008 with 18 temporary agents, and is foreseen to grow gradually further towards 20 staff in 2011 – 2012 (+1 AD, +1 AST, in total 17 AD, 3 AST).

A main reason for the further growth relates to the new **Regulation on classification, labelling and packaging** of substances and mixtures (the CLP Regulation) entered into force on 20 January 2009. ECHA has now analysed the resource implications of the tasks that it is requested to carry out following the adoption of the CLP Regulation (agenda point MB/10/2009). The outcome of this analysis is that for the years 2009 to 2012 ECHA would need more human resources than anticipated in the initial estimates of the MAWP 2009-2012. For 2010, it is estimated that two staff will be needed for carrying out the new tasks required by the CLP Regulation. The Establishment Plan is therefore proposed to incorporate this increase.

5) The **advice and assistance** function targets in 2010-2012 to further complete and enhance the guidance framework and improve its accessibility as well as to reinforce the network with national helpdesks and adapt proactively to changed user requirements. A further required growth in staffing is foreseen in 2010, with 7 additional Temporary Agents (+4 AD, + 3 AST), while an additional of 3 temporary staff in 2011 (+2 AD, +1 AST) would complete the development of the team.

This capacity would allow:

- the Agency is to assume its responsible for guidance management, including publication, updating and the development of new guidance,
- to operate helpdesk which gives advice to registrants (and other REACH actors submitting data to ECHA) and to non-EU companies. The ECHA helpdesk also has responsibilities related to the implementation of the CLP Regulation while an important part of the work of the helpdesk is to provide support to the national helpdesks established by Member States, in particular through the REACH Helpdesk Correspondents Network.

6) A key medium-term target is to complete the functionalities of the **REACH-IT system** and to develop other IT tools needed for operations, especially tools supporting the assessment of substances. REACH-IT is an online system that manages the communication between industry, ECHA, Member States and the general public as well as ECHA's internal workflows in relation to the REACH processes. After the completion of the initial functionalities for industry, ECHA will maintain and enhance the application over the next few years. A first priority will be the completion of the REACH-IT system for handling the evaluation and other workflows, and gradual replacement of "work-around" solutions. REACH-IT will need many further updates to become an instrument that can support industry, ECHA and other regulators, and the public in consulting databases and communicating on-line.

The building up of staffing capacity has been prioritized in 2008 and 2009 and slightly further growth with 8 Temporary agents is foreseen for 2010 (+6 AD, +2 AST) and to be decreased by 3 in 2011 (-3 AD).

7) The **Committees and Forum** are an integral part of ECHA and play an essential role in carrying out its tasks. ECHA took over the role of certain Committees of the European Commission in issuing science-based opinions in its field of competence. The members of the Committees are experts appointed by ECHA's Management Board on the basis of proposals from the Member States.

Their key targets for 2009-2012 are:

- to deliver opinions on time, to allow the Executive Director and the European Commission to reach decisions on a scientifically-sound and well-argued basis,
- to ensure a maximum number of unanimous agreements in the Member State Committee,
- to significantly improve the harmonisation of REACH enforcement, in particular through the coordination of harmonised enforcement projects.

A basic staffing capacity of 18 Temporary agents (13 AD, 5 AST) has been established in the 2009 establishment table, and which is foreseen to further develop with additional 8 staff in respectively 2010 (+5 AD, +3 AST) and stabilising 2011. This corresponds to the expected evolution between 2009 and 2012 with a gradually increasing number of draft decisions for compliance checks on registration dossiers.

8) The **Board of appeal of ECHA** is part of ECHA, but takes its decisions independently of the Agency secretariat. It consists of a Chair and two members, who may not perform any other duties in ECHA. Additional members may be appointed if appeals need to be processed at a more satisfactory rate. The members of the Board of Appeal are appointed by ECHA's Management Board on the basis of a list of candidates proposed by the European Commission. The Board of Appeal is assisted in its functions by the Registry.

The number of appeals lodged before the Board of Appeal will depend on the number of decisions taken by ECHA. The resources of the Board of Appeal and its Registry have been established on the assumption that approximately 200 appeals will be lodged every year, except in 2010 when the number is expected to be double that. These estimates will be refined on the basis of experience acquired after 2009.

Assuming a fast increasing number of appeals, the 2009 capacity of 16 temporary agents (9 AD, 7 AST) is foreseen to grow towards 23 in 2010 (+7 AD) and with a further recruitment of 4 additional staff in 2011 (+2 AD, 2 AST) the development of the Board of Appeal would be completed.

9) **ECHA's communication** policy is set out in the *ECHA communication strategy*. The activities cover the internal information exchange with the different actors within ECHA, including the Committees and the Forum, as well as external communication with the broader public.

Communication with the general public plays a pivotal role for ECHA by supporting its overall quest for openness and transparency while still fulfilling the requirements for data protection and data security. Complementary to ECHA's guidance and helpdesk activities, external communication improves the level of knowledge about REACH in companies and at Member State level. Information needs thus have to be actively monitored, in order to improve communication. To this end ECHA will further develop its cooperation with stakeholders, in order to provide tailor-made opportunities for exchange of information and so obtain feedback and expertise. ECHA's annual stakeholder workshops will be a key forum for this type of exchange.

Through coordination and advice, ECHA will contribute to the development of effective communication of information on chemical risks management at the European level. The

work of the Risk Communication Network established in 2008 with Member States and EU institutions will be further developed in 2009-2012.

The main communication tool will continue to be ECHA's website, while annual stakeholder workshops and other events, an effective press service, and e-news will play an increasing role as ECHA's operations mature. Depending on the target audience and the type of document, translations are to be provided.

The staffing capacity aligned for communication currently amounts to a total of 13 staff (5 AD, 8 AST), while it is proposed to further develop and increase this staffing base with an additional 5 ADs in 2010 and 7 in 2011 (+2 AD, +5 AST).

10) **Relation with EU and international relations** will focus in 2009-2012 on:

- further enhancing its co-operation with the EU institutions, in particular the European Parliament and the Commission,
- to foster further the working relations with international research bodies and the scientific community, specifically on making scientific information on chemicals available and accessible for research needs,
- broaden further the cooperation with third countries and international organisations in the field of chemicals policy which falls within the remit of the European Commission; to provide support for these international activities at the request of the Commission.

The current foreseen capacity is planned to extend the team from 8 to 10 posts in 2010 (9 AD, 1 AST) and stabilising in 2011 to the level of 10 temporary agents (-1 AD, +1 AST).

11) Establishing the **management, organisational and administrative** capacities has been prioritized in the initial start up phase of the Agency and the following staff will be recruited in 2010:

- internal management, support to the Board and legal/audit/security issues (+2 AD, +2 AST)
- budget, finance and procurement (+1 AD, +1 AST)
- human resources and infrastructure (+1 AD, +1 AST)
- information and communication technology (+1 AD, +1 AST).

The needed core staffing capacity can be complemented with contract staff for time limited project support or some assistance functions.

**2.4 Consequences of 1., 2. and 3. on the number of staff in the agency for the next 3 years.**

Activities	2009				2010				2011				2012															
	Staff				Staff				Increase 2009-10				Staff				Increase 2010-11				Staff				Increase 2011-12			
	AD	AST	CA	TOT	AD	AST	CA	TOT	AD	AST	CA	TOT	AD	AST	CA	TOT	AD	AST	CA	TOT	AD	AST	CA	TOT	AD	AST	CA	TOT
<b>3.0 Operational activities</b>																												
(Management, coordination and support)	12	15	0	27	15	17	0	32	3	2	0	5	16	18	0	34	1	1	0	2	16	18	0	34	0	0	0	0
3.1 Registration and Pre-registration	19	5	2	26	39	6	6	51	20	1	4	25	26	7	2	35	-13	1	-4	-16	26	7	2	35	0	0	0	0
3.2 Evaluation	41	4	2	47	58	9	2	69	17	5	0	22	73	12	5	90	15	3	3	21	73	12	5	90	0	0	0	0
3.3 Authorisation and Restriction	7	1	1	9	12	3	1	16	5	2	0	7	17	4	1	22	5	1	0	6	17	4	1	22	0	0	0	0
3.4 Classification and Labelling, SVHC	16	2	1	19	17	3	1	21	1	1	0	2	17	3	1	21	0	0	0	0	17	3	1	21	0	0	0	0
3.5 Advice and Assistance	26	8	6	40	30	11	5	46	4	3	-1	6	32	12	5	49	2	1	0	3	32	12	4	48	0	0	-1	-1
3.6 IT-Tools for operations	18	2	1	21	24	4	2	30	6	2	1	9	21	4	2	27	-3	0	0	-3	21	4	1	26	0	0	-1	-1
<b>4.0 ECHA's bodies and supporting activities</b>																												
4.1 The Secretariat																												
4.2 Committees and Forum	13	5	2	20	18	8	3	29	5	3	1	9	19	7	3	29	1	-1	0	0	19	7	3	29	0	0	0	0
4.3 Board of Appeal	9	7	1	17	16	7	3	26	7	0	2	9	18	9	3	30	2	2	0	4	18	9	1	28	0	0	-2	-2
4.4 Communication (incl. translations)	5	8	4	17	10	8	4	22	5	0	0	5	12	13	1	26	2	5	-3	4	12	13	2	27	0	0	1	1
4.5 Relations with EU and intern. Relations	8	0	0	8	9	1	0	10	1	1	0	2	8	2	4	14	-1	1	4	4	8	2	4	14	0	0	0	0
<b>5.0 Management, Organisation and Resources</b>																												
5.1. Managing ECHA (incl. MB + Legal Advice)	15	7	2	24	17	9	3	29	2	2	1	5	18	10	3	31	1	1	0	2	18	10	3	31	0	0	0	0
5.2 Budget, Finance and Procurement	6	15	3	24	7	16	7	30	1	1	4	6	7	17	6	30	0	1	-1	0	7	17	6	30	0	0	0	0
5.3 Human resources and infrastructure	5	19	5	29	6	20	7	33	1	1	2	4	6	19	6	31	0	-1	-1	-2	6	19	6	31	0	0	0	0
5.4 ICT	10	16	4	30	11	17	8	36	1	1	4	6	12	18	10	40	1	1	2	4	12	18	10	40	0	0	0	0
<b>TOTAL</b>	<b>210</b>	<b>114</b>	<b>34</b>	<b>358</b>	<b>289</b>	<b>139</b>	<b>52</b>	<b>480</b>	<b>79</b>	<b>25</b>	<b>18</b>	<b>122</b>	<b>302</b>	<b>155</b>	<b>52</b>	<b>509</b>	<b>13</b>	<b>16</b>	<b>0</b>	<b>29</b>	<b>302</b>	<b>155</b>	<b>49</b>	<b>506</b>	<b>0</b>	<b>0</b>	<b>-3</b>	<b>-3</b>



The below table shows a summary of the new posts 2009-2012, indicating the percentage of non-management recruitment at AD 9 and above.

New posts	2009	2010	2011	2012	2009-2012
AD	74	79	18	5	176
AST	30	25	16	3	74
<b>Total</b>	<b>104</b>	<b>104</b>	<b>34</b>	<b>8</b>	<b>250</b>
AD 9+	18	19	4	2	43
Of which Management	4	4	2	2	12
non-management recruitment	19%	19%	11%	0%	18%

2.4.1 Corresponding to the PDB transmitted to the Commission for the year 2010.

The estimate for PDB 2010 includes € 45.2 million for salaries of the statutory staff (temporary and contract agents). The total budget foreseen for staff related expenditure amounts to € 52 million. This is 1.4 million or 2.6% below the allocation of € 53.4 million in the multi-annual financial framework of the REACH Revised Legislative Financial Statement of 12 July 2006<sup>7</sup>.

2.4.2 Indicative for the two consecutive years (2011 and 2012).

The indicative staff expenditure budgets for 2011 and 2012 have been set at 54.3 and 56.8 million, respectively. Both remain below the annual ceilings in the multi-annual financial framework.

### **3. ADAPTATION OF THE ESTABLISHMENT PLAN FOLLOWING THE STAFF POLICY DEFINED IN I AND THE EVOLUTION FORESEEN FOR THE NEXT 3 YEARS IN II.**

See Annex II.

The figures are broadly in line with the overall staffing estimates indicated in the Multi-annual Work Programme 2009-2012.

An additional 2 posts for 2010 are added to cover new tasks entrusted to the Agency under the recently agreed Regulation on Classification, Labelling and Packaging of substances and mixtures (CLP Regulation<sup>8</sup>). Such tasks were not foreseen in the Revised Legislative Financial Statement of 12/07/2006.

The establishment plans for 2011 and 2012 show indicative numbers of posts and grades and will be subject to possible adaptations in view of the future development and situation of the agency.

The staffing estimates indicated in the REACH Revised Legislative Financial Statement of 12 July 2006<sup>9</sup> were developed on the basis of an operational model of the Agency's tasks and

<sup>7</sup> SEC(2006)924

<sup>8</sup> Regulation (EC) N° 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures implements in the EU the international criteria agreed by the United Nations Economic and Social Council (UN ECOSOC) for the classification and labelling of hazardous substances and mixtures and known as the Globally Harmonised System of Classification and Labelling of Chemicals (GHS). The Regulation repeals Directives 67/548/EEC and 1999/45/EC with effect from 1 June 2015.

<sup>9</sup> SEC(2006)924

related workload. ECHA intends to conduct a thorough review of the assumptions underlying this operational staff model in the light of experience since entry into operation and the information now available on the intentions and behaviour of registrants. The results of this review will feed into the Multi-Annual Work Programme 2011-2013 and the Multi-Annual Staff Policy Plan for that period which will be presented in 2010.

#### **4. SCHOOLING.**

The Finnish Government established an Associated European School in Helsinki (European Schooling Helsinki) in 2008, which opened its doors to the first pupils on 15 August 2008. The school has three language sections (Finnish, French and English) covering the pre-school years (ages 4-5), the primary years, and the first two years of secondary school (S1-2). The Finnish government aims to gain accreditation to deliver the European Baccalaureat from 2010. Until 2010, children of ECHA staff who are at upper secondary level will have access to the existing foreign-language schools in Helsinki. There are upper secondary schools providing education in English, French and German. The German School in Helsinki has committed itself to providing places for children of ECHA staff who wish to be educated in German. Education in European Schooling Helsinki is free of charge for Agency staff. The school also provides after-school care to 18:00 which is accessible to the children of all ECHA staff.

#### **5. STATE OF PLAY OF IMPLEMENTING RULES ADOPTED BY THE AGENCY CONSISTENT WITH ITS STAFF POLICY.**

With the agreement of the Commission and following consultation of the Staff Committee, which was established in November 2008, the Agency's Management Board will adopt a first package of implementing rules in February 2009. These include the decision on the Commission implementing rules to be applied by analogy, the rules on the employment of temporary agents (including provisions on the Inter-Agency Job Market), on the employment of contract agents and on grading on recruitment. ECHA aims to adopt the rest of the implementing rules with the agreement of the Commission after consulting the staff committee by June 2009. Pending the final adoption of the remaining implementing rules, the Agency will continue to apply by analogy or anticipation the principles of the relevant implementing rules of the Commission, and where appropriate, those of the draft implementing rules developed by the Commission in consultation with the Agencies. This policy has been approved by the Agency's Management Board.

**ANNEXES**

**I - Staff Policy = type and level of employment corresponding to the tasks and the functions end 2008**

Service	Management	Title		FG	Recruitment Grade	No
Executive Office	y	Executive Director	TA short-term 5 + 5 years	AD	15	1
	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Advisor	TA long-term 5 + 5 years + indefinite	AD	12	1
	n	Internal Audit Capability	TA long-term 5 + 5 years + indefinite	AD	11	1
	n	Senior legal advisor	TA long-term 5 + 5 years + indefinite	AD	9-11	1
	n	Senior Administrator	TA long-term 5 + 5 years + indefinite	AD	9-11	2
	n	Legal Advisor	TA long-term 5 + 5 years + indefinite	AD	7-8	4
	n	Administrator	TA long-term 5 + 5 years + indefinite	AD	7-8	1
	n	Senior Administrative Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	2
	n	Administrative Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	1
	n	Senior Secretary	TA long-term 5 + 5 years + indefinite	AST	4	2
	n	Legal Assistant	TA long-term 5 + 5 years + indefinite	AST	3-5	1
n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1	
Board of Appeal	y	Registrar	TA long-term 5 + 5 years + indefinite	AD	11	1
	n	President	TA long-term 5 + 5 years + indefinite	AD	12	1
	n	Member	TA long-term 5 + 5 years + indefinite	AD	10-11	2
	n	Legal Advisor	TA long-term 5 + 5 years + indefinite	AD	7-8	1
	n	Legal Assistant	TA long-term 5 + 5 years + indefinite	AST	3-5	2
Cooperation Directorate	y	Director	TA long-term 5 + 5 years + indefinite	AD	13	1
	n	Senior Secretary	TA long-term 5 + 5 years + indefinite	AST	4	1
Guidance and Helpdesks Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	5
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	3
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	8
	n	Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	5-6	1
	n	Senior ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	5-6	3
	n	ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	1
	n	Junior Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	3-4	2
Committees	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1

Service	Management	Title		FG	Recruitment Grade	No
and International Relations Unit	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	5
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	4
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	2
	n	Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	5-6	1
	n	Junior Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	3-4	3
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Communication and REACH Training Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Communication Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	2
	n	Junior Communication Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	2
	n	Senior Communication Assistant	TA long-term 5 + 5 years + indefinite	AST	5-6	1
	n	Communication Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	3
	n	ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	2
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Assessment Directorate	y	Director of Assessment	TA long-term 5 + 5 years + indefinite	AD	14	1
	n	Senior Secretary	TA long-term 5 + 5 years + indefinite	AST	4	1
Evaluation Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	7
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	4
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	5
	n	Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	5-6	1
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Risk Management Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	7
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	6
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	4
	n	Jr Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	3-4	1
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Registration and Scientific IT Tools Directorate	y	Director	TA long-term 5 + 5 years + indefinite	AD	13	1
	n	Senior Secretary	TA long-term 5 + 5 years + indefinite	AST	4	1
Scientific IT Tools Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	1
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	3
	n	ICT Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	1
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	3

Service	Management	Title		FG	Recruitment Grade	No
	n	Junior ICT Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	2
	n	Senior ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	2
	n	ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	2
	n	Junior Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	3-4	2
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Registration Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	9	3
	n	Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	5
	n	Junior Scientific Officer	TA long-term 5 + 5 years + indefinite	AD	6-7	7
	n	Junior Assistant Scientific Officer	TA long-term 5 + 5 years + indefinite	AST	3-4	2
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Resources Directorate	y	Director	TA long-term 5 + 5 years + indefinite	AD	14	1
	n	Senior Administrative Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	1
	n	Secretary	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Finance Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	y	Accounting Officer	TA long-term 5 + 5 years + indefinite	AD	11	1
	n	Procurement Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	1
	n	Finance Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	1
	n	Junior Finance Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	1
	n	Senior Procurement Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	2
	n	Senior Finance Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	5
	n	Senior Accounting Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	2
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
Human Resources and Facilities Unit	y	HoU R2	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Facility manager	TA long-term 5 + 5 years + indefinite	AD	8	1
	n	HR Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	2
	n	Junior HR Officer	TA long-term 5 + 5 years + indefinite	AD	6	1
	n	Senior HR Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	8
	n	Senior FM Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	2
	n	HR Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	4
	n	Facility manager Assistant	TA long-term 5 + 5 years + indefinite	AST	1-4	1
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	1
ICT Unit	y	Head of Unit	TA long-term 5 + 5 years + indefinite	AD	11-12	1
	n	Senior ICT Officer	TA long-term 5 + 5 years + indefinite	AD	9-11	2
	n	ICT Officer	TA long-term 5 + 5 years + indefinite	AD	7-8	2

<b>Service</b>	<b>Management</b>	<b>Title</b>		<b>FG</b>	<b>Recruitment Grade</b>	<b>No</b>
	n	Junior ICT Officer	TA long-term 5 + 5 years + indefinite	AD	5-6	3
	n	Senior ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	5-8	5
	n	Secretary/clerical assistant	TA long-term 5 + 5 years + indefinite	AST	1-2	2
	n	ICT Assistant	TA long-term 5 + 5 years + indefinite	AST	3-4	4

## II – Adaptations to the establishment plan in the year 2010 and indicative adaptations in 2011 & 2012)<sup>10</sup>

Grade	Year N (2009)				Year N+1 (2010)											
	Establishment Plan				Staff evolution						Organisational evolution			Establishment Plan		
	Approved				Promotion / Career advancement			Turn-over*			New posts			Requested		
	Officials	TA - LT	TA - ST	Total	Officials	TA - LT	TA - ST	Officials	TA - LT	TA - ST	Perm	Temp - LT	Temp - ST	Perm	Temp	Total
AD16	0	0	0	0							0	0	0	0	0	0
AD15	0	1	0	1							0	0	0	0	1	1
AD14	0	1	0	1							0	0	0	0	1	1
AD13	0	6	0	6			2				0	1	0	0	9	9
AD12	0	13	0	13		-2	2				0	3	0	0	16	16
AD11	0	19	0	19		-2	2				0	3	0	0	22	22
AD10	0	21	0	21		-2	2				0	4	0	0	25	25
AD9	0	22	0	22		-2	6				0	8	0	0	34	34
AD8	0	27	0	27		-6	6				0	5	0	0	32	32
AD7	0	31	0	31		-6	6				0	15	0	0	46	46
AD6	0	40	0	40		-6	4				0	5	0	0	43	43
AD5	0	29	0	29		-4					0	35	0	0	60	60
<b>Total AD</b>	<b>0</b>	<b>210</b>	<b>0</b>	<b>210</b>	<b>0</b>	<b>30</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>79</b>	<b>0</b>	<b>0</b>	<b>289</b>	<b>289</b>
AST11	0	0	0	0							0	0	0	0	0	0
AST10	0	0	0	0							0	0	0	0	0	0
AST9	0	0	0	0			1				0	0	0	0	1	1
AST8	0	7	0	7		-1	1				0	0	0	0	7	7
AST7	0	8	0	8		-1	3				0	0	0	0	10	10
AST6	0	17	0	17		-3	3				0	0	0	0	17	17
AST5	0	17	0	17		-3	6				0	0	0	0	20	20
AST4	0	25	0	25		-6	6				0	3	0	0	28	28
AST3	0	20	0	20		-6	3				0	10	0	0	27	27
AST2	0	10	0	10		-3	3				0	4	0	0	14	14
AST1	0	10	0	10		-3					0	8	0	0	15	15
<b>Total AST</b>	<b>0</b>	<b>114</b>	<b>0</b>	<b>114</b>	<b>0</b>	<b>26</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>0</b>	<b>0</b>	<b>139</b>	<b>139</b>
<b>Overall Total</b>	<b>0</b>	<b>324</b>	<b>0</b>	<b>324</b>	<b>0</b>	<b>56</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>104</b>	<b>0</b>	<b>0</b>	<b>428</b>	<b>428</b>

<sup>10</sup> The establishment plans for 2011 and 2012 show indicative numbers of posts and grades and will be subject to possible adaptations in view of the future development and situation of the agency.

Grade	Year N+1 (2010)				Year N+2 (2011)													
	Establishment Plan				Staff evolution						Organisational evolution			Establishment Plan				
	Requested				Promotion / Career advancement			Turn-over*			New posts			Requested (Provisional Draft Budget)				
	Officials	TA-LT	TA - ST	Total	Officials	TA - LT	TA - ST	Officials	TA - LT	TA - ST	Perm	Temp - LT	Temp - ST	Perm	Temp	Total		
	AD16	0	0	0	0									0	0	0	0	0
AD15	0	1	0	1									0	0	0	0	1	1
AD14	0	1	0	1									0	0	0	0	1	1
AD13	0	9	0	9			2						0	0	0	0	11	11
AD12	0	16	0	16		-2	3						0	2	0	0	19	19
AD11	0	22	0	22		-3	4						0	0	0	0	23	23
AD10	0	25	0	25		-4	4						0	0	0	0	25	25
AD9	0	34	0	34		-4	8						0	2	0	0	40	40
AD8	0	32	0	32		-8	10						0	0	0	0	34	34
AD7	0	46	0	46		-10	13						0	3	0	0	52	52
AD6	0	43	0	43		-13	9						0	0	0	0	39	39
AD5	0	60	0	60		-9							0	6	0	0	57	57
<b>Total AD</b>	<b>0</b>	<b>289</b>	<b>0</b>	<b>289</b>	<b>0</b>	<b>53</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>302</b>	<b>302</b>
AST11	0	0	0	0									0	0	0	0	0	0
AST10	0	0	0	0									0	0	0	0	0	0
AST9	0	1	0	1			1						0	0	0	0	2	2
AST8	0	7	0	7		-1	1						0	0	0	0	7	7
AST7	0	10	0	10		-1	3						0	0	0	0	12	12
AST6	0	17	0	17		-3	3						0	0	0	0	17	17
AST5	0	20	0	20		-3	8						0	0	0	0	25	25
AST4	0	28	0	28		-8	6						0	5	0	0	31	31
AST3	0	27	0	27		-6	3						0	5	0	0	29	29
AST2	0	14	0	14		-3	3						0	3	0	0	17	17
AST1	0	15	0	15		-3							0	3	0	0	15	15
<b>Total AST</b>	<b>0</b>	<b>139</b>	<b>0</b>	<b>139</b>	<b>0</b>	<b>28</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>155</b>	<b>155</b>
<b>Overall Total</b>	<b>0</b>	<b>428</b>	<b>0</b>	<b>428</b>	<b>0</b>	<b>81</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>457</b>	<b>457</b>



Grade	Year N+2 (2011)				Year N+3 (2012)													
	Establishment Plan				Staff evolution						Organisational evolution			Establishment Plan				
	Requested				Promotion / Career advancement			Turn-over*			New posts			Requested (Provisional Draft Budget)				
	Officials	TA - LT	TA - ST	Total	Officials	TA - LT	TA - ST	Officials	TA - LT	TA - ST	Perm	Temp - LT	Temp - ST	Perm	Temp	Total		
	AD16	0	0	0	0									0	0	0	0	0
AD15	0	1	0	1									0	0	0	0	1	1
AD14	0	1	0	1			1						0	0	0	0	2	2
AD13	0	11	0	11		-1	3						0	0	0	0	13	13
AD12	0	19	0	19		-3	4						0	0	0	0	20	20
AD11	0	23	0	23		-4	5						0	0	0	0	24	24
AD10	0	25	0	25		-5	6						0	0	0	0	26	26
AD9	0	40	0	40		-6	10						0	0	0	0	44	44
AD8	0	34	0	34		-10	15						0	0	0	0	39	39
AD7	0	52	0	52		-15	14						0	0	0	0	51	51
AD6	0	39	0	39		-14	19						0	0	0	0	44	44
AD5	0	57	0	57		-19							0	0	0	0	38	38
<b>Total AD</b>	<b>0</b>	<b>302</b>	<b>0</b>	<b>302</b>	<b>0</b>	<b>76</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>302</b>	<b>302</b>
AST11	0	0	0	0									0	0	0	0	0	0
AST10	0	0	0	0									0	0	0	0	0	0
AST9	0	2	0	2			1						0	0	0	0	3	3
AST8	0	7	0	7		-1	1						0	0	0	0	7	7
AST7	0	12	0	12		-1	3						0	0	0	0	14	14
AST6	0	17	0	17		-3	4						0	0	0	0	18	18
AST5	0	25	0	25		-4	9						0	0	0	0	30	30
AST4	0	31	0	31		-9	9						0	0	0	0	31	31
AST3	0	29	0	29		-9	4						0	0	0	0	24	24
AST2	0	17	0	17		-4	5						0	0	0	0	18	18
AST1	0	15	0	15		-5							0	0	0	0	10	10
<b>Total AST</b>	<b>0</b>	<b>155</b>	<b>0</b>	<b>155</b>	<b>0</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>155</b>	<b>155</b>
<b>Overall Total</b>	<b>0</b>	<b>457</b>	<b>0</b>	<b>457</b>	<b>0</b>	<b>112</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>457</b>	<b>457</b>