No.	Organisation Name	Section Number	Page Number	Line Number	Comment
1	Humane Society International / Europe	IV	10	1 et seq.	As previously noted, we recommend the creation of an additional high-level strategic aim that is responsive to the alternatives-promotion mandates under REACH and BPR, including sub-objectives and 'SMART' (simple, measurable, achievable, realistic and time-bound) success metrics. See for example the US EPA's draft Strategic Plan on Alternative Test Methods and Strategies to Reduce Vertebrate Animal Testing — https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/alternative-test-methods-and-strategies-reduce — which includes a proactive and multi-level integrated strategy aimed at: - Identification, development and integration of NAMs for chemical regulation - Establishing scientific relevance, reliability and confidence in NAMs (via regional validation authority, i.e. ICCVAM in the US, EURL-ECVAM in the EU) - Training, education and collaboration - Implementation of NAMs under chemical regulation An equivalent strategy is needed for EU regulations within ECHA's remit.
2	PETA International Science Consortium Ltd.	IV	10	table	The objectives 1 and 2 (accelerate data generation, intensify identification of substances of concern and accelerate regulatory action on the latter) of strategic priority 1 should be tackled carefully because the speed of data generation inter alia depends on time needed to develop and obtain acceptance of any potential waivers and standard data adaptations, such as read-across and weight-of-evidence approaches, and on limited laboratory capacities for conducting studies such as newly adopted in vitro tests. As such, if registrants are pushed to accelerate data generation, there is a serious risk that REACH Art. 25, Art. 7 of the Regulation on Classification, Labelling and Packaging of Substances and Mixtures and Art. 62(1) of the Biocidal Products Regulation on the last resort requirement could be breached because testing on animals may be performed to avoid lengthy processes of acceptance of alternative data by ECHA. Specific, section V.1, page 10, line 10: Please consider adding a sentence in line 10 on page 10: "… initiate regulatory intervention. As administrators of REACH, the Regulation on Classification, Labelling and Packaging of Substances and Mixtures and the Biocidal Products Regulation, ECHA will ensure that non-animal methods are used wherever possible for the generation of new information."
3	ECEAE	IV. Multi-annual Programming 2019 – 2023	10	1	It is unfortunate that promotion and implementation of alternatives to animal testing is not seen as a strategic priority. In the previous work plan, becoming a 'hub for excellence in regulatory science' was a strategic priority and it is important that this continues in our opinion. Not only that but it should be made even more explicit that this includes expertise in appropriate use of alternatives to animal testing.
4	Humane Society International / Europe	V	11	40, et seq.	We appreciate inclusion of this mention here of non-animal testing. However, it is not articulated in a manner that can objectively measured, nor is a vision or strategy suggested for how this will be achieved in practice. At a recent meeting between animal welfare ASOs and ECHA senior leadership there was agreement that a shift toward more flexible/hypothesis-driven/fit-for-purpose testing is needed, in line with the proposed "Tox21" paradigm of mechanistic, pathway-based in vitro/computational toxicology. This ought to be introduced to the narrative as a priority work area that will drive a shift in testing methodology, which will ultimately allow the stated success metric to be achieved. As above, we believe there is sufficient overarching need for such consideration and detail within this strategic plan to warrant the addition of a standalone strategic priority for this topic.
5	PETA International Science Consortium Ltd.	V.1	11	23	We understand that risk assessment of potential endocrine disruptors and nanomaterials needs to evolve. However, the approach adopted should prioritise the use of non-animal methods rather than higher-tier tests using animals and should consider the grouping of related substances wherever possible. The use of higher-tier tests on animals is time consuming, expensive and uses a large number of animals and, therefore, is not practical to assess the large numbers of chemicals that require characterisation. ECHA must promote the use of alternative methods to testing on animals to ensure that potential endocrine disruptors are assessed in the most efficient way to protect human health and the environment. Therefore, please add: "With regard to these emerging priorities, ECHA is dedicated to the promotion and use of alternative methods to animal testing wherever applicable."

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
6	PETA International Science Consortium Ltd.	V.1	11	3-4	Despite the legal requirements to use animals only as a last resort, the 2017 ECHA report on 'The use of alternatives to testing on animals for the REACH regulation' (Article 117(3) report) indicates that tests on animals continue to occur without prior performance of the relevant in vitro tests and that avoidable tests on animals may be occurring for the assessment of human health endpoints where non-animal assessment approaches are available, e.g. for skin and eye irritation and corrosion and for skin sensitisation. We are also aware from an ECHA report on Member State investigations concerning the obligation to submit testing proposals for vertebrate animal tests under REACH, that a potential case of non-compliance may have been subject to enforcement action if the case had been reported and acted upon within three years of the offense. Furthermore, as directed by the European Ombudsman (case 1568/2012/(FOR)/AN), ECHA are required to report all possible breaches of the last resort principle to Member States. Therefore, we request that the following amendment be made: "... including those related to enforcement in a timely manner to ensure that any appropriate enforcement action may be taken where required and ensure full public disclosure of information explaining why these breaches continue to occur. Furthermore, in accordance with recommendations made in the REACH refit report, ECHA will explore in detail why in vivo tests are conducted for endpoints where validated and accepted non-animal methods are available and will work to promote the use and acceptance of non-animal methods wherever possible."
7	PETA International Science Consortium Ltd.	V.1.3	13	34-36	ECHA must take an active role in ensuring that tests on animals are conducted only as a last resort. For example, in the ECHA Board of Appeal case, A-005-2011, the Board considered that where "the Agency requires a test to meet an information requirement it has itself identified under Section 8.6.4 of Annex X, it in effect assumes the responsibility, which in most cases belongs primarily to the registrant, to ensure that testing on vertebrate animals was required as a last resort". Furthermore, the European Ombudsman confirmed that ECHA must use all the tools at its disposal to minimise tests on animals in relation to the compliance check process and issued clear direction for ECHA to request information from registrants to demonstrate compliance when required (case 1568/2012/(FOR)/AN). We therefore welcome ECHA exploring how it could "without assuming the burden of proof or compromising its regulatory authority role, give direct substance/case-specific advice to registrants on dossier compliance including for specific groups of substances." It is essential that this advice be focused on the use of alternative methods in compliance with the requirement to use animals only as a last resort.
8	PETA International Science Consortium Ltd.	V.2	13	15-25	In the section "Enhanced mapping and prioritisation of substances", the use of all data sources and novel methods for mapping and prioritising substances, new approach methodologies, sharing knowledge with the scientific community, other regulators and policy fields and support of development of alternative methods are mentioned. This sounds promising from an animal welfare perspective, but we would appreciate the addition of more specific information. Which data sources, novel methods and new approach methodologies are meant? How does ECHA intend to share knowledge with academia; what activities of ECHA at scientific conferences does this imply and what conferences is ECHA going to hold? With which regulatory bodies does ECHA intend to cooperate and how; does this, e.g., include EURL ECVAM, ICCVAM and US EPA? How does ECHA intend to support the development of alternative methods? More specifically, how does ECHA's strategy relate to the US EPA Strategic Plan to Promote the Development and Implementation of Alternative Test Methods (https://www.lexology.com/library/detail.aspx?g=f5e6d2b3-1a73-49b0-975c-802698dfa0cc) that was released in March 2018? What level of cooperation with the OECD is intended?
9	Health and Environment Alliance (HEAL)	V	13	23-25	We would welcome some clarification on the language used when mentioning animal testing. While we totally agree with REACH's objective to avoid unnecessary animal testing, it remains unavoidable in order to properly assess risks of chemicals for human health at the time of writing. This should be fully acknowledged when considering future strategies for the agency's work and substance assessment. In practice we would welcome the document to avoid mentioning reduction of animal testing in general terms and rather specify that the aim is to reduce it to avoid unnecessary use when relevant. We would also welcome clarifications from the agency on relevant hints and plans to use ongoing animal testing in a more efficient way in the future.
10	ecopa	2. Enhanced mapping and prioritisation of substances	13	14	I fully agree with the list of actions to improve mapping and prioritisation of substances. In the future of toxicology, risk assessors should include novel methods and the holistic approach also for refining the definition of concerning substances, by including new emerging risks. For example, DNT (Developmental Neuro Toxicity) and impairment of the reproductive system are often underestimated (or misinterpreted) by the actual approach that is mainly based on outdated animal tests. In some cases, there is also the opposite situation when animal tests are recording some concerns that are absolutely not confirmed by wide epidemiological studies.
11	ECEAE	V. Strategic priorities	16	48	"Synergies across new and existing legislative tasks and policies: Working with the Commission and Member States, identify legislation and policy areas to which the Agency can contribute. Priority is given to areas that can contribute significantly to an improved level of protection and where synergies exist regarding ECHA's current knowledge and competences." This is should include alternatives to animal testing. Suggest insert following 'improved level of protection, reduction in animal testing, and where synergies…
12	PETA International Science Consortium Ltd.	V.4.1	17	35	It is essential that those reviewing registration dossiers are familiar with the use of alternative methods to testing on animals. Please adapt this sentence as follows: "Ensure that staff maintain up to date knowledge in scientific, technical and technological advancements, trends and challenges, including the use and acceptance of alternative methods, with a focus on emerging needs and minimising test on animals for nanomaterials and endocrine disruptors."

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
13	ECEAE	V. Strategic priorities	17	15	"Foster synergies at international level: Continue to contribute actively to the OECD chemicals programme, and increase its activities in other international fora (e.g. SAICM), if requested by the European Commission." This should specifically reference 'including on test methods and testing strategies that replace animal testing'. ECHA is already involved at the OECD in this way so it is important as a minimum that this is reflected in the strategic plan.
14	ecopa	3. Foster synergies at international level	17	4	Add the bullet: Lobbying to improve acceptability of NAMs outside the EU
15	Humane Society International / Europe	I	3	21	Notably absent from ECHA's mission statement is the REACH Article 1 aim of "promotion of alternative methods for assessment of hazards of substances." ECHA's failure to acknowledge this point as one of its core functions – on par with other Article 1 aims – has been evident in the Agency's approach to compliance checks, follow-up on instances of new vertebrate testing absent an approved testing proposal, etc. This should be corrected going forward, both in ECHA's statement of mission and its actions.
16	PETA International Science Consortium Ltd.	I	3	24	ECHA's mission, vision and values are due to be reviewed in 2018. We request that the following sentence be added to the section on ECHA's mission: "… and competitiveness. In order to avoid testing on animals, ECHA is committed to the requirement that testing on vertebrate animals shall be undertaken only as a last resort."
17	PETA International Science Consortium Ltd.	I	3	29	Please also add the following paragraph to ECHA's values with the headline "Animal welfare": "We are committed to the refinement, reduction and replacement of testing on animals."
18	Humane Society International / Europe	III	6	15	We recommend the creation of an additional high-level strategic aim that is responsive to the alternatives-promotion mandates under REACH and BPR.
19	ECEAE	III. General Context	6	15	Why does ECHA not aim to be knowledge centre on alternatives to animal testing for chemical safety? Cf. 2014-18 strategic aims (5.2 Serving as a hub for excellence in regulatory science 2014-2018). Suggest insert "4. Support industry and evaluating member states in the appropriate use of alternatives to animal testing for the demonstration of the safety of substances and become a hub of excellence on current and potential 'new approach methodologies'.
20	Humane Society International / Europe	III	7	21 et seq.	The REACH Refit Evaluation also noted "Respondents from almost all stakeholder groups agreed that the principle of 'animal testing as a last resort' is not yet fully implemented. Respondents explain this problem by strict information requirements coupled with a low acceptance of alternative methods." (http://eur-lex.europa.eu/resource.html?uri=cellar:2834985c-2083-11e8-ac73-01aa75ed71a1.0001.02/DOC_3&format=PDF) This warrants acknowledgement in this section as well.
21	PETA International Science Consortium Ltd.	III	9	17	Please update this sentence as follows: "ECHA keeps on adapting its processes, methodologies, tools, as well as its staff competences to reflect the advancing science (including the use of alternatives to testing on animals), technology and changes in the regulatory environment."
22	ECEAE	IV. Multi-annual Programming 2019 – 2023	9	16	Please insert specific reference to 'competences on appropriate alternatives to animal testing'

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
23	ECEAE	n/a	n/a	n/a	We are disappointed that promotion of alternatives to animal testing and seeking to ensure animal testing as a last resort does not feature particularly prominently in this strategic plan. Both activities are in REACH (Article 1 and 13 respectively) so the lack of emphasis here is a shame. Whilst there is some mention of assisting in the development of alternatives (under 2. Enhanced mapping and prioritisation of substances) it is not given great prominence. Indeed this is the only specific reference to activity related to alternative methods of testing. We can only assume that this means that it will not be given a great deal of attention. This represents a reduction in emphasis on this important aspect REACH compared to the previous strategy (2014-18). We also note that ECHA sees itself less as a 'hub for excellence in regulatory science' in this strategy. This was an aim in the last work plan (2014-18) and it is disappointing that this is not continued in this one. Of course, excellence in regulatory science would include expertise and interest in alternative methods as well as their promotion both within the EU and outside. Whilst we are making relatively minor text changes to support this suggestion, we do encourage the drafting team to reconsider how ECHA will promote alternatives to animal testing and ensure any changes to the text to that effect are supported by internal prioritisation and funding.
24	EFSA	V. Strategic priorities	13	23	alternatives: can combine with two EFSA actvities: 1. Dev Neurotox battery (Andrea Terron et al) 2. TK platform (JL Dorne et al)
25	EMA	V. Strategic priorities	13	23-25	"develop regulatory strategies and assessment methods for specific (groups of) chemicals or effects, such as nanomaterials and endocrine disruptors, support development of alternative methods to animal testing and explore how these can be used in risk assessment" - this might be relevant for the work of EMA in terms of implementing the 3Rs approaches (both for human and veterinary medicines), therefore we would welcome if we could keep further contacts in the future in terms of information sharing on relevant activities in this area.
26	European Environmental Bureau (EEB)	IV	10	2	We fully agree with these priorities!
27	European Environmental Bureau (EEB)	V	11	24	We fully support this chapter
28	ClientEarth	5	11	10-12	We welcome the plan to find new ways of identify which of the <100 tonnes substances need closer scrutiny. We would like to remind ECHA of the necessity to involve civil society when it will do so
29	ClientEarth	5	11	7	We welcome the intensification and generalization of a group approach
30	Eurometaux	V	11	42-46	Eurometaux supports the involvement of stakeholders to identify which high-volume substances could be of concern. We strongly support the identification of substances of concerns using a risk/prioritisation approach whereby also aspects of other EU Environmental policies should be considered (e.g. Circular economy, energy efficiency,…).
31	Eurometaux	V	12	32-34	Information from the REACH registration dossiers is considered to be of high quality as it is assessed and screened by both authorities and stakeholders. Eurometaux welcomes the proposal to look beyond the registration dossiers. Indeed, data relevant for aspects like RMM, RMOas and SEAs are normally not available in registration dossiers while they can be most relevant and useful. However, the quality and reliability of external information sources should be assessed before being used to map areas of possible concern.
32	Eurometaux	V	16	6-10	This is a further confirmation of the importance of REACH registration data. Eurometaux is fully committed to ensure completeness and quality, also via the sectorial collaborative approach (MISA)
33	Eurometaux	V	17	14-19	Eurometaux supports the establishment of synergies at international level.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
34	ClientEarth	5	18	2-4	We join ECHA's call to agree on a sustainable source of income of ECHA, as its role is and will be crucial in the achievement of a high level of environmental protection.
35	Health and Environment Alliance (HEAL)	III	6	26-35	We welcome the multiple references to other EU regulatory processes all throughout the document (REACH review, Non-REACH fitness check, assessment of interface between chemicals/products/waste legislation, the development of a non-toxic environment strategy) and the emphasis put on ensuring that ECHA both contributes to and builds on these to further improve the quality of its own work and delivers on its mission.
36	German Competent Authority	4	8	37-42	It is very much welcomed that in the upcoming years ECHA's main focus will be on its core pro-cesses. This should be the main message of the strategic plan and thus, be made clearer in all sec-tions of the document.
37	Health and Environment Alliance (HEAL)	IV	8	36-42	HEAL welcomes the general rationale and structure for ECHA's draft strategic plan 2019-2023.We strongly agree that ECHA's first strategic priority should be on the identification and risk management of substances of concern.
38	individual person	IV. Multi-annual Programming 2019 – 2023	8	36-42	A staff member reflection: Nice to see a clearly set priority, I don't remember us doing so this explicitly in the past! Having a clearly defined organisational priority (SP1) will contribute to a happier workforce because staff will know what is expected of them. When faced with conflicting directions to take, this clear priority will "tip the balance" in the correct direction for staff to "tow the same line" ultimately leading to better organisational performance and a less stressed workforce. Less is more!
39	ClientEarth	all	all	all	• We welcome the general approach of the Strategy, in particular its focus on identifying substances of concern and speeding up the adoption of risk management measures. We particularly welcome the acknowledgement of the need to explore 'new ways of accelerating data generation and increasing compliance' section III page 7 line 40-41. • We welcome the mention to the REACH refit, as the staff documents and its annexes gave detailed analysis of the numerous actions needed to improve the effectiveness of REACH. It is essential to use those documents as a source of inspiration for prioritizing actions in the next year, beyond the few themes mentioned in the strategy. We particularly welcome the acknowledgment that the implementation of REACH is 'lagging behind' (section III page 7 line 22). • We welcome the numerous references to group approach. Section V page 12 line 2-4 • We welcome the specific focus the strategy places on chemicals in products, both to improve the information on their existence for all actors and to ensure a better control of harmful chemicals in products, particularly imported ones. Section V page 12 line 13-15 • We welcome the link made to the non-toxic environment strategy & with the WSSD success factors section V p 11 line 23-51. We would welcome a commitment by ECHA to contribute and encourage the adoption of an ambitious non-toxic environment strategy. • Finally, we welcome the reference to the need to consider the achievement of a safe circular economy as one of the objectives to take into account in the implementation of REACH and CLP –as identified by the Communication on the interface between products, waste and chemical regulations. We strongly agree that ECHA has an important role to play, in particular considering the traceability of chemicals in products and the avoidance of harmful chemicals in virgin and recycled materials, including imported ones. (Section V page 13 line 45-49, section V page 14 line 46-49)
40	French Competent Authority				French competent authorities welcome the work done by ECHA during the first 10 years of implementation of the REACH Regulation, and also for the implementation of the CLP, Biocides and PIC Regulations. They welcome the direction given in recent years for ECHA to become the Community reference for expertise in the management of chemicals. The development of the 2019-2023 strategic plan is the result of a process initiated more than two years ago, which takes into account the observations of the members of the management board and in particular the dedicated working group. The finalization phase of the strategic plan coincides with the Commission's second five-year REACH evaluation. It will therefore have to integrate the decisions that will be adopted by Member States in response to the discussion that will take place on this subject.
41	EFSA	V. Strategic priorities	12	19	Great potential for collaboration here (not for the substitution but mainly for the information and also communication); we need and want to go in this same direction
42	EFSA	V. Strategic priorities	12	29	Let's share experience with EChA also thinking of our databases and the use of the revamped MATRIX

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
43	R.I.S.K. Consultancy	-	0.00	-	Attempt to make "all available data" a reality, not a hypocritical farce. I.e., not "one REACh-adequate study per endpoint", but the 3 out of 4 published toxicity stuides that are missing (average, hundreds have zero, based on random sampling). Otherwise, expect decades of ridicule.
44	European Environmental Bureau (EEB)	IV	10	2	We regret the 2020 goal of all substances of concern are identified and regulatory action initiated has been postponed to 2025
45	Eurometaux	IV	10	2-3	The strategy refers to the period 2019-2023. The measure of success should therefore be measured within that timeframe. If the target is "By 2025, all substances of concern are identified and regulatory action initiated" the strategy should give a more precise indication of what is expected to be achieved by 2023 with the 2025 perspective in mind.
46	German Competent Authority	4	10	Table, first row	ECHA indicates that by 2025 it will be possible to categorize all registered substances according to the presence/absence of a concern or the need for more data, respectively. However, this implies that it will not be possible that by 2025 all substances of concern are identified (only vaguely categorized). Please clarify.
47	Health and Environment Alliance (HEAL)	IV	10	1-3	We welcome the emphasis put on the need for faster SVHC identification – which we have long demanded – but wonder whether the current objective of identifying all substances of concern by 2025 is realistic, considering the current pace of work. A 2001 EU white paper listed 1,400 substances with hazardous properties giving rise to very high concern, which should therefore be progressively phased out and substituted with safer alternatives via authorisation, but the candidate list currently has only 181 entries. In the meantime, the SIN list that is used as a reference by the industry itself has 912 entries (See Chemsec's recent 'Pick up the Pace' report http://chemsec.org/publication/reach,sin-list/pick-up-the-pace/). This reveals a huge gap and calls for strong and clear commitments for ways to address it. While we welcome the measures that the agency intends to implement, we question whether these will be sufficient to speed up the pace as much as needed. Maybe further clarifications on the exact measures to be taken in this regard would respond to this question.
48	ClientEarth	5	11	42-46	• Section V page 11 line 42-46 In line of the recent analysis of the SIN list by ECHA, we would like to remind ECHA that the role of the candidate list is to identify substances of very high concern, based on their hazardous properties. The placement on the candidate list is the first step towards authorisation but it also has a standalone goal, which is the promotion of early substitution and the creation of an information flow in the supply chain. We welcome ECHA's acknowledgement that it needs to conclude its analysis related to which high volume substances are of concern. But we strongly invite ECHA to reconsider the exclusion of substances used as intermediate from the list (as the specific use of a substance is legally irrelevant for its identification as SVHC). The fact that a substance is under evaluation should also not be considered as a sufficient outcome, as, when under evaluation, the substance can still be used and information within the supply chain may still be inadequate. This is precisely why REACH REFIT called for more information to be obtained for substances used as intermediates (see staff document annex 4 REACH REFIT p 10. 117 millions tonnes of chemicals produced in the EU are used as intermediate annex 4 REACH REFIT p. 9) and for running evaluation in parallel between or with the risk management processes (annex 4 REACH REFIT p 82)
49	Health and Environment Alliance (HEAL)	V	11	21-23	We also welcome the emphasis put on the need for even improved risk management of substances of concern. In our view, major wins could be made by improving the use of the authorisation and restriction processes more efficiently and it is important that ECHA's draft strategic plan provides indications on how this is going to be done. On the one hand, the fact that authorisations can still get granted when safer alternatives exist is undermining their purpose to encourage companies to move to safer substitutes, and risks making the process a right to pollute. On the other hand, too much burden is currently put on Member States to demonstrate the need for restrictions and the original scope often ends up narrower at the end of the committee reviews (derogations, changes in concentration limits or transitional periods). The textile restriction which was just approved at the REACH committee (25-26 April 2018) is a very good example of missed opportunity because of narrow scope (30+ substances when 300 substances would have been relevant for the restriction to be truly health protective).
50	Health and Environment Alliance (HEAL)	V	11	25-30	• We welcome ECHA's commitment to delivering a transition to a non-toxic environment – which is essential, overdue, and needs full ECHA's support to be successful. We would welcome ECHA feeding in its strategic plan for 2019-2023 as a possible contribution and encouragement for the European Commission to deliver on its legal commitment for a Union's strategy for a non-toxic environment – the latter would significantly boost Europe's contribution to the delivery of the 2020 goals.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
51	individual person	1	1-13	1	Always good to see an institution analysing its future. I suggest that all the draft's Strategic Objectives (SO), especially the ultimate goal of encouraging more substation of clearly safer chemical, would all be turbo-charged if EChA ever felt motivated to realise the most core of REACh's objectives: 'all available data'. All evaluations globally, including the gold standards of Evidence based Medicine and Systematic Review (SR--EBM for chems) acknowledge that in the first instance, reliable decisions require applying their criteria to all information. Instead, all REACh stakeholders are deeply committed to 'one adequate industry study per REACh endpoint'. Two audits (see attached manuscript) show ~75% of non-acute toxicity published findings (PubMed) were not in the HPV Registrations (range, 20-100% are missing); i.e. extrapolated, hundreds of HPV registration have none(!). A fatal initial mistake, ignored since. Second, any inconvenient findings are dismissed without any logic, by saying that an industry Test Guideline study is automatically better quality). This would not matter if industry's reported toxicity findings (and to a degree, toxicokinetic, exposure and env'l behavior & fate; but toxicity studies are the bottom line) were accurate (reliable). In public health, sensitivity (less false negatives) is required over specificity (less false positives). The TG could not be more insensitive to detect the subtleties of biochemistry that lead to adverse effects (including testing only chronically-"poisonous", i.e. very high, doses); while financially inde academics have to develop sensitive methods...and they are finding ever more adverse effects at low doses. How can you ever claim that the EU is doing the job REACh set out?! [by email to EChA's EO secretariat I will send a brief new manuscript recently submitted for publication, for more explanation of the above and for some key citations]. Last, is a solution to this practical. I have thought long about this, and obviously in the first instance, finding 'all available information' is industry's task. But EChA & MS must oversee. 1st, on a practical level, prioritise resources on ensuring all published chronic toxicity findings (as well as industry TG and grey literature (e.g. unpublished science from government labs) is there. For any HPV chem with lots of published tox findings, I can estimate how many exist (via PubMed and Web of Science, the two best databases per some studies) in ~two hours (ok, bPA would double that!; but others no more than a ½ hour). Something such as this must be part of the completeness check. The 5% or more compliance checked could get more thorough 'all available data' checks. Second, what about the substance evaluation? EChA's strategy must be to eventually (MS too) perform SR. It is infinitely more reliable than Klimisch; using the most objective and stringent data quality criteria that exist. But it can't even start until essentially 'all available data' is found.
52	European Environmental Bureau (EEB)	V	12	46-48	make use of the precautionary principle, which underpins REACH Regulation according to Article 1(3). The REACH refit evaluation states that "In most cases, the ECHA and its Committees did not assess the scientific uncertainties to enable the Commission to consider possible action based on the Precautionary Principle. The principle could be invoked by ECHA in cases where there are indications of potential risks while the insufficiency of data, their inconclusive or imprecise nature makes it impossible to determine with sufficient certainty the risk in question. In such cases, ECHA should highlight to the Commission which information is needed to clarify the uncertainties, the timeline for generating such information and provide an assessment of the potential consequences of inaction. The restriction task force has identified this issue and recently the Committee assessment on uncertainties has been conducted" (page 44).
53	European Environmental Bureau (EEB)	V	12	41	and managing substances of possible concern and ensuring subistitution and safe use.
54	European Environmental Bureau (EEB)	V	13	31	industry actors and other stakeholders (NGOs, cnsumers, trade unions, academia, etc),..
55	European Environmental Bureau (EEB)	V	13	12-13	ECHA should include action to improve the deficiencies identified in the REACH review such as: - Avoidance of animal testing hindering the identification of new SVHC - Better address emerging issues - improve identification of endocrine disrupters - suficient information on nanomaterials to ensure safety
56	ClientEarth	5	13	31-33	We regret that the inclusion of civil society was not mentioned – it is in our view indispensable for this kind of actions.
57	ClientEarth	5	13	31-33	We regret that the inclusion of civil society was not mentioned – it is in our view indispensable for this kind of actions.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
58	Eurometaux	V	13	15-16	Eurometaux believes that sectorial industry approaches, such as the one currently launched for metals and inorganics (MISA) can help contributing to the generation and improvement of knowledge on uses and exposure in a more efficient way.
59	German Competent Authority	5	13	34-36	The success of such initiatives is to a great extent driven by the willingness of industry to cooperate. In case ECHA's support and advice is not taken up by industry, other (i.e. regulatory) measures to improve the quality of registration dossiers should be taken.
60	German Competent Authority	5	14	14/15	As stated before the overall focus of ECHA's stra-tegic plan should be on the fulfilment of its core tasks. Thus, instead of promoting best business practices ECHA should rather use these resources for the improvement of the quality of registration dossiers and an increased support of the ECHA committees when adopting opinions on authorisations or restrictions.
61	German Competent Authority	5	14/15	49-06	When taking up new tasks sufficient additional resources need to be made available in order not to hamper the execution of ECHA's core tasks under REACH/CLP and BPR.
62	Eurometaux	V	15	49-51	ECHA has an expertise base that can be most effective in other policy areas. Using this expertise by extending its mandate can provide complementary efficiency and consistency. Since we are talking about a 5 year plan (not so long), if an extension of the mandate is included, more clear/precise info needs to be specified allowing potential implications to be assessed upfront.
63	Eurometaux	V	15	43-47	Interaction is a two-way street meaning that ECHA may also draw on the knowledge and expertise of authorities, specialised scientific bodies as well as industry experts. As the aim is not to duplicate but to render the application of chemicals legislation more effective, it is important to recognise that there might be cases, where ECHA could rely on specialised knowledge and expertise from third parties.
64	German Competent Authority	5	15	10	Please add "… and the public consultation on alternatives in the REACH authorisation process".
65	European Environmental Bureau (EEB)	V	16	49	Member States and other stakeholders (NGOs, consumers...
66	Eurometaux	V	16-17	53,1-2	We think that the concept of "synergies" is unclear and should be further clarified. Does it refer to synergies between different legislations? Within ECHA? Between stakeholders?]
67	European Environmental Bureau (EEB)	V	17	14	Adopt a coherent approach to the regulation of chemicals destined to non-EU countries exports and those destined to the EU single market. Fostering synergies at the international level also includes preventing double standards that currently allow for the production of substances of very high concern that are restricted or subject to authorisation within the EU single market if they are destined to non-EU countries. This practice is certainly hindering the synergistic ambition of ECHA.
68	European Environmental Bureau (EEB)	V	17	33	Include actions to: - change ECHA mindset from "supporting industry" to supporting citizens - improve ECHA's understanding and implementation of REACH underlying principles, in particular the precautionary principle.
69	Eurometaux	V	17	20	Groups of substances for further evaluation need to be selected and prioritised wisely in order to increase efficiency. Constructive cooperation of involved industry actors is a crucial factor for success but depends on the self-interest of industry which
70	ChemSec	I-V	3-20	1-50	ChemSec welcomes the opportunity to give comments to ECHA Strategic plan. Overall we support the direction of the plan, with a clear focus on acceleration of data generation and identification of substances of concern as well as to accelerate the regulatory action on substances of concern. We have for many years expressed our concern about the slow progress within the REACH process, a concern confirmed within the REACH review. We support ECHA in that strategic priority area 2 and 3 can effectively support (if done correctly) the work on strategic priority 1. But, since priority area 2 and 3 are less controversial, easier to work with and more liked by industry they have a tendency to take over and given too much weight, it's important to have it spelled out clearly in the strategy that priority area 2 and 3 are "ad-on work" to ECHA's main task. ECHA need to focus on being an authority applying its power of forcing companies to comply with their obligations.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
					It's a bit unclear to us if the new strategy focuses only on registered substances or on all substances since the objective specifically mentions acceleration for substances of concern. In our view also non-registered substances can be substances of concern and needs to be dealt with in the REACH context. It's also stated in the strategy that also industries knowledge on substances in articles needs to improve, to meet REACH and also to face challenges in the future connected to Circular economy. We strongly agree with this and suggest ECHA to include to the strategy the need to add all SVHCs on the Candidate list. Companies find substances on the candidate list easier to communicate in their supply chain, the candidate list also gives consumers the right to know about SVHCs in articles they intend to buy and most importantly, the candidate list is a very strong driver for substitution. ChemSec has for 10 years listed substances we believe fulfil the criteria's set out in REACH being SVHCs in the SIN List. The SIN List today contains over 900 substances. ChemSec's recent 'Pick up the Pace' report http://chemsec.org/publication/reach,sin-list/pick-up-the-pace/ highlights the importance of adding substances to the Candidate List. REACH aims to drive substitution and we would have liked to see this included in the main priority 1, how ECHA shall work to be able to driving substitution within their regulatory work. The strategy mentions substitution, but just in priorities 2 and 3. We welcome the links to Circular economy and the Non Toxic Environment in the strategy as ways for ECHA to prepare for future challenges. We would also have liked to see the strategy include ways on how ECHA shall make sure the Precautionary principle is applied in their work in the future. ChemSec agree that animal testing should be avoided when possible but would like the strategy to be more clear on that animal tests are needed when no alternatives for the specific endpoint is available in order to gather relevant data and be able to accelerate action on the regulatory side.
71	JACOR LLC	II	4	4	I am a U.S. SE with a solid intention to manufacture and sell safer products (especially i relation to water systems management and terrestrial concerns) I have limited staff and limited capacity for policy work and recommendations. I have been successful at registering my IP Products with US regulators, especially the US EPA and the USDA and will use such registration in my marketing strategies. I am currently taking a leadership role in trying to establish US/EU SME collaborations on safer chemicals. I took part in the UN-ISC3 meeting in September 2017 in Berlin to make connections and to learn about national and international (OECD, SAICM) efforts toward sustainable chemistry. My company supports the inclusion of sustainable chemistry/the acceleration of the adoption of safer chemicals, and would consider further opportunity to increase bilateral collaborations.
72	ClientEarth	2	4	7-11	We would welcome a better representation of REACH objectives. If ECHA correctly identifies the multiple objectives of REACH, it wrongly seems to give them an equivalent level of importance. ECHA needs to set its priorities in line with what the European Court of Justice has consistently stated: the achievement of a high level of protection of human health and the environment is REACH's main objective. (See Case T-115/15, Deza v ECHA (2017) EU:T:2017:329 para 57; Case T-456/11, ICdA and Others v Commission (2013) EU:T:2013:594 para 44 and Case C-558/57, S.P.C.M. and Others (2009) EU:C:2009:430, para 45).
73	individual person	II. The EU regulatory system for 1 chemical safety	4	15 1. Registration	Voglio portarvi a conoscenza che già dalla fine del 2017, molti nostri clienti ci hanno detto che dopo il 31 maggio 2018 PRETENDERANNO i numeri di registrazione per tutti i prodotti forniti. Abbiamo spiegato che la quasi totalità dei nostri coloranti commercializzati non sotto in area Reach in quanto < 1ton/anno. La loro risposta è stata che senz'altro troveranno chi lo potrà fornire e quindi cessare con noi. Questo non è sleale, di più!dato che probabilmente molte PMI come la nostra rischieranno di chiudere per essere eliminate dal mercato perchè non siamo grandi importatori. Prestate attenzione per cortesia!

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
74	Cefic	Whole document	4 - 19	1 - x	Cefic comments on the ECHA Strategic Plan 2019 – 2023 Cefic welcomes the ECHA Strategic Plan 2019 – 2023, which looks like a logic evolution from the previous experiences and the future expectations. However, Cefic has the impression that, with this strategic plan, ECHA is going beyond the roles actually assigned to them, without any clarity on the funding of those tasks. Strategic priority 1: Identification and risk management of substances of concern ECHA is using the term "substances of concern" without definition, but from the text it appears that this can be any chemical that has a hazard, and/or a gap in information whether it is knowledge, risk evaluation or management gap. The term can be confusing, as it is actually used as well in the discussions on chemicals, products, waste interface. It is very clear that under REACH we have substances of very high concern where industry can prove safe use, or minimisation of exposure under authorisation and we have restrictions that are banning certain (or all) uses depending on an unacceptable risk. Having the discussions as well under chemicals, products and waste, Cefic wants a general common understanding over all legislations with a clear explanation of what is really meant, realising the different practices and consequences for industrial, professional and consumer use. Cefic still believes, supported by the REACH Review communication, that an appropriate Risk Management Option Analysis (RMOA) is necessary as early as possible, allowing a contribution from industry. This RMOA should cover the three pillars of sustainability, and not only the environmental and societal parts. The ambitious and supported EU plan for climate change, may require certain chemicals that are scoring less on certain aspects but may help on others. Cefic believes it is important to have a holistic judgement on the use of chemicals in view of a life cycle analysis looking at all aspects. Strategic priority 2: Safe and sustainable use of chemicals by industry Similarly "sustainable use of chemicals" is not defined and it is not explicitly mentioned in ECHA's mission, although it is covered by "…driving force among regulatory authorities in implementing the EU's groundbreaking chemicals legislation…". "Sustainable use of chemicals" seems to imply "do not contain substances of concern". Under the Annex the text is very much driven by substitution of hazardous chemicals instead of substances of (very high) concern. Cefic wants to remind as well that the confidentiality of industry's substitution related projects is more than relevant for a fair competition. To improve sustainable management of chemicals in Europe, Cefic recalls the need for a comprehensive search tool on chemicals regulated under horizontal and sectoral legislations, even beyond the legislations with ECHA tasks, the EUCLEF database (European Chemicals Legislation Finder). The realisation of this database should be mentioned as a measure of success. This database will be a help for SMEs and become more important for the circular economy when materials might enter a new material cycle under another sectoral legislation. An overview of all restricted and forbidden uses should be easily available, also for SMEs having more resources constraints. Strategic priority 3: Sustainable management of chemicals through the implementation of EU legislation Cefic welcomes further synergies between the operation of tasks under the regulations ECHA is mandated for. As ECHA is providing capacity building already now to developing countries, we would ask them to add support to regulatory cooperation that could improve efficiency of implementation of the sound management of chemicals. Cefic notes as well the intention of ECHA being the reference in the world. As such not a problem, but ECHA should be driven essentially by the chemicals legislations that are setting obligations to ECHA, and the Commission should provide the budget for ECHA to fulfil its obligations, even more for the nice to have, or actions outside ECHA's legislative tasks.
75	individual person	III. 1 General Context	6	19 2. Enable European regulatory authorities to be in a better position to focus their regulatory 20 interventions on those chemicals which matter most to protect human	Fare attenzione a regolamentare con misure restrittive sostanze chimiche, c'è il grosso rischio che l'industria UE non possa più produrre/importare sostanze pericolose, ma che queste possano essere introdotte attraverso gli articoli. L'esempio sono i coloranti per uso tessile,molto ben regolamentati e gestiti sin da dopo i MAK I e II tedesco degli anni '80 e da moltissime leggi nazionali e comunitarie. Si corre il serio rischio che non si potranno più importare (produrre non lo si fa più nella UE da almeno 20anni) ma che entreranno sottoforma di capi pret a porter. Miliardi di capi tessili entrano nei nostri porti UE giornalmente, e i controlli sono davvero sottodimensionati. Lo dimostra l'attività RAPEX e dei vari enti preposti al controllo sofisticazioni, che non riesce a coprire nemmeno l'1% delle merci tessili che arrivano da Paesi extra UE, dove non esistono i controlli e che la regolamentazione lascia il tempo che trova. Sostanze chimiche pericolose devono prima di tutto rispettare la loro gestione occupazionale, e poi capire se una volta applicato al tessile sia ancora pericoloso. meglio considerare il rischio e non il pericolo oggettivo di una sostanza! I coloranti hanno una lunga lista di leggi cui devono sottostare, e per fortuna che ci sono dato che bisogna sempre lavorare in sicurezza, e di garantire i consumatori (siamo tutti consumatori anche noi che importiamo coloranti!).

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
				health and the 21 environment;	
76	Euroalliages	III	7	1	Type of comment Sct Pg Line Topic Comment Specific III 7 40-41 Accelerating data generation In less than 1 month-time the last registration deadline will be over. A considerable work with the corresponding resources have been engaged by Industry to set up the registration dossiers. Post-2018 phase shall be a data GAP generation as and where relevant and/or data revision only according to new relevant scientific development. Most of the consortia have reached their financial limits and co-registrants are not willing to pay extra-amounts, in particular when science is not justified. The lead registrant cannot bear the responsibility to pay on its own new costs otherwise many LR will step down. Specific III 8 8 Safer alternative If only the hazard properties are considered it can lead to regrettable substitutions. Cross-media effects, impact on EHS issues shall be considered (resource efficiency, service life use, circular economy, criticality, strategic importance …). Specific III 8 13 Cooperation with other agencies Customs should be better highlighted as key players in enforcement. Specific IV 8 2-3 Substance of concern The way to identify and retain the relevant substances of concern should be based on a risk approach. Indeed, if there are no exposure, the issue becomes not relevant. Otherwise too much resources will be allocated to irrelevant concerns. Specific IV 8 45-46 Functioning on supply chains and circular economy themes More clarification on what could be the role of the Agency within the legal framework and the related financial implications would be welcome Specific IV 9 16 Adapting processes, tools, … Adaptation to scientific progress/knowledge is required by REACH but we are also concerned about the required stability of the IT and other tools in place. Industry resources should be allocated to increase scientific knowledge and not to administrative procedure without providing new real EHS knowledge. Specific IV 10 Table [4] Support the implementation of EU legislation We support the principle that ECHA should be more consulted by the Commission services when drawing up new or updated legislations. This should already be the case today. However, ECHA should not substitute or duplicate the role already taken by various official technical working groups in place at the Commission. Specific IV 10 2-3 EU synergies It is unclear how it will be possible to measure how "ECHA demonstrates synergies and consistencies created by the further interaction and integration of EU legislation". We suggest to list specific EU legislations on which ECHA would like to focus on and how. Ensuring coherence across legislation is mainly the role of the European Commission according to the Treaty. Specific V 11 40 Non-animal testing We would welcome a better synergy with ECVAM, also to speed up the validation process of non-animal testing. Specific V 11 6-7 Grouping substances The goal to reach a "higher throughput" should not minimise the importance to assess, on a case-by-case basis, the appropriateness and correctness of grouping. Specific V 11 42-46 High-volume substances of concern We support the need to involve stakeholders to identify which high-volume substances are of concern. We support the identification of substances of concerns using a risk/prioritisation approach whereby also aspects of other EU Environmental policies should be considered (e.g. Circular economy, resources/energy efficiency…). Specific V 12 32-34 External information sources Information on the REACH registration dossier are considered to be of high quality as they are assessed and screened by both authorities and stakeholders. Quality and reliability of external information sources should be assessed before being used Specific V 13 27 Promote proactive behavior Euroalliages support promotion of proactive update against mandatory updates. Specific V 14 13-17 Market pressure to substitute It is important that ECHA has recognised the role of market demand to push for substitution. This should be recognised as possible consequence of any regulatory action. Criticality and strategic importance are criteria that should also be better recognized and integrated. Specific V 15 23 Improved SDS The exposure scenarios as they are today is a barrier to an efficient communication. Specific V 15 41-42 Holistic legislative approach We fully supports the need to follow a holistic legislative approach, but this is the mainly role of the Commission which should also consulted ECHA. Specific V 15 49-51 Extension of ECHA mandate An extension of the mandate would have strong implications which should properly be assessed upfront.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
					Since we are talking about a 5 year plan, if an extension of the mandate is included, more clear/precise info needs to be specified and in particular the financial consequences. Industry is not supposed to finance the coordination work of the Commission services. Specific V 17 14-19 Synergies at international level We support the establishment of synergies at international level. Specific V 17 20-32 ECHA funding sources Collaborative sectorial approaches will play an important role in helping ECHA to reach its goals. However, we are concerned that besides these additional Industry efforts, additional financial calls/fees would be made to industry to finance coordination activities of ECHA that should be bear by the Commission services and hence by its budget. The early stage of building the guidances, tools, working methods IT system to host the registration are nearly over. We are entering a phase of fine-tuning, improving dossiers. It should be possible to reallocate substantial resources within ECHA to the upcoming tasks.
77	Eurometaux	III	7	40-41	The ECHA-industry sectorial approach should be indicated as an efficient and targeted way to accelerate and promote data generation, where relevant and appropriate.
78	Eurometaux	III	7	21-27	Industry is investing significant resources and efforts to engage with ECHA in sectorial programmes to further improve the quality of registration dossiers in an efficient way while solving pending issues hampering appropriate risk management for metals and inorganics. We would welcome a reference to the Metals and Inorganics Sectorial Approach – MISA in the Integrated Strategy.
79	Eurometaux	III	7	2-3	A discussion on the end of the phase-in status after 2018 is currently ongoing at CARACAL level. We consider it appropriate for ECHA to include in- the strategy a legal and technical assessment of the implications associated with such decisions, looking in particular at the extent to which registration dossier might need to be updated and the associated modalities.
80	individual person	III. 1 General Context	7		Indeed, there are gaps and severe shortcomings in data provided 24 by industry through REACH registration dossiers, especially with regards to long-term effects of 25 their substances on human health and the environment and in relation to the uses and exposure. 26 Also industries knowledge on substances in articles needs to improve, not only to meet REACH 27 obligations, but also to face the challenges coming from the EU's objectives on Circular Economy10. Questo aspetto sul gap di dati da fornire per le sostanze, specie per studi lunghi come cronicità o riproduzione. Non doveva essere l'industria e l'importatore a eseguire questi test. Sarebbe stato molto più semplice se l'industria e l'importatore pagassero un %/kg sulla sostanza prodotta/importata e che questi denari fossero destinati ad un laboratorio (ECHA?) che avrebbe fatto uno studio preciso e conforme senza lacune e gap, valido per tutti. Invece abbiamo sostanze con centinaia di studi differenti e a volte contradditori, e sostanze, specie quelle complesse e o UVCB di nicchia come lo sono gran parte dei coloranti tessili, con un gap di letteratura importante dovuto alla loro natura chimica di complessità molecolare. Non doveva essere delegato a noi il compito di fare studi e report, ma certamente noi a pagare perchè un ente apposito lo facesse bene e per tutti. Si può ancora rimediare a questo gravoso aspetto del Reach, basta solo volerlo politicamente, e pensare soprattutto che non tutta l'industria UE è fatta di multinazionali o grossi gruppi, la gran parte sono PMI.
81	individual person	III. 1 General Context	7	28 The REACH review also identifies opportunities for improvement and simplification, in particular in 29 relation to extended Safety Data Sheets, evaluation, authorisation and restrictions.	eSDS. Compresi gli scenari espositivi, possono essere anche di centinaia di pagine. Io sono un chimico e vi posso garantire che mi perdo anch'io in tutte quelle informazioni. provate a mettervi nei panni di chi maneggia le sostanze chimiche, generalmente con un grado d'istruzione minimo, assolutamente non in grado di interpretare e muoversi attraverso già una SDS normale. Il personale extracomunitario, che a mala pena parla la lingua del posto e con probabili gap scolastici? Le eSDS sono un'esagerazione senza utilità pratica, dove troppa informzaione è sinonimo di cattiva informziaone. Bisogna mettere in grado il personale più a rischio di poter comprendere facilmente cosa sta maneggiando, come deve fare e come proteggere se stesso e gli altri. L'aspetto visivo, etichette,è assolutamente da prediligere, facile da capire se poi con una didascalia semplice elementare che non deve dare adito a fraintendimenti. Poche immagini/disegni e poche righe sono d'immediata comprensione.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
82	European Environmental Bureau (EEB)	IV	8	34	there is a typo: an extra 's': "The following section includes s a detailed description of the scope"
83	European Environmental Bureau (EEB)	IV	9	16-20	As the REACH Review indicates, ECHA needs to improve the implementation of REACH and EU Environmental policy underlying principles, including: - Aplication of the precautionary principle - No data no market - Allocate the burden of proof to industry - Prevention and substitution - Polluter pays principle ECHA needs to build internal competences to understand its role in the implementation of these principles.
84	European Environmental Bureau (EEB)	IV	9	16-20	As the REACH Review indicates, ECHA needs to improve the implementation of REACH and EU Environmental policy underlying principles, including: - Aplication of the precautionary principle - No data no market - Allocate the burden of proof to industry - Prevention and substitution - Polluter pays principle
85	FuelsEurope and Concawe	Overall comments	Overall comments	Overall comments	We welcome ECHA thinking about the coming years for product stewardship regulation. As a responsible industry and active stakeholder in REACH and CLP, Concawe and FuelsEurope would like to share the following thoughts. What is important for us as industry: • Clarity about roles, in the coming years, for industry, for ECHA and for national authorities, • Clarity about data ownership; the plan often refers to using ECHA's database/data globally, yet data is owned by the data providers, usually coming from industry, • Delivering on our REACH obligations; local competent authorities and ECHA should help and guide implementation, though industry is responsible for information and safe use of their products • Recognition of the timelines needed to ultimately deliver the goals of REACH; there is still a lot for all parties to do to implement REACH, let alone further ambitions. We consider the following to be a very important topic, which needs further elaboration in the strategic plan: • Uncertainty and science; a lot of the conversations our industry has with the authorities are about developing the best approach to answering various scientific questions. As an example: o Environmental effects; it is not clear what the best scientific approach for assessing PBTs is, yet there is already pressure to make regulatory decisions on this basis, particularly in the context of the SVHC Roadmap On ECHA's priorities, we have the following comments: • Identification and risk management of substances of concern o We agree this is a priority focus area. Indeed, we are supportive of developing new approaches, and of collaboration with industry actors. • Safe and sustainable use of chemicals by industry (page 13) o We believe that simplification of safety data sheets (page 15), will make them easier to understand and more effective • EU legislation o Going beyond ECHA's current mandate is something that should be separately considered, but the first consideration should be ECHA's role in best achieving the two priorities above
86	French Competent Authority				IV. PIC. For the PIC Regulation, France proposed that the agency invest in information and decision support for developing Member States and third countries. This could be mentioned in the document in priority 3.
87	EFSA	III General context	6	1	I am missing a chapter summarising the state-of-play with ECHA in 2018. It could be useful to understand the strategic objectives for 2019-2023.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
88	EFSA	III General context	6	4	"If ECHA wants to become the main source (in EU? worldwide?) of scientific knowledge and technical know-how of chemicals, nowhere in this strategic plan it is made clear the nature and kind of knowledge and know-how that can be expected at ECHA by 2023.
89	EFSA	III General context	6	35	EFSA should be part of this
90	EFSA	III General context	7	25	Here and there, but quite sporadic is referred to ECHA's Scientific Committees; should they not be mentioned in more detail in a strategic plan of ECHA?
91	EFSA	IV. Multi-annual Programming 2019 – 2023	9	12	This section provides only general information on the targets for how ECHA considers to maintain its competence basis. How does ECHA want to become the main source of scientific knowledge and technical know-how on chemicals in 2023 is not described.
92	EFSA	V. Strategic priorities	10	4	Quite comprehensive chapter describing what ECHA should achieve from an EU legislation point of view. There is no detailed description how ECHA intends to achieve these targets, which efforts ECHA will put in place, which could be an important motivation for the establishment of the budget to be allocated to ECHA in the forthcoming years.
93	EFSA	V. Strategic priorities	10	9	ECHA identifies the evaluation of testing proposals as fundamental. I think there is room for EFSA to consider this further (e.g. pre-submission meetings). We could share views and perspectives with EChA, besides effective collaboration on this
94	EFSA	V. Strategic priorities	12	36	"when not enough data are available : ....ECHA could/should explore the possibilities that EKE can do to help and speed up reaching conclusions . EFSA has good experience with EKE and our GD is in place since 2014: https://www.efsa.europa.eu/en/efsajournal/pub/3734 "
95	EFSA	V. Strategic priorities	13	19	EKE again: https://www.efsa.europa.eu/en/efsajournal/pub/3734
96	EFSA	V. Strategic priorities	13	35	Again, relations with the presubmission meetings
97	EFSA	V. Strategic priorities	15	28	EFSA is very strong in exposure, at least dietary exposure. ECHA is invited to join in with our KIC on Exposure Sciences In addition, EFSA and ECHA are both involved in the HBM4EU programme
98	EFSA	V. Strategic priorities	16	33	Matrix ...
99	Eurometaux	V	11	5-8	The goal to reach a "higher throughput" should not minimise the importance to assess, on a case-by-case basis, the appropriateness and correctness of grouping. Grouping should be considered in respect to the effectiveness of the RMMs, i.e. grouping by use (e.g. substances used in a specific application), not only by hazard. This implies that the grouping for hazard and testing is not necessarily equal to the grouping relevant to RMM setting. The RMOa phase can be used to check for the most appropriate grouping depending the use and the RMM measure selected/proposed.
100	German Competent Authority	5	11	8	The usefulness of addressing substances in groups should be carefully assessed on a case-by-case basis for efficiencies. Experience shows that group approaches may have the opposite effect and lead to increased workload and delays.
101	German Competent Authority	5	13	31-33	Groups of substances for further evaluation need to be selected and prioritised wisely in order to increase efficiency. Constructive cooperation of involved industry actors is a crucial factor for success but depends on the self-interest of industry which is not always in line with the interest of the authorities.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
102	Health and Environment Alliance (HEAL)	V	13	23-25	Under enhanced mapping and prioritising of substances, we would welcome: 1) some clarifications about: a) what specific "regulatory strategies and assessment methods for specific (groups of) chemical or effects, such as nanomaterials and endocrine disruptors" the agency intends to develop; by when? For endocrine disruptors, which implication of specific working groups such as the ED expert group does it foresee and how will it articulate with assessment of endocrine disruptors carried out in regulations outside of ECHA's remits? b) Clarifications about intentions in relation to the "development of alternative methods to animal testing". While we share the intention to limit animal testing as much as possible, we insist that it remains unavoidable in order to properly assess risks for human health at the time of writing and should be fully acknowledged when considering future strategies for the agency's work and substance assessment. 2) References to practical ways and methods that the agency intends to use in order to make progress in: increasingly assessing chemicals by groups rather than individually as is done presently as well as assessing mixtures of chemicals, considering the reality of human exposure to a cocktail of chemicals and an important need to take it into account in the risk assessment process.
103	ecopa	2. Use of data, information and knowledge on safe use of chemicals	17	7	Clarify and enlarge the opportunity for using data in the ECHA public database, for example by admitting reference to proprietary studies for read across approach. At the moment there is no regulation and a letter of access for read across purposes can be very expensive
104	EFSA	V. Strategic priorities	13	24	Also EFSA MixTox is dealing with grouping
105	Fertilizers Europe	2 Safe and sustainable use of chemicals by industry	15	4-16 Support to substitution and sustainable use of chemicals	Fertilizers Europe welcomes the ECHA Strategic Plan 2019-2023, outlining the priorities of ECHA for the next five-year period. The plan lists three strategic priorities that are to be achieved: o Identification and risk management of substances of concern o Safe and sustainable use of chemicals by industry o Sustainable management of chemicals through the implementation of EU legislation and Fertilizers Europe considers them as an expected evolution of the legislation. However, despite we believe that the substitution of chemical substances of concern is fully under the scope of REACH Regulation, the confidentiality of industry's substitution related projects is quite relevant for a fair competition. Therefore, we would like to be assured that ECHA do not intend to advocate the role of facilitator by mapping and facilitating the sharing of data made available to them by industry for regulatory purposes. We are confident that ECHA will take our comment related to the confidentiality into consideration and provide with more clarification when publishing the final Strategic Plan 2019-2023.
106	Eurometaux	IV	9	13-15	Industry is a partner and an important generator in building and communicating knowledge. Industry should therefore also be referenced (besides MSCAs and EU agencies) regarding the cooperation's established by ECHA to build knowledge (i.e. sectorial approaches, participation in PEGs, etc.).
107	individual person	a	b	c	The European chemical industry has halved in 20 years, 32.5% global market share in 1996 and in 2016 Europe's global market share was only 15.1%, source CEFIC Brussels. Regulation needs to promote wealth creation, not export it out of Europe
108	ClientEarth	5	10	10-11; 49-50	We welcome the acknowledgement of the opportunity opened by the final registration deadline to identify all substances of concern. We would however like to emphasize that SVHC may very well be placed on the market under the 1 tonne threshold, which should not be reason enough to exclude them from the screening approach and, later, from the placement on the candidate list.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
109	Eurometaux	IV	10	2-3	We suggest to clarify the following clarified the following sentence: "ECHA demonstrates synergies and consistencies created by the further interaction and integration of EU legislation". We suggest to list specific EU legislations on which ECHA would like to focus on.
110	Health and Environment Alliance (HEAL)	V	11	1-23	We are surprised not to see more emphasis on recycled materials in this part. Recycled materials are one of the current gaps in the aim to achieve a circular economy; they should not be exempt from risk management and will become an increasingly relevant focus for the work of the agency. The carpet sector, which we have highlighted in a recent HEAL briefing, is an excellent example of the efforts that need to take place in that regard (http://env-health.org/IMG/pdf/cm-detoxing-carpet-pathways-towards-safe-and-recyclable-carpet-in-a-truly-circular-economy-layout-english-draft-08.pdf)
111	Eurometaux	V	15	41-43	Eurometaux supports the need for a more holistic view on chemicals legislation whereby different environmental goals are pursued in a balanced and efficient way. Overlap of regulatory tools to achieve the same objective (e.g. ROHS, restrictions, …) could be a low hanging fruit to s more integration progress more integration.
112	French Competent Authority	V. New topics.			The European Commission's proposals for a non-toxic environment have highlighted the new responsibilities of the agency that should feature prominently in the strategy document. In particular, and in support of the development of a secure circular economy, it should be indicated that the agency should support or even initiate initiatives for the provision of data by producers and importers of their SVHC content (which constitutes a European regulatory obligation) or other dangerous substances within the meaning of the CLP Regulation. With regard to new concerns such as endocrine disruptors, nanomaterials or cocktail effects, the strategic document would benefit from further evoking the work accomplished and laying down ambitious avenues for the period ahead, to improve the acquisition of knowledge and skills. risk management. Finally, the agency will have to continue its involvement in the search for a better coordination between the chemical regulations (REACH, CLP, BIOCIDE, PPP, etc ...) and health and safety regulations at work, in particular in the definition and the taking into account of principles of prevention with regard to the use of collective protection and personal protection equipment, and the articulation of the different exposure limit values on the basis of the regulations implemented.
113	Eurometaux	V	13	1-3	We need to ensure that "increasing efficiency of the formal processes and evaluation decision making" will proceed in parallel with an increase of their scientific quality and robustness. Also, an increase in efficiency should not jeopardize the transparency of the decision making process.
114	German Competent Authority	5	17	45/46	ECHA is spending a high share of its budget on IT expenditures compared with other EU decentralised agencies. Thus, it should be carefully evaluated whether expenditure on new IT tools and developments are imperative for the fulfilment of ECHA's tasks.
115	Health and Environment Alliance (HEAL)	V	18	1-7	We welcome the acknowledgement made on the need for increased finance and capacities for the agency to be able to carry out its task and deliver on its mission. This is an essential question, which will become increasingly relevant from next years on. For example, with the EDC criteria for biocides becoming applicable, it is expected that the ED expert group and the biocidal product committee will have an increase in work to assess substances. Yet it is hard to imagine how they will be able to deliver with the current resources available to them. This is also an issue for improving compliance checks, achieving faster SVHC identification, or speeding up substitution, among other things. Therefore, we would welcome clearer indications about which specific posts ECHA foresees a need for increased resources and more details about plans to match the needs identified. Keeping the fundamental "Polluter Pays" principle, it would be interesting to have clarity on whether an increase in industry fees or other financial contributions is considered in order to deal with the tasks lying ahead. The language in the current plan is very vague when it comes to resources.
116	German Competent Authority	3	7	35-43	It should be ensured that enough resources are/ will be available to maintain or even enhance EC-HA's evaluation activities.
117	French Competent Authority				The document should place greater emphasis on the need for the Agency to have sufficient means to carry out all the current and new tasks assigned to it, and to clearly indicate the central role of ECHA in the management of substances. and chemicals in Europe. There is a need to deepen the question of their adequacy and the evolution of their modes of financing. The upcoming passage of the 2018 REACH deadline is a turning point, in part because it is likely to result in a significant reduction in resources, and yet a predictable increase in risk management, substitution incentive and information to the public. In order to reinforce its legitimacy and to convince the relevance of the means allocated to it, the agency will have to strengthen its reputation through communication actions adapted to European level, valuing its accomplished and future action.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
					The strategic plan should also highlight the need to coordinate the work of the different European agencies involved in the protection of health and the environment, in particular on the issue of cooperation in publishing guides, improving consistency in substance hazard identification, harmonization of conflict of interest rules, governance, transparency or information management. This is a major issue in terms of the credibility of European agencies, as the examples of glyphosate or Bisphenol A have shown. In particular, the document could highlight avenues of improvement for the rules of ethics and the transparency of the action, through an extensive provision of data at the base of the regulatory action, in compliance with the requirements necessary confidentiality. A cross-examination of the good practices of the different agencies will help in this direction.
118	EFSA	V. Strategic priorities	17	34	Maintain and build identified staff competence for current and future tasks:
119	German Competent Authority	4	10	9	Please rephrase this sentence as it is not the authorities' task to complement the industry role but rather to scrutinize, to evaluate and to identify gaps in the data submitted by industry and to urge industry to comply with the legal provisions.
120	European Environmental Bureau (EEB)	V	12	49	We agree that the priority of ECHA (and also of the Commission and of the Member states) shall be to improve the generation of information on hazards, exposure and uses of chemicals. However, we believe that the proposed actions are insufficient. As the REACH Review recognizes, the only incentive to industry might be strong enforcement actions, this is,to apply the "no data, no market" principle . ECHA shall also include actions to improve the transparency on companies that are not complying with their legal obligations (naming and shaming) and explore tools to facilitate the compilation of missing or outdated registration information (for example by allowing academia and other stakeholders to provide the registration's missing information through its website).
121	German Competent Authority	5	13	27-30	Please rephrase this sentence in order to empha-size the responsibility of industry to comply with their legal obligations: "Make industry aware of their obligation to comply with information needs and their responsibility in updating and improving the information on their substances…"
122	ecopa	3. Improved safety data sheets	13	17	In my daily experience, I see that the difficulty in reading the SDS is relevant. In addition to the well-known problem of the lengthy and unreadable exposure scenarios, there is the difficulty in combining DNELs with OELs. The REACH interface between REACH and other EU legislations is mentioned in the section of REACH&CLP (page 7 line 32) and it should be referred here again
123	ClientEarth	5	14	13-17	We welcome the plan of ECHA to use 'name and shine' techniques to create incentive to comply for the industry. We strongly encourage ECHA to complement this excellent approach by a 'name and shame' – the public should know which companies do not comply with the obligations set by REACH in order to protect human health and the environment. This is in particular the case considering the dire need of strong incentive for compliance, and is in line with what is required by REACH REFIT (Staff document Annex 4 p 81, annex 4 p 7)
124	European Environmental Bureau (EEB)	V	15	5-7	develop strong incentives to support compliance of registration dossiers and generation of high quality data , so that applicants do not try to bypass their legal obligations (as suggested by REACH refit evaluation at page 54).
125	French Competent Authority				II-2. Accompaniment of the national enforcement authorities. The control actions of the national enforcement authorities are a necessary condition for the proper functioning of the regulations that the agency implements. A harmonized and efficient application of these on the territory of the union is likely to guarantee a high level of protection while preventing the risks of distortion of competition between companies. In addition, feedback from monitoring operations contributes to the development of more effective regulation. With regard to the coordination of controls, the agency's priorities will be registration. This obligation should be subject to controls to ensure the flow of information, as well as control of risks to human health and the environment within the various supply chains located in the region. 'European Union. These actions should also be strengthened on the authorization, in particular in the context of ongoing applications for chromium VI compounds, in particular in response to that issued by the CTAC-SUB, which should ultimately impact a significant number of user companies across the European Union. Lastly, particular attention should be given to the control of online sales for the period 2019-2023, taking into account, as part of these controls, the REACH obligations relating to substances in the articles (restrictions in particular).

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
126	Forum member	V.2. Safe and sustainable use of chemicals by industry	13	38	amend "chemicals" to "chemical substances"
127	Forum member	V.2. Safe and sustainable use of chemicals by industry	13	42	Importers are missing here
128	Forum member	General			"I have no specific comments to the Strategic Plan, but from enforcement body point of view, there is no clear outline of enforcement activities under the umbrella of ECHA. What I mean by that is coordinated enforcement projects and trainings for inspectors. I can see page 8 line 11 - very briefly , page 11 line 3, page 13 line 4 as well but this is only mentioned. Of course I see ECHA mostly through the prism of Forum/BPRS and that's why I would like to see more mentioned about enforcement. If there is no need to expand these (a bit of description), I will not argue on that. "
129	Forum secretariat	V.1 Identification and risk management of substances of concern	13	23	"I support the comment from [ ] - there is no clear reference to support of strong enfrocement by ECHA under the Areas of Operation . Strategic Priority 1, section on follow up of the WSSD 2020 indicates that the goals are achieved when ""Companies experience firm, and fair enforcement, focusing on ensuring the safe use of hazardous chemicals and fostering a level playing field. "" Strategic priority 1 can be achieved with firm enfrocement, but ECHA's support of coordinated enforcement is not explicitly mentioned under Startegic Priority 1 - it should be mentioned explicitly under one of the Areas of Operation for Strategic Priority 1. Risk management can be effectively implemented with strong enforcement. There is only mention of involving enforcement in building common understanding on priorities of best use of regulatory instruments - this is not sufficient. "
130	Forum secretariat	V.2 Safe and sustainable use of chemicals by industry	16	26	"Colaboration with enforcement is mentioned here with regard to priomotion of use of supply chain communication tools - this is a very specific area of collaboration. While it fits under Strategic Priority 2, Action area 3 ""improved SDS"", considering that there is no clear reference to support of enforcement under Strategic Priority 1, it looks out of place. Currently, the high level Staretgic Plan does not mention the ECHA's generic support of coordinated enforcement under SP1, but does explicitly mention one very specific area of cooperation with NEAs. Please see comment above and add reference to generic support to cooridnated enforcement under Staretgic Priority 1"
131	Forum secretariat	V.3.Sustainable management of chemicals through the implementation of EU legislation	16	35	Strategic Objective 3 is an alternative place where the support for strong enforcement can be mentioned, if it is not covered under priority 1, but it definitely fits better under priority 1.
132	Forum member	General			"I have no further reactions and/or suggestions on ECHA Strategic Plan 2019-2023 in relation to the enforcement of REACH, CLP and PIC. Perhaps my BPRS colleagues will additional react related to the BPR-issues. "
133	Forum member	General			The strategic plan hardly mentions enforcement and how ECHA could work to improve it across the EU. We think this is unfortunate since enforcement is an important measure to ensure implementation of the legislations. Especially so if what is stated on page 6 should be read as to include enforcement- On page 6 it says that ECHA aims to: 2. Enable European regulatory authorities to be in a better position to focus their regulatory interventions on those chemicals which matter most to protect human health and the environment; "

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
134	Forum member	General			thank you for the opportunity to comment the ECHA's strategy paper which is quite clear and compact. We have one question concerning Commission's infringement procedures in the attached table.
135	Forum member	V.1. Identification and risk management of substances of concern	11	4	What is meant by infrindgement by the Commission? "ECHA and the Member States will strive to further integrate and optimise their actions, including those related to enforcement. Where necessary the Commission may decide to initiate infringement procedures."
136	Forum secretariat	V.1. Identification and risk management of substances of concern	12-13		"Considering the feedback from the Forum and the need to explictly mention enforcement, the WG proposes to add an explicit bullet poiunt about supporting the Forum under Strategic Priority 1, Area of Operation 1: ""Concerted Regulatory Action"" • Enhance the risk-based enforcement of REACH, CLP, PIC and BPR by supporting Forum coordinated actions. Stronger reference to enforcement is necessary in the strategic plan - ultimately the cooperation with NEAs is necessary to make a difference in the actual situation in the companies. "
137	Forum secretariat	V.1. Identification and risk management of substances of concern	6	19-21	"To address comment 8 and other comments above, add the reference to ""enforcement"" among the European authorities in 2nd bullet point. For example: Enable European regulatory and enforcement authorities to be in a better position to focus their regulatory interventions on those chemicals which matter most to protect human health and the environment; or Enable European ... authorities to be in a better position to focus their regulatory and enforcement interventions on those chemicals which matter most to protect human health and the environment;"
138	EMA	V. Strategic priorities	13	34-36	"Explore how ECHA could, without assuming the burden of proof or compromising its regulatory authority role, give direct substance/case-specific advice to registrants on dossier compliance including for specific groups of substances" - we flag that this concept seems similar to the scientific advice given by the EMA to medicine developers or to the EMA pre-submission meetings with marketing authorisation applicants for the preparation of the dossier. Linked to this, you might also be aware that the European Ombudsman is currently conducting a Strategic inquiry into pre-submission activities organised by the European Medicines Agency (OI/7/2017/KR). Should this be useful, we would be happy to share our experiences with those in due time.
139	European Environmental Bureau (EEB)	V	12	23-24	Focusing on ensuring that hazardous substances are eliminated or substituted by safer alternatives and the safe use of chemiclas and fostering a level playing field.
140	ClientEarth	5	12	5-7	We would welcome a commitment to ensure that the authorisation process fully promotes substitution, including by making sure that authorisations are not granted to substances for which there is no adequate control and for which an alternative technology or substance is available. We are surprised to not see a reference to ECHA substitution strategy.
141	ClientEarth	5	12	50-52	We would welcome a specific commitment of ECHA to address the fact that the restriction process has not met expectations so far. ECHA needs to commit to ease the requirements for dossier submission and adopt a more critical approach towards the industry's request for derogations (As required by the REACH REFIT, see p 16 staff document and Action 8(1) of the Commission's Communication)
142	individual person	V.1	12	26 ff.	The text does not contain specific information regarding priority setting of inherent hazard properties of substances. My concern ist that apparently the area of sensitizing properties of substances is not a priority of ECHA. How can you explain that most of the extreme and strong sensitiziers identified for instance in the cosmetics area are not yet legally classified? See for instance the review of Lidén et al. (2016) Comparative sensitizing potencies of fragrances, preservatives, and hair dyes. Contact Dermatitis 75, 265–275. Millions of European people are sensitized by this kind of substances and many of them suffer from from signs or symptoms of allergic contact dermatitis.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
143	Eurometaux	V	13	24-25	Where relevant, EM strongly supports the development of risk assessment methods for nanomaterials (NM) apart from animal testing, while ensuring that there is no shortcut in the assessment of NM if further testing is required. Nanomaterials may have potential different hazard properties requiring separate classification entries to ensure the entry is related to the form manufactured and used. This is in particular the case for the environmental endpoint.
144	Eurometaux	V	13	24-25	Where relevant, EM strongly supports the development of risk assessment methods for nanomaterials (NM) apart from animal testing, while ensuring that there is no shortcut in the assessment of NM if further testing is required.
145	Health and Environment Alliance (HEAL)	V	13-14	37-49; 1-23	In our view, priority 2 should reference its strategy for substitution and promotion of safer alternatives even more explicitly in this section. It is not so clear from the current wording that improved substitution is the actual prerequisite to reaching sustainability in the mid to long term.
146	Eurometaux	V	14	13-17	Market pressure has an impact on the substitution research and innovation policies of supplier and are part of market mechanisms. While this could be further promoted there is a risk that a market but also a regulatory substitution drive does not internalise all effects (e.g. substitution that would hamper recycling). Regulators should in such case ensure corrective measures to prevent this. In essence this should be part of the regrettable substitution assessment which should be conducted based on a broader set of criteria than hazard alone. Substitution should be recognised as possible consequence of any regulatory action (example: impact of a metal classification on recycled metals and slags).
147	Eurometaux	V	14	18-21	The concept of regrettable substitution should be duly taken into consideration also in the RMOAs (e.g. would the exposure increase or recycling be hampered, or the energy efficiency be impacted, …)
148	European Environmental Bureau (EEB)	V	15	5	Several studies as well as the REACH review identify the authorisation process as key to promote the substitution of SVHC. ECHA should include specific actions to enhance substitution of SVHC through the authorisation process: - Support MS and the Commission to simplify and speed up the identifications of SVHC. - Support downstream users of SVHC to identify potential alternatives and engage in substitution activities at early stages, E.g. as soon as a substance is included in the candidate list. Develop criteria for SEAC to assess technical and economic suitability of alternatives - Ensure alternative providers can provide meaningfull and timely information on safer alternatives and ensure that SEAC takes it into account...
149	Health and Environment Alliance (HEAL)	V	15	4-16	Achieving priority 2 also requires a significant effort from the agency to beef up the process of analysis of safer alternatives, which is currently mostly carried by companies applying for authorisation. Recent analysis by Chemsec and ClientEarth has demonstrated that this results in authorisations being granted even when safer alternatives are available (http://chemsec.org/publication/authorisation-process,reach/how-to-find-and-analyse-alternatives-in-the-authorisation-process/)
150	Fondation pour la Recherche sur la Biodiversité	iv	2	8	As a general remark on this document, it is regrettable that the term "biodiversity" does not appear at all in this text. In addition, it appears that the evaluation criteria are rather limited in terms of monitoring the effects of molecules on biodiversity. It also seems that these tests are identical whatever the type of active molecule, while certain active molecules will only act on specific taxa or ecosystem functions. With regard to plant protection products, the French strategy for monitoring the effects of these products will integrate more biodiversity monitoring, see http://translate.google.com/translate?sl=fr&tl=en&u=http%3A%2F%2Fagriculture.gouv.fr%2Fplan-dactions-sur-les-produits-phytopharmaceutiques-et-une-agriculture-moins-dependante-aux. It is important to us that the different regulations are made coherent, and we present ourselves to you as an contact point to discuss the assessment of the effects of chemicals on biodiversity. The FRB is a science-society interface bringing together stakeholders interested and impacted by these questions. The FRB could mobilize these stakeholders in order to help develop elaborate proposals on the evolution of the REACH regulation. For more information on the foundation, see http://www.fondationbiodiversite.fr/fr/
151	European Environmental Bureau (EEB)	III	7	29-34	We believe that some issues requiring most urgent action are missing; namely the identification of (new) SVHC and its rapid inclusion to the candidate list; the flow of information throughout the supply chain and to consumers, in particular on substances in articles (consumer products); the effective shift of the burden of proof to industry and still weighs excessively on Member States and the application of the precautionary approach by ECHA
152	Health and Environment Alliance (HEAL)	III	7	26-27	We welcome ECHA’s acknowledgement that there might be conflicting challenges arising from the implementation of REACH on the one hand and the circular economy on the other hand – this is why we agree that dealing with substances of concern is indeed a key priority for the agency. From a human health protection point of view, the success of a circular economy strongly depends on our ability to minimise exposure to substances of concern from onset, keeping them out of the economic loop in the first place.We however regret that not more emphasis is placed on the agency’s strategy for substitution towards safer alternatives in the overall framing of the approach proposed.

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
153	individual person	3.2	7	20	More emphasis should be given to petrochemicals for human use by their gradual substitution by similar "green products", based on natural products and natural polymers.
154	Humane Society International / Europe	III	8	18 et seq	It should be noted that BPR information requirements are also in need of revision in the same fashion as the REACH annexes to reflect 3R technical progress. While we recognise that this will entail a legislative process that is beyond ECHA's remit or control, recognition of this need in this strategic document would be helpful.
155	Eurometaux	III	8	3-10	We consider it important to introduce the concept of prioritisation to ensure that risk management measures are focusing on what matters. Focus should be on manufacturing and uses where exposure to human health or the environment is unknown or not controlled resulting in a risk. (cf. OECD concept).
156	Health and Environment Alliance (HEAL)	III	8	18-23	We welcome the acknowledgement of the need to intensify biocides activities and wonder to what extent the application of the new identification criteria for biocides endocrine disruptors (which will become applicable from 7 June 2018 onwards) are taken into account in the agency's plans for 2019-2023. For the period 2019-2024, it is expected that 40-50 biocide discussions will take place at the EDC expert group every year, which amount up to +/- 300 biocide discussions by the end of the period (based on the average of 0 to 3 discussions per substance at the expert group). We would welcome additional details in this regard, including plans for additional resources for the agency to carry out its mission in this area.
157	French Competent Authority				II. Regulatory action REACH and CLP. At the root of the regulatory action, the question of the completeness of the files raises many questions as to the quality of the registration dossiers. This question will be particularly salient once the last REACH registration phase has passed, with the need to ensure the credibility and reliability of the device to speed up the compliance checks of the dossiers. This point deserves to be highlighted in the document, particularly with regard to the means to be allocated to the agency. This point is related to the main achievement of REACH to have been able to have an exceptional database in Europe on the hazards, uses and risks of substances and chemicals, allowing better control, especially by companies. This concern is accentuated by the need to take better account of so-called emerging risks (endocrine disruptors, nanomaterials, cocktail effects) which is sometimes delayed because of the levels of evidence required that are not adapted for these problems. Once the REACH 2018 deadline has passed, special attention will have to be paid to updating the dossiers, adding the requirements for nanomaterials, and taking into account the polymers as well. ECHA should reiterate its role as a pilot in support of the Commission and the Member States to improve testing and methods, particularly at the OECD level. The grouping of substances with similar properties, rather than systematically by individual substance, should be encouraged, which will also improve the consistency of risk assessment and risk management measures between substances in the same group. With particular reference to Strategic Objective 1, relating to risk management, the relevant part of the document should be completed as follows, including the action of the Forum, which is essential for effective implementation of the provisions adopted: II-1. Reinforcement of the "authorization" and "restriction" titles of REACH. With regard to the restriction and authorization titles of REACH, an acceleration of the overall process is desirable, noting the cumbersome process of inclusion in Annex XIV, which means that all substances that should be in Annex XIV are not yet ; the agency will rely in particular on member states to ensure that all relevant substances are included in the SVHC list in a reasonable timeframe before 2025. The Agency will work to strengthen the coupled use of authorization and restriction procedures with a simplified procedure to obtain bans on (imported) articles containing Annex XIV substances, to protect European industry while ensuring its security of supply. In support of this development, the agency will value and continue the work done in favor of the substitution of substances of concern by the industry, through the communication and structuring of sectors for this purpose. Biocides As far as the biocidal regulation is concerned, the agency will have to ensure consistency between its implementation and that of the CLP and REACH regulations. Recent developments in creosote work have highlighted the risk of failing to effectively achieve health and environmental protection objectives through insufficient coordination of actions. To this end, the agency, in liaison with the national agencies, should systematically examine whether, as part of the monitoring of the approval or marketing authorization program, the results of the evaluation call for the need to propose new restrictions measures.
158	EFSA	II	4	45	Potentially relevant collaboration on toxicology of mixture

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
159	EFSA	V. Strategic priorities	13	45	waste call for collaboration on Environmental risk assessment.
160	EFSA	V. Strategic priorities	15	5	A chemical can come from any source
161	ClientEarth	5	18	7	We regret that ECHA's strategy does not contain more detailed commitments on transparency. We would like to remind our recent report on this topic, which contains detailed recommendations on the areas where improvements are needed. https://www.documents.clientearth.org/library/download-info/10-years-in-time-for-echa-to-disseminate-strategic-information-to-empower-third-parties/
162	European Environmental Bureau (EEB)	III	6	36-37	ECHA could be a good example to show how the EU institutions and agencis work to improve citizens lives and build confidence on EU institutions. However, in order to achive this, ECHA needs to change its mindset as commented above.
163	European Environmental Bureau (EEB)	III	6	22-23	We don't believe that ECHA's aim should be to build citizens confidence, but to serve the citizens by protecting their health and the environment. We believe that ECHA needs to change its mindset from "serving industry" to "serving citizens" as a truly public Agency.
164	European Environmental Bureau (EEB)	III	6	15-18	As ECHA's main mandate is to implement REACH, we believe that its aims should adhere to REACH's objectives of protecting health and the enviroment from the risks posed by hazardous chemicals. Therefore, the main aim, should not be to support industry but to ensure the proper implementation of REACH and other chemicals regulation in order to ensure a high evel of protection of human health and the environment from the riks posed by hazardous chemicals. Furthermore, ECHA should aim to improving product safety rather than improving product quality.
165	European Environmental Bureau (EEB)	III	6	3-4	ECHA is not a scientific institution as its main activity is not to research and generate scientific evidence. It is also not a technological institute generating know-how. We understand ECHA as being an agency that should compile and make the best use of scientific data and technical know-how to carry out its mandate to implement chemical legislation. Furthermore, Article 77 of REACH provides that ECHA "shall provide Member States and the institutions of the Community with the best possible scientific and technical advise on questions relating to chemicals" that fall under REACH's scope; it is essential that ECHA sticks to the role granted to it under REACH Regulation and ensures the main tasks it was attributed: advisory and implementation support to Member states and European institutions. Therefore, perhaps it would be more accurate and reasonable that ECHA aims to become the main source of information on hazards and uses of chemicals, hereby serving a wide range of EU policies and stakeholders
166	ClientEarth	2	6	16-18; 22-23	• Section II, p 6 line 16-18. See also section III p 7 line 18 'aiding industry to comply with their obligation' See also section V page 12 line 27-30 We would welcome a better formulation of ECHA's role towards the industry. We regret that ECHA depicts itself, in its relation with the industry, solely as a support/enabler/facilitator. ECHA has without doubt an important role to play in providing to the industry the tools it needs to understand the extent of its legal obligations, and to fully comply with them. (II p 4 line 21 22) However, this is but one side of ECHA's role. As an EU Agency created to serve the public interest, ECHA shares with the Commission and the Member States the power, and obligation, to enforce the obligations that the industry has to comply with under REACH and CLP. ECHA should fully and explicitly assume its role in the enforcement of REACH and set clear, innovative and ambitious objectives for its actions aiming at forcing companies to comply with their obligations. The REACH REFIT calls for the adoption of a new REACH implementing Regulation aiming at reinforcing the obligations of the industry to provide full information when they register, and to update their information fully and in a timely manner - (See for example Staff document, Annex 4 page 8). We would welcome a plan, set in the strategy, to contribute and encourage the Commission to do so. This is even more the case considering that ECHA recognizes in section III page 7 line 23-25 the gaps and severe shortcomings in the data provided by the industry. • Section II, p.6 line 22-23 We would welcome a better formulation of ECHA's role towards all interested parties. In relation to the general population, such as consumers, citizens, investors, the objective should be explicitly to empower them. This requires to provide them with the tools they need to know what is being done by ECHA, the Commission and the Member States, where, why and in which quantities chemicals are used, which chemicals are in products and in which quantity, which are dangerous, which companies are frontrunners and which do not comply with their obligations. This includes for example full access to downstream users notifications (see paper attached).

No.	Organisation Name	Section Number	Page Number	Line Number	Comment
167	ADS - Trade Organisation for companies in the UK Aerospace, Defence, Security and Space Sectors	3	6	3	ADS welcomes the clarity and transparency that is provided by the ECHA Strategic Plan. However ADS is concerned that ECHA's ambition (Page 6, Line 3), "ECHA aims to become, by 2023, the main source of scientific knowledge and technical know-how on chemicals hereby serving a wide range of EU policies and stakeholders". Whilst laudable, this statement is not appropriate within ECHA's role in managing the technical and scientific data provided by industry, and the administrative aspects of the implementation of REACH and other legislation in relation to chemical hazard. Scientific knowledge and technical know-how on chemicals is acquired primarily through technical development within academia and industry, hence ECHA's ambition is of deep concern. ECHA's expertise is in the management of data relating to chemical hazards; the information on the hazards is produced by registrant companies and MS Competent Authorities who undertake testing to develop that data. Due to product complexity and longevity, and stringent airworthiness and safety requirements, the technical requirements of the Aerospace and Defence Industry are demanding. Furthermore the technical requirements are heavily dependent upon appropriate use of chemicals. Early Technology Readiness Levels may be achieved through scientific research carried out within academic institutions or industry. Technical maturity can only be achieved by industry through long-term testing of products and the chemical processes required to manufacture and maintain them, through rigorous qualification of the final product, and through careful monitoring of in-service use data. The introduction of substitute chemicals in response to chemicals regulation introduces risk to the integrity and safety of complex Aerospace and Defence Products. For example, the introduction of a substitute chemical to a protective treatment system for an airframe may increase the risk of fatigue failure. The introduction of successive substitute chemicals to that protective treatment system will significantly increase that risk. Only industry has the scientific knowledge and technical know-how to manage that risk. Therefore, ADS proposes that ECHA's ambition be changed to: "ECHA aims to become, by 2023, a valuable and respected source of scientific knowledge and technical know-how on chemical hazards". Or: "ECHA aims to become, by 2023, the main source of regulatory scientific knowledge and technical know-how on chemical hazards hereby serving a wide range of EU policies and stakeholders".
168	German Competent Authority	3	6	10-14	ECHA's claim is "working for the safe use of chemicals". Thus, this aspect (safe use of chemicals) should be included in the section on ECHA's ambitions.
169	German Competent Authority	3	6	16-18	The first ambition of ECHA is to "support industry in assuming its regulatory responsibilities for the safe use of chemicals". However, in line with ECHA's strategic priorities, the first ambition of ECHA should be to fulfil its role as regulatory authority and thus more emphasis should be put on the identification and risk management of substances of concern and not on the support of industry complying with their legal obligations.
170	German Competent Authority	3	6	3-23	Rather than highlighting ECHA as the main source of scientific knowledge and technical know-how, ECHA's core competences regarding dossier evaluation and risk management should be in the focus of this section (and of the strategic plan in general).