Closing remarks

Tenth Stakeholders' Day

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Thank you for being with us

- More than 200 of you here
- Over 400 online
- 20 questions online
- 61 one-to-one sessions
- 69 Tweets today!
- 50,000 Twitter accounts reached
- 40 mentions by our followers

Very strong common messages

- The clock is ticking – don’t wait
- Lots of support available – use it
- Lots of advance notice available – get ahead
- Communicate thoroughly and openly
- Engage with downstream users – and vice versa
- Make your case well, justify and document, be concise
- Keep your dossier updated – don’t wait
- Your future is in your hands…

REACH 2018

Registration

- Lots of support:
  - ECHA website, Sector organisations, National Help Desks, Experienced partners, Registered substances, QSAR toolbox, Cefic Long-range Initiative, Sector use-maps, ENES Network and tools
- New things coming:
  - IT tools, alternative test methods
- SIEF:
  - Transparent: Clear letter of access, SIEF agreement
  - Non-discriminatory costs: based on tonnage band, cheapest financial option for registrant

Challenges and ideas

- Complex supply chains – estimating 2018 volumes can be hard
- Lack of understanding “where is REACH?”
- Letter of Access costs: ask for clarity, does it cover data that you need?
- Improve reporting of in-vitro studies
- More clarity on:
  - Getting “old” data
  - How to manage deal with lead registrant dossiers with poor quality data
- Reaching the unaware

Improving dossier quaity

Successful evaluation

- New compliance check strategy, clear priorities
- Help yourself:
  - Keep up to date
  - Use ECHA website - forewarning and advice
  - React to ECHA letters/decisions quickly
- Get ready – CoRAP, PACT, compliance check list
- Keep your dossier updated
- Contact the evaluating authority

Appealing against decisions

- You can appeal
- Clarifies specific case but also legislation
- Help yourself:
  - Check the decision summaries
  - Appeal in time
  - Make your case yourself!
  - Keep correspondence
  - Explain reasons for adaptation or waiving

Challenges and ideas

- Needs to run without being over bureaucratic
- Parallel processes – compliance, substance, biocides
- Cosmetics/REACH interface
- Focus on detail and ignoring weight of evidence
- Can SONCs be appealed? Dialogue with ECHA?
- Consult industry before RMOA

Risk management

Risk management

- Starts in the company
- Apply for authorisation when you're convinced you need it – it's serious
- Authorisation works, but watch out!
  - Consider the future of your substance
  - Organise in time
  - Define appropriate level of submission
  - Strong exposure evidence
  - Build case for review period
- Respond to public consultations

Alternatives to authorised substances

- Substitution tools
  - SIN list
  - SINimilarity
  - SUBSPORT
- Public consultations crucial for success of REACH and innovation

Challenges and ideas

- Too much, unclear information – makes consultation hard
- Not clear uses
- Improve webpage
- Communicate with parties having provided input
- Improve reach of consultations

And finally…

- Please give us your feedback – http://www.echa.europa.eu/sd10fb

- Safe journey home!

See you next year!

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