

Breakout Groups feedback

Workshop on Substance Brief Profiles

06 November 2014



Structure of discussion

Actors

Who should provide/have access to the information/comment

Format

How would you like to receive / provide the information

Type of information

Which questions would you like to have answered / which information would you like to receive / which type of issues should be addressed

Strength, Weaknesses, Threats and Opportunities

What are the strength, weaknesses, threats and opportunities of implementing a dialogue tool between registrants and third parties (direct and indirect impacts)

The focus is the concept not the technical implementation

Results from Breakout Group 1

Rapporteur:
Anna-Maria Zeller



Possible actors

- NGOs
- Companies
- Other registrants of the same substance
- Registrants of substitutes
- Downstream users
- CAs (?)
- Non-EU Governments
- Other agencies (EU/Non-EU)

- Special actor: ECHA

Possible actors – Questions raised

- Identify yourself?
- Would CAs use this platform (semi-official way of communication)?
- Would ECHA validate the comments or only act as an observer?

Possible type of information

- Classification
- DNELs/PNECs
- Uses
- Safe uses
- New studies

Strength, Weaknesses, Threats and Opportunities

- Full open communication, all parties aware

Strength, **Weaknesses**, Threats and Opportunities

- Consider – what if no reaction
- Resources needed
 - IND -> respond
 - ECHA -> monitor

Strength, Weaknesses, **Threats** and Opportunities

- “Mickey-Mouse” comments
 - Waste of resources (IND/ECHA)
- Competitors: Misuse?

Strength, Weaknesses, Threats and **Opportunities**

- Data quality
- Improve the image/trust of IND
- Improve of consumer trust in chemicals
- Stimulate IND -> invest in REACH
- Highlight the competitive advantage EU/Non-EU
- Competitors with valid data
- Potential channel for other Non-EU states or other agencies to communicate with IND
- Potential platform for inquiries (Art. 23?)
- cc etc. broadcasting channel

SWOT analysis summary

Strengths

- Full open communication, all parties aware

Weaknesses

- Consider – what if no reaction
- Resources needed
 - IND -> respond
 - ECHA -> monitor

Opportunities

- Data quality
- Improve the image/trust of IND
- Improve of consumer trust in chemicals
- Stimulate IND -> invest in REACH
- Highlight the competitive advantage EU/Non-EU
- Competitors with valid data
- Potential channel for other Non-EU states or other agencies to communicate with IND
- Potential platform for inquiries (Art. 23?)
- cc etc. broadcasting channel

Threats

- “Mickey-Mouse” comments
- Waste of resources (IND/ECHA)
- Competitors: Misuse?

Results from Breakout Group 2

Rapporteur:
Adriana Jalba



Main comments

- Summary - key points:
- Registration of the contributor should be mandatory
- Uncertainty on how to filter the relevant contributors
- HOW: Private/ comment/ forum – more disagree with the forum idea
- Open discussion/ forum will give raise to resources issues for both ECHA and industry
- Type of info: new data available, spotting errors (maybe due to aggregation?)
- Template to provide consistent and meaningful input? – it will be this sufficient? It will help to improve data quality?

SWOT analysis summary

Strengths

- Possible way to provide information
- Good tool to provide information on Brief Profiles data aggregation

Weaknesses

- Brief Profile does not provide the level of information needed / not the place to do CCH
- How to ensure the information relevance

Opportunities

- Help Industry improving Data

Threats

- Work overload ECHA / IND
- To many irrelevant comments

Thank you!