

REACHing the 2020 goals

Break-out group 3

Regulatory Risk Management (1)

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Key areas

- Data quality and availability;
 → do we get the information we need?
- Supply-chain communication;
 → is this information being used?
- Regulatory Risk management;

→ do we address substances of concern quick enough?

Take stock on the current implementation and come up with tangible ideas for further improvement!



Questions covered

- 1. Which regulatory risk management measures to be used for which type of case? Can we get policy agreement
- 2. How to achieve the SVHC Roadmap goals

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- 6. How to increase the number of CLH dossiers
- 7. How to improve the convergence of C&L notifications
- 8. Appropriate resourcing if the Committees



RMOA/understanding impacts

- What: Develop an early 'impression' of socio-economic consequences in RMOA phase based on (available) information on uses
- Why: to build step-wise understanding of the wider impacts of the regulatory options

Annex XIV inclusion is based on ECHA recommendation and takes into account additional policy aspects, as appropriate.

Assumption: with the Roadmap implementation, it is expected that there will be less new issues coming up in the Annex XIV phase

- How:
 - Define (proportionate) key information and consideration, develop examples and best practices. Make public for transparency. Discussion in RiME as a starting point.
 - Industries' RMOAs in early phase of the process
- Time: ongoing, continuous improvement



Information for decision making (1/2)

- What: activate industry to improve the registration information on uses
- Why: ensure that authorities can identify appropriate substances for regulatory action
- How:
 - Continue informing early of substances in authorities' radar screen; using letter campaigns, art 36 etc
 - Develop further approaches to have a wider focus and 'spotlight effect' e.g., per function, use or sector (rather than per substance) which complements the common screening approach; identify an example sector: RiME to discuss
 - Initiate discussion with industry to identify incentives for spontaneous improvement of data, make use of industry with experience on regulatory processes



Information for decision making (2/2)

- What: Use of other information sources (enforcement, authorities responsible of other legislation, other databases)
- How:
 - more interaction between authorities responsible for different legislation on EU (COM) and national level
 - Complement common screening with information from other databases (non-EU, EU), projects, monitoring data



What: More CLH where harmonised classification has biggest impact on safe use.

Why: to increase number of substances for SVHCs identification and achieve the SVHC Roadmap goal and beyond. To make full use of CLH as a RRM.

How

- MSCAs to make full use of common screening which identifies candidates also for CLH process, consider the regulatory impact
- Ensure that manual screening/CCH/SEv conclusion that CLH is needed is followed up
- Consider to give higher priority to CLH
- Explore possibilities to encourage industry CLH dossiers following self-classifications, understand the reasons for low number of industry dossiers



Make full use of CLP

What: achieve increased convergence of selfclassification

How

- Explore needs to amend CLP to strengthen the notification approach
- Address in combination with other item (e.g., work on supply chain communication, SDS)
- Combine the message to other awareness raising activities
- Consider specific awareness raising activity (MSCAs, COM, ECHA, industry associations)



Functioning of the Committees

- Plea for more economic expertise to support SEAC
- Increase awareness at policy level that the workload of the Committees will remain after 2018 registration deadline