Workshop proceedings
4 April 2016

Workshop on 'REACH(ing) the WSSD 2020 goals'

1. Introduction

On 27 and 28 of January 2016 the European Chemicals Agency organised in Helsinki a workshop on 'REACH(ing) the WSSD 2020 goals'. The objective of this workshop was to discuss how the current implementation of the REACH and CLP processes are contributing to the WSSD 2020 goals and to agree on actions that can be taken to further increase the overall contribution. In total 87 representatives of Member States authorities, the European Commission, ECHA, Industry organisations and NGO participated in the event[1].

The discussions in the workshop focused on three main elements of REACH and CLP implementation:

1) The extent to which registration, evaluation and any other mechanisms/instruments sufficiently ensure the availability of good quality information on uses, hazards and exposures of chemicals throughout their life-cycle
2) The extent to which the tools and methods developed for supply chain communication are effective (and in use) to ensure safe use of chemicals at company level, in particular for those chemicals that are not specifically addressed by the authorities
3) The extent to which the regulatory risk management processes are functioning adequately and with the right speed to address substances of concern

2. Background

The World Summit on Sustainable Development (WSSD) in 2002, as part of the Johannesburg Plan of Implementation adopted the chemicals goal that "by 2020, chemicals are produced and used in ways that minimize significant adverse impacts on human health and the environment". Regulation (EC) 1907/2006 on registration, evaluation and authorisation of chemicals (REACH) and Regulation (EC) 1272/2008 on the Classification, Labelling and Packaging of substances and mixtures (CLP) were developed as part of the European Union's contribution to meeting the WSSD 2020 goal.

The ECHA Management Board specifically requested the ECHA secretariat to reflect which further actions would be necessary to contribute to achieving the "REACH 2020 goals". In addition, 2016 will be the third year of implementation of ECHA's Multi-Annual Work Programme 2014-2018 which has as its main aims to improve the quality of information on chemicals and to make best use of this information for risk management and control.

[1] A list of participants can be found in Annex 1

Given that nearly eight years have passed since the entry into operation of REACH and less years are available to ensure that the existing legislation provides an optimal contribution to reaching the WSSD goal, it is opportune to take stock of the situation and together with the Commission, Member States and Stakeholders and specify further actions that could be taken in the coming years. At the same time the current way of REACH and CLP implementation should not only be reflected in the light of the WSSD goals but also take into account relevant new(er) developments such as the 7th Environment Action Programme and the concept of Circular Economy.

3. Welcome and Introduction to the Workshop

The opening address for the workshop was provided by Daniel Calleja Crespo, Director General for the Environment, European Commission. In his speech Mr Calleja provided the policy background and explained that the REACH and CLP Regulations are two of the most important instruments that the EU has developed for achieving the WSSD goals. He reiterated the main objectives of the Regulations; (1) bridging the knowledge gap that existed on almost all the chemicals on the market, (2) creating adequate and transparent assessment procedures, (3) reversal of the burden of proof on industry to demonstrate that the chemicals they produce can be used in a safe manner and finally (4) the promotion of innovation and competitiveness of the EU industry. He referred to the fact that in terms of data availability a lot has been achieved so far but that the challenge is to put the knowledge to good use and minimise the adverse effects of chemicals on health and the environment. He emphasised that from an environment point of view there are still a number of challenges with chemicals which were also identified in the 7th Environmental Action Programme, namely: how to deal with the combined effects of chemical mixtures and how to tackle chemicals in products? He then referred to the Commission's recently launched "circular economy package" and stressed that "to close the loop" and tackle all phases in the lifecycle of a product - from production and consumption to waste management and the market for secondary raw materials - we need to ensure the safe use of recycled materials. This implies we need better knowledge on what chemicals are present in which products from the onset. This work closely links to the further development of the EU chemicals policy where the Commission is developing a strategy for a "non-toxic environment" which must be delivered in 2018.

Mr Calleja furthermore explained how the REACH review fits into the REFIT exercise and explained the Commission's intentions to check whether and how a less costly framework for business, workers and citizens can be created. At the same point, he stressed that the protection of health and the environment and international commitments such as the WSSD goals cannot be compromised. Mr Calleja finalised his opening address by bringing to the attention of the audience the new Sustainable Development Goals that were recently set by the international community. In particular, SDG Goals 3, which is about ensuring health and wellbeing, and 12, which is about ensuring sustainable consumption and production patterns, build strongly on the successful implementation of the WSSD goal that by 2020 we must achieve the environmentally sound management of chemicals and all wastes throughout their life cycle in order to minimise their adverse impacts on human health and the environment. He stressed that all parties involved, Member State competent authorities, enforcement authorities, ECHA, the Commission, industry and NGO's will need to play an active role in

improving the implementation of REACH and CLP!

The opening address was followed by an introduction to the workshop provided by Jack de Bruijn, Director Risk Management of ECHA (see Annex 2). Mr de Bruijn explained to the workshop participants the background and objective of the meeting and stressed in particular the need for the participants to take stock on the current implementation and come up with tangible ideas for further improvement. He then continued with providing a helicopter view on what, according to ECHA, has been achieved so far with REACH and CLP implementation and what further work is needed and planned for the coming years. With respect to one of the key questions whether the pre-REACH knowledge gap is going to be closed, he concluded that we are clearly on the right track and that the wealth of information that has and still will become available has great potential to help educate manufacturers, retailers and consumers, to handle chemicals safely and make safer choices about what they make, sell and buy. Nevertheless, further work is needed to improve the data availability and quality. Turning to the second important question, whether safe use is achieved, he concluded that there is clear evidence that REACH information is being used for replacing chemicals of concern, that communication up and down the supply chain is increasing and the quality of SDSs is gradually improving. Still there is quite some work to do to make sure that useful safety information reaches the companies at the end of the supply chain. He furthermore stressed that authorities' should further align their views on the best regulatory action to take when concerns for a specific substance have been identified and that these actions are then taken swiftly. Mr de Bruijn continued with explaining the Regulatory Strategy for "substances that matter most" which ECHA has recently developed. Key to this strategy is the intention to better integrate the REACH and CLP processes to ensure that when a specific concern has been identified, efficient follow-up takes place through compliance check or substance evaluation, Risk Management Option Analysis (RMOA), followed by, where relevant, proposals for harmonised classification and labelling (CLH), for SVHC and/or restrictions. Through this strategy, ECHA, together with MS authorities, should ultimately also be able to conclude where action is needed but should as well be in a position to communicate more clearly for all other substances that they are currently of no or lower priority for regulatory action. Finally, Mr de Bruijn introduced the further organisation and structure of the Workshop and stressed the overall aim of arriving at recommendations that are specific, relevant and achievable within the time available until 2020.

4. Discussion on General Topics

After a short intermezzo where the participants in a world café setting were introduced to the discussion items for the breakout groups that had been identified in advance by the organising committee (see Annex 3), the workshop continued with a plenary session on seven general discussion topics (see Annex 4 for the full list). This discussion was chaired by Mr Jukka Malm, Deputy Executive Director of ECHA.

4.1. Increasing the integration of REACH and CLP processes?

The discussion item was shortly introduced by Christel Musset (ECHA) who referred to recently developed Regulatory Strategy and posed the question of what could be done to further

optimise the full REACH/CLP system vs. optimising each process individually with the risk of missing the aim. In addition, she stressed the need to try to optimise our work in terms of scope and ambition level to maximise the outcome, for instance by having a critical look at whether all steps are needed in all cases.

In the discussion several participants stressed the importance of integration of REACH and CLP processes, to understand well the mechanisms by which they work and to search for the most effective and impactful ways of implementation. Further prioritisation might be necessary as well. It was mentioned that the availability of information for all substances is key as it will provide an equal playing field and hence a basis for further decision-making by industry for instance in the context of transferring to safer alternatives. The importance of having clarity on the substance identity was stressed as a backbone for regulatory processes such as CLH. Some raised concerns that the CLP criteria would request data for long-term endpoints that would not or rarely be fulfilled under REACH. Others were of the opinion that the regulations were meant to allow decision-making on the basis of limited information. Another point that was raised was to start looking for the more difficult/complicated substances rather than keep focussing on the well-known cases. Overall the participants were of the view that understanding the impacts of taking actions as well as of not taking action, both in terms of costs and benefits would be of help.

4.2. Respect the main paradigm change

The second item was introduced by Jack de Bruijn (ECHA) who explained that REACH is based on the paradigm change where the burden of proof for safe use is on industry. However, when (valid) criticism of the functioning of the Regulation is aired, e.g. in relation to the inadequacy of the available information and the slowness of certain regulatory processes, the reaction to this criticism is often to implement more stringent 'control' measures by authorities. Hence the question put forward was whether we should rather look for (business) incentives that could help/reward pro-active companies.

In the discussion one industry representative highlighted the fact that in many companies a lot of work was done in preparation for the first two registration deadlines which unfortunately have created the impression (e.g. at CEO level) that REACH would be over after 2018. Workshops like this one help to make clear that this is not going to be the case but significant communication on this issue is still needed. This was confirmed by another industry representative who stated that industry has initially probably taken the shift in burden of proof too easy but now it starts to realise better the job that needs to be done. He raised furthermore the importance of getting more clarity on the key questions that need to be answered, in particular with a view of the need for regulatory risk management actions. Several NGO representatives highlighted the importance of taking regulatory action in cases where the necessary information is not provided and that more precautionary decision-making could be used as a stick to ensure that companies fulfil their obligations. Reference was as well made to not accepting applications for authorisation that lack important information for decision-making. Several MSs representatives indicated that focussing on strict compliance may not be good enough and that the challenge lies in finding the right business and economic incentives that would lead to companies making high quality dossiers and safety advice an inherent part of their business strategy. Finding ways to somehow reward pro-active companies could be part of such a strategy.

4.3. Are we able to demonstrate the benefits of the legislation?

Wim de Coen (ECHA) introduced the third discussion item and explained the dilemma that while we see many positive effects of the REACH Regulation, for instance in terms of new information now available through the dissemination website, the generation of new effects data through evaluation processes, the shift to safer alternatives for SVHCs, the challenge remains to explain the benefits of all parties' work - which is often highly technical and scientific - to policy makers and to the public at large.

The participants recognised the challenge and agreed there's a need for good 'stories' that can exemplify the positive effects of the introduction of the REACH and CLP Regulations. Reference was made to possibilities of using the information generated by REACH as a basis for selling sustainable products as well as to support implementation by industry and authorities of other legislation, to the potential positive effect on trade as a result of the worldwide harmonisation of the classification criteria and to more effective use of Member States' resources, for instance through the coordination of risk management and enforcement activities at EU level. It was furthermore stressed that some of the problems that industry foresaw in the REACH implementation (authorisation of certain substances by the aerospace industry, registration of essential oils) were efficiently tackled by working in close cooperation between authorities and industry organisations.

4.4. Are there sufficient links with other legislation established?

Elina Karhu (ECHA) explained the fourth discussion topic which was whether there are sufficient links with other legislation established to ensure that REACH/CLP information is used effectively? She explained that some exploratory work has been done to look into how companies at different levels in the supply chain could effectively use the REACH information for the benefit of complying with other obligations under environmental, workers protection, products or waste legislation. Similarly she highlighted options for authorities to better align REACH implementation with other areas, for instance through harmonisation of assessment methods or priority setting approaches.

Participants who intervened in the discussion agreed that there are many options for better integration and collaboration that should be further explored. Reference was made to areas where some promising initiatives have been taken such as the REACH/OHS tools developed under the Exchange Network on Exposure Scenarios (ENES) or the work done under the construction products directive that follows fully the REACH information and guidance. Another example brought to the attention of the meeting was the link between REACH and the Water Framework Directive (WFD) where in one specific case through the implementation of the restriction proposal the environmental quality standard set by the WFD could to a large extent be reached. Several participants on the other hand noted the difficulties in setting up collaborations between different authorities who are often not fully knowledgeable of each other's areas of work and hence may not fully appreciate the benefits, including those for companies having to deal with different obligations. Overall, it was concluded that this is an area where the Commission, ECHA and the Member States could join forces with industry to find opportunities for streamlining and better integration of working practices and processes.

4.5. How can ECHA better support third countries?

Elina Karhu introduced how ECHA could better support third countries, for instance by looking how the amount of data and information from REACH could be useful for other countries in their national chemicals management. Reference was specifically made to the need for co-operation to increase information on substances in articles, as these are an important source for chemicals entering the EU and potentially affecting human health and the environment.

In the discussion one of the Commission representatives indicated that there are many opportunities for ECHA to further promote the REACH methods and deliverables in an international context. Other participants indicated that cooperation with international organisations such as UNIDO on implementing chemical policies could be further explored. The meeting participants stressed the fact the specific needs of developing countries should be well analysed to ensure fit-for-purpose and targeted support rather than handing over a wealth of information that countries may not be able to handle in practice.

4.6. Improved promotion of substitution of hazardous substances?

Matti Vainio (ECHA) introduced the item on how to further improve promotion of hazardous substances and explained that substitution often takes place invisibly as it is usually part of companies' R&D activities. He reported that ECHA nevertheless sees more and more companies adopting a corporate policy to avoid hazardous substances (driven e.g. by Classification, Candidate and Annex XIV Listing). Discussions were held on how substitution could be promoted through other means (e.g. better flow of information, new institutional arrangements) and whether more or other actions should be taken by industry, NGOs, Member States, ECHA and the Commission to promote substitution and make better use of REACH/CLP information.

In the discussion, one NGO representative noted that proactive companies generally want strong legislation and want to see substances that need to be substituted listed on regulatory lists as this drives innovation and provides insurance to their management that the efforts taken to replace a substance are well placed. Reference was also made to the need to publish more information on available alternatives in certain sectors or applications that other companies can make use of. One of the challenges will be to bring the chemicals producing industry in closer contact with the actual users so that the communication on the supply-chain needs for safer alternatives is enhanced. Further suggestions were made for ECHA or MS helpdesks to play a more active role in helping downstream users with finding alternatives for SVHCs once these are placed on the candidate list. It was recognised that in order to do this work efficiently, it would need a substantial improvement of the information on the actual uses of substances compared to what is now in the registration database.

4.7. Understanding of socio-economic aspects of regulation

The last discussion item was introduced by Matti Vainio (ECHA) who explained that while having an understanding of the socio-economic aspects of taking regulatory measures is often put forward as a prerequisite and could increase their acceptability, this brings as well questions in which phase this information needs to be available, and at what level of detail? Moreover, it is important to ensure that the process for collecting and discussing the socio-

economic aspects is transparent and that all interested parties have equal opportunities to provide their views and input both on the costs and benefits side. Another question is how to ensure that an overall (societal) view of the costs and benefits is obtained, including those of the alternative providers.

Due to time constraints, this item was not further discussed in the plenary meeting but transferred to the risk management breakout group(s).

5. Discussions in Breakout groups

The workshop discussions continued in four break-out groups, one on data quality and availability, one on supply chain communication and two on regulatory risk management. The groups used the list of discussion items that was prepared in advance of the workshop (see Annex 4) as a basis. The results of the discussions were presented and discussed in the plenary meeting on the second day of the workshop after which the groups worked further to finalise their proposals. In the concluding session on the afternoon of the second day the participants took note of the final recommendations and provided comments as appropriate. The main recommendations are provided in the next section. The recommendations from the two risk management groups were combined into one list. The full reports of each break-out group are available in Annex 5.

6. Main Recommendations

6.1. Recommendations on Data quality and availability

Dossier quality for the 2018 deadline		
Topic	**Challenge**	**Recommendation**
1. Language	Simple and own EU language necessary. Go beyond what is on website	1. ECHA to make video tutorials that can be reused, translate if possible. 2. MSs / Associations to organise workshops, convey the tutorials / material from ECHA (Train the trainers).
2. Outreach	SMEs not in chemical associations that are dealing with REACH. Many are not aware of their obligations	1. MSs to use national & local chambers of commerce. 2. MSs to contact associations even outside the traditional ones, send them newsletters etc. 3. MSs to organise national workshops. 4. ECHA/MSs to collect and publish list of associations that can provide support

		to SMEs or at least direct them towards right address.
3. IUCLID	Too complex for SMEs	1. ECHA to prepare a webinar/tutorial to make a demo, translated in all languages.
4. Support to SMEs	SMEs dependent on consultants (cost issue) Timeline for registration MS Helpdesks will be submerged by questions Economic crisis hampering MSs' capacity	1. ECHA to raise awareness on non-ethical behaviour of some consultants/ORs. 2. ECHA to encourage companies to start early, as soon as IUCLID 6 is released. 3. Commission to alert MSs ministries at the Council level of the importance of chemicals and resources needed at MS level. 4. Workshops organised by ECHA/MS with those preparing the dossiers incl. consultants to explain the quality expectations, especially on read-across/waiving.
Compliance of existing dossiers		
1. Conflict between processes	2018 registration is a priority for many companies while at same time CCH & SEV, RMOAs etc. ongoing	1. Process owners (Authorities) to check that pre-conditions are in place e.g. registration exists (e.g. for CLH proposals) before initiating action. 2. Authorities to look better at the priority of the actions in light of the objectives (e.g. ECHA with the soft measures).
2. Update of existing dossiers	To reach the 2020 goal it is a continuous process to register and update the dossiers	1. COM, MSs and ECHA to prepare a joint letter to inform the CEOs of the needs to keep resources for REACH implementation. 2. Industry is committed to proactive improvement of certain dossiers on a voluntary basis.
3. Outsiders, bad behaviours	Some ORs have taken the role of LR with poor quality dossiers – others do not want to join (NB: Implementing Regulation forces joint submission)	1. Registrants can use opt-out but then ECHA to consider action on those clear issues of data quality between existing registrants and newcomers. 2. MSs and industry associations can also alert ECHA/national authorities to act by presenting precise cases and facts.

4. Promote good dossiers & efforts done by industry	Seven years of work and industry is always only hearing complaints. No recognition of good work	1. ECHA to consider using more real examples of good quality dossiers or good robust study summaries/data packages. This option needs to be explored further with industry associations. 2. ECHA to consider a comparison of good dossier with bad dossier to illustrate the deficiencies.
5. Sticks	Not enough sticks when dossiers are not compliant, hence no consequences, hence no stimulation to update spontaneously	1. ECHA to explore further the possibility to use revocation and link it to the national enforcement authorities – in cooperation with MSs (ECHA Forum interlink procedures). 2. ECHA to continue to use this threat. Experience so far is that already the threat of revocation triggers updates which make actual revocation unnecessary.
6. Promotion of data quality / Confidence in the data	Some data selected by the SIEFs – what if 3rd parties have relevant data? How to take into account data from newcomers in existing registrations? Not sufficiently clear on the website whether the data has been "validated" by ECHA/MS (i.e. which dossiers have been evaluated) If data are "validated" that could facilitate their use for other legislation	1. ECHA to explore the possibility to enable registrants to contact 3rd parties e.g. via a forum on the ECHA website. However it is up to the registrants to decide whether they want to base their assessment on this new information. 2. ECHA to work further on making clear which dossiers went through compliance check, and with what outcome on the website. 3. Recommendation is to use the data even though they have not been checked under dossier evaluation, but possible limitations (e.g. quality) should be taken into account depending on the purpose for re-using the data and the legislative process.
7. Transparency/ dialogue	Not always possible to have a dialogue with ECHA/MS before regulatory process –	1. Based on good experience in certain MSs, all MSs are encouraged to organise informal dialogues

	differences of behaviours across MSs	/consultation with registrants before starting a SEV, RMOA. 2. MS with good experience can share this with other MS. 3. Authorities to announce specific interest for certain sectors.
Improving volume, use and exposure information		
Getting info on use/volume	Difficulties with non members of consortia or ORs and importers. Difficult to motivate the DUs as they do not see how REACH impacts them	1. Industry associations or sectors should get organised to clarify the downstream uses, e.g. sector-specific workshops. 2. Industry associations and authorities should promote the tools already developed by ENES. 3. MSs/ECHA to use proactively Art 36 for getting information from both M/I and DUs.
	DUs do not want to provide their uses to the manufacturer	1. Registrants should confront their customers with the consequences of not providing their uses (incl. advise against such uses; in that case DU would need to do a DU report – Art 38). 2. Registrants should communicate clearly what uses are supported by the registration. 3. The Forum to explore the feasibility of a pilot project on DUs respecting the compliance with the registered users.
	Reach out to DUs	1. ECHA's campaigns to increase the visibility of DUs obligations. MS can be multipliers.
Substance identity (SID)		
UVCB	By their nature it may not be possible to fully describe the substance. Uncertainty to relate the SID information with the hazard data set. Test is done on a sample and difficult to understand	1. Registrants are responsible for ensuring that the SID information provided can be linked to the data and is fit for purpose. 2. Registrants to make use of IUCLID 6 to revaluate the data. 3. Registrants to make use of the Substance Identity Profile for ensuring transparency (explain that the

	whether the results are representative for all compositions covered by the registration	boundaries are fit for purpose) and the information on the tested substance. 4. ECHA to use soft measures to the extent possible if authorities need to take action.

6.2. Supply chain communication

Improving the availability and usage of good quality information on use and exposure along the supply chain.		
Topic	**Challenge**	**Recommendation**
1. Improving information on conditions of use	Making companies/sectors invest in implementing the supply chain machinery	1. Explain the communication cycle and the elements of the "machinery" in simple terms: make it popular and understood. Explain the incentives/benefits at the level of the different supply chain actors. 2. Downstream user sector organisations get active to generate sector use map information to characterise the uses/use conditions in the markets of their membership. 3. Appoint person at company level to translate exposure scenario information into instruction for operators. 4. National authorities (Helpdesks, inspectors) more intensively educate/inform SME downstream users not belonging to an active sector organisation; raise awareness on potential business problems if they stay passive.
2. Safe use of mixtures	Translating exposure scenario information for substances into safe use information for mixtures Ensure that information needed for safe use (hazard and risk management) is communicated through the	1. Methods/Solutions developed under the CSR/ES Roadmap are ready for implementation by industry: Lead Component iDentification methodology; Safe Use of Mixtures Information. 2. Roll out and implementation of solutions depends on sector use maps. Use maps start the information cycle, based on which registrants then communicate downstream the safe use

	supply chain to end users	information. 3. National authorities will still need to support SME formulators with no access to active sector organisations.
3. Achieving a communication cycle that becomes self-sustained	Creating the business demand for quality safe use information	1. Find out the barriers. 2. Good practice examples on successful supply chain dialogue. 3. More sectors to join those trade associations that already belong to the Downstream Users of Chemicals Coordination (Ducc) Group and are active in this field.

6.3. Regulatory Risk Management

Regulatory Risk Management		
Topic	**Challenge**	**Recommendation**
1. SVHC Roadmap	The machinery is in place. Tools and coordination mechanisms are sufficient and should be used	1. Better information on uses is needed from industry in order to focus on substances that matter and have highest and most efficient impact of regulatory action. 2. MSs who are initiating the development of an RMOA should clarify towards stakeholders that they are seeking for information, including any specific types of data.
2. Identification of substances for regulatory action	Activate industry to improve the registration information on uses	1. Continue informing early of substances in authorities' radar screen; using letter campaigns, art 36, PACT, etc. 2. 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. 3. Initiate discussion with industry to identify incentives for spontaneous improvement of data, make use of industry with experience on regulatory processes.
	Identify and use other information sources	4. Improve the use of enforcement information. 5. Collaboration with authorities responsible of other legislation. 6. Effective use of national research and monitoring programmes.

3. RMOA	Scope of RMOA as currently practiced is agreed. Policy steer is needed but may be difficult to achieve To build a **step-wise** better understanding of the wider impacts of the regulatory options	1. MSCAs and ECHA/COM to develop an 'impression' of socio-economic consequences in RMOA phase. Further discussion is needed on the nature and depth of the analysis. 2. Both consequences of action and of inaction should be looked at; this can include costs if desired. 3. RiME should assess current practice in reflecting socio-economic consequences in RMOAs and suggest any necessary adaptation. 4. Key deciding factors in RMOAs should be made more explicit and be communicated to stakeholders. First analysis to be made by RiME, and then brought to CARACAL as appropriate. 5. Industries' RMOAs could be used in early phases of the process.
4. Authorisation	How to ensure fit-for-purpose upstream applications for authorisation	1. ECHA should clarify to what information (nature and quality) is expected, so that (1) the circumstances of potential rejection can be clarified, and (2) RAC/SEAC efficient opinion-making is supported. 2. Authorities to discuss further what is the most effective way of achieving safe use: requiring detailed use descriptions for DUs in upstream applications, or setting additional operational conditions in the decisions?
5. Restrictions	To consider using restrictions for a wider range of issues Burden to gather information on costs and impacts for developing RES proposals is still perceived to be high	1. MSs could consider restrictions; a) for uses advised against b) to cover grouping from hazard or use perspective c) to including alternatives from the start (to avoid regrettable substitution). 2. Consider accepting that missing information in Annex XV dossier can come later in the process (e.g. public consultation)? 3. ECHA to apply this e.g. for proposals for Annex XIV substances in articles?
6. CLP	Initiate CLH where harmonised classification has biggest impact on safe use.	1. 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; to give higher priority to CLH.

		2. Explore possibilities to encourage industry CLH dossiers following self-classifications, understand the reasons for low number of industry dossiers.
7. CLP	Achieve increased convergence of self-classification	1. COM to explore needs to amend CLP to strengthen the notification approach. 2. Combine the message to other awareness raising activities (MSCAs, COM, ECHA, industry associations). 3. Consider specific awareness raising activity (MSCAs, COM, ECHA, industry associations).
8. Substances in articles	How to improve the information on the use of substances in articles, which is still very limited, and its communication through supply chains?	1. A workshop between MSs, COM, ECHA and stakeholders is recommended to agree on means to ensure better compliance and understanding of SiA. 2. This discussion should feed the policy discussion on the interrelationship between REACH and the circular economy.
9. Committees	Ensure appropriate resourcing of the Committees, also for the future	1. Plea for more economic expertise to support SEAC. 2. Increase awareness at policy level that the workload of the Committees will remain after 2018 registration deadline.

7. Follow up

ECHA will present the draft proceedings of the workshop to the CARACAL meeting in March 2016 for discussion. Based on the discussion and responses received, the report will be finalised and published.

The outcome of the workshop will furthermore be used by ECHA when developing its 5-year report on the operation of the REACH Regulation (article 117(2) report) which is due in June 2016. In addition, some actions that may follow from the more specific recommendations will be included in ECHA's Work Programme for 2017 (and for the years beyond).

Member States, Commission, industry and other stakeholders are advised to take note of the recommendations and further plan and target their actions to improve REACH and CLP implementation.

Annexes:

Annex 1 - List of participants

Annex 2 - Introduction to the workshop

Annex 3 - The Organising Committee

Annex 4 - List of discussion items

Annex 5 - Reports from the break-out groups