HelpNet CLP Workshop: summary of discussions

Time: 27 November 2019, 9:00 – 17:30
Place: Marie Skłodowska Curie conference room, ECHA, Helsinki

The HelpNet CLP Workshop was organised for HelpNet CLP members and observers on 27 November 2019. This document summarises the topics discussed, the conclusions reached[1] and the action points agreed during the meeting.

The main focus of the workshop was to look into ways of providing harmonised advice to industry on the upcoming obligations related to poison centres. The challenges of national helpdesks (NHDs) dealing with the harmonised classification process were also discussed.

Opening of the workshop

The Chair, Erwin ANNYS (ECHA), started working at ECHA in June 2019 as the Head of the Support and Enforcement Unit, after a long career in chemical manufacturing companies, and chemical industry associations. He started at the Belgium association and worked at Cefic on REACH, GHS and CLP for 16 years.

He opened the CLP Workshop and welcomed representatives of the CLP NHDs, observers from industry, and representatives of Albania, Bosnia & Herzegovina, Kosovo and Serbia, benefitting from the Instrument for Pre-Accession project (see Annex I – List of participants). The HelpNet members and observers not attending the meeting had the opportunity to follow the event remotely[2].

The Chair introduced the agenda of the day, and it was adopted without comments.

1. Regulatory update on Annex VIII to CLP: changes and timelines

An JAMERS (DG GROW, European Commission) presented the regulatory aspects and upcoming amendments of Annex VIII to CLP[3]. In 2017, to harmonise information requirements and the format in which information has to be submitted to appointed bodies , the regulation[4] adding Annex VIII to CLP was adopted.

In the context of forthcoming amendments, she emphasised the difference between compliance date and date of applicability. The notification obligation on hazardous mixtures applies since the entry into force of CLP.

[1] The text of the CLP Regulation is the only authentic legal reference and this workshop summary does not constitute legal advice.
[2] Representatives of nine national helpdesks (Cyprus, Finland, Iceland, Italy, Liechtenstein, Lithuania, The Netherlands, Slovakia and Spain), and one industry observer (FECC) followed the event on WebEx.
[3] Regulation (EC) No 1272/2008 of the European Parliament and of the Council on classification, labelling and packaging of substances and mixtures.
[4] Regulation (EU) 2017/542 on information relating to emergency health response.

The first amendment to Annex VIII to CLP was adopted on 29 October 2019 with a scrutiny period ending on 29 December 2019. The amendment moves the first applicability date, for mixtures supplied to consumers, to 1 January 2021. The legal act is expected to enter into force by mid/end January 2020. It retroactively amends Annex VIII, leaving a gap between the initial applicability date of the Annex VIII on 1 January 2020 and the entry into force of the first amendment. A second amendment – addressing workability issues claimed by specific industry sectors – is currently under discussion and is expected to enter into force in July 2020.

After the presentation, several aspects were further discussed and clarified.

The first was that the unique formula identifier (UFI) is not a product identifier, therefore the normal rules for supplemental information apply to it, namely Article 29 and Annex I.5 to CLP. Moreover, biocidal products for professional and industrial use under the Biocidal Products Regulation (BPR) are not exempted from CLP, nor from the use of the UFI.

Secondly, for the sake of documenting that the properties are virtually the same in the Interchangeable Components Group (ICG), ECHA suggested to bring it to the Forum. As for reporting the concentration, the Commission insisted that this would need to be done only at ICG level, following the example in the slides. The concept and use of ICG still needs refinement, mostly at format level, and probably at guidance level. Furthermore, An Jamers considered that Annex II to REACH, dealing with safety data sheets (SDSs), implicitly covers the use of ICG and there is no need to act on that legislation.

Finally, during the discussion, it was concluded that the contact point to be reported in the notification can be an external service provider. Also, this contact point can even be placed outside the European Union, but it needs to have toxicological competence and be able to use the language of the Member State that receives the submission.

ECHA informed that two updates to the Guidance document are planned following the publication of the two amendments. It was acknowledged that, in the meantime, ECHA could publish Q&As based on proposals from the NHDs.

The industry representatives expressed their concern about the time needed to update their IT tools, a challenge which was acknowledged by ECHA.

The Chair closed the agenda point by inviting all CLP correspondents to post the questions that need clarification before the updated versions of the Guidance in HelpEx.

2. ECHA submission portal: overview and development plans

Heidi RASIKARI (Submission and Processing Unit, ECHA) presented the IT tools developed by ECHA, including those available for preparing notifications, and those available to submit it.

She clarified that the algorithm behind the UFI was never intended to hide the value added tax (VAT) number of the submitter, nor the composition of the mixture but rather to keep the integrity and uniqueness of the UFI code. There has always been the possibility to use a 'company key' instead of VAT. This option has now been more clearly explained and highlighted in the support material.

Regarding the tools available for authorities, ECHA explained that the web service requires the

appointed body, or the relevant authority, to sign in to check if new notifications have been submitted. The eDelivery, on the other hand, will include an automatic notification.

It was mentioned that the workshop 'Appointed Bodies and Poison Centres working practices and use of the PCN database' was scheduled on 10 December 2019, where several aspects of the IT tools would be discussed, including availability of information about submissions and notifications, and searching options. The idea of providing training to competent authorities on how the industry side of the tools work will be explored by ECHA.

Regarding translations, ECHA reminded about its policy requiring a certain level of stability on for support material (Guidance documents, web pages, etc.) before working on translations. Consequently, the help of the IT tools and the Navigational guide are not translated for the time being, while the Guidance document will have translated versions available soon.

Some participants informed about their intention to use the available PowerPoint presentations from the Poison Centre website for their national events.

3. Managing helpdesk questions on Annex VIII to CLP

The Chair introduced the moderators of the World Café session with four topics proposed for discussion.

3.1 NHDs as first point of contact for regulatory questions/ECHA for IT tool related questions

Moderator: Pedro ROSELLÓ VILARROIG, ECHA

Objective: Increase the understanding on who is providing regulatory support in each Member State, and who can provide IT support for ECHA's portal. Also, to set the basis for discussing the scope of ECHA and the NHDs/appointed bodies when providing regulatory support on Annex VIII to CLP.

Most of the NHDs are part of competent authorities, or closely related. Whenever a national helpdesk and a competent authority are separate entities, there is still good cooperation between them and with the appointed body or the poison centre.

In a few countries, the national helpdesk, poison centre and appointed body are the same; however, regulatory questions are replied by the national helpdesk while the technical questions are replied by the appointed body. Some participants acknowledged that the link with enforcement can be weaker, and that sometimes is a drawback.

All NHDs are already receiving **regulatory and IT tool-related questions**. Of the overall CLP questions received by NHDs, between 30 % and 80 % are Annex VIII related. The NHDs are confident in replying to the regulatory questions, getting the information from the Poison Centre website. Due to the upcoming application dates, there is a common anticipation that in the autumn 2020 there will be a sharp peak in Annex VIII questions.

Regarding the **complexity of questions** received, to a large extent, customers are still asking basic questions, or showing confusion with the legislation (mix of vocabulary, wrong concepts, etc.).

- Some NHDs have spotted consultants who are asking several NHDs at the same time, fishing for a reply they want to get. These consultants seem to also be related to the spread of wrong or confusing messages, for example, related to the transitional period.

- Regarding confidentiality issues, it was acknowledged that the possibility to decode the unique formula identifier (UFI) and obtain the value added tax (VAT) of the company had come as a surprise to many actors, and it was found to be inconvenient.

- There are many questions about labelling, and how to understand the CLP general rules with the new obligations under Annex VIII. Some sectors where identified as particularly impacted: formulators of pesticides, concrete manufacturers, and petroleum.

Two other issues of particular concern were identified: how to manage in practice the Interchangeable Component Group (ICG) and how to properly and transparently report mixtures in mixtures (MiMs) in the IUCLID dossier. Some NHDs proposed that ECHA develops specific guidance, including practical examples as much as possible.

Moving to the IT side of the topic, only a limited number of NHDs can actually **provide IT support**. They would like to have a testing environment or at least receive some training to provide better support for duty holders. As a good supporting material, videos were perceived as helpful, if developed in coordination with the step-by-step guides: the video introducing the topic, the guide serving as a background document. Some NHDs expressed their willingness to translate the videos produced by ECHA.

Both the European Commission and the Slovenian helpdesk announced **poison centre-related events** in March 2020.

3.2 Approaches/challenges among national authorities

Moderator: Laura WALIN, ECHA

Objective: Increase the understanding of the approaches and challenges with CLP that NHDs are facing in providing regulatory support on Annex VIII-related questions, reaching the duty holders in their country, cooperating with their national appointed bodies and following national legislation. NHDs shared best practice throughout the discussions. On ECHA's side, awareness of national contexts helps us target our training and information activities to suit the NHDs' needs better.

On **managing Annex VIII/PCN related questions**, the majority of Member States enjoy good working relations and information flow between the NHDs and the appointed bodies/poison centres, which may be based in the same or different organisations.

Such collaboration allows regulatory questions to be handled smoothly. In several countries, however, such cooperation is still to be established. In all cases, NHDs are a lead actor in harmonising replies on a national level. Harmonisation on the EU level can be done through the HelpNet mechanisms, including HelpEx discussions and, potentially, FAQs.

The NHDs asked ECHA to publish a document in S-CIRCABC that would clearly state which questions are expected to be replied by them and which by ECHA. One frequently asked question where harmonisation is required concerns the timing of placing a UFI code on the label concerning the timing of the Poison Centre Notification submission: on one hand, a UFI must

correspond to the submitted notification, while, on the other hand, some supply chains are long and need sufficient time to adapt (as they have to update labels throughout the supply chain). Another issue that may benefit from clarification is the applicability of Annex VIII obligations to actors under the Biocidal Products Regulation.

Participants shared best practice in **reaching duty holders and raising awareness** about upcoming obligations. Means such as dedicated events (roadshows), direct email contact (based on national product registries), and adding a note on the poison centre notification duties in other national helpdesk replies were mentioned.

Targeted events would mostly take place in 2020 when the national legislation and transitional arrangements are finalised. A few countries reported good experiences in awareness raising through their national enforcement inspectors. All NHDs find that the hardest audiences to reach are SMEs, companies not belonging to industry associations, and those not realising that the obligations apply to them (for example, candle manufacturers or importers).

Making a Poison Centre Notification banner available to place on NHD websites or in everybody's email signature was identified as an effective awareness raising tool – the NHDs asked ECHA to consider this action. Additionally, cooperation with national industry associations is beneficial both for the NHDs and potential duty holders. Some of the associations also develop their own support material, targeted to the needs of their sector (in case of sector-specific associations). ECHA was asked to consider if this material can be shared through the links on the ECHA website.

Many NHDs find **following national legislation challenging**, as it is still under development. Several countries consider introducing fees, while the fee amounts are not yet set – this adds to regulatory uncertainty and triggers additional questions from industry. All NHDs highly appreciate a compilation document 'Member State overview on implementing CLP Annex VIII' published by ECHA. NHDs are encouraged to inform ECHA's Poison Centre Notification team of any changes or new developments to keep it up-to-date. For example, information on forthcoming fees can be added even if amounts are not known yet.

3.3 Support needs from ECHA

Moderator: Hanna-Kaisa TORKKELI, ECHA

Objective: To clarify the NHD's need for support from ECHA. To receive feedback on the information currently available on the Poison Centre Notification website as well as suggestions for improvement. To understand the need for any specific IT training or tools. To clarify which support materials are used and how stakeholder communication is achieved in practice. To identify how ECHA could better contribute to the information flow.

In general, the **Poison Centre Notification website** was considered to be a good source of information: it is logical and the right information is in the right place. The Q&A section was considered to be very good, it covers practical questions. However, numbering could be added to Q&As and also a notification on updates would be appreciated. The PDF document on Member State status/differences is very useful but it could be further developed: adding missing data, adding links to Member State info, and also an understandable scheme would be useful. Some of the NHDs pointed out that the website should show more clearly the difference between national portals and the Poison Centre Notification portal. Also, it would be good to emphasise

that national obligations exist already and to clarify the 2021 and 2025 applicability dates (new vs. existing products).

A specific comment was risen on the UFI code appearance on the website. It should be more clearly stated that it is part of the notification. In addition, a link from the ECHA website to the Poison Centre Notification would be needed. Translation of all information material is important, especially for SMEs. As many issues are still developing, the 'stable' parts of the information could be prioritised for translation.

IT training was found important and in particular 'hands on training' was preferred, e.g. to practice submission (not real submissions). NHDs could have a 'training account' to practice. Companies need practical guidelines on how to use the tools. Webinar and tutorial videos would be useful for the Poison Centre Notification portal and IUCLID as well as for basic problems and questions. The 2019 ECHA webinar was useful and informative, but it is no longer up to date. Online training for HelpNet would be appreciated as well.

Support material used by NHDs is based on ECHA's material and new material is developed as soon as ECHA updates the information. Workshops have been arranged in some countries and these are also planned to be held in the future at relevant time points. Some NHDs make visits or organise roadshows for industry. In addition, they provide information on their web pages, step by step guidance and fact sheets.

A HelpNet catch up was considered to be useful to 'get together' and speed up the creation of FAQs after the second amendment to Annex VIII has been adopted. Other topics included in the meeting could be on the issues emerging after the compliance date kicks in as well as enforcement processes. In general, simple support material to make it useful would be appreciated. The representative from Kosovo (non-EU member country) requested support from ECHA in terms of putting in place the national support system.

3.4 Ensuring efficient information flows

Moderators: Anisa KASARUHO, ECHA

Objective: To discuss information flows at national level (between Member State competent authorities, NHDs, appointed bodies, poison centres and enforcement) as well as communication between NHDs and ECHA, through the HelpNet channel. The aim was to understand whether communication is streamlined and, if not, what are the means to improve it.

While tackling the topic of **information flows at national level**, we identified two aspects that significantly impact the effectiveness of communication:

- Organisational structure of authority bodies.
- Clarity on the source of information (e.g. handling of questions):
    - Regulatory.
    - IT tools and submissions.
    - National fees.

Authorities are organised differently at national level. Based on the input provided by participants, it appeared that communication is more challenging when authorities correspond to distinct institutions versus the scenario when they are grouped within the same organisation

(e.g. Member State competent authority/NHD and appointed body/poison centre; or Member State competent authority/NHD/appointed body and poison centre). Being located within the same institution eases the exchange of information and boosts cooperation.

In most countries, the Member State competent authority/NHDs are responsible for handling regulatory questions, whereas appointed bodies or poison centres are responsible for replying to questions related to notification submissions, IT tools and national fees. Publishing this information online may be helpful to avoid confusion about which authority to contact.

We then discussed the **communication of NHDs with ECHA through HelpNet**. It was noted that HelpNet tools are useful for this purpose.

- HelpEx – useful for discussing and aligning understandings related to the interpretation of regulations. Some participants indicated:
  - The need to receive training on how to use it.
  - The need to introduce a search functionality for Annex VIII.

- HelpNet meeting – useful for discussing hot topics. Some suggestions for the forthcoming meeting were to:
  - Provide clarity on the distributors' obligation.
  - Provide an update on the second amendment of Annex VIII.
  - Discuss Article 29 of CLP.
  - Provide training on the ECHA Submission tool.
  - Discuss/inform about FAQ/Q&A updates, if any.

- HelpNet functional mailbox (help-net@echa.europa.eu) – useful to communicate changes related to appointed body/poison centre contact details to ECHA. ECHA will, in turn, update the relevant web page: https://poisoncentres.echa.europa.eu/appointed-bodies

Finally, participants highlighted the need to be able to disseminate information related to submitted notifications and potentially link it to other databases (e.g. antidote databases). They indicated that ECHA may help to facilitate this dissemination. They also indicated the need to 'translate' information related to hazards into practical advice and help at poison centre level. Workshops may be needed to develop this advice.

4. Interpretation of Article 30 of CLP regarding UFI

Boglárka DURUCSKÓ (Hungarian National Public Health Center), representing the Hungarian helpdesk, gave a presentation on three specific scenarios raising questions around the need to update the label or not.

The Chair argued that the solution for these scenarios would not come from trying to define 'undue delay', a discussion already triggered by Article 22 of REACH. There was a common understanding that the UFI needs to be updated only when there is an actual change in the composition: changes of classification due to new information do not trigger this obligation. In this context, ECHA clarified that the UFI should only be used in relation to a submission. Otherwise, there is no use in adding it to the label. It may even become an issue during inspection.

Regarding the first scenario presented by Boglárka DURUCSKÓ, the Commission suggested to use the term 'before placing on the market' rather than 'not undue delay'. The reasoning was that in this scenario it would be the case of a new product, and would therefore need to be notified before being placed on the market. Moreover, references to national legislation were relevant. Another suggestion was to include a previous date: 1 January 2020 (applicability date), after which there would be two options: the first one, to follow the national legislation; the second one (optionally), to follow Annex VIII. For the second option, complying with Annex VIII becomes mandatory from then on, and the update has to be done without undue delay.

ECHA highlighted that, for the time being, only Germany and Estonia accept notifications through ECHA's portal. Germany has modified their national legislation to coincide with Annex VIII, but the national notification is still required until 1 January 2021. In this sense, the Commission reminded participants that regardless how the Member State had transposed the Dangerous Products Directive (DPD), the appointment of appointed bodies in each Member State stemmed from Article 45 of CLP, which is a regulation.

The last point discussed was about products with long shelf lives. Industry asked for a pragmatic approach to avoid 'empty UFIs' (when the duty holder has generated a UFI and placed it on the label but not submitted it in a notification). Some correspondents proposed solutions like early voluntary notifications[5]. However, the scenario seemed to have several aspects making it more complex and deserving of a more thorough analysis.

5. Member States' experiences and challenges in the CLH process

Nicolaj HEUER (Federal Institute for Occupational Safety and Health, BAuA), representing the German helpdesk, gave a presentation on their experience as a competent authority on working together with experts[6] and industry to harmonise classification and labelling.

He highlighted their informal approach, which they consider most beneficial for all parties involved. Also, he outlined their challenge to behave more as a competent authority or more as a helpful and approachable helpdesk depending on the moment of the process. He mentioned the high expectations of industry but the limited influence they can have on the dossiers of other Member States, or limited time and resources to peer review every dossier.

Finally, he made a plea to reconsider using the IUCLID format as, in their view, the benefits outbalance the drawbacks of using it.

The Chair pointed out the valuable input from industry into the process, which becomes more valuable the earlier it comes. He also explained that a major reason to give up on the IUCLID format was due to the fact that most of the dossiers came from the Plant Protection Products domain, where this format is not used yet.

[5] Boglárka Durucskó indicated that notified products that are already on the shelves across the EU are difficult to be relabelled.

[6] In Germany, four competent authorities are engaged in the harmonised classification and labelling process: Federal Institute for Materials Research and Testing (Physical Hazards), Federal Institute for Risk Assessment (Health – Consumer), Federal Institute for Occupational Safety and Health (Health – Worker), Federal Environmental Agency (Environment).

6. Updates from ECHA

6.1 Updates from Forum

Maciej BARANSKI (Support and Enforcement Unit, ECHA) walked the participants through the plans and procedures of the activities of the Forum related to CLP, particularly the results of the REF-6 project[7] on classification and labelling of mixtures, and the ongoing[8] and upcoming[9] enforcement projects. In REF-6, inspectors found that 17 % of hazardous mixtures were classified incorrectly, 33 % of labels were incorrect and 33 % of checked safety data sheets had deficiencies.

On a positive note, he pointed to the increased rate of compliance in safety data sheets compared to previous years, even if only those sections relevant for hazard and safe use information were checked. He concluded that an incorrect classification of a substance is the root to further non-compliances: wrong classification and labelling of mixtures, lack of consistency with different sections of the safety data sheet, and so on. To prevent incorrect information being communicated in the safety data sheet and on the label, duty holders should put more effort in deriving the right classification of the mixtures and communicating it down the supply chain.

There was a question about non-compliance[10] related to harmonised classification and labelling – whether a more severe classification based on new data was considered as non-compliance. The exact data of what was found in each case is not available to ECHA, but it is expected that the classifications were less severe. Industry is aware of an increasing number of such cases, and was also interested in knowing the details.

6.2 Updates from the CARACAL

Fabrice BROECKAERT (Hazard Assessment I Unit, ECHA) reported back to the HelpNet about the last CARACAL meeting. He started his presentation with an overview of the CLH process, complementing the previous presentation from Nicolaj HEUER. He highlighted the length of the process, as from the very first step until the publication of the relevant legislation it may take up to four years.

He introduced ECHA's plans to improve the Classification & Labelling (C&L) Inventory, the most visited of ECHA's data dissemination portals, and informed about the potential publication of notifier names, which is under investigation by the Commission.

ECHA confirmed that the next guidance update[11] taking into account the GHS/CLP updates will follow the regular consultation procedure, and right now they are identifying the members of the Partner Expert Group (PEG). The formal launch is expected in February or March 2020. ECHA also clarified that there is already an internal UVCB task force, but other groups with external participants and observers are looking into the classification of UVCBs also.

Some correspondents reminded ECHA about the usefulness of translated material in their Member State, and in particular their interest in the update and translation of the *Guidance on*

[7] REF-6 on classification and labelling of mixtures published after the meeting on ECHA website at: https://echa.europa.eu/about-us/who-we-are/enforcement-forum/forum-enforcement-projects
[8] REF-8 on online sales of chemicals and the pilot project on cooperation with customs.
[9] Pilot project on classification of mixtures, focusing on cleaning / detergent products.
[10] REF-6 main results show that 9 % of the checked substances were non-compliant (Article 4(3) of CLP).
[11] Guidance on the Application of the CLP Criteria: https://echa.europa.eu/documents/10162/23036412/clp_en.pdf

Classification. Furthermore, they had an interest in knowing the current rate of notifications to the C&L Inventory. Lately they have not received news about it, and there seems to be no changes in that sense.

7. Work plan for 2020

The Chair introduced the tentative dates for the HelpNet 15 events with the CLP Workshop provisionally scheduled for 2 April 2020.

Two action points from the previous workshop were mentioned as possible topics on the agenda of the CLP Workshop in 2020: the legal review of the interpretation of Article 29(1) and (2) of CLP; and the most recent view on nail and lash glue products (whether or not they are considered as cosmetics).

The Commission have recently sent their interpretation on the above issues to ECHA, which will be shared with the CLP correspondents and observers.

Other topics proposed by national helpdesks were the findings of REF-6 and the liquid laundry detergent capsules (LLDCs); the SCIP database, stressing that obligations stemming from the Waste Framework Directive[12] Article 9(1)(i) refer to Articles 3(33) and 33(1) of REACH.

The representative of CEPE wished to reopen an action point from HelpNet 14, particularly the joint session of the BPR and CLP helpdesks and asked ECHA and the national helpdesks for feedback on the CEPE guidance 'Labelling of Treated Articles'[13].

8. Conclusions of the day

The Chair gave a short wrap-up of the meeting, thanked correspondents and observers for their active and valuable contribution to the workshop and informed that the action points, the report from the break-out group discussions and a short satisfaction survey will follow after the meeting.

[12] Directive 2008/98/EC of the European Parliament and of the Council on Waste.
[13] The 'Labelling of Treated Articles' guidance issued by CEPE is available on S-CIRCABC and at: http://www.cepe.org/wp-content/uploads/2018/01/BPR-revised-guidance-Art-583-v3-Nov-16.pdf

Annex I - List of participants

HelpNet members/Country	Name
Austria	WETZER Barbara
Belgium	CLAES Kristof
Croatia	JEŽIĆ VIDOVIĆ Irena Zorica
Cyprus	PALEOMYLITOU Maria
Denmark	PALUDAN Ditte Secher
Estonia	LAHE Aigi
Finland	OLLIKKA Jussi
France	HAYAUD Nathalie
Germany	FLEISCHER Andreas
Germany	HEUER Nicolaj
Greece	SKAFIDA Panagiota
Hungary	DURUCSKÓ Boglárka
Italy	ALESSANDRELLI Maria
Latvia	LAZDEKALNE Elīna
Lithuania	JANONYTĖ Agnė
Luxembourg	FREUDENTHAL Oona
Netherlands	VAN IERSEL Petrus
Norway	FAARLUND Bodil
Poland	DOMAŃSKI Krzysztof
Portugal	LAGINHA Isabel
Romania	CAROLE Nicoleta
Slovak Republic	MURÁNIOVÁ Lucia
Slovenia	HUMAR JURIČ Tatjana
Sweden	NORRTHON RISBERG Susanna
European Commission	**Name**
DG GROW	JAMERS An
HelpNet observers	**Name**
Cefic	SERRANO Blanca
CEPE	ROBINSON Janice
IPA countries	**Name**
Albania	DIBRA Laureta
Bosnia & Herzegovina	MILAKOVIC-RAMADANI Dzejna
Kosovo	TAHIRI Enver
Serbia	JAKOVLKEVIC Bobana

ECHA, Unit	Name
Communications, A1	DOSKACHAROV Dobromir
	TORKKELI Hanna-Kaisa
Support & Enforcement, A2	ALBERTO Joana
	ANNYS Erwin
	BARANSKI Maciej
	BRILLAS Patricia
	JÄRNSTRÖM Helena
	KASARUHO Anisa
	KRYCHEVSKA Olena
	LOUKOU Christina
	NAEEM Muhammad Umer
	NAGHY Viorica
	ROSELLÓ VILARROIG Pedro
	WALIN Laura
Submission & Processing, A3	APE Daniele
	JAANU Sari
	RASIKARI Heidi
	SANCHEZ SAEZ Javier
	SOMPOLSKI Daniel
	SUMIALA Saara
Hazard, C1	BROECKAERT Fabrice
Corporate Services, R3	NYGARD Daniel
	PELLA Katrin
	VALKEINEN Ari

Annex II - Action points

No.	Action	Agenda item	Responsible	Due date	Status
1.	Bring PCN issues to the attention of the Forum of enforcement.	1.0	NHDs	In the course of 2020 as appropriate	Open
2.	Post PCN questions to HelpEx with a view to clarify open issues.	2.0	NHDs	As early as possible	Open
3.	Consider how the NHDs could be best trained on the submission tools.	2.0	ECHA	February 2020	Open
4.	Consider adding links to stakeholder support material on PCN, following the example of REACH support.	2.0	ECHA	January 2020	Open
5.	Consider developing a PCN banner with link to PCN website.	2.0	ECHA	6 February 2020	Closed
6.	Provide to NHDs the PowerPoint version (editable) of the navigational guide.	2.0	ECHA	February 2020	Open
7.	Inform ECHA on any updates to the 'Member State overview on implementing CLP Annex VIII'.	2.0	NHDs	As early as possible	Open
8.	Provide comments on the list of what kind of PCN questions are expected to be replied by NHDs and what by ECHA.	3.1	NHDs	February 2020	Open
9.	Explore the possibility to create a matrix/mapping of all PCN related national actors and their roles.	3.1	All	December 2019	Closed
10.	Inform the Commission of the sectors in your country that may have low awareness of their forthcoming PCN obligations. Inform the sectors as well.	4.0	NHDs	As early as possible	Open
11.	Decide and inform ECHA how to move forward with the three scenarios presented in the presentation 'The interpretation of Article 30 of CLP regarding the UFI'.	4.0	Hungarian CLP Helpdesk	January 2020	Closed
12.	Inform clearly and transparently the industry in your country about the CLH process and when the opportunity for them to provide input is.	5.0	NHDs	As early as possible	Open
13.	Report back to HelpNet about the non-compliances related to CLH: if they are over- or under-classifications.	6.1	Forum	December 2019	Closed
14.	Give NHDs an update on the status of C&L Inventory: trends in notification numbers and ECHA's plans for updating/cleaning up the inventory.	6.2	ECHA	12 December 2019	Closed
15.	Provide comments on CEPE's guideline for Labelling of Treated Articles.	April CLP Workshop	NHDs, observers	31 January 2020	Closed