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Towards the future of ECHA's submission systems – Vision document

1. Introduction

The competence of ECHA in implementing chemicals' legislation and developing suitable IT solutions has allowed us to successfully deliver a number of tasks with tight deadlines over the last decade. Although initially set up for the purpose of implementing the REACH Regulation, the EU has entrusted ECHA with more tasks over the years and further requests for undertaking new ones are likely to come e.g. as part of the Chemicals Strategy for Sustainability (CSS).

The elements of data preparation and data submission are positioned at the beginning of many of the regulatory processes under ECHA's remit. Consequently, ECHA's data submission systems play a key role in the Agency's landscape, being the gateway for structured data made available to processes in ECHA, other authorities and the public.

These elements are also the façade of ECHA to the different actors, as they usually represent the first contact point of duty holders with the Agency. They facilitate the administration work of the actors to fulfil their regulatory duties (e.g., perform submissions, manage their assets, keep track of tasks that they need to perform) and it is through those systems that the official communication takes place with industry and, in certain cases, with authorities.

With the current and potentially larger variety and volumes of submissions that ECHA manages, the time has come to define how the submission systems should evolve, the corresponding next steps and communicate further its vision for the future.

This paper focuses on the systems used by industry actors to submit information to ECHA. Concerning authorities, some types of authority submissions may be very similar in nature and content to the industry ones, thus a similar proposal for authority submissions will be developed at a later stage.

2. Main challenges of ECHA submissions

ECHA currently maintains four different submission systems to be used by companies to supply information and comply with their obligations. These submission systems are the following:

- REACH-IT (REACH and CLP submissions, except Poison Centres notifications)
- R4BP3 (submissions related to the Biocidal Products Regulation)
- ePIC (PIC submissions)
- ECHA Submission portal (Poison Centres notifications; notifications for Substances of Concern In articles as such or in complex objects/Products (SCIP) established under the Waste Framework Directive (WFD); applications for Plant Protection Products (PPP) submitted to EFSA).

Experience shows that although the development of tailor-made applications provides the focus and flexibility needed in implementing complex processes, it also leads to consuming more and, in many cases, competing resources, high maintenance costs, duplication of capabilities/development of similar functionalities, loss of consistency in services and potentially limited scalability capacity. This is true in ECHA's case since we currently maintain and develop different submission systems/portals, with different user interfaces and without common technological foundation. This also means that product and project/service management activities and efforts are duplicated, work in silos remains and coordination efforts and uniformity/consistency are hindered.

In addition, REACH-IT is currently approaching the end of its life cycle, as it stands today. Upgrading it to a modern sustainable technology and re-scaling it to enable the increasing number of submissions, would mean substantial costs and efforts to be focused in one single application. The same challenge will inevitably occur in the future with the rest of the existing submission systems (R4BP3, ePIC). Therefore, when considering any re-design of the current set-up, long term cost and technology optimisation is definitely one of the elements that needs to be considered.

In view of these challenges, the Agency has identified the need for the development of a future-proof solution for submissions of data. This solution is expected to be based on up-to-date technology, facilitate its maintenance and development, and better integrated to the rest of ECHA's IT tools landscape. The solution needs to reflect simplicity, centralisation and be intuitive for its users.

3. Future of ECHA submissions: towards modularisation and a new unified industry portal

Creating re-usable and flexible modules for various submission and processing functionalities/capabilities (such as asset management, communication or searching), appears to be the best way forward from a technological point of view. Building a common technological foundation in the back-end, consisted of the same set of common or dedicated modules, will enable a unified/common front-end of the different data submission systems as well. The proposed approach of adapting and re-using modules would allow processes to benefit from synergies and enriched capabilities, since any technical development would be potentially available (considering a low degree of customisation) to all the processes.

By working on common modules which act as common "building blocks" for the different regulatory needs, we aim to progressively converge users and capabilities under one umbrella and move to one entry point for all the industry users in a unified industry portal. This brings the opportunity to rationalise ECHA's portfolio of submission systems, provide a more consistent user experience and further facilitate companies' compliance with the EU chemicals regulations under ECHA's remit.

3.1. Current status

The centralisation of functionalities/capabilities already started few years ago with the introduction of the ECHA accounts (i.e., account creation and user access management), moving away from creating individual accounts for each system and logging in separately to each one of them. This is the general principle that is being considered and will be followed from now on, meaning building systems/functionalities that can be reused and applied to all users regardless of the regulatory context in which they are working.

In addition, all ECHA submission systems share some common functionalities/basic capabilities, like for example the submission and processing of a file and the query of submissions. While these modules can be easily merged to one system, others will need to be adapted before they can be re-used to serve new regulatory tasks or complement existing ones. This includes modules for legal entity change, asset management, joint submission, invoicing, and data sharing facilitation, among others.

3.2. The work ahead

Currently, the mapping of the business capabilities of the submission systems is taking place in order to establish an implementation plan for their common development. The target is that by 2026/2027, all the capabilities, at least of REACH-IT and ECHA's Submission portal as a first step, will be modular and reusable.

These capabilities will be developed under the one industry portal, serving the processes of REACH and CLP (including Poison Centre notifications) submissions, notifications for Substances of Concern In articles as such or in complex objects/Products (SCIP) established under the Waste Framework Directive (WFD), applications for Plant Protection Products (PPP), Drinking Water Directive notifications and any new tasks that will enter into force by then.

Submissions related to the Biocidal Products Regulation and PIC submissions will further take advantage of those capabilities, although some are more complex and unique (e.g., workflows involving industry, national authorities and the Commission) and need further elaboration on the feasibility and practicalities of merging them under one umbrella.

3.3. Stakeholder engagement

Active engagement of industry stakeholders is foreseen from early stage, including clear identification and involvement in the different phases of the project. A dedicated industry working group with experience in using ECHA's current submission systems will support the implementation of the new industry portal and provide input in the form of requirements for the future portal and testing of prototypes.

In brief…

ECHA has identified the need for a future-proof submission solution in the coming years (benefitting from up-to-date technology, easier maintenance and scalability).

The Agency has also recognised that industry will benefit by a streamlined solution that reflects a centralised interface and supports all their chemical regulatory processes.

The future of ECHA's submissions will move towards greater modularisation of functionalities/basic capabilities providing users with a unified industry portal.

Development of the new portal will require early and active engagement with relevant stakeholders and begin with a step-wise approach with the integration of REACH-IT and the ECHA Submission portal.

The project aims to be completed by 2026/27.