

Amendment to the Rules of Procedures of ECHA bodies

47th meeting of the Management Board 28-29 September 2017

Proposal

The Management Board is invited to adopt an amendment to the Rules of Procedures of the Management Board, the ECHA Committees and the Forum in order to remove the templates for the annual declaration of interests, declaration of commitment and declaration of confidentiality from the annexes of these procedural rules.

In place of the declarations, hyperlink references to declaration templates will be added.

This will allow the Secretariat to manage and monitor all declarations in an automated manner, thereby reducing administrative overhead and increasing at the same time the visibility to allow timely filling of any gaps and eliminate duplicate declarations.

The type of information required and the level of detail of the declarations will remain unchanged and fully aligned with the ECHA policy for managing potential conflicts of interest.

Background

The Rules of Procedure of the ECHA bodies all currently include, as an annex, the specific text of their required declarations, which were updated in line with the ECHA procedure on prevention and management of potential conflicts of interest (MB decision 09/2014).

As part of the Efficiency Programme, the Committees and Meetings project – in parallel with the implementation of a new tool to manage meeting logistics – identified declaration management as an area where administrative efficiency and better visibility could be achieved through standardisation, increased automation and central administration.

One part of the enhancements requires the declarations to be standardised so as to be applicable to all ECHA bodies. Therefore the text of the declarations – which includes minor body-specific variations at present - must either be moved out of the Rules of Procedure, or the new, proposed standard declaration text must be duplicated in each.

The preferred option is to remove the declarations' text and instead make references to the new single-source declarations templates. This option fits well with the simultaneous move to centralised management of the actual declarations received, and checks that such are sufficient and current. The templates will be put under the quality control of ECHA's certified Integrated Management System, where the process owner can make minor non-substantial changes if needed, while changes that would have an effect on the underlying policies, would still be put for approval to the Management Board.

Rationale

The re-working of declaration management allows several benefits, both for ECHA secretariat and for those making declarations:

- Common templates allow each declaration to be made only once per member, rather than once per body per member;

- Common storage and handling allows ease of backup and simpler scrutiny to identify and fill any gaps;
- Combining the text of declarations with the same periodicity reduces the overall number of declaration files while maintaining the regulatory requirements.

Overall the administrative efficiencies are estimated to save c.0.5 FTE in the secretariat, ease administrative backup through common handling, as well as simplifying declaration submission for the ECHA body members. New declaration handling would begin in Q4 of 2017.

Alternative options

It would be possible to continue working with declarations using the current variant declaration templates, but for the reasons explained above then no efficiency gain in the management of the declarations could be made.

Drawbacks

There were no drawbacks identified.

Attachments:

- Annex 1: New Declaration of Confidentiality and Commitment to adherence to S-CIRCA BC security rules template
- Annex 2: New Declaration of No Interest and Commitment for Rapporteurs template
- Annex 3: New acceptance notice for the Code of Conduct for stakeholder observers
- Annex 4: New Declaration of Interest and Commitment template

(text changes in the declarations are highlighted in yellow)

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