Workshop summary

Workshop on review of ECHA's IRS and future steps for identification and prioritisation of (groups of) substances

6-7 March 2024

European Chemicals Agency

IRS review - successes

Successes identified in the IRS review

- → ECHA has improved its knowledge base on the registered substances to support their priority setting for EU regulatory risk management
- → ECHA grouped over 6000 substances from all tonnage bands and screened them to identify which need data generation, which need risk management, or which do not need action for now (58% of substances)
  - Almost all high-tonne substances have been screened
- → ECHA has completed all actions committed to in the Joint Evaluation Action Plan
- → ECHA has put in place effective tools like PACT/ACT to support the coordination and collaboration on (groups of) substances for EU regulatory risk management and to increase transparency

ECHA
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IRS review - challenges

Challenges identified in the IRS review - 1/2

→ Data availability is key:
- A lack of hazard data is slowing down the risk management work - need to wait for data generation
- More information needed also on exposure (essential for risk assessment and prioritisation)
  - Call for evidence may help
- More guidance and experience in handling uncertainty in hazard and risk assessment should be developed
  - We should try out with various cases

→ Grouping of substances for EU regulatory risk management
- Authorities need guidance for justifying read-across for the selected cases

→ MSCAs need further information to follow the status of readiness for RRM of groups they are interested in

Challenges identified in the IRS review - 2/2

- → Need to increase further transparency and predictability for both for authorities and stakeholders, also need to improve cooperation and working together
- → Updating ARNs: how much to invest vs transparency to outside when no EU regulatory risk management needed
- → Need to increase use of New Alternative Methods (NAMs) in justifying grouping, but also in relation to the data generation
- → One Substance - One Assessment (1S1A): looking beyond REACH and CLP – incl. new ECHA tasks. Need to look at synergies and overlaps between the 1S1A working group and RIME+.
- → Resources and timelines
  - We want to work on groups - but acknowledge challenges (workload, resources/ expertise, consultations, national priorities)

Priorities for the upcoming years

Priorities – what to focus on - 1/2

→ General support for a shift in focus to consolidating cases for regulatory risk management

→ General support that coordinated effort is needed to synchronise action and maximise outputs

→ Grouping work and ARNs are a good starting point to discuss priorities among authorities and for further work by authorities to bring the cases for EU regulatory risk management.

→ Shortlisting of cases for regulatory risk management
- Be clear about maturity / readiness and impact
- Focus work on groups where possible

Priorities – what to focus on - 2/2

→ Building on ARN findings: ECHA or MSs can consider targeted work for selected cases prior to CLH or restriction (no full-fledged assessment)

→ Authorities each have their own priorities

- MSCAs have national priorities, the Commission has priorities
- ARNs / common priorities can feed into national work programs
- Sharing up-to-date national work programs and list of interests to avoid duplication of work

New tasks beyond REACH and CLP

- → New tasks for ECHA also mean new expertise to be developed within ECHA – opportunity to look at broader options for regulatory risk management
- → Information from new tasks can help ECHA in proposing priorities (e.g., monitoring data)
- → All parties need to reach out to new stakeholders, authorities
- → 1S1A Expert Group to play a role to exchange information on ongoing / planned work (and priorities) beyond REACH/CLP
- → Continue discussions on when and how to make best use of synergies

Opportunities for further collaboration

Collaboration – overview of priorities

→ Exchange on authorities' priorities is key for fruitful collaboration!

- All authorities to cooperate in updating the overview of ongoing and planned work → need for improved communication
- Having a good overview helps all authorities to identify synergies, possibilities for cooperation and avoid overlaps
- Resources are limited – exchanging information among authorities on priorities allows ECHA and MSCA to use resources effectively
- Acknowledge that national priorities can change

Collaboration - dossiers

→ Collaboration between MS to complement expertise, training on the job and overcome resource limitations

→ Suggestions to speed up restrictions
- Develop targeted restrictions
- Consider if CLH is needed. If so, to consider whether the processes can run in parallel
- Not all actions need to be done by one MS

→ Keep clarity on roles:
- MSCAs develop dossiers and ECHA prepares dossiers based on COM request
- MSCAs interest can be one indicator to see if targeted work to progress the group is needed

Build on existing tools

- → No need for new tools
- → Improve usefulness, user-friendliness, for example 1S1A will require extension of PACT/ ACT
- → Make tools better accessible and learn how to use better but avoid frequent changes

How to use existing fora

→ RIME+

- Importance and usefulness of the RiME+ platform was widely shared
- Enhanced exchange on priorities and activities at authority level is key to improve collaboration
  - Share priorities / interests early on (and how authorities come to priorities)
  - Discuss and shortlist RRM candidates (identify overlapping interests, available expertise / experience, collaboration where possible), e.g. for the Restriction Roadmap
  - Discuss cooperation – e.g. how to complement expertise in MSCAs
- Explore ways to ensure optimal use of the platform in the light of upcoming tasks
- Consider how to work best together with other fora (e.g. 1S1A EG and the Heads of CAs meeting) to exchange on priorities
- RiME+ Bulletin is a useful communication tool for authorities

→ Expert groups (ED, PBT)

- Useful advisory role for substances/groups that are further advanced
- Consider how to better facilitate expert discussion on read-across

Next steps

Next steps

- → Information and discussion at CARACAL meetings after April
- → Workshop outcome will be considered in the context of the IRS report planned to be published in June that will cover the mid-term review of the IRS

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