

## Annual Report from the Committees 2020

61<sup>st</sup> Meeting of the Management Board 25 March 2021

### Key messages

#### RAC and SEAC

In a very challenging year, the members achieved the required level of contribution to the work of both Committees during 2020. In both RAC and SEAC, rapporteurs were in short supply but it was possible to allocate all dossiers in the pipeline throughout the year. There is a risk that limited availability of rapporteurs will affect the committees' workplan and output.

The Management Board is requested to:

- note the continued fall in number of RAC and SEAC members (also reported in the previous Annual Report from the Committees)
- provide further resources to increase the RAC membership to a minimum of 50 and SEAC to a minimum of 40 members by encouraging their MS to appoint members, in case of vacancies
- note the continued **restructuring of RAC** with the addition of further standing working groups **for CLH and restrictions** plus the opportunity to support members in these working groups by providing them with advisors
- recommend to their MS that a dialogue with ECHA and the Chairs as to the suitability of new and existing members is always needed prior to their (re-)appointment
- Note that RAC and SEAC members should be free from political influence on the part of their nominating member State.

#### MSC

MSC smoothly transitioned and held its five meetings in 2020 all in a virtual setting, while commitment and interest to the work of MSC remained high. MSC reached unanimous agreements on all of the substance evaluation (SEV) cases referred to it, most dossier evaluation (DEV) cases and cases for the identification of substance of very high concern (SVHC). The on-boarding of the new MSC Deputy Chair was successful, and Rapporteur appointments were efficient, owing to the MSC discussion on a back-up approach for Rapporteur identification, as agreed by the Management Board mid of the year. In line with the REACH Joint Evaluation Action Plan (Action 9) MSC discussed several general topics.

The Management Board is invited to take note of the specifics and functioning of MSC.

#### BPC

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#### All Committees

All four Committees were confronted with a rapid switch to remote meetings in 2020 due to the Covid-19 pandemic. This was successfully achieved. MSC started with its first virtual meeting in February without Stakeholders, but the necessary procedural changes for their participation were resolved by the June meeting. A delay in decision-making occurred for the June meeting as MSCAs and Registrants needed time to adjust to the new situation too. RAC and SEAC lost some time due to the first lockdown falling in the middle of a two-week plenary meeting but this was rescheduled for later in the year and completed.

The momentum of strong social cohesion and willingness to get the work done carried the Committees through the year, monitored in all cases by post Committee questionnaires to gain feedback. Some negative changes became noticeable and the quality of discussion on some dossiers was more difficult for the Chairs to maintain towards the end of the year. However, all Committees successfully completed their work programmes.

## Background

This is the fourth report from the Committees to the MB since annual reporting began in 2017.

## PART I RAC and SEAC

### Members' performance

Annex III of the nomination papers to RAC and SEAC contains a requirement that the nominee for appointment by the MB will be available for at least 50% of their time for the work of the Committees. The Chairs of RAC and SEAC consider that this target was met on aggregate in 2020 across the membership. Members are required to:

- take on a number of rapporteurships per year,
- comment on opinions during written RAC and SEAC consultation rounds and
- play an active role in working groups and plenary discussions in order to achieve consensus on the opinions of RAC and SEAC.

Further steps have been taken in consultation with MS to replace less active/non-contributing members, the Chairs have taken measures to improve the participation in the latter two tasks mentioned above, with specific members asked to comment on particular opinions, to ensure all receive the necessary level of scrutiny.

### Rapporteurships in RAC and SEAC in 2020

The number of rapporteurships for dossiers adopted in the years 2015 to 2020 can be seen in Table 1 below.

**Table 1.** SEAC and RAC members' rapporteurships<sup>1</sup> during 2015-2020. Including co-opted members from December 2015.

Process	Restrictions		AfA		CLP	OELs	Article 77(3)(c) COM requests		Total	
	RAC	SEAC	RAC	SEAC	RAC	RAC	RAC	SEAC	RAC	SEAC
2015	9	7	38	36	59				<b>106</b>	<b>43</b>
2016	2	3	113	107	57				<b>172</b>	<b>110</b>
2017	8	6	105	104	52		8		<b>181</b>	<b>110</b>
2018	6	6	42	44	107	6	9	1	<b>164</b>	<b>50</b>
2019	6	6	105	119	90	4	2		<b>203</b>	<b>125</b>
2020	12	15	101	117	89	4	4	2	<b>212</b>	<b>134</b>

For RAC, the number of rapporteurships needed annually reflects the baseline of CLH plus the peaks in Authorisation evaluations in 2018/17 and 2019/20 (many additional rapporteur's appointments as a result). For SEAC, the picture is similar but the AfA peaks have a greater impact, and 2020 was the year with most rapporteurships required in the history of the Committees.

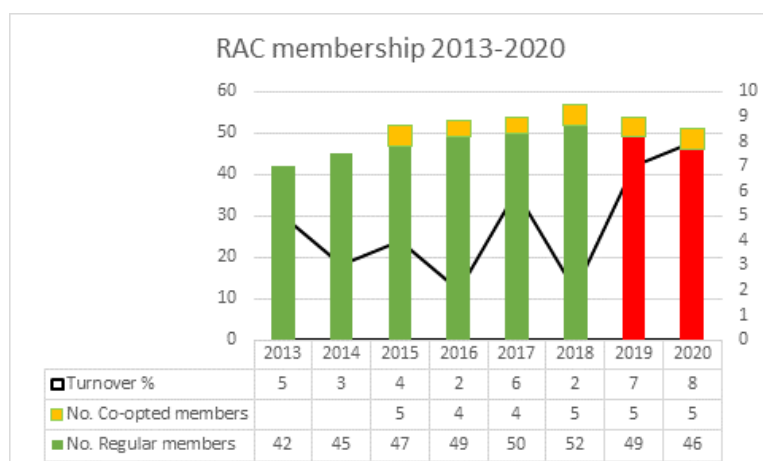
<sup>1</sup> Figures in Table 1 refer to number of rapporteurships and co-rapporteurships of current membership of RAC and SEAC. An additional 16 members in RAC and 15 members in SEAC members that left the Committees during 2013-2017 had rapporteurships or co-rapporteurships.

## Numbers, turnover of members, renewals and new nominations

In 2018, MB members were requested to inform their MSCAs that a dialogue with ECHA and the Chairmen as to the suitability of new and existing members is needed prior to their (re)appointment. MS generally responded well to this request and this continued during 2020. The Chairs were actively involved in several selection procedures, and this was greatly appreciated. Unfortunately, some MS continue to (re-)nominate members of RAC and SEAC largely without reference to ECHA. Where adequate arrangements are not in place with the nominee's employer to secure their time, members will not be able to adequately contribute to the work of the Committees. Proposed nominations which do not involve an appropriate support basis (see REACH Art. 85(7)) for the nominee are advised against by the ECHA Secretariat.

### RAC

RAC had a total of 46 EU/EEA members in December 2020 (dropped to 45 at the time of writing). Previously, the Committee's growth has been linear at about 3 to 4 % a year but peaked in 2018 and after that, even excluding the effects of Brexit, dropped by 10%. This drop in numbers is now noticeable when selecting Rapporteurs.



### SEAC

SEAC had a total of 32 EU/EEA members in December 2019 (compared to 40, 39, 35, 34 and 35 in 2015, 2016, 2017, 2018 and 2019 respectively). Here the trend has been declining for some time. Efforts are being made with MSs to increase the membership, and some results were already seen in 2020. However, there were more resignations than new nominations.

## Prognosis and workload management

Looking ahead to 2021 and 2022, the workload projections for RAC and SEAC continue to be challenging. A high number of Restrictions will continue to be in the system (7 to 8), against a previous annual average of 2-3 before 2019). In addition, the scope of many recent restrictions of groups of substances is much larger, requiring teams of members rather than just the rapporteurs to work on developing opinions. They can also result in longer opinion-making, so that Rapporteurs are tied up with a single case for a longer period of time. For applications for authorisation, even though the peak experienced in 2019 and 2020 (with a very high number of opinions on octyl and nonylphenol ethoxylates) is coming to an end, there is still a steady flow of applications related to other substances, including chromates. Additionally, the Committees will have to deal with a series Article 77(3)(c) requests from the European Commission (including the production by SEAC in 2021 of 12 addenda to the original opinions, covering Substitution Plans requested by the Commission from certain authorisation applicants).

RAC experienced a continued high number of CLP dossiers (50 in 2020, 51 in 2019, 61 in 2018 against a previous average of 35), with up to 60 dossiers projected with certainty for 2021. There are several factors which will drive the number of CLH dossiers up in the coming years, including changes to the PPP regulation, work on biocides and the effects of the new Chemical Strategy. CLH continues to take up 40 to 50% of Committee time, i.e. a separate week of each plenary. Where OEL's are concerned, two were completed in 2020 (diisocyanates and lead), two are in process (asbestos and cadmium), while four were requested at the beginning of 2021.

After consulting RAC and SEAC at their March plenaries, ECHA will publish an open call for five co-opted members per Committee, as the term of the current group runs out in September.

Most importantly, for RAC, further processes will be added to its remit in the coming years (see Annex I).

### **Restructuring of RAC**

In the 2019 report to the Management Board, the Chair noted that "*RAC met for 10 working days in September 2019, mainly to handle the volume of complex restrictions on hand; without further action, most meetings are expected to be two weeks long in 2020*". SEAC commenced two-week meetings at its 2019 December plenary, and these continued throughout 2020.

RAC had already implemented a standing working group for evaluating Authorisations, comprised of members, their advisors and observed by stakeholders. It has held 7 meetings to date and allowed the Committee to process 96 applications for authorisation in 2020, with only a fraction of the previous plenary time. It also allowed the introduction of A-listing of authorisations in plenary. More importantly, it allows additional expertise, mainly in the form of member's advisors to be introduced.

Using this model, based on the RAC/SEAC Rules of Procedure with some additions to strengthen the role of the Committees rapporteurs, additional (process based rather than thematic) working groups will be set up in 2020 for both restrictions and CLH. Further details are given in the Annex. [RAC agreed on the mandates for these working groups at its March meeting].

## **PART II - MSC<sup>2</sup>**

### ***Numbers, turnover of members, renewals and new nominations***

In 2020, MSC had 27 members and 24 alternate members at the end of the year. All MSCAs were represented in the MSC and additionally also NO was represented. In 2020 IT appointed an alternate member to the MSC and new members and/or alternate members were appointed from AT, HR, EE, FR, LT, LU, and PL. In addition, the ES and HU member and alternate member crossed over their roles. Furthermore, 8 MSC member and 7 alternate member mandates were renewed.

MSC met in virtual meetings during its five full MSC-rounds; zero face-to-face meetings were held.

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<sup>2</sup> Details on REACH processes requiring MSC involvement is available in the 2018 MB report, on ECHA's website and in the REACH legal text.

### **Main achievements and challenges**

MSC reached **unanimous agreements on all of the SEV cases**<sup>3</sup> in 2019 and most DEV and SVHC cases<sup>1</sup> within the legal deadline (60 days and 30 days after referral to MSC). MSC referred one DEV-case (CCH-038/2020; MSC-70) and one SVHC case (Resorcinol; MSC-70) to the Commission for decision making. Secretariat withdrew two DEV cases from decision making during MSC process.

<b><u>Process</u></b>	<b><u>Referred cases</u></b>	<b><u>Agreed cases</u></b>	<b><u>Agreed in written procedure</u></b>	<b><u>Agreed in Meeting</u></b>	<b><u>Referred to Commission</u></b>
DEV	19	16	10	6	1
SEV	12	12	9	3	0
SVHC	4	3	2	1	1
<i>Sum</i>		<i>31</i>	<i>21</i>	<i>10</i>	<i>2</i>

In 2020, MSC did not need to issue any opinions on draft CoRAPs or recommendations for inclusion of priority substances in Annex XIV; the opinion on the CoRAP 2020-2022 was agreed already in December 2019.

MSC held 5 plenary meetings (all were virtual meetings using Secure Webex) over 10 calendar days, 5 preparatory web-meetings and 11 written procedures for agreement seeking (4 SEv, 5 DEV, 2 SVHC). Four Rapporteurs and co-rapporteurs contributed to the work and held some smaller meetings preparing for MSC draft opinions, for adoption in February 2021.

The first virtual meeting in 2020, before the outbreak of the Covid crisis, was held remotely due to its short length (1-day) and to reduce the Agencies carbon footprint. Stakeholder representatives could not yet participate, however, the meeting's learnings allowed MSC Secretariat to set up the process and procedures for stakeholder participation in open sessions. Their participation was secured again as of the second virtual meeting, and this led to more stakeholder participation, as it is easier to manage personal/work agendas around the open and closed session structure of the virtual meetings.

The members maintained **high interest and commitment** to the work of MSC as shown in their very high participation to both the plenaries (27 members in all meetings, except in the first virtual meeting of February, when there were 23) and to the written procedures. Also, overall interest in the meetings remained high with on average 69 (ranging between 54-90) participants, including experts and observers, per meeting.

The MSC deputy chair, Ms. Charmaine Ajao, took on responsibility for chairing different processes in the MSC-rounds. She finished the on-boarding programme with successfully chairing the full MSC-73 round, including all preparatory agenda management steps, in February 2021.

One of MSC's main challenges in 2020 was the successful transition from plenary to virtual meetings. ECHA's IT, audiovisual (AV) and MSC's Secretariat's support were instrumental to this success, but it is also impressive how quickly and efficiently members and stakeholders adapted to the situation. It required a mindset change, changes to the way we work, and making the best of the situation. We see an increased bi/trilateral collaboration via email and online meetings before plenary, making the discussion at the meeting more focused on the unresolved elements that require input from the MSC at large. Emerging points of special attention are the integration

<sup>3</sup> Abbreviations: CCH – Compliance Check; CoRAP – MSC opinion on the ECHA draft Community Rolling Action Plan; DEV – Dossier evaluation; SEv – Substance evaluation; SVHC – identification of Substances of Very High Concern; RECOM – MSC opinion on the ECHA draft Recommendation for inclusion of substances in Annex XIV; TPE – Testing Proposal Examination.

of new members and stakeholders, and how keeping the team spirit and active participation from MSC members.

Dossier and substance evaluation decision making in the MSC-70 round was delayed beyond the scheduled meeting dates due to new working-from-home arrangements many actors had to make due to the Covid situation. MSCAs received additional time for submission of PfAs, and several Registrants requested and received a deadline extension for commenting on PfAs, however, the meeting could not be rescheduled due to the upcoming summer period. Therefore, the meeting was used for discussion and, as much as possible, resolution of the PfAs and registrant(s) comments thereupon. Following the meeting, agreements on the decisions were sought in written procedure.

### Dossier evaluation

In 2020, the fraction of all dossier evaluation draft decisions which received PfAs was further reduced compared to previous years (21% in 2019, 6% in 2020), and the fraction of cases agreed in written procedure seemed to stabilise (57% in 2018, 74% in 2019 and 76% in 2020).

Agreement process	Percentage of cases							
	2017		2018		2019		2020	
	Referred to MSC	Agreed in written procedure	Referred to MSC	Agreed in written procedure	Referred to MSC	Agreed in written procedure	Referred to MSC	Agreed in written procedure
Compliance check (CCH)	51	67	35	66	24	76	6	83
Testing proposals (TPE)	52	59	16	63	20	70	6	60

As anticipated already at the MSC-70 meeting, one of the cases (CCH-038/2020) had to be referred to the Commission due to diverging views on the inclusion of the cohorts 2A and 2B (developmental neurotoxicity, DNT) and cohort 3 (developmental immunotoxicity, DIT) in the extended one-generation reproductive toxicity study (EOGRTS).

To efficiently deal with the increasing number of dossier evaluation cases, ECHA piloted notification of draft decisions to MSCAs in an additional round (MSC-70bis). None of these cases received PfAs. If PfAs had been received, MSC would have sought agreement in written procedure.

### Substance evaluation and SVHC identification

In 2020, out of 17 SEv draft decisions notified to MSCAs 12 had to be referred to MSC. Of these, nine cases (75%) were agreed in written procedure, an increase compared to 2019. There were no cases for the MSC-71 round in October.

In 2020, out of 7 submitted SVHC proposals four were referred to MSC. Of these, two cases (50%) identified under Art. 57(c) were agreed in written procedure. One case was identified under Art. 57(f) as an endocrine disruptor with equivalent level of concern for human health (i.e. butyl 4-hydroxybenzoate). One case proposed to be identified under Art 57(f) as endocrine disruptor with equivalent level of concern for human health was referred to the Commission (i.e. Resorcinol).

## Other aspects

To address recurring challenges to find a volunteer from the MSC membership to become Rapporteur, MSC discussed and supported a fall-back approach which uses for each opinion forming process a randomised ordered list of Member States from which the rapporteur may be picked. MSC also expressed preference to allow that alternate members can take on the task of Rapporteur. The MB agreed to this and updated the MSC Rules of Procedure. The approach was applied and proved to be a very efficient and effective way for the Chairman to identify a Rapporteur.

The Rapporteur and Working Group for the development of the MSC opinion on the 10<sup>th</sup> draft ECHA recommendation for inclusion of priority substances in Annex XIV had their first meetings on the draft MSC opinion in the second part of the year. Furthermore, the MSC Rapporteur and Co-Rapporteur prepared the first draft opinion on the draft CoRAP update (2021-2023).

In line with the REACH Joint Evaluation Action Plan (Action 9) (*ECHA will continue, as far as possible, identify and plan discussions on more generic issues that may arise in upcoming compliance checks*) MSC discussed the following general topics:

- Mutagenicity testing strategy when both a concern for chromosomal aberration (CA) and gene mutation (GM) exist) (MSC-70, MSC-71)
- Long-term fish toxicity testing (MSC-71)
- Terrestrial toxicity testing strategy (MSC-71)
- Scientific evidence required to include the developmental neurotoxicity (DNT) and developmental immunotoxicity cohorts (DIT) into the design of the extended one-generation reproductive toxicity study (EOGRTS) (MSC-72 and MSC-73).

Examples of general topics that arise in the context of substance evaluation discussions:

- Amphibian information requirements that may lead to a conclusion that a substance meets the WHO definition for endocrine disruptors in the environment (MSC-69)
- Technical specifications /guidance for sterility controls to be performed in a water-sediment simulation study (OECD TG 308) (MSC-70)

MSC members started with pilots of the INTERACT MSC Meetings Module (MSC-71, MSC-72) and piloted the use of the Collaboration tool for a SEv-case (MSC-72).

### Outlook 2021

MSC has scheduled four meeting rounds in 2021, one meeting per quarter. ECHA will continue with additional MSCA notifications for dossier evaluation cases, not synchronised with an MSC meeting, to efficiently cope with the increasing number of draft decisions<sup>4</sup>. In terms of workload for MSC, more SVHC cases are expected than in 2020. Also, the first dossier evaluation decisions from the group approach may arrive. In terms of IT, MSC fully transitions first half of 2021 to INTERACT MSC Meeting Module for its meeting documentation, while for the time being, it expects to retain S-CIRCABC for voting in written procedures.

## PART III - BPC

### Numbers, turnover of members, renewals and new nominations

Due to the Brexit the number of members in the BPC and Working Groups has decreased. The number of BPC members is 28 where 26 members have appointed an alternate member. Currently all MSCAs except BG are represented in the BPC. In addition, CH and NO are represented in the BPC. BE, CY, HU and PL have appointed both a new member and an alternate

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<sup>4</sup> These decision-making rounds, dedicated to dossier evaluation cases, are identified as MSC-xxbis rounds (with the xx being replaced with the preceding MSC round number e.g. MSC-73bis).

member, and DK has appointed a new alternate member to the BPC.

For the Working Groups the number of core and flexible members has slightly decreased compared to 2019 with the total of 34 core and 233 flexible members<sup>5</sup>. In 2020, there were no WG-members from BG, LT, LU, MT and PT. Due to the large number of experts, the turnover of flexible members is relatively high. The WG-members are nominated until further notice.

## Performance 2020

The total opinions adopted by the BPC in 2020 increased from 20 in 2019 to 38 in 2020. This number is comparable to other years. In fact, the year 2019 can be considered as an outlier, mainly resulting from the delays in the evaluation by the MSCAs in relation to the newly required assessment of the ED properties of active substances.

The BPC adopted:

- 15 opinions (compared to 3 in 2019) on an application for approval of an active substance; all for the Review Programme. In addition, 10 opinions<sup>6</sup> were adopted at the BPC where the evaluating Competent Authority (eCA) performed an assessment of the endocrine disrupting (ED) properties. Also these opinions were all for the Review Programme. For 3 opinions a non-approval was proposed: esbiothrin in PT 18; chlorophene in PT 2 and N-(3-aminopropyl)-N-dodecylpropane-1,3-diamine in PT 8;
- 10 opinions (similar to 2019) on an application for Union authorisation where for 8 opinions the BPC proposed to grant the authorisation, whereas for 2 opinions a non-authorisation was proposed;
- two opinions following an Article 75(1)(g) request from the Commission: i) re-assessment of the specifications for an active substance for which the opinion was already adopted; ii) analysis of alternatives for two wood preservatives within the renewal process.

The number of Working Group meetings was reduced from five meetings to four virtual meetings in 2020. The peer review activities slightly increased for active substances, whereas the Union authorisation peer review discussions remained stable in 2020 compared to 2019. The overall workload for the Working Groups slightly increased compared to 2019 as the Working Groups also contributed to the coordination between different evaluating Competent Authorities of the assessment of related Active Substance and Union Authorisation applications. A number of evaluating Competent Authorities increasingly used early WG discussions (17 in total) to receive guidance on their assessment. This has in particular been used for the assessment of endocrine disrupting properties and for environmental exposure assessments. The Working Groups addressed also many guidance related issues, such as: i) new emission scenarios; ii) specific scientific questions regarding e.g. dermal absorption; iii) three chapters of the efficacy guidance have been revised and finalised at the WG level, i.e. PT1-5 – Disinfectants developed in close collaboration with CEN, PT11 – Preservatives for liquid-cooling and processing systems, and PT19 – Repellents and attractants.

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<sup>5</sup> There are 9 core members in the Efficacy Working Group (WG) representing AT, HR, FR, DE, EL, NL, RO and SI; 2 alternate members representing FR and DE and 69 flexible members. The Analytical methods and Physico-chemical Properties WG is composed of 6 core members representing FR, DE, EL, NL, PO and SI; 4 alternate members representing FR, DE, EL and NL and 42 flexible members. In the Human Health WG, there are 11 core members representing CZ, FR, DE, EL, ES, IE, NL and SI; 6 alternate members representing FR, DE, EL, IE and NL and 86 flexible members. The Environment WG includes 8 core members representing FR, DE, EL, IE, NL and SI; 6 alternate members representing FR, DE, EL, IE and NL as well as 77 flexible members. Since some members are nominated in more than one WG, the total number of flexible members is 233.

<sup>6</sup> The BPC adopted already an opinion for these active substance PT combinations. However, after the ED criteria became applicable the opinions were returned by DG SANTE via an Article 75(1)(g) request.



## Prognosis and workload management

Looking ahead to 2021 and 2022 the relevant processes show the following developments:

- For active substance approval the submission of draft evaluations by the MSCAs to ECHA for peer review almost came to a complete standstill in 2019 but has increased again in 2020. For 2021 it is foreseen that the number of opinions will be similar to 2020.
- For Union authorisation, based on the planning of submissions of assessment reports provided by the MSCAs, the workload is expected to increase significantly in 2021. In view of the foreseen timeline of the submissions and the duration of the peer review the number of opinions will probably be between 15 and 20.
- At least three opinions on an Article 75(1)(g) request will be adopted in 2021: two related to risk assessment for an active substance identified as meeting the ED criteria and one related to a Union authorisation application. In addition, one or more opinions on an Article 38 request are expected.
- In conclusion, the overall workload for the BPC and the Working Groups should increase but remains manageable for 2021. It is foreseen that the total number of opinions adopted will be comparable to 2020 with some increase in the number of Union authorisation and maybe Article 38 opinions, the latter due to the increasing number of referrals occurring in the Coordination Group.
- For 2022 however a substantial increase in the numbers of opinions to be adopted is expected for both the active substance approvals and Union authorisations. This is based on the planning of submissions of assessment reports received by ECHA from the MSCAs, as reported in the last CA meeting of 2020. It remains to be seen if all the planned submissions will materialise. However, for the next process flow for Union authorisation an almost doubling of the numbers will occur. This increase will have an impact on the workload of the BPC and the Working Groups and the SECR will take initiatives to discuss this with the members, where this may lead to a change in working processes for the peer review.

The Secretariat has initiated activities in relation to the analysis of alternatives under the active substance approval process. A dedicated session at the BPC was organised in the first meeting of 2021. This will lead to follow-up actions and activities for the short and long term. In the short term the Secretariat will – in cooperation with the relevant REACH units – develop formats, templates and guidance for applicants and MSCAs.

## Reflections for the MB

Considering the previous annual report and the current and future developments the following points are brought to the attention of the MB:

- It remains difficult to schedule the meeting agendas for the BPC and the Working Groups due to the unpredictability of incoming draft evaluations by MSCAs. MB members are asked to increase their planning capacities to allow for a realistic and timely planning. This applies to the active substance approval process as well as Union authorisation. ECHA reports on the progress of both processes on a regular basis at the CA meetings.
- In view of the foreseen increase of submissions of assessment reports this year and the following ones, the organisation of the peer review activities will have to be adapted.

### Attachment:

- Annex: Summary of RAC restructuring plan

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## Annex

### Summary of RAC restructuring plan

Since 2008, RAC has operated as a single Committee with only occasional use of *ad hoc* working groups for specific dossiers. The increase in workload since 2014 has been continuous and reached the point in 2018 where a standing working group for evaluating Applications for Authorisation was set up under the RAC Rules of Procedure, in order to reduce the pressure on plenary. This enabled RAC to handle the high number of authorisation effectively, using much less plenary time. With further increases in workload in the other three processes (Restriction CLH and Occupational Exposure Limits) expected, ECHA intends to further restructure the Committee by setting up further standing working groups, i.e. for Classification and Labelling as well as for Restrictions. As a smaller process, OELs can be considered at a later date.

The consequence for ECHA will be a shift in resources from preparing the quarterly plenaries to preparing meetings of several working groups held in the middle of the inter-plenary cycle. The preparation of dossiers and opinion development is not expected to be impacted except in the case of CLH, where parallel changes are proposed (see DM paper Jones and Bowmer). Instead of one long meeting per quarter, there would be one shorter plenary and 3 working group meetings every quarter. Even when activities have been combined efficiently for each cycle, preparing 16 meetings a year will require some additional Committee resources. The consequence for members is that all opinions would be scrutinised in detail a Working Group, allowing much shorter handling, e.g. through A-listing or shorter consideration of the key points in plenary.

The working group model proposed is that already developed for Authorisations, i.e. using the Committee procedure implemented there for enhancing the role of the rapporteurs. The added value of the Authorisation WG has been an increase in member's capacity and specific expertise on worker protection through member's advisers, while plenary agendas have been reduced by 50-70%. This facilitated the agreement/adoption of 96 Authorisation opinions in 2020, many by A-listing, the WG providing appropriate scrutiny. A similar positive spin-off is expected from further process-based working groups, which will also provide an opportunity for member's advisers to join in the activities of the working groups.

There are several aspects of the Commissions chemicals strategy on sustainability which will provide RAC with additional work through its current processes. However, new work proposed under other legislation will also arrive in the next three years for ECHA and RAC's attention. Opinions on substances will be required under the Drinking Water Directive from 2024, while the Commissions plans for the Batteries Regulation could add additional restrictions to RAC's workload. It is proposed to apply the same working group model to service the evaluation of opinions in RAC under such new processes. More accurate (Committee) workload estimates of such new tasks are needed.

Work on setting up the CLH and Restrictions standing Working groups started in February 2021 and RAC was consulted on the mandates for both working groups at its March plenary.