

## MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	EE
What reporting period are you reporting on?	2010
Primary contact person's name.	Natali Promet
Please provide an email address for the primary contact person.	natali.promet@terviseamet.ee

Theme 1 - Information on the Competent Authority	
How many Competent Authorities are responsible for REACH?	There is one Competent Authority responsible for REACH.

One Competent Authority Responsible for REACH	
What is the name of the organisation where the Competent Authority is situated?	Health Board
What is the address of the organisation?	Paldiski Road 81 10617 Tallinn ESTONIA
What is the email address of the organisation?	kesk@terviseamet.ee
What is the telephone number of the organisation?	+372 6943500
What is the fax number of the organisation?	+372 6943501
What part of REACH does this part of the Competent Authority deal with?	All
From what part of Government does this part of the Competent Authority have authority from?	Health
Are employees in the Competent Authority directly employed by Government (civil servants)?	Yes
What skills do staff in this part of the Competent Authority have?	Chemistry Toxicology Ecotoxicity Enforcement Exposure CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Other
If Other, please list the different legislations here	Chemical Weapon Convention
Are there any other institutions that the Competent Authority works with in relation to REACH issues?	Yes
Please list the other institutions that the Competent Authority works with.	Ministry of Social Affairs Tax and Customs Board Ministry of Environment Ministry of Economic Affairs and Communications Technical Surveillance Authority Labour Inspectorate Baltic Environmental Forum Estonian Association of Chemical Industry University of Tartu Tallinn University of Technology
Does the Competent Authority outsource any of its work?	No

How adequately resourced is the Competent Authority?	3
Space is available below to provide further comments on the resourcing of the Competent Authority.	There is lack of: Human resources Finances Some specific field of expertise (e.g. toxicokinetic, CMR)

## Theme 2 - Information on Cooperation and Communication with other Member States, the European Chemicals Agency (ECHA) and the Commission

How effective is communication between MS for REACH?	8
How could effectiveness of communication between MS be improved?	The effectiveness of communication could be improved by: - organising twinning light projects with more experienced MS to harmonise level of knowledge
How effective is collaboration between MS for REACH?	7
How could effectiveness of collaboration between MS be improved?	The effectiveness of collaboration could be improved by: - regional cooperation e.g. Nordic countries, Baltic countries meetings, e-mail exchange, establishing contact points, working group on similar issues
Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	Yes
Please provide further information.	Health Board took part in the following projects: CLEEN Eurobiocides (biocides control) Eunick (nickel control in articles) Eurazos (aromatic amines in textile and leather) RiskASSETs (The Risk Assessment and Management - European Training Programme)
How effective is MS communication with ECHA?	9
How could effectiveness of communication with ECHA be improved?	Communication with ECHA is effective, some minor technical issues could be improved - so that documents would be compatible.
How effective is MS collaboration with ECHA?	9
How could effectiveness of collaboration with ECHA be improved?	Collaboration with ECHA is effective
How effective is MS communication with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of communication with the Commission be improved?	The timeframe of the work of the COM should be more considerate of the timeframe of the work of the MS.
How effective is MS collaboration with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of collaboration with the Commission be improved?	To improve collaboration with different sections within the COM.
Has use been made of the safeguard clause of REACH (Art. 129)?	Yes
If so, please provide further information.	RAPEX is used on the regular basis

### Theme 3 - Operation of the National Helpdesk and Provision of Communication to the Public of Information on Risks of Substances

Please provide the name of the organisation responsible for operating the National Helpdesk for REACH.	Health Board
What is the address of the Helpdesk?	Gonsiori 29 10147 Tallinn ESTONIA
What is the web page address of the Helpdesk?	www2.sm.ee/reach
What is the email address of the Helpdesk?	reach@sm.ee
What is the telephone number of the Helpdesk?	+372 6269397
What is the fax number of the Helpdesk?	+372 6269395
Are there any more organisations responsible for operating the National Helpdesk for REACH?	No

#### Please indicate the number of each type of staff that are involved in the Helpdesk.

Toxicologist	1-5
Ecotoxicologist	1-5
Chemist	1-5
Risk Assessor	1-5
Economist	0
Social Scientist	0
Exposure Assessor	1-5
Other (please list)	1-5
If you have specified that there are a number of other staff that are involved in the Helpdesk, please list the type of staff here.	Regulatory
Is the same Helpdesk used to provide help to Industry on CLP?	No
Does the Helpdesk receive any non-governmental support?	No
How many enquiries does the Helpdesk receive per year?	1-100
In what format can enquiries be received by the Helpdesk?	Email
How are the majority of enquiries received?	Email
Do you provide specific advice to SME's?	No
Who are the majority of enquiries from?	Small-medium enterprises

What type of enquiries does the Helpdesk receive?	<ul style="list-style-type: none"> <li>Pre-registration</li> <li>SIEFs</li> <li>Registration</li> <li>REACH-IT</li> <li>Authorisation</li> <li>Downstream user obligations</li> <li>Restriction</li> <li>Obligations regarding articles</li> <li>Safety Data Sheets</li> <li>Enforcement</li> </ul>
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For each type of enquiry received, please provide the proportion in percentage of the total enquiries.	
Pre-registration (%)	15
Registration (%)	20
Authorisation (%)	3
Restriction (%)	2
Enforcement (%)	11
SIEFs (%)	3
REACH-IT (%)	4
Downstream user obligations (%)	14
Obligations regarding articles (%)	8
Safety Data Sheets (%)	20

What proportion of enquiries received are deemed to be 1) straight forward, 2) complex, OR No information	
Straight forward (%).	60
Complex (%).	20
No information (%).	20

How long, on average, does it take to respond to the following types of questions?	
Straight forward questions	1 week
Complex questions	2 weeks
Are any types of enquiry outsourced?	No
Does the Helpdesk seek feedback on its performance?	No
Does the Helpdesk review its performance and consider ways to improve its effectiveness?	Yes

What level of cooperation is there between Helpdesks?	
What level of cooperation is there between Helpdesks under REHCORN?	5
What level of cooperation is there between Helpdesks outside REHCORN?	3
How frequently do you use RHEP?	Monthly

Has the MS carried out any specific public awareness raising activities?	Yes
What type of activities have been carried out?	Newspaper Leaflets Other (please list)
Please list the other types of activities that have been carried out.	E-mail campaigns to related contact points

How effective was each type of activity?	
Newspaper	3
Leaflets	3
Other	4
Do you have a REACH webpage/website?	Yes
Do you have a single webpage for REACH or multiple pages?	Multiple webpages
How frequently is the REACH webpage visited (per month)?	501-5,000
Please describe the scope of the number of REACH webpage visits.	There are a number of frequent users who seek for reliable information source, access to up-to-date information. Some of the users have heard of different processes of REACH and seek for further information via the website.

Theme 4 - Information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods	
Does the MS contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?	Yes
What has been the overall public funding on research and development of alternative testing in your MS each year?	No information

Theme 5 - Information on Participation in REACH Committees (FORUM, MS, RAC, SEAC, CARACAL, PEG, RCN, REHCORN)	
On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are?	9
How could the effectiveness of the Committees be improved?	The work between MS for REACH enforcement issues is well organised in the FORUM, where the representative from the Health Board is nominated as a FORUM member. Health Board is nominated as the CA. Members to the MSC, RAC, RCN, CARACAL and REHCORN are nominated from the Department of Chemical Safety of the Health Board. SEAC member is nominated from the Ministry of Social Affairs. For the time being we are not actively participating in PEG.

Theme 6 - Information on Substance Evaluation Activities
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### 2010 Reporting

Please name the organisations/institutions that are involved in the evaluation process. Health Board

### Please indicate the number of each type of staff that are involved in substance evaluation.

Toxicologist

Ecotoxicologist

Chemist

Risk Assessor

Socio-Economic Analyst

Exposure Assessor

Other (please list)

If you have specified that there are a number of other staff that are involved in substance evaluation, please list the type of staff here.

Please list the names of the substances covered in the dossiers that the MS has commented upon.

Please list the names of the substances covered in the dossiers where a draft decision has been made.

Please list the names of the substances covered in the dossiers that the MS has rapporteured.

Please list the names of the substances covered in the dossiers that the MS has completed.

How long, on average, does evaluation of a dossier take?

How many transitional dossiers has the MS completed?

How many substances has the MS added to the Community Rolling Action Plan?

How many of ECHA's draft decisions on dossier evaluation has the MS commented on?

### Theme 7 - Annex XV Dossiers

#### How many of each type of dossier has the MS prepared?

CLP 0

Restriction 0

Identification of SVHC 0

Is the time spent following up your MS dossiers reasonable? 1

Space is available below to provide further comments on how reasonable the time spent following up your MS dossiers was.

#### How many of each type of dossier are rapporteured?

CLP 0

Restriction	0
Identification of SVHC	0
Is the time spent following up rapporteured dossiers reasonable?	1
Space is available below to provide further comments on how reasonable the time spent following up your rapporteured dossiers was.	

How many of each type of dossier are co-rapporteured?	
CLP	4-6
Restriction	0
Identification of SVHC	0
Is the time spent following up co-rapporteured dossiers reasonable?	5
Space is available below to provide further comments on how reasonable the time spent following up your co-rapporteured dossiers was. It is difficult to specify as the process is still ongoing.	

How many dossiers prepared by other MS has the MS contributed to or commented upon?	
CLP	0
Restriction	1-3
Identification of SVHC	0

How many dossiers prepared by ECHA has the MS contributed to or commented upon?	
Restriction	0
Identification of SVHC	0

What expertise is available for preparing dossiers?	
Chemist	1-3
Toxicologist	
Ecotoxicologist	1-3
Economist	
Enforcement	1-3
Legal	
Policy	
Exposure	1-3

CLP	1-3
Other (please list)	
If you have specified that there is other expertise is available for preparing CLH dossiers, please provide details here.	
Is the MS able to access external specialists?	Yes
What types of external specialists does the MS have access to?	It is possible to consult with or invite experts from Universities.
Is the MS satisfied with the levels of access to expertise?	3
Has there been any industry involvement in the preparation of MS dossiers?	No

## Theme 8 - Information on Enforcement Activities

### General Information

Please enter the MAIN enforcing authority for REACH within the Member State.	The main enforcing authority for REACH is Health Board (Enforcement Department), who performs control of chemicals and articles at the level of holesale (incl. producers and importers).
Is there more than one enforcing authority for REACH within the Member State?	Yes
Please provide details on the other enforcing authorities for REACH within the Member State.	Other enforcement bodies are Labour Inspectorate, Consumer Protection Board, Environmental Inspectorate, Tax and Customs Board, Technical Surveillance Authority and Rescue Service. - Labour Inspectorate and Environmental Inspectorate took part in REACH inspections at the level of downstream users (SDS requirements were checked) - Consumer Protection Board made chemicals control at the level of retailers (incl. Articles and Annex XVII) - Tax and Customs Board focused their chemicals control on the border (incl. Articles and Annex XVII) Health Board has cooperation agreements with Consumer Protection Board and Tax and Customs Board and the exchange of information and actions on information is an everyday work. - Labour Inspectorate took also an active part in REACH inspections during Forum project REACH-EN-FORCE-1.

### Enforcement Strategy

Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH?	No
If No, are there any plans for making an enforcement strategy (or strategies)?	No



Comments

The strategy is not developed yet, but the meetings between enforcement authorities are held on regular (once per one or two months) in order to develop a new Chemicals Act with more specified enforcement tasks. During these meetings discussions were started about the preparation of national enforcement strategy in line with the strategy devised by the Forum and cooperation agreements between enforcement authorities. But also as a result of these discussions additional proposals to prepare cooperation agreements between Health Board and Labour Inspectorate and Health Board and Environmental Inspectorate met a positive response. The preparation of the enforcement strategy is at the beginning phase.

### Co-ordination, co-operation and exchange of information

Please outline of the mechanisms put in place to ensure good cooperation, coordination and exchange of information on REACH enforcement between enforcing authorities and the Competent Authority.

Health Board has updated cooperation agreements with Consumer Protection Board and Tax and Customs Board . The exchange of information and actions on information is an everyday work. Meeting were organised with enforcement authorities to prepare proposal for cooperation agreements between Health Board and Labour Inspectorate and Health Board and Environmental Inspectorate. In these agreements also the the exchange of information, joint trainings for inspectors are foreseen. First joint training for inspectors of REACH-ENFORCE-1 project was at the end of April 2009. Health Board coordinated project on National level.

Describe how these mechanisms have operated in practice during the reporting period (e.g. regular meetings, joint training, joint inspections, co-ordinated projects and so on).

Regular meetings of the Enforcement authorities. Exchange of information on enforcement issues on regular basis. Participation in Forum projects. Several joint inspectors trainings. This report to the Commission on Enforcement consist from the combined data, collected from Health Board, Labour Inspectorate, Environmental Inspectorate, Consumer Protection Board and Tax and Customs Board. Materials from the national coordinators training, organised by Forum distributed to all enforcement authorities. Cooperation agreements between enforcement bodies, which already exists end which are planned to sign. Information about the discussions on the Forum meetings and materials, which are needed to help to enforce REACH were provided to enforcement authorities.

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Describe the inspection and investigation strategy and methodology.

1. On the regular basis the information from the Tax and Customs Board on suspected chemicals and article, stopped for the further investigation on the border (until 01.01.2010 it was regulation 339/93/EC, after AMS regulation). As a result of this information the following products were stopped: Cord and seal from Russia, which contained asbestos (25/07/2007 and 22/08/2008), aerosol paints from US, which contained toluene (10/07/2009) and nail glue from Korea, which contain dibutylphthalate (27/11/2009). This information exchange will continue. 2. To continue in 2010 controls on preregistration/registration of phase-in substances and SDS during the REACH-EN-FORCE project continuation and according to the information on preregistrations provided by ECHA focusing on producers and importers of the substances over 1 ton per year. 3. During 2010 to perform target checks on SDS at the level of downstream users in the scope of SLIC projects in wood processing and furniture manufacturing, motor vehicle repairs, cleaning and dry cleaning establishments. 4. To continue target checks on articles with laboratory testing on restrictions (DMF, phthalates, aromatic amines) and on the regular basis to cooperate with Consumer Protection Board 5. To continue monitoring the RAPEX system information and inspections on the market 6. To prepare to investigate on the national market the issue of PAH in tires with the help of manual, provided by England 7. To continue SDS investigation during the monitoring VOC in varnishes in cooperation with Environmental Inspectorate. In the planning process the following information sources were used: • Available list of operators from the national business register • Information about the operators from the Tax and Customs Board. • Information from ECHA to CA on national preregistration of phase-in substances and preregistered producers/importers (as a target - companies with more, than 5 substances) • RAPEX system information • Information, available via internet Inspections are divided to planned activities and reactive activities (on complains and control of information)

Describe the level and extent of monitoring activities.

Monitoring RAPEX information and control on the market, monitoring and information provided by Poison Information Centre, media monitoring on chemicals issues, online information on chemicals, target checks.

Describe sanctions available to enforcing authorities.

In Estonia penalties are regulated with general laws like Penal Code, Code of Misdemeanour Procedure and special laws. The special law for the implementation of Regulation 1907/2006 is the Chemicals Act. Persons who are responsible to proceed the penalties have rights to use right of discreditation according to the Administrative Procedure Act. The penalties for non-compliance with the Regulation 1907/2006 will be imposed with the amendment of the Chemicals Act. The amendment is currently under proceeding in Parliament and is expected to be enforced in the beginning of February 2009. However, all general laws named above should be taken into account as well. The amendment of the Chemicals Act is introducing new penalties: „„§ 244. Violation of the requirements of the REACH-regulation (1) Violation of the requirements of the REACH-regulation is punishable with a fine up to 300 fine units; (2) The same act, if committed by a legal person, is punishable by a fine of up to 350 000 Estonian crowns.” § 245. Procedure „(1) The provisions of the General Part of the Penal Code and of the Code of Misdemeanour Procedure apply to the misdemeanours provided for in § 241 , 242 and 244 of this Act.”” According to the Penal Code a fine unit is a base amount of a fine and is equal to sixty Estonian crowns and is applicable to natural person. With the provisions above upper level of financial penalties will be stated in the Chemicals Act when the proceeding of the proposed amendment is finalized. The average costs for legal person to comply with tasks and duties (mainly based on costs for registration of substances) according

based on costs for registration of substances) according to REACH-regulation for safety of goods have been taken into account in calculating the upper level of the financial penalties. The upper limit of financial penalties for legal persons is planned to be increased during the upcoming years. The aim of the additional increase of financial penalties is to make it proportional with the costs of authorisation. However, case-by-case approach in determination of the amount of financial penalties shall be used for each infringement. The Administrative Procedure Act is stated to ensure the protection of the rights of persons by creation of uniform procedures which allow participation of persons and judicial control and ensure also that administrative acts and measures shall be appropriate, necessary and proportionate to the stated objectives. According to Administrative Procedure Act: “§ 4. Right of discretion (1) The right of discretion is an authorisation granted to an administrative authority by law to consider making a resolution or choose between different resolutions. (2) The right of discretion shall be exercised in accordance with the limits of authorisation, the purpose of discretion and the general principles of justice, taking into account relevant facts and considering legitimate interests.” If a serious harm to human health, property or environment has been caused then according to the Penal Code imprisonment can be applied as well. According to Penal Code: “§ 367. Violation of requirements for handling dangerous chemicals or waste (1) Violation of the requirements for handling chemicals or waste dangerous to human health

or the environment, if such violation causes a danger to human life or health or to the environment, is punishable by a pecuniary punishment or up to 3 years' imprisonment. (2) The same act, if a danger to human life or health or to the environment is thereby caused through negligence, is punishable by a pecuniary punishment or up to one year of imprisonment. (3) An act provided for in subsection (1) or (2) of this section, if committed by a legal person, is punishable by a pecuniary punishment. § 368. Violation of requirements for handling dangerous chemicals or waste through negligence (1) Violation of the requirements for handling chemicals or waste dangerous to human health or the environment through negligence, if such violation causes a danger to human life or health or to the environment, is punishable by a pecuniary punishment or up to one year of imprisonment. (2) The same act, if committed by a legal person, is punishable by a pecuniary punishment.” Also in case of products, which pose serious risk to consumer (non compliance with the requirements of Annex XVII), Health Board and Consumer Protection Board usually remove products from the market and report via RAPEX information system.

Describe the referrals from ECHA.	Information on pre-registrations from ECHA.
Describe the referrals from other Member States.	Exchange of information with Latvia on cement with chromium VI content, exchange of information with France CA on DMF pre-registration issue, exchange of information with Poland on toluene issue in glue.
Describe any other measures/relevant information.	Health Board and Consumer Protection Board monitor RAPEX information and provide this information to inspectors to organise control activities on Estonian market.

## 2007

### Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	1249
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	38

What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	616
State the number of manufacturer dutyholders subject to inspections and investigations.	38
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	21
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	478
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	85
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed information in the supply chain.	616
State the number these cases which were non-compliant.	133
State the number of inspections that addressed downstream use.	85
State the number these cases which were non-compliant.	2
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed restriction.	138
State the number these cases which were non-compliant.	7
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	0

Investigations	
State the number of investigations prompted by complaints and concerns raised.	1
State the number of investigations prompted by incidents or dangerous occurrences.	0

State the number of investigations prompted by monitoring.	34
State the number of investigations prompted by results of 135 inspection/follow up activities.	
State the number of inspections and investigations resulting in no areas of non-compliance.	0
State the number of inspections and investigations resulting in verbal or written advice.	17
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	142
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

### Enforcement

State the number of manufacturers subject to formal enforcement.	32
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	21
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	478
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	85
Were these mainly:	Small-Medium

### 2008

### Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	2312
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	64
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	1550
State the number of manufacturer dutyholders subject to inspections and investigations.	43
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	21

Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	329
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	1151
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed information in the supply chain.	1550
State the number these cases which were non-compliant.	259
State the number of inspections that addressed downstream use.	1151
State the number these cases which were non-compliant.	55
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed restriction.	183
State the number these cases which were non-compliant.	8
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	0

Investigations	
State the number of investigations prompted by complaints and concerns raised.	2
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	44
State the number of investigations prompted by results of inspection/follow up activities.	266
State the number of inspections and investigations resulting in no areas of non-compliance.	0
State the number of inspections and investigations resulting in verbal or written advice.	28



State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	322
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	32
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	21
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	329
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	1151
Were these mainly:	Small-Medium

2009
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Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	2727
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	121
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	2089
State the number of manufacturer dutyholders subject to inspections and investigations.	36
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	29
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	796
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	1285

Were these mainly:	Small-Medium
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Inspections	
State the number of inspections that addressed registration.	37
State the number these cases which were non-compliant.	1
State the number of inspections that addressed information in the supply chain.	2089
State the number these cases which were non-compliant.	366
State the number of inspections that addressed downstream use.	1285
State the number these cases which were non-compliant.	103
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed restriction.	213
State the number these cases which were non-compliant.	6
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	0

Investigations	
State the number of investigations prompted by complaints and concerns raised.	2
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	47
State the number of investigations prompted by results of inspection/follow up activities.	382
State the number of inspections and investigations resulting in no areas of non-compliance.	0
State the number of inspections and investigations resulting in verbal or written advice.	23
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	475
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement
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State the number of manufacturers subject to formal enforcement.	36
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	29
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	796
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	1285
Were these mainly:	Small-Medium

### Theme 9 - Information on the Effectiveness of REACH on the Protection of Human Health and the Environment, and the Promotion of Alternative Methods, and Innovation and Competition

Do you think that the effects of REACH would be better evaluated at a Member State (MS) or EU level?	EU
What parameters are available at MS level that could be used to assess the effectiveness of REACH in a baseline study?	REACH enforcement data from 01.06.2007 - 31.12.2010 Results of REACH-EN-FORCE-1 project. Information on pre registrations/registrations of phase-in substances. Information flow in supply chain and its compliance with REACH requirements.

### Theme 10 - Other Issues/Recommendations/Ideas

Please provide any further information on the implementation of REACH that the MS considers relevant.	
Do you wish to upload documents in support of this submission	No

### Meta Informations

Creation date	19-07-2010
Last update date	
User name	ReachEE
Case Number	583278835371120010
Invitation Ref.	
Status	N