

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	SK
What reporting period are you reporting on?	2010
Primary contact person's name.	Peter Rusnak
Please provide an email address for the primary contact person.	rusnak@cchlp.sk

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

More than one Competent Authority Responsible for REACH

First Competent Authority	
What is the name of the organisation where the Competent Authority is situated?	Centre for Chemical Substances and Preparations
What is the address of the organisation?	Mierova 19 827 15 Bratislava Slovakia
What is the email address of the organisation?	info@cchlp.sk
What is the telephone number of the organisation?	+421 2 4854 4511
What is the fax number of the organisation?	+421 2 4854 4555
What part of REACH does this part of the Competent Authority deal with?	Evaluation Restriction Helpdesk CLP Risk Assessment Other (please list)
Please list the other parts of REACH that this part of the Competent Authority deals with here.	participation in MSC, RAC, SEAC, REHCORN - HelpNet, RCN, CARACAL, CASGNano, SON, REACH-IT
From what part of Government does this part of the Competent Authority have authority from?	Other (please list)
Please list the other parts of Government that this part of the Competent Authority has authority from.	Please list the other part of Government the Competent authority gets authority from. From national legislation /Act No. 163/2001 Coll. and Act No. 67/2010 Coll./

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 Legal Policy Exposure CLP
What other chemical legislation are the staff of the REACH CA involved in?	Biocides Other
If Other, please list the different legislation here	REGULATION (EC) No 648/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 March 2004 on detergents REGULATION (EC) No 1272/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006

Second Competent Authority

What is the name of the organisation where the Competent Authority is situated?	Ministry of Economy of the Slovak Republic
What is the address of the organisation?	Mierova 19 827 15 Bratislava Slovakia
What is the email address of the organisation?	palkovicova@economy.gov.sk, jurik@mhsr.sk
What is the telephone number of the organisation?	+421 2 4854 1111, +421 2 4854 7142
What is the fax number of the organisation?	+421 2 4333 7827, +421 2 4333 3595
What part of REACH does this part of the Competent Authority deal with?	Other (please list)
Please list the other parts of REACH that this part of the Competent Authority deals with here.	Policy, legislation and coordination at international and national level including nomination of national representatives to MSC, RAC, SEAC, FORUM, MB, REACH Committee, Participation in Management Board ECHA, REACH Committee, CARACAL
From what part of Government does this part of the Competent Authority have authority from?	Other (please list)
Please list the other parts of Government that this part of the Competent Authority has authority from.	From national legislation /Act No. 163/2001 Coll. and Act No. 67/2010 Coll./
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 Economy Legal Policy
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Other
If Other, please list the different legislation here	CLP, detergents, explosives, consumer protection,
Are there any more Competent Authorities responsible for REACH?	No

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?	We consider the communication between MSs as sufficient and appropriate. There is a lot of meetings as well as the opportunities for electronic communication.
How effective is collaboration between MS for REACH?	6
How could effectiveness of collaboration between MS be improved?	As a small CA with the limited capacity and available expertise we would welcome the modification of the REACH in a way to enable the joint preparation of dossiers according to Annex XV of REACH as well as the substance evaluation by two or more countries.
Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	No
How effective is MS communication with ECHA?	5
How could effectiveness of communication with ECHA be improved?	We would appreciate if ECHA, when something is needed from CAs, communicates DIRECTLY with CAs simultaneously to sending messages through Permanent Representation or MB member.
How effective is MS collaboration with ECHA?	4

How could effectiveness of collaboration with ECHA be improved?	We would appreciate if ECHA could take into account specific situation in the each country and avoid as much as possible one unified approach to all countries.
How effective is MS communication with the Commission (specifically Article 133 Committee)?	7
How could effectiveness of communication with the Commission be improved?	-
How effective is MS collaboration with the Commission (specifically Article 133 Committee)?	7
How could effectiveness of collaboration with the Commission be improved?	-
Has use been made of the safeguard clause of REACH (Art. 129)?	No

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. Centre for Chemical Substances and Preparations

What is the address of the Helpdesk? Mierova 19 827 15 Bratislava Slovakia

What is the web page address of the Helpdesk? <http://helpdesk.ccsp.sk>

What is the email address of the Helpdesk? info@cchlp.sk

What is the telephone number of the Helpdesk? 00421 2 4854 4511

What is the fax number of the Helpdesk? 00421 2 4854 4555

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)	0
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.	We would like to stress that the above information doesn't provide real number of helpdesk staff and overestimate the number of staff. Some of the functions are cumulative.
Is the same Helpdesk used to provide help to Industry on CLP?	Yes
Does the Helpdesk receive any non-governmental support?	No
How many enquiries does the Helpdesk receive per year?	101-1000
In what format can enquiries be received by the Helpdesk?	Email Phone Fax Letter Other (please list)
Please list the other format(s) of enquiries that can be received by the Helpdesk.	On the webpage http://helpdesk.ccsp.sk there is a special webform for enquiries. Personal visits of industry representatives at CCSP -helpdesk are held also quite often.
How are the majority of enquiries received?	Other
Do you provide specific advice to SME's?	No
Who are the majority of enquiries from?	No information
What type of enquiries does the Helpdesk receive?	Pre-registration SIEFs Registration REACH-IT IUCLID5 Downstream user obligations Restriction Obligations regarding articles Safety Data Sheets Enforcement SVHC CSR preparation CLP

For each type of enquiry received, please provide the proportion in percentage of the total enquiries.

Pre-registration (%)	5
Registration (%)	5
Restriction (%)	5
Enforcement (%)	5
CSR preparation (%)	5
CLP (%)	5
SIEFs (%)	1
REACH-IT (%)	5
IUCLID5 (%)	1
Downstream user obligations (%)	15
Obligations regarding articles (%)	5
Safety Data Sheets (%)	20
SVHC (%)	5

What proportion of enquiries received are deemed to be 1) straight forward, 2) complex, OR No information

Straight forward (%).	10
Complex (%).	90
No information (%).	0

How long, on average, does it take to respond to the following types of questions?

Straight forward questions	1 week
Complex questions	1 week
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?	Weekly
Has the MS carried out any specific public awareness raising activities?	Yes
What type of activities have been carried out?	Television Telephone Newspaper Leaflets Radio Other (please list) Speaking events
Please list the other types of activities that have been carried out.	- website - conferences organized under the auspices of Ministry of Economy - collaboration with the Industry REACH Helpdesk

How effective was each type of activity?	
Television	1
Newspaper	1
Radio	1
Speaking events	3
Telephone	5
Leaflets	5
Other	5
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.	Such parameter is not monitored.

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?	No
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?	7
How could the effectiveness of the Committees be improved?	We believe that the large administrative and bureaucratic procedures are not in favor of the effectiveness of the committees work. Some modification and simplification of REACH would be of help.

Theme 6 - Information on Substance Evaluation Activities

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Please name the organisations/institutions that are involved in the evaluation process.	Centre for Chemical Substances and Preparations in cooperation with Regional Public Health Office in Banska Bystrica and Slovak Environmental Agency in Bratislava
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Please indicate the number of each type of staff that are involved in substance evaluation.

Toxicologist	1-5
Ecotoxicologist	1-5
Chemist	1-5
Risk Assessor	1-5
Socio-Economic Analyst	0
Exposure Assessor	1-5
Other (please list)	0

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.	We would like to stress that the above information doesn't provide real number of staff involved in substance evaluation. The number of people is at the lower borderline of the range and in addition the functions are cumulative.
Please list the names of the substances covered in the dossiers that the MS has commented upon.	o Soybean oil, epoxidised, reaction products with methanol and water, EC No: 700-080-3, Registration number(s): 01-2119380300-52-0000, Communication number: TPE-D-0000000775-69-02/D - SK CA proposal for amendments to the Agency's draft decision on testing proposal Note: Comments were only sent where we found it relevant but even the dossiers that were not commented had to be studied. Thus, the total number of dossiers studied was higher than those commented upon.
Please list the names of the substances covered in the dossiers where a draft decision has been made.	- Dusantox L - Dastib 845
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?	No information
How many transitional dossiers has the MS completed?	
How many substances has the MS added to the Community Rolling Action Plan?	0
How many of ECHA's draft decisions on dossier evaluation has the MS commented on?	1-3

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.

Not relevant - As we have not prepared any dossier we cannot assess the time needed for the dossier preparation.

How many of each type of dossier are rapporteured?

CLP	1-3
Restriction	0
Identification of SVHC	0
Is the time spent following up rapporteured dossiers reasonable?	5

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

Note: The value is given as an estimate as no rapporteurship was brought to an end.

How many of each type of dossier are co-rapporteured?

CLP	1-3
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.

Note: The value is given as an estimate as no rapporteurship was completed

How many dossiers prepared by other MS has the MS contributed to or commented upon?

CLP	0
Restriction	0
Identification of SVHC	4-6

How many dossiers prepared by ECHA has the MS contributed to or commented upon?

Restriction	0
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Identification of SVHC	1-3
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What expertise is available for preparing dossiers?

Chemist	1-3
Toxicologist	1-3
Ecotoxicologist	1-3
Economist	0
Enforcement	1-3
Legal	1-3
Policy	0
Exposure	1-3
CLP	1-3
Other (please list)	0
If you have specified that there is other expertise is available for preparing CLH dossiers, please provide details here.	We would like to stress that the above information doesn't provide real number of staff involved in substance evaluation. The number of people is close to the lower borderline of the range and in addition the functions are cumulative.
Is the MS able to access external specialists?	Yes
What types of external specialists does the MS have access to?	Toxicology - reprotoxicity
Is the MS satisfied with the levels of access to expertise?	1
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.	There is no main enforcing authority for REACH in Slovakia.
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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.	Slovak Trade Inspection and regional inspectorates, Public Health Office and regional public health offices and the Regional Public Health Office based in Banska Bystrica, Slovak Environmental Inspection National Labour Inspectorate and labour inspectorates Main Mining Office and local mining offices Customs authorities Slovak Ministry of Defense

Enforcement Strategy

Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH?	Yes
If Yes, is the strategy (or strategies) in line with the strategy devised by the Forum?	Yes

Please outline the enforcement strategy within the Member State in a maximum of 2000 characters.	<p>Ministry of Economy of the SR (MoE SR) as the main responsible authority determines the REACH enforcement strategy. For designing the strategy, the Ministry used the information coming from European collaboration. The basic principle was creation of a legislative framework that would enable to involve all inspection authorities executing control in the REACH relevant areas in REACH enforcement. The aim was maximum utilization of available resources so that the main REACH objectives regarding the protection of target groups could be achieved. In this way, an enforcement system was created in Slovakia ensuring an effective and systematic inspection of all REACH related obligations in all relevant subjects. On the other hand, the different authorities have different internal structures and activities and have therefore to use their specific strategies. Their strategies of REACH enforcement have to be modified accordingly. The co-ordination of the authorities involved is ensured by the legislative framework, bilateral co-ordination (e.g. joint inspections), co-ordination by the MoE SR, as well as by the activities of a national coordinator in case of international inspection projects. The inspectors are specifically trained. For example National Labour Inspectorate reported: The nationwide Slovak labour inspection performances were focused on the workplaces where workers may be exposed to dangerous chemical agents to check that employers took action to protect workers from dangerous chemical agents required by chemical OSH legislation and also in terms of</p>
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required by chemical substance registration and also in some of safety data sheets. The aim of these inspections was to find that the companies which are manufacturers and importers of chemicals. This procedure was chosen because the labor inspection departments did not have access to the database of ECHA.

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.

The co-operation and REACH enforcement co-ordination is ensured by the MoE SR on the basis of the Act No. 163/2001 and Act No. 67/2010. In Slovakia, an analogy of the „Forum for Information Exchange and Enforcement...“ has been established where the representatives of inspection authorities are being informed of the „Forum“ Activities, they can Exchange information and participate in common projects. The inspection authorities organize trainings targeted on their specific activities where representatives of other inspection authorities are also invited .

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).

Centre for Chemical Substances and Preparations, the national competent authority of the Slovak Republic organized coordination meeting with enforcement authorities concerning verification of the pre-registration. National coordinator of project REACH-EN-FORCE 1 carried out training concerning this project and other REACH duties for inspectors of the Slovak Trade Inspection and invited representatives from other enforcing authorities. All participants have received project manual and other relevant methodological materials of the Slovak Trade Inspection. There was a labour inspectors workshop and training arranged on REACH enforcement for the representatives from all 8 regional labour inspectorates in Slovakia arranged by National Labour Inspectorate and the labour inspectors received a methodology how to carry out labour performance of REACH regarding ECHA Manual Forum: Project on pre registration/registration of phase in substances and SDS in 2009 (REACH-EN-FORCE 1). In 2009 was carried out joint training for custom officials and inspectors of Slovak Trade Inspection on enforcement REACH regulation.

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Describe the inspection and investigation strategy and methodology.

The inspection and investigation strategy and methodology are based on the national legislation (Act no. 163/2001 Coll., Act no. 67/2010 Coll.) and in line with FORUM recommendations.

Describe the level and extent of monitoring activities.

Even before the adoption of REACH, each control authority systematically monitored the area of their specific activities (e.g. the National Labour Inspectorate in the area of workers health protection in chemical industry, the Slovak Environmental Inspection in the prevention of serious industrial accidents and inspections for water protection, Slovak Trade Inspection in consumer protection by inspections of the market and of the distributors, etc.). After the adoption of REACH, the inspection authorities continue their respective activities and target them on specific obligations stipulated by REACH.

Describe sanctions available to enforcing authorities.

Sanctions available to enforcing authorities are given in part eight, particularly in paragraphs 40a, 40b, 40c, 40d, 40e, 40f and in paragraphs 40g of the Act No. 163/2001 Coll. on chemical substances and preparations as amended. Authorized control body imposes the sanction from 9 958 € to 99 582 € for an administration tort described in law on chemicals substances and preparations. Moreover the order forfeit can be imposed right to 16 597€.

Describe the referrals from ECHA.

Participation in the „Forum“ activities, membership in the „Forum“ working group „Cooperation with the customs authorities“. Participation of 2 SR representatives in the „Training the Enforcement Trainers Event“ Participation of the national coordinator in the training for the international project „REACH-EN-FORCE“, control of the Slovak translation of the „REACH-EN-FORCE 1“ manual, and participation in the project.

Describe the referrals from other Member States.

The inspection authorities collaborate with those of other member states also within other networks created in their specific areas, such as SLIC, RAPEX. Slovakia participated in the international project „Safety of toys for children up to 3 years of age“ aimed at investigation of restriction of the use of chemicals. Information was supplied to Austria on a legal subject residing in Austria who imported chemical substances and the respective customs process took place in Slovakia.

Describe any other measures/relevant information.

2007

Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.

Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.

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? 89

State the number of manufacturer dutyholders subject to inspections and investigations. 3

Were these mainly: Not applicable

State the number of importer dutyholders subject to inspections and investigations. 27

Were these mainly: Small

State the number of distributors subject to inspections and investigations. 43

Were these mainly: Small-Medium

State the number of downstream users subject to inspections and investigations. 16

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.	89
State the number these cases which were non-compliant.	0
State the number of inspections that addressed downstream use.	0
State the number these cases which were non-compliant.	0
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.	0
State the number these cases which were non-compliant.	0
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.	0
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	0
State the number of investigations prompted by results of inspection/follow up activities.	0
State the number of inspections and investigations resulting in no areas of non-compliance.	34
State the number of inspections and investigations resulting in verbal or written advice.	39
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	2

State the number of convictions following legal proceedings.	0
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Enforcement	
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State the number of manufacturers subject to formal enforcement.	0
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Were these mainly:	Not applicable
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State the number of importers subject to formal enforcement.	0
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Were these mainly:	Not applicable
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State the number of distributors subject to formal enforcement.	13
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Were these mainly:	Small-Medium
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State the number of downstream users subject to formal enforcement.	0
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Were these mainly:	Not applicable
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2008	
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Dutyholders	
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Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	
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Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	
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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?	122
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State the number of manufacturer dutyholders subject to inspections and investigations.	1
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Were these mainly:	Small
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State the number of importer dutyholders subject to inspections and investigations.	11
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Were these mainly:	Small-Medium
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State the number of distributors subject to inspections and investigations.	91
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Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	19
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	122
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed restriction.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	

Investigations	
State the number of investigations prompted by complaints and concerns raised.	0
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	0
State the number of investigations prompted by results of inspection/follow up activities.	0
State the number of inspections and investigations resulting in no areas of non-compliance.	74

State the number of inspections and investigations resulting in verbal or written advice.	58
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	1
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	1
Were these mainly:	Small
State the number of importers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of distributors subject to formal enforcement.	10
Were these mainly:	Small
State the number of downstream users subject to formal enforcement.	0
Were these mainly:	Not applicable

2009

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	
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?	333
State the number of manufacturer dutyholders subject to inspections and investigations.	39

Were these mainly:	Medium
State the number of importer dutyholders subject to inspections and investigations.	46
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	214
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	53
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	83
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	141
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	24
State the number these cases which were non-compliant.	
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed restriction.	131
State the number these cases which were non-compliant.	
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	

Investigations	
State the number of investigations prompted by complaints and concerns raised.	6

State the number of investigations prompted by incidents or dangerous occurrences.	7
State the number of investigations prompted by monitoring.	42
State the number of investigations prompted by results of inspection/follow up activities.	28
State the number of inspections and investigations resulting in no areas of non-compliance.	226
State the number of inspections and investigations resulting in verbal or written advice.	13
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	4
State the number of inspections and investigations resulting in initiation of legal proceedings.	21
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	11
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	11
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	21
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	2
Were these mainly:	Small

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?

Currently we do not see scientifically based parameters to be used for measurement of REACH effectiveness. HH as well as ENV are affected by too many factors simultaneously so that it is too controversial to evaluate a specific parameter as improved or deteriorated due to REACH implementation. Competitiveness of the EU industry at the global market seems to be diminished.

Theme 10 - Other Issues/Recommendations/Ideas

Please provide any further information on the implementation of REACH that the MS considers relevant.

Other activities directly connected to REACH implementation tasks which require a lot of effort, time and capacity are: 1. - the preparation of the national legislation harmonized with the REACH, 2. - the translation of basically all guidances, relevant documents, review and correction of translated EU legislative documents and consultation on terminology for the EU Translation Centres, 3. - work in Council when needed, and in Commission when EU legislation is under preparation 4. - MS CA - CCSP sent a Seconded National Expert to ECHA for 2 years (January 2007 - May 2009). This one expert represents about 10 % of the staff and could not be substituted. 5. - Preparation for the access to REACH IT and fulfillment of Standard Security Requirements needs extra resources. 6. - In 2009 there were 1636 messages sent through CIRCA interest groups: REACH&CLP CA, MSC, Registration, Annex XV, Evaluation. (Further large number of messages were received from REHCORN, SEAC and RAC) Such overload of information is not manageable by the small CA. 7. Since 14 June 2007 Slovak helpdesk provided 255 positions to 255 questions through HELPEX (RHEP) system. Further information: 1. National Labour Inspectorate reported for 2007: There where 7 accidents investigated in regard to dangerous substances by labor inspectors in Slovakia (1 of all 7 was mortal) 2. National Labour Inspectorate Reported: There where 68 accidents registered in regard to dangerous chemicals in 2007 by labour inspection in Slovakia. 3. No record of

... by labour inspection in Slovakia. (neither of 11 was mortal.) 4. National Labour Inspectorate reported for 2008: There were 11 accidents investigated in regard to dangerous substances by labour inspection in Slovakia. (neither of 11 was mortal.) 5. National Labour Inspectorate reported for 2008: There were 85 accidents registered in regard to dangerous chemicals in 2008 by labour inspection in Slovakia.

Do you wish to upload documents in support of this submission No

Meta Informations

Creation date	28-05-2010
Last update date	
User name	ReachSK
Case Number	482246029130814810
Invitation Ref.	
Status	N