

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	LT
What reporting period are you reporting on?	2010
Primary contact person's name.	Lina Dunauskiene
Please provide an email address for the primary contact person.	l.dunauskiene@aaa.am.lt

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?	Environmental Protection Agency (EPA)
What is the address of the organisation?	A. Juozapaviciaus str. 9, LT-09311 Vilnius Lithuania
What is the email address of the organisation?	aaa@aaa.am.lt
What is the telephone number of the organisation?	+370 5 2662808
What is the fax number of the organisation?	+370 5 2662800
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?	Environment
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 Enforcement Legal CLP Other (please list)
Please list the other skills that staff in this part of the Competent Authority have.	Biochemistry; Biology; Public health; Forestry
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Other

If Other, please list the different legislations here

The Environmental Protection Agency/REACH-CA is involved in the implementation of the following other EC legislation: Council Directive 67/548/EEC of 27 June 1967 on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances. Directive 1999/45/EC of the European Parliament and of the Council of 31 May 1999 concerning the approximation of the laws, regulations and administrative provisions of the Member States relating to the classification, packaging and labelling of dangerous preparations. 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 (CLP). Council Directive 1999/13/EC of 11 March 1999 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations. Directive 2004/42/CE of the European Parliament and of the Council of 21 April 2004 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products and amending Directive 1999/13/EC. Regulation (EC) No 842/2006 on certain fluorinated greenhouse gases. Regulation (EC) No 1005/2009 on substances that deplete the ozone layer. Regulation (EC) No 850/2004 of the European Parliament and of the Council of 29 April 2004 on persistent organic pollutants (POPs). Implements National law of Lithuanian Republic on chemical substances and preparations (published in Official gazette "Valstybės Žinios", 2000, No. 36-987; 2004, No. 116-4329; 2005, No. 79-2846; 2006, No. 65-2381; 2008, No. 76-3000) and manages national database of chemical substances and preparations.

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.

Lithuanian REACH-CA/Environmental Protection Agency is entitled (by the Governmental Resolution of 11 July 2007 and joint ministerial order of 1 October 2007 No D1-500/V-781) to work in close co-operation with the State Public Health Service/Ministry of Health as regards implementation of the tasks allotted to the competent authorities under REACH. The State Public Health Service is responsible for human health aspects and some other more general issues. This Resolution not only nominates the Lithuanian REACH Competent Authority, but also establishes an administrative system for the implementation of REACH Regulation (including sharing of responsibilities in drafting national legal acts with the aim to adapt national legislation to the REACH Regulation, representation at the European Chemicals Agency), defines tasks/duties of the Competent Authority other than those defined in the REACH Regulation (such as coordination of activities related to the implementation at national level (inter alia preparation of the Annex XV dossiers as regards restrictions or identification of substances of very high concern)). The joint ministerial order of 1 October 2007 No D1-500/V-781 (as amended by Order of 13 November No D1-682/V-925) defines areas of competences of main concerned institutions for participation and representation in the REACH Committee. Those institutions are: Environmental Protection Agency/REACH-CA, Ministry of Environment, and Ministry of Health/State Public Health Service. The Ministry of Environment is the leading state institution responsible

for overall coordination of activities related to chemicals management, including the REACH Regulation, performs tasks of political nature. The Ministry of Environment is responsible for the negotiations on the further development/amendments of the REACH Regulation and representation of the Lithuanian position, on the draft REACH implementing/supplementary legislation on general administrative issues to be approved at Committology level, drafting of the major part of the national legal acts with the aim to adapt national legislation to the REACH Regulation. The issues/draft REACH implementing/supplementary legislation of more technical and scientific nature are under responsibility of Environmental Protection Agency, State Public Health Service/Ministry of Health according to their competences. The Ministry of Environment represents Lithuania at the Management Board of the European Chemicals Agency. The Ministry of Economy is responsible for economic impact assessment of forthcoming proposals on restriction or authorization of chemical substances and participation at Committee for Socio-economic Analysis of the European Chemicals Agency.

Does the Competent Authority outsource any of its work? No

How adequately resourced is the Competent Authority? 5

Space is available below to provide further comments on the resourcing of the Competent Authority.

Compared to the tasks imposed the resources currently allocated are insufficient. This equally applies to financial, human and technical resources for REACH-CLP implementation. Therefore the tasks are performed on the basis of priority setting. Such situation requires very thorough planning of work and awareness raising campaigns. There is also a quite high rotation of staff within the CA and because of financial constrains training of the new staff is hampered. Our staff is working on “learning by doing “basis. Therefore ECHA training and co-operation platform is much appreciated. Every occasion to get knowledge from the experienced ECHA staff during different events is being fruitfully used We are organizing, as many as we can with our limited financial and human resources, public awareness campaigns and trainings for industry as well as for the staff of governmental institutions. We are preparing newsletters, leaflets and etc. in house. As for technical resources, IT tools our staff uses (hardware and software) do not fully comply with the requirements set for REACH implementation. Some of technical equipment is old and needs to be renewed. Financial resources currently being allocated for these purposes are not sufficient. That creates some problems for the Helpdesk staff who needs new IT tools to store, organize and follow up received and answered questions.

Theme 2 - Information on Cooperation and Communication with other Member States, the	
How effective is communication between MS for REACH?	8
How could effectiveness of communication between MS be improved?	
How effective is collaboration between MS for REACH?	8
How could effectiveness of collaboration between MS be improved?	
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?	9

How could effectiveness of communication with ECHA be improved?	
How effective is MS collaboration with ECHA?	9
How could effectiveness of collaboration with ECHA be improved?	
How effective is MS communication with the Commission (specifically Article 133 Committee)?	6
How could effectiveness of communication with the Commission be improved?	
How effective is MS collaboration with the Commission (specifically Article 133 Committee)?	6
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.	Environmental Protection Agency
What is the address of the Helpdesk?	Pylimo str. 35, LT-01309 Vilnius, Lithuania
What is the web page address of the Helpdesk?	http://chemija.gamta.lt/cms/index?rubricId=aa7b9ac7-0b08-4f60-a4f1-00dbb2252064
What is the email address of the Helpdesk?	reachclp@aaa.am.lt
What is the telephone number of the Helpdesk?	+370 5 2126094
What is the fax number of the Helpdesk?	+370 5 2123507
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	0
Ecotoxicologist	0
Chemist	1-5
Risk Assessor	0
Economist	0

Social Scientist	0
Exposure Assessor	0
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.	1 biochemist; 2 biologists.
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.	Industry representatives or other interested parties can come directly to our office and get consultations.
How are the majority of enquiries received?	Phone
Do you provide specific advice to SME's?	Yes
Who are the majority of enquiries from?	Small-medium enterprises

What type of enquiries does the Helpdesk receive?	<ul style="list-style-type: none"> Pre-registration SIEFs Registration REACH-IT IUCLID5 Authorisation Downstream user obligations Restriction Obligations regarding articles Testing Safety Data Sheets Enforcement Other (please list) CLP
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Please list the other types of enquiries that the Helpdesk receives.	General questions about REACH; REACH fee regulation; Guidance documents.
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For each type of enquiry received, please provide the proportion in percentage of the total enquiries.

Pre-registration (%)	17
Registration (%)	28
Authorisation (%)	2
Restriction (%)	1
Testing (%)	2
Enforcement (%)	2
CLP (%)	5
SIEFs (%)	4
REACH-IT (%)	3
IUCLID5 (%)	2
Downstream user obligations (%)	3
Obligations regarding articles (%)	1
Safety Data Sheets (%)	10
Other (%)	General questions about REACH 16%; REACH fee regulation 3%; Guidance documents 2%

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

Straight forward (%)	60
Complex (%)	30
No information (%)	10

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

Straight forward questions 3 days

Complex questions 2 weeks

Are any types of enquiry outsourced? No

Does the Helpdesk seek feedback on its performance? Yes

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? 4

What level of cooperation is there between Helpdesks outside REHCORN? 1

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? Newspaper
Leaflets
Other (please list)

Please list the other types of activities that have been carried out. Since 2007, 14 seminars/workshops were organized for industry. Our experts gave 12 presentations as invited speakers in seminars organized by others, published 16 publications in various newspapers, prepared 8 REACH newsletters and 10 information leaflets as well as answered to more than 1000 questions.

How effective was each type of activity?

Newspaper 3

Leaflets 4

Other 4

Do you have a REACH webpage/website? Yes

Do you have a single webpage for REACH or multiple pages?	Single webpage
How frequently is the REACH webpage visited (per month)?	501-5,000
Please describe the scope of the number of REACH webpage visits.	<p>REACH webpage is an integrated part of Environmental Protection Agency's/REACH-CA webpage: http://gamta.lt. In this webpage there is a dedicated part for chemical substances (http://chemija.gamta.lt/cms/index) and there is a dedicated section for REACH. In this webpage we also provide information on enforcement and other legislations that we are responsible for. Therefore it is hard to tell the exact number of visits that were concerned with REACH. We can provide general statistics for our webpage visits. Chemical substances webpage visits: Yearly: 20538; Monthly: 2785; Daily: 119. In addition, some actual information (regularly updated) of more general nature is available at the website of the Ministry of Environment: http://www.am.lt/VI/index.php#r/698. This information covers inter alia texts of REACH and CLP regulations, description of the REACH provisions and main requirements in "user friendly" language, introduction of the amendments of the REACH Regulation as well as implementing/supplementary legislation, the newest developments (e.g.; Review of Annexes, Candidate List of Substances of Very High Concern for Authorization). The REACH section of the website of the Ministry of Environment (MoEnv) is being of great interest of the various stakeholders from the very beginning (starting from the submission of the initial Commission's Proposal). We can provide only the total statistics/number of visitors of the REACH section of the MoEnv webpage: from 2006 until now: 8232 visitors are counted (the previous data (i.e. visitors' numbers before 2006 are lost due to the technical reorganisation of the website).</p>

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?	9
How could the effectiveness of the Committees be improved?	

Theme 6 - Information on Substance Evaluation Activities

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Please name the organisations/institutions that are involved in the evaluation process.	Environmental Protection Agency State Public Health Service under the Ministry of Health

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

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

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.

1 biologist. The cooperation mechanism that was established for the risk assessment of new and existing substances activities will be used to implement Evaluation procedures under REACH. As far as the Lithuanian CA was not directly involved in the transitional Evaluation process, at the moment mainly staff of Environmental protection agency (EPA) is following current Evaluation activities. However in the future EPA will closely cooperate with the State Public Health Service under the Ministry of Health (former - State Environmental Health Centre). The sharing of responsibilities between the Environmental Protection Agency and the State Public Health Service and general co-operation mechanism are set by the Governmental Resolution No. 687 of 11 July 2007 (as amended by Governmental Resolution No. 666 of 25 June 2010) and joint ministerial order of 1 December 2007 No. D1-500/V-781 (as amended on 13 November 2009 by Order No D1-682/V-925). The preparation of Annex XV dossiers (especially dossiers for the identification of the substance as a Substances of Very High Concern (SVHC) is important) and substance evaluation procedure are very challenging tasks for us as having no enough experience in risk assessment of new and existing substances. However we would be willing to do such work in conjunction with some other Member State - at least in the beginning. That would give us a chance to gain an expertise in identifying of SVHC, substance evaluation, etc. and the ability to do this work alone in the future.

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
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Restriction	0
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Identification of SVHC	0
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Is the time spent following up your MS dossiers reasonable?	1
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Space is available below to provide further comments on how reasonable the time spent following up your MS dossiers was.	As indicated above we did not prepare any Annex XV Dossiers; however the program required mandatory answer to the next question that is why we chose the lowest number.
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How many of each type of dossier are rapporteured?

CLP	0
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Restriction	0
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Identification of SVHC	0
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Is the time spent following up rapporteured dossiers reasonable?	1
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Space is available below to provide further comments on how reasonable the time spent following up your rapporteured dossiers was.	As indicated above we did not prepare any Annex XV Dossiers; however the program required mandatory answer to the next question that is why we chose the lowest number.
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How many of each type of dossier are co-rapporteured?

CLP	1-3
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Restriction	0
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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.	

How many dossiers prepared by other MS has the MS contributed to or commented upon?	
CLP	0
Restriction	0
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	4-6
Toxicologist	1-3
Ecotoxicologist	0
Economist	1-3
Enforcement	4-6
Legal	0
Policy	4-6
Exposure	0
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.	
Is the MS able to access external specialists?	No
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.	From 2010 EPA is MAIN enforcing authority for REACH within Lithuania. In 2007-2009 State Environmental Protection Inspectorate (SEPI) was MAIN enforcing authority and carried out the national and international activities on chemical legislation enforcement. At the end of 2009 reorganization of EPA was performed, during which SEPI has been incorporated into EPA together with its duties and resources.
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.

In 2007 the Lithuanian Government issued the special Resolution on REACH and CLP implementation (of 11 July 2007, No. 687; as amended by Governmental Resolution No. 666 of 25 June 2010), which provides for responsibilities of the main four ministries involved: Ministry of Environment, Ministry of Social Security and Labour, Ministry of Economy and the Ministry of Finances. According to the Law of Public Administration the corresponding enforcement institutions under four above mentioned ministries are responsible for the enforcement activities according to areas of competence. Those enforcement institutions are: State Labour Inspectorate (Ministry of Social Security and Labour) Chemicals at workplaces <http://www.vdi.lt> State Non Food Products Inspectorate under the Ministry of Economy Household chemicals <http://vnmpi.lt> Customs Department under the Ministry of Finance Cross border flow of chemicals

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)? Yes

Comments

The national strategic approach of REACH enforcement is in line with the Strategy devised by the Forum. Certain part of its 5 principle elements has been already introduced and applied in daily practice. REACH enforcement is the constituent part of all chemical legislation enforcement of Lithuania. Seeking to influence the creation of the necessary organization in order to be able to achieve effective, efficient, systematic enforcement of the REACH, the legal base has been adapted. The special Governmental Resolution on REACH implementation (2007, No 687) was issued and the respective enforcement authorities were appointed. Regulatory powers for inspectors were created by the The Law on the Code of Administrative Offences No X-1766 (Žin., 2008, No 135-5227) in which sanctions for infringement of REACH provisions are listed. The national Forum of REACH enforcing authorities was established and meetings are held regularly. Joint inspections are performed and joint trainings for inspectors of all four enforcing authorities are planned. Every enforcing authority is establishing its annual work plan, including REACH enforcement plan, according to the scope and in line with the annual strategy of corresponding ministry. The annual inspection plan is being drawn at the beginning of every year and is complemented by detailed monthly plans. Inspections are performed on permanent basis by specialized chemical inspectors. On-site inspections are the preferred method of enforcement. The priorities and annual inspection activities are being focused on the Forum's suggestions on essential enforceable requirements. The inspections are being carried out in these general areas: preregistration, registration, SDS, supply chain and use. The current enforcement priorities will be slightly refocused taking into account experience gained, the improved data base of duty holders, the behavior of each identified target industry group and evaluation of the enforcement gaps identified.

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.

1) The special Governmental Resolution (of 11 July 2007, No. 687; as amended by Governmental Resolution No. 666 of 25 June 2010) has been issued the on REACH and CLP implementation, putting all 4 implementing (and, correspondingly, enforcement) institutions together and setting their responsibilities; 2) National Forum of Authorities Enforcing Chemical Legislation has been established in Lithuania; 3) Main Enforcing Authority and Competent Authority have been merged, what ensured better cooperation, coordination and exchange of information within the same unit.

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).

At least two annual meetings are held according to the Rules of Procedure of the National Forum of Authorities Enforcing Chemical Legislation. Joint training of chemical inspectors has been started and partially implemented. Exchange of data according to the Law of Public Administration and joint inspections are taking place, when necessary.

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Describe the inspection and investigation strategy and methodology.

In Lithuania the annual inspection plan which includes enterprises from all administrative districts of Lithuania is designed at the beginning of every year and is complemented by detailed monthly plans. Before every planned inspection, representative of the company to be inspected is called and informed about the forthcoming inspection. The company representative is informed what will be checked during inspection. The rights and obligations of inspectors are laid down in the Law on State Control of Environmental Protection (No. IX-1005, published in Official gazette "Valstybės žinios" (Žin.) 2002, No. 72-3017; amendments No. IX-2075, Žin., 2004, No. 50-1636; No. X-648, Žin., 2006, No. 72-2667; No. X-1299, Žin., 2007, No. 116-4741; No. X-1510, Žin., 2008, Nr. 53-1954). In Lithuania inspectors have a right to inspect any document, any object and working process. On the inspection site, the inspector requests for a site presentation, requests to see a person in charge of management of chemicals in that company, checks if all documentation is in line with Lithuanian and EU legislations that are concerned with chemicals. If applicable, company might be asked to provide the proof of pre-registration through ECHA submission report. Downstream users are asked to provide certificates of REACH compliance from suppliers. During every inspection the review of the company's safety data sheets and those received from its suppliers is performed. The classification and labelling of chemicals on site are checked routinely. If any violations are determined at the inspection site the report of

...determined at the inspection site and reported. If an administrative violation is drawn up and administrative penalty is imposed in accordance with the Code of Administrative Offences (No X-1766, published in Official gazette „Valstybės Žinios“, 25 November 2008, No 135-5227) and obligatory order is issued to eliminate determined violations. The compliance is followed up by subsequent inspections. Our inspectors' practices to use friendly approach to industry as well: they take along leaflets and other material prepared by themselves or REACH CA about REACH provisions and requirements; provide advice on REACH obligations as well as on requirements of national legislations on chemicals if necessary.

Describe the level and extent of monitoring activities.

All cases of breaches are monitored and followed-up until the full remedy is achieved, in 100 % of cases

Describe sanctions available to enforcing authorities.

The Law on the Code of Administrative Offences No X-1766 (published in Official gazette „Valstybės žinios“, 25 November 2008, No 135-5227) has been adopted on 6 November 2008 by the Parliament of the Republic of Lithuania. Article 6 of this Law has amended Article 841 of the Code “Infringement of the Provisions on Chemical Substances and Preparations Management and is the main article concerning penalties for non-compliance with the REACH Regulation. Effective from 25 November 2008. In the Code of Administrative Offences, Lithuania established an approach consisting in a list of specific REACH obligations and their related sanctions. The infringement of the REACH provisions listed in the legislation is subject to fines with minimum and maximum limits (variation between 500 to 15.000 Litass, also written notice). The subject of those fines may be natural persons or officers. The latter shall mean state representative or member of administrative staff of either public or private organization/company. There are no fines foreseen for legal persons. However, in case of damage resulting from the violation of REACH, they may be found liable under civil proceedings. There are no criminal sanctions provided for violation of REACH. Several articles laid down in the Criminal Code deal with criminal offences against environment, human health and disposal of hazardous chemicals in general. The Criminal Code also provides criminal sanctions for unlawful possession of poisonous* substances. These provisions may apply in certain cases for violation of REACH. However. they have been developed before

...in addition, they have been developed since REACH was adopted and do not specifically cover REACH violations. The Draft Law on the Amendment of Article 841 of the Code of Administrative Offences has been prepared, endorsed and on 11 November 2009 submitted to the Parliament for the final adoption. The amendment has been made seeking to implement 2 new Regulations (EC) of the European Parliament and Council (No. 1102/2008 (CLP) and 1272/2008 (on mercury)) and to improve the sanctions system for REACH violations currently in force. Therefore some changes will be introduced. First of all the changes in the Administrative Code aimed to mutually consistent the Administrative Code and the Criminal Code as regards the offences of the rules on poisonous substances. Secondly, the changes would clearly set the liability of the natural persons as well as of the managers or authorised representatives of the legal persons. Thirdly, seeking for more consistency, some provisions have been added to the Administrative Code, some editorial changes have been made for more precise and clear formulation of the violations. Adoption is pending. * Poisonous substances - the certain group of the most dangerous substances (very toxic, toxic, carcinogenic, mutagenic, toxic to reproduction) regulated by the national legislation (Law on control of poisonous substances).

Describe the referrals from ECHA.	There were no referrals from ECHA.
Describe the referrals from other Member States.	There were no referrals from Member States.
Describe any other measures/relevant information.	The “blame and shame“ information on enterprises where infringements have been found were placed on the website of the State Environmental Protection Inspectorate.

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	392
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?	100
State the number of manufacturer dutyholders subject to inspections and investigations.	12
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	6
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	107
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	156
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.	125
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	156
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.	5
State the number of inspections and investigations resulting in no areas of non-compliance.	234
State the number of inspections and investigations resulting in verbal or written advice.	0
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.	47
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	5
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	4
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	18

Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	20
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.	594
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	143
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?	150
State the number of manufacturer dutyholders subject to inspections and investigations.	7
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	10
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	69
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	231
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	17
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	69

State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	231
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.	1
State the number of inspections and investigations resulting in no areas of non-compliance.	233
State the number of inspections and investigations resulting in verbal or written advice.	0
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.	84
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	4

Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	8
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	16
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	56
Were these mainly:	Small-Medium

2009

Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	777
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	172
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?	300
State the number of manufacturer dutyholders subject to inspections and investigations.	17
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	6
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	80
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	258
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	23
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	80
State the number these cases which were non-compliant.	5
State the number of inspections that addressed downstream use.	258
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.	287
State the number of inspections and investigations resulting in verbal or written advice.	0
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.	74

State the number of convictions following legal proceedings.

Enforcement

State the number of manufacturers subject to formal enforcement. 9

Were these mainly: Small-Medium

State the number of importers subject to formal enforcement. 2

Were these mainly: Small-Medium

State the number of distributors subject to formal enforcement. 23

Were these mainly: Small-Medium

State the number of downstream users subject to formal enforcement. 40

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?

The possible parameters could be:

- o Amounts of used/circulating on the Lithuanian market SVHC. This parameter could show the tendency of the use reduction of the most dangerous substances and consequently decreased the negative impact to human health and environment. Since 2007 until now amounts of SVHC has decreased (information from Lithuanian chemical substances and preparations data base). It might be influenced by the inclusion of these substances into the Candidate List.
- o The number of imported chemical substances and preparations. Since 2007 we could see decrease in imported chemicals. It might mean that for a lot of Lithuanian importers are not profitable to import chemical substances and preparations from third countries so to register those substances and they are choosing to buy them from EU suppliers, which are making pre-registration/ registration of substances. This parameter could show the change in flows of chemicals.
- o Percentage of availability of SDS and increase in quality of available SDS.

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	02-06-2010
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