

General Information	
Which Member State are you reporting for?	GR
What reporting period are you reporting on?	2010
Primary contact person's name.	Mrs Ioanna Angelopoulou
Please provide an email address for the primary contact person.	elhlpdesk@ath.forthnet.gr

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?	MINISTRY OF FINANCE-GENERAL CHEMICAL STATE LABORATORY-DIVISION OF ENVIRONMENT
What is the address of the organisation?	16, AN. TSOHA STR 115 21 ATHENS GREECE
What is the email address of the organisation?	GXX-ENVIRONMENT@2005.SYZEFXIS.GOV.GR, GXX-ENVIRONMENT@ATH.FORTHNET.GR
What is the telephone number of the organisation?	+30210 6479 000
What is the fax number of the organisation?	+30210 6466917
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?	Other (please list)
Please list the other parts of Government that this part of the Competent Authority has authority from.	MINISTRY OF FINANCE
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 CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Other
If Other, please list the different legislations here	CLP, GLP, Chemical Weapons Convention, ADR, SEVESO, PIC, POPs, Dual use items
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.	LABOUR INSPECTORATE, CUSTOMS, MINISTRY OF ECONOMICS & COMPETITIVENESS
Does the Competent Authority outsource any of its work?	No

How adequately resourced is the Competent Authority? 4

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

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? 4

How could effectiveness of communication between MS be improved?

How effective is collaboration between MS for REACH? 7

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? 10

How could effectiveness of collaboration with ECHA be improved?

How effective is MS communication with the Commission (specifically Article 133 Committee)? 9

How could effectiveness of communication with the Commission be improved?

How effective is MS collaboration with the Commission (specifically Article 133 Committee)? 9

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. MINISTRY OF FINANCE, GENERAL CHEMICAL STATE LABORATORY, DIVISION OF ENVIRONMENT

What is the address of the Helpdesk? 16, AN. TSOHA STR. 115 21 ATHENS, GREECE

What is the web page address of the Helpdesk? www.gcsf.gr

What is the email address of the Helpdesk? elhelpdesk@ath.forthnet.gr

What is the telephone number of the Helpdesk?	+30210 6479286- 287
What is the fax number of the Helpdesk?	+30210 6466917
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	
Ecotoxicologist	1-5
Chemist	1-5
Risk Assessor	
Economist	
Social Scientist	
Exposure Assessor	
Other (please list)	
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.	
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
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?

Pre-registration
SIEFs
Registration
REACH-IT
IUCLID5
Authorisation
Downstream user obligations
Restriction
Obligations regarding articles
Testing
Safety Data Sheets
Enforcement
SVHC
CSR preparation
Other (please list)
CLP

Please list the other types of enquiries that the Helpdesk receives. Only representative, exemptions

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

Pre-registration (%)	20
Registration (%)	5
Authorisation (%)	1
Restriction (%)	1
Testing (%)	0
Enforcement (%)	8
CSR preparation (%)	1
CLP (%)	4
SIEFs (%)	10
REACH-IT (%)	15
IUCLID5 (%)	2
Downstream user obligations (%)	4
Obligations regarding articles (%)	3
Safety Data Sheets (%)	5
SVHC (%)	1
Other (%)	20

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

Straight forward (%)	80
Complex (%)	20
No information (%)	0

How long, on average, does it take to respond to the following types of questions?	
Straight forward questions	1 day
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?	Telephone Leaflets Other (please list) Speaking events
Please list the other types of activities that have been carried out.	Through CAs website

How effective was each type of activity?	
Speaking events	4
Telephone	3
Leaflets	5
Other	3
Do you have a REACH webpage/website?	No

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?

Theme 6 - Information on Substance Evaluation Activities

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

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 0

Restriction 0

Identification of SVHC 0

Is the time spent following up co-rapporteured dossiers reasonable? 1

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	1-3
Economist	
Enforcement	
Legal	
Policy	
Exposure	
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? NATIONAL RESEARCH INSTITUTES, UNIVERSITIES AND/OR INDIVIDUAL EXPERTS

Is the MS satisfied with the levels of access to expertise? 4

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 SAME AS THE CA FOR REACH
Is there more than one enforcing authority for REACH within the Member State?	No

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.	REACH enforcement is investigated in two steps : 1. in cooperation with custom authorities for imported products 2. on a basis of an annual inspection plan and/or targeted inspections

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.	Local inspectorates have to report to the Competent Authority for every inspection made, including inspection report, follow-up etc. Moreover, the Competent Authority has a regular communication providing feedback and tools to facilitate the work of local inspectors. At the Annual Inspectors meeting there is an exchange of information on REACH enforcement activities.
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 Annual meeting, joint inspections, phones and mails

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Describe the inspection and investigation strategy and methodology.	Inspections must be focused on controlling pre-registration and registration compliance. The CA in cooperation with national inspectors is developing a desk-study inspection procedure in order to improve effectiveness.
Describe the level and extent of monitoring activities.	A harmonised questionnaire is filled for every inspection and reported to the CA. Moreover, the custom authorities submit to the enforcement CA regularly reports containing information for the imported goods which have obligations under REACH.
Describe sanctions available to enforcing authorities.	1. Administrative order and/or injunction 2. Fine
Describe the referrals from ECHA.	No referrals till now
Describe the referrals from other Member States.	No referrals till now
Describe any other measures/relevant information.	Follow up after the inspection

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?	65
State the number of manufacturer dutyholders subject to inspections and investigations.	0
Were these mainly:	No information
State the number of importer dutyholders subject to inspections and investigations.	0
Were these mainly:	No information
State the number of distributors subject to inspections and investigations.	0
Were these mainly:	No information
State the number of downstream users subject to inspections and investigations.	0
Were these mainly:	No information

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.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	35
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. 3

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. 5

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. 0

State the number of convictions following legal proceedings.

Enforcement

State the number of manufacturers subject to formal enforcement. 0

Were these mainly: No information

State the number of importers subject to formal enforcement. 0

Were these mainly: No information

State the number of distributors subject to formal enforcement. 0

Were these mainly: No information

State the number of downstream users subject to formal enforcement. 0

Were these mainly: No information

2008

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?	52
State the number of manufacturer dutyholders subject to 10 inspections and investigations.	
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of distributors subject to inspections and investigations.	23
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	25
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.	12
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	23
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.	3
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.	0
State the number of inspections and investigations resulting in verbal or written advice.	9
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.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	No information
State the number of importers subject to formal enforcement.	0
Were these mainly:	No information
State the number of distributors subject to formal enforcement.	0
Were these mainly:	No information
State the number of downstream users subject to formal enforcement.	0
Were these mainly:	No information

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?	49
State the number of manufacturer dutyholders subject to 40 inspections and investigations.	

Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	18
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	10
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	24
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	49
State the number these cases which were non-compliant.	3
State the number of inspections that addressed information in the supply chain.	49
State the number these cases which were non-compliant.	14
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.	2
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	5
State the number of investigations prompted by results of inspection/follow up activities.	8

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.	36
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.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	No information
State the number of importers subject to formal enforcement.	0
Were these mainly:	No information
State the number of distributors subject to formal enforcement.	0
Were these mainly:	No information
State the number of downstream users subject to formal enforcement.	0
Were these mainly:	No information

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?	At this time there is no sufficient data to assess a baseline study.

Theme 10 - Other Issues/Recommendations/Ideas
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Please provide any further information on the implementation of REACH that the MS considers relevant.

From our experience in the implementation and enforcement of REACH at national level so far, we strongly believe that a harmonised enforcement in EU level is needed in order to avoid cases where a MS enforces more strictly REACH (like Greece has done) thus resulting in low competitiveness of the national products.

Do you wish to upload documents in support of this submission

No

Meta Informations

Creation date	11-06-2010
Last update date	
User name	ReachGR
Case Number	094306016261316210
Invitation Ref.	
Status	N