

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	FI
What reporting period are you reporting on?	2010
Primary contact person's name.	Kaija Kallio-Mannila, Annette Ekman
Please provide an email address for the primary contact person.	kaija.kallio-mannila@ymparisto.fi, annette.ekman@valvira.fi

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?	Finnish Environment Institute (SYKE)
What is the address of the organisation?	Mechelininkatu 34a P.O.Box 140 00251 Helsinki Finland
What is the email address of the organisation?	syke.reach@ymparisto.fi
What is the telephone number of the organisation?	+358 20 610 123
What is the fax number of the organisation?	+358 9 5490 2591
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 Ecotoxicity Enforcement Policy Exposure CLP Other (please list)
Please list the other skills that staff in this part of the Competent Authority have.	Risk assessment and risk management
What other chemical legislation are the staff of the REACH CA involved in?	Biocides Pesticides Other
If Other, please list the different legislation here	Volatile organic compounds (VOC) in paints and varnishes European Directive 2004/42/EC Detergents Regulation 648/2004/EC

Second Competent Authority

What is the name of the organisation where the Competent Authority is situated?	National Supervisory Authority for Welfare and Health (Valvira)
What is the address of the organisation?	PO Box 210, FIN-00531 HELSINKI
What is the email address of the organisation?	kemo@valvira.fi
What is the telephone number of the organisation?	+358 9 772920
What is the fax number of the organisation?	+358 9 77292138
What part of REACH does this part of the Competent Authority deal with?	All
From what part of Government does this part of the Competent Authority have authority from?	Health
Are employees in the Competent Authority directly employed by Government (civil servants)?	Yes
What skills do staff in this part of the Competent Authority have?	Chemistry Toxicology Enforcement Legal Policy Exposure CLP Other (please list)
Please list the other skills that staff in this part of the Competent Authority have.	biochemistry
What other chemical legislation are the staff of the REACH CA involved in?	Biocides Pesticides Other
If Other, please list the different legislation here	Detergents Regulation (EY) N:o 648/2004
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?	6
How could effectiveness of communication between MS be improved?	Official communication is comprehensive enough, and needs no improvement. However for example in enforcement cases we are lacking direct contact details of relevant persons concerned. Therefore quick communication is slightly difficult.
How effective is collaboration between MS for REACH?	5
How could effectiveness of collaboration between MS be improved?	We have mainly regional (Nordic) collaboration on a case by case.
Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	Yes

Please provide further information.	<ul style="list-style-type: none"> • Nordic Chemical Group under the Nordic Council of Ministers. Nordic Chemical Group has several subgroups and projects such as Enforcement, Classification and Labelling, Risk Assessment and Human Exposure. • OECD: harmonized test methods (including nano)
How effective is MS communication with ECHA?	8
How could effectiveness of communication with ECHA be improved?	
How effective is MS collaboration with ECHA?	8
How could effectiveness of collaboration with ECHA be improved?	
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.	In Finland the national Helpdesk is run by both Competent Authorities as a joint venture, responsible authorities being: National Supervisory Authority for Welfare and Health (Valvira) and Finnish Environment Institute (SYKE)
What is the address of the Helpdesk?	People running the Helpdesk are working at the premises of Competent Authorities and the Helpdesk as such has not a specific (physical) address.
What is the web page address of the Helpdesk?	The Helpdesk has two web site addresses that lead to the same starting page: www.reachneuvonta.fi and www.clpneuvonta.fi
What is the email address of the Helpdesk?	The Helpdesk does not have a specific email address. Customers send their requests by a query form that is available on web page of the Helpdesk and they get the answers to their email addresses. Query form can be found at: http://www.reachneuvonta.fi/Reach/reach.nsf/sp3?Open&cid=kysymyslomake&size=
What is the telephone number of the Helpdesk?	The telephone numbers of the helplines are: +358 400 393 033 (available on workdays during working hours ~ 8:00 - 16:00) +358 40 590 4141 (available on workdays 9:00 - 12:00)
What is the fax number of the Helpdesk?	The Helpdesk does not have a specific fax number but can be reached even via the faxes of the Competent Authorities.

Are there any more organisations responsible for operating the National Helpdesk for REACH?	No
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Please indicate the number of each type of staff that are involved in the Helpdesk.

Toxicologist
Ecotoxicologist
Chemist
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.	We regard educational background irrelevant for the Helpdesk work. In Finland there are 10 CA employees involved in Helpdesk work and they are trained in the application of REACH- and CLP-Regulation. At the same time there are 2 persons (one in SYKE and another one in Valvira) on call. Totally approximately 3 person years are spent for Helpdesk work yearly (This includes inter alia production of material for web pages, leaflets, giving lectures, arranging trade fairs, participating in HelpNet activities and answering incoming questions.)
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Is the same Helpdesk used to provide help to Industry on CLP?	Yes
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Does the Helpdesk receive any non-governmental support?	No
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How many enquiries does the Helpdesk receive per year?	>1000
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In what format can enquiries be received by the Helpdesk?	Phone Other (please list)
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Please list the other format(s) of enquiries that can be received by the Helpdesk.	A good 50 % of the enquiries come via telephone but almost an equal amount of queries come via the query form that is available on the Helpdesk web pages.
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How are the majority of enquiries received?	Phone
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Do you provide specific advice to SME's?	No
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Who are the majority of enquiries from?	Small-medium enterprises
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What type of enquiries does the Helpdesk receive?	Other (please list)
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Please list the other types of enquiries that the Helpdesk receives.	See the report in pdf format.
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For each type of enquiry received, please provide the proportion in percentage of the total enquiries.

Other (%)	100
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What proportion of enquiries received are deemed to be 1) straight forward, 2) complex, OR No information

Straight forward (%).	50
Complex (%).	50
No information (%).	100

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

Straight forward questions	No information
Complex questions	No information
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?	Daily
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) Speaking events
Please list the other types of activities that have been carried out.	<ul style="list-style-type: none"> • There are video lectures on web • Helpdesk has built rather extensive web pages where news on current developments is added regularly. • Helpdesk has had stand at trade fairs on several occasions combined with speaking events • Helpdesk has sent letters (emails) for selected target groups like importers of chemicals, Finnish pre registrants and industry sector organisations.

How effective was each type of activity?

Newspaper	1
Speaking events	1
Leaflets	1
Other	1
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>Statistics from June 2007 - end 2009 on the use of the web pages of the Finnish REACH&CLP Helpdesk show following numbers of visits:</p> <table border="1"> <thead> <tr> <th></th> <th>2007</th> <th>2008</th> <th>2009</th> <th>Unique visitors total:</th> <th></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td>3 643</td> <td>14 975</td> <td>18 075</td> <td>average</td> </tr> <tr> <td>per month:</td> <td></td> <td></td> <td>520</td> <td>1 248</td> <td>1 506</td> </tr> <tr> <td>Number of visits total:</td> <td></td> <td></td> <td></td> <td>7 376</td> <td>29 432</td> </tr> <tr> <td></td> <td>33 904</td> <td>average per month:</td> <td></td> <td></td> <td>1 054</td> </tr> <tr> <td></td> <td>2 453</td> <td>2825</td> <td>Visited pages total:</td> <td></td> <td></td> </tr> <tr> <td></td> <td>79 464</td> <td>243 895</td> <td>231 269</td> <td>average per</td> <td></td> </tr> <tr> <td>month:</td> <td></td> <td>11 352</td> <td>20 325</td> <td>19 272</td> <td></td> </tr> </tbody> </table>		2007	2008	2009	Unique visitors total:				3 643	14 975	18 075	average	per month:			520	1 248	1 506	Number of visits total:				7 376	29 432		33 904	average per month:			1 054		2 453	2825	Visited pages total:				79 464	243 895	231 269	average per		month:		11 352	20 325	19 272	
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Theme 4 - Information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods

Does the MS contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?	Yes
What has been the overall public funding on research and development of alternative testing in your MS each year?	No information

Theme 5 - Information on Participation in REACH Committees (FORUM, MS, RAC, SEAC, CARACAL, PEG, RCN, REHCORN)

On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are?	5
How could the effectiveness of the Committees be improved?	The work in Committees is at the beginning and it is difficult at this stage to find ways to make the work more effective. The processes in Committees are quite complicated and a lot of thought should be given to streamline the work. Issues of concern are, in our opinion, e.g. very long agendas of the CARACAL meeting. Moreover, the progress with harmonised classifications in RAC is at the moment very slow compared to the old TC C&L.

Theme 6 - Information on Substance Evaluation Activities

2010 Reporting

Please name the organisations/institutions that are involved in the evaluation process.	CAs ie Finnish Environment Institute (SYKE) National Supervisory Authority for Welfare and Health (Valvira)
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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. Due to lack of experience question is impossible answer.	

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 Due to lack of experience question is impossible answer. 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 Due to lack of experience question is impossible answer. 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	1-3
Identification of SVHC	0

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

Restriction	0
Identification of SVHC	0

What expertise is available for preparing dossiers?

Chemist	
Toxicologist	
Ecotoxicologist	
Economist	
Enforcement	
Legal	
Policy	
Exposure	
CLP	
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?	Depends on the case, inter alia test methods, Qsars ...
Is the MS satisfied with the levels of access to expertise?	2

Has there been any industry involvement in the preparation of MS dossiers?	No
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Theme 8 - Information on Enforcement Activities

General Information

Please enter the MAIN enforcing authority for REACH within the Member State.

Is there more than one enforcing authority for REACH within the Member State?	Yes
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Please provide details on the other enforcing authorities for REACH within the Member State.	<p>At national level In Finland there are two ministries responsible for the superior management and direction of the enforcement activities. They are the Ministry of Social Affairs and Health (health hazards and physical hazards) and the Ministry of the Environment (environmental hazards). At central administration level the main enforcement authorities (operating under the Ministries above) are the National Supervisory Authority for Welfare and Health (Valvira) and the Finnish Environment Institute (SYKE). Their remit covers:</p> <ul style="list-style-type: none">• coordination of and guidance for regional and local enforcement authorities' activities• participation in the work of ECHA's Forum and national coordination of Forum's enforcement projects• enforcement at national level of REACH product related (placing on the market) provisions concerning registration, PPORD notifications, communication of information in the supply chain and compliance with restrictions (not including use conditions related provisions) Customs. Their remit covers enforcement of import of substances, mixtures and articles. Consumer Agency. Their remit covers enforcement of restrictions concerning certain consumer products. (That section of the Consumer Agency was merged to the Safety Technology Authority on 1.1.2010.) <p>At regional level Regional occupational safety authorities (Occupational Safety and Health Inspectorates of Regional State Administrative Agencies). Their remit covers product related provisions (registration obligation, PPORD notifications, communication of information in the supply chain and</p>
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communication of information in the supply chain and compliance with restrictions, compliance with authorisation obligation) as well as use conditions related provisions when occupational hazards are concerned. Regional environment authorities (Environment and natural resources Inspectorates of Centres for Economic Development, Transport and the Environment). Their remit covers enforcement of use conditions related provisions (compliance with SDS instructions (exposure scenarios), authorisations and with restrictions) when environmental hazards are concerned. At local level Municipal supervisory authorities for chemicals. Their remit covers enforcement of product related provisions when placing on the market and retail sale is concerned. Municipal environmental protection authorities. Their remit covers enforcement of use conditions related provisions when environmental hazards are concerned in smaller sites that are not mandated to regional environment authorities by the Environment Act. Regional and local enforcement authorities are obliged to carry out inspections at sites that fall under their remit. They are also obliged to take part in the European level enforcement campaigns when their remit is concerned. They are further obliged to work in co-operation with each other.

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.

The national REACH enforcement policy was developed when the bill for amending the Chemicals Act was prepared and it was based on the principle that inspections to the sites dealing with chemicals are carried out by regional and local authorities that are already enforcing other (chemicals related) legislation in those sites. The idea is that (excluding special enforcement campaigns) the authorities carry out enforcement of REACH when carrying out enforcement of other legislation, such as the Occupational Safety Act, Environment Act, Consumer Safety Act, Customs Act.

Coordination is provided by central authorities, ministries for regional authorities and CAs for local authorities. Based on the principles laid down the above enforcement authorities have prepared their individual enforcement strategies. E.g. SYKE and Valvira have prepared a common three year action plan for REACH implementation that covers also enforcement-related issues and SYKE has a more detailed plan that defines yearly objectives, necessary actions and priorities of its enforcement actions. Valvira and SYKE have also produced a three year enforcement programme for municipal supervisory authorities for chemicals that covers similar issues. Preliminary enforcement programmes obliged by AMS Regulation that cover also enforcement of product related REACH-provisions have been prepared by the authorities concerned. There is an ongoing national joint project aiming at defining national outlines and common principles for REACH enforcement.

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 Chemicals Act requires cooperation between enforcement authorities. Valvira and SYKE have prepared an enforcement programme described in point 8.7., and they follow the actions taken by local authorities based on the reports the local authorities produce.

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).

Meetings occur regularly where ministries and enforcement authorities at the central administration level discuss current issues on enforcement. SYKE and Valvira meet the enforcement authorities at regional and local level at regular bases. Regional and local authorities receive information mail from CAs and CAs arrange training occasions and seminars for them regularly.

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Describe the inspection and investigation strategy and methodology.	
Describe the level and extent of monitoring activities.	We are able to carry out searches from the National Product Register to increase our understanding of what kinds of chemicals are on the market in Finland. ECHA's list on pre- registrations from Finland has also been used for monitoring the situation.
Describe sanctions available to enforcing authorities.	Finnish provisions on penalties have already been reported to the Commission as laid down in Article 126. Reference is also made to the Milieu report "Report on penalties applicable for infringement of the provisions of the REACH Regulation in the Member States" http://ec.europa.eu/enterprise/sectors/chemicals/files/reach/docs/studies/penalties-report_en.pdf Brief summary: The Chemicals Act (744/1989) with its amendments defines administrative measures which enforcement authorities can make use of (e.g. instructions to correct non-compliances, prohibition of operations, conditional fine, threat of actions at the defaulter's expense). The Chemicals Act and the Penal Code define sanctions for severe cases (non-compliance that results in environmental pollution or health hazards) which need a Court decision. Sanctions can lead to a maximum of two years of imprisonment.
Describe the referrals from ECHA.	None.
Describe the referrals from other Member States.	A couple of informal requests have been received.
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.	0
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	0
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?	121
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.	36
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	80
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.	54
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	84
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.	19
State the number of inspections and investigations resulting in no areas of non-compliance.	39
State the number of inspections and investigations resulting in verbal or written advice.	74

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.	0

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.	0
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	0
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?	1518
State the number of manufacturer dutyholders subject to inspections and investigations.	2
Were these mainly:	Medium
State the number of importer dutyholders subject to inspections and investigations.	2
Were these mainly:	Small
State the number of distributors subject to inspections and investigations.	39
Were these mainly:	No information

State the number of downstream users subject to inspections and investigations.	1465
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.	598
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	1176
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.	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.	24
State the number of inspections and investigations resulting in no areas of non-compliance.	454
State the number of inspections and investigations resulting in verbal or written advice.	760
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	86
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	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.	86
Were these mainly:	Small

2009

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	0
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	0
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?	2559
State the number of manufacturer dutyholders subject to inspections and investigations.	10
Were these mainly:	Small-Medium
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.	73
Were these mainly:	No information
State the number of downstream users subject to inspections and investigations.	2395
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	15

State the number these cases which were non-compliant.	0
State the number of inspections that addressed information in the supply chain.	741
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	1997
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.	0
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.	19
State the number of inspections and investigations resulting in no areas of non-compliance.	708
State the number of inspections and investigations resulting in verbal or written advice.	1352
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	88
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	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.	3
Were these mainly:	Small
State the number of downstream users subject to formal enforcement.	88
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?	Information received via the enforcement activities. In addition the Finnish Institute of Occupational Health has measurements available on exposures (concentrations) at workplaces and the Finnish Environment Institute on the concentrations of chemicals mainly in the aquatic compartment. Also the HELCOM (Baltic Marine Environment Protection Commission) has data on chemicals in the Baltic Sea area.

Theme 10 - Other Issues/Recommendations/Ideas

Please provide any further information on the implementation of REACH that the MS considers relevant.	Reach is an extensive and complicated piece of legislation and we are concerned that the interpretation of the legal text is changing frequently. This makes the implementation of the regulation challenging to the industry, the CAs and the enforcement authorities especially in the early years from entry into force. Furthermore, the lack of resources in the Finnish CAs makes the situation more demanding. We feel that it is not realistic to assume a similar kind of contribution from a small country with few resources than from a bigger country, for example in proposing SVHC substances or harmonised classification and labelling. In our opinion, there are too many meetings which take more time than expected and less time is left for actual chemicals' evaluation and enforcement activities. As a smaller issue, we find this reporting questionnaire far too detailed and question the usability of the results as for many questions there is no data available. Reporting period should have been clearly stated in the questionnaire.
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Do you wish to upload documents in support of this submission	Yes
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