

REPORTING OF REACH IMPLEMENTATION

2007 – 2009

FINLAND

28 MAY2010

MS REACH Reporting Questionnaire

General Information

0.1. Which Member State are you reporting for? (compulsory)

Finland

0.2. What reporting period are you reporting on? (compulsory)

2010

Data given covers period June 2007 – December 2009 and we assume that next reporting period will be 2010 – 2014 (deadline for submitting the report being June 2015).

2015 or later

0.3. Primary contact person's name. (compulsory)

Kaija Kallio-Mannila, Finnish Environment Institute (SYKE) and Annette Ekman, National Supervisory Authority for Welfare and Health (Valvira)

0.4. Please provide an email address for the primary contact person. (compulsory)

kaija.kallio-mannila@ymparisto.fi and annette.ekman@valvira.fi

Theme 1 - Information on the Competent Authority

1.1. How many Competent Authorities are responsible for REACH? (compulsory)

There is one Competent Authority responsible for REACH.

There is more than one Competent Authority responsible for REACH.

One / First Competent Authority Responsible for REACH

1.2. What is the name of the organisation where the Competent Authority is situated? (compulsory)

Finnish Environment Institute

1.3. What is the address of the organisation? (compulsory)

Mechelininkatu 34a
P.O.Box 140
00251 Helsinki
Finland

1.4. What is the email address of the organisation? (compulsory)

syke.reach@ymparisto.fi

1.5. What is the telephone number of the organisation? (compulsory)

+358 20 610 123

What is the fax number of the organisation? (compulsory)

+358 9 5490 2591

1.6. What part of REACH does this part of the Competent Authority deal with?

(compulsory)

- | | | |
|---|-------------------------------------|--|
| <input checked="" type="checkbox"/> All | <input type="checkbox"/> Evaluation | <input type="checkbox"/> Restriction |
| <input type="checkbox"/> Helpdesk | <input type="checkbox"/> CLP | <input type="checkbox"/> Risk Assessment |
| <input type="checkbox"/> Other | | |

Please list the other parts of REACH that this part of the Competent Authority deals with here.

1.7. From what part of Government does this part of the Competent Authority have authority from? (compulsory)

- | | | |
|---|---------------------------------|--|
| <input checked="" type="checkbox"/> Environment | <input type="checkbox"/> Health | <input type="checkbox"/> Consumer protection |
| <input type="checkbox"/> Worker protection | <input type="checkbox"/> Other | |

Please list the other part of Government the Competent authority gets authority from.

1.8. Are employees in the Competent Authority directly employed by Government (civil servants)?

(compulsory)

- Yes
 No

1.9. What skills do staff in this part of the Competent Authority have? (compulsory)

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Chemistry | <input type="checkbox"/> Toxicology | <input checked="" type="checkbox"/> Ecotoxicity |
| <input type="checkbox"/> Economy | <input checked="" type="checkbox"/> Enforcement | <input type="checkbox"/> Legal |
| <input checked="" type="checkbox"/> Policy | <input checked="" type="checkbox"/> Exposure | <input checked="" type="checkbox"/> CLP |
| <input checked="" type="checkbox"/> Other | | |

Please list the other skills that staff in this part of the Competent Authority have.

Risk assessment and risk management

1.10. What other chemical legislation are the staff of the REACH CA involved in?

(compulsory)

- | | | |
|--|--|--|
| <input type="checkbox"/> Import/Export | <input checked="" type="checkbox"/> Biocides | <input checked="" type="checkbox"/> Pesticides |
| <input type="checkbox"/> Food | <input checked="" type="checkbox"/> Other | <input type="checkbox"/> None |

If Other, please list the different legislations here

Volatile organic compounds (VOC) in paints and varnishes European Directive 2004/42/EC
Detergents Regulation 648/2004/EC

1.11. Are there any other institutions that the Competent Authority works with in relation to REACH issues? (compulsory)

- Yes
 No

Please list the other institutions that the Competent Authority works with.

Finnish Institute of Occupational Health

1.12. Does the Competent Authority outsource any of its work? (compulsory)

Yes

No

Please provide details on who the Competent Authority outsources parts of its work to.

1.13. How adequately resourced is the Competent Authority? (compulsory)

1 = Lowest, 10 = Highest.

Resources included are a mix of financial, technical and human resources. This question is to help the Commission to understand possible reasons if there are implementation problems.

1 2 3 4 5 6 7 8 9 10

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

Finnish Environment Institute has not received any new vacancies based on REACH. We are implementing the REACH with the same resources (4 man years) as we did implement the Existing Substances Regulation and New Substances Directive. However, some proposals have been made for receiving new resources based on reorganisation of the chemicals administration. From the beginning of 2011 the two REACH CAs will be merged to a new institute called Safety and Chemicals Agency.

Second Competent Authority Responsible for REACH

1.14. What is the name of the organisation where the Competent Authority is situated? (compulsory)

National Supervisory Authority for Welfare and Health (Valvira)

1.15. What is the address of the organisation? (compulsory)

PO Box 210, FIN-00531 HELSINKI

1.16. What is the email address of the organisation? (compulsory)

kemo@valvira.fi

1.17. What is the telephone number of the organisation? (compulsory)

+358 9 772920

1.18. What is the fax number of the organisation? (compulsory)

+358 9 77292138

1.19. What part of REACH does this part of the Competent Authority deal with?

(compulsory)

- All Evaluation Restriction
 Helpdesk CLP Risk Assessment
 Other

Please list the other parts of REACH that this part of the Competent Authority deals with here.

1.20. From what part of Government does this part of the Competent Authority have authority from? (compulsory)

- Environment Health Consumer protection
 Worker protection Other

Please list the other part of Government the Competent authority gets authority from.

1.21. Are employees in the Competent Authority directly employed by Government (civil servants)?

(compulsory)

- Yes
 No

1.22. What skills do staff in this part of the Competent Authority have? (compulsory)

- Chemistry Toxicology Ecotoxicity
 Economy Enforcement Legal
 Policy Exposure CLP
 Other

Please list the other skills that staff in this part of the Competent Authority have.

biochemistry

1.23. What other chemical legislation are the staff of the REACH CA involved in?

(compulsory)

- Import/Export Biocides Pesticides
 Food Other None

If Other, please list the different legislations here

Detergents Regulation (EY) N:o 648/2004

1.24. Are there any other institutions that the Competent Authority works with in relation to REACH issues? (compulsory)

- Yes
 No

Please list the other institutions that the Competent Authority works with.

Finnish Institute of Occupational Health
National Institute for Health and Welfare

1.25. Does the Competent Authority outsource any of its work? (compulsory)

- Yes
 No

Please provide details on who the Competent Authority outsources parts of its work to.

1.26. How adequately resourced is the Competent Authority? (compulsory)

1 = Lowest, 10 = Highest.

Resources included are a mix of financial, technical and human resources. This question is to help the Commission to understand possible reasons if there are implementation problems.

1 2 3 4 5 6 7 8 9 10

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

Human resources are the main lacking component. From the beginning of 2011 the two REACH CAs will be merged to a new institute called Safety and Chemicals Agency.

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

2.1. How effective is communication between MS for REACH? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of communication between MS be improved? (compulsory)

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 somewhat difficult.

2.2. How effective is collaboration between MS for REACH? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of collaboration between MS be improved? (optional)

We have mainly regional (Nordic) collaboration on a case by case basis.

2.3. Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH? (compulsory)

Yes

No

Please provide further information.

- Nordic Chemical Group under the Nordic Council of Ministers. The 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)

2.4. How effective is MS communication with ECHA? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of communication with ECHA be improved? (optional)

2.5. How effective is MS collaboration with ECHA? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of collaboration with ECHA be improved? (optional)

2.6. How effective is MS communication with the Commission (specifically Article 133 Committee)? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of communication with the Commission be improved? (optional)

2.7. How effective is MS collaboration with the Commission (specifically Article 133 Committee)? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

How could effectiveness of collaboration with the Commission be improved? (optional)

2.8. Has use been made of the safeguard clause of REACH (Art. 129)? (compulsory)

Yes

No

If so, please provide further information.

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

3.1. Please provide the name of the organisation responsible for operating the National Helpdesk for REACH. (compulsory)

In Finland the national Helpdesk is run by both Competent Authorities as a joint venture, the responsible authorities being:
the National Supervisory Authority for Welfare and Health (Valvira) and the Finnish Environment Institute (SYKE)

3.2. What is the address of the Helpdesk? (compulsory)

People running the Helpdesk are working at the premises of the Competent Authorities and the Helpdesk as such has no specific (physical) address.

3.3. What is the web page address of the Helpdesk? (compulsory)

The Helpdesk has two web site addresses that lead to the same starting page:
www.reachneuvonta.fi and www.cipneuvonta.fi

3.4. What is the email address of the Helpdesk? (compulsory)

The Helpdesk does not have a specific email address. Customers send their requests by a query form that is available on the web page of the Helpdesk and they get the answers to their email addresses. The query form can be found at:
<http://www.reachneuvonta.fi/Reach/reach.nsf/sp3?Open&cid=kysymyslomake&size=>

3.5. What is the telephone number of the Helpdesk? (compulsory)

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)

3.6. What is the fax number of the Helpdesk? (compulsory)

The Helpdesk does not have a specific fax number but can be reached via the faxes of the Competent Authorities.

3.7. Are there any more organisations responsible for operating the National Helpdesk for REACH? (compulsory)

- Yes
 No

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

	0	1-5	6-10	>10
Toxicologist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ecotoxicologist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk Assessor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Economist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Scientist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.)

3.9. Is the same Helpdesk used to provide help to Industry on CLP? (compulsory)

Yes
 No

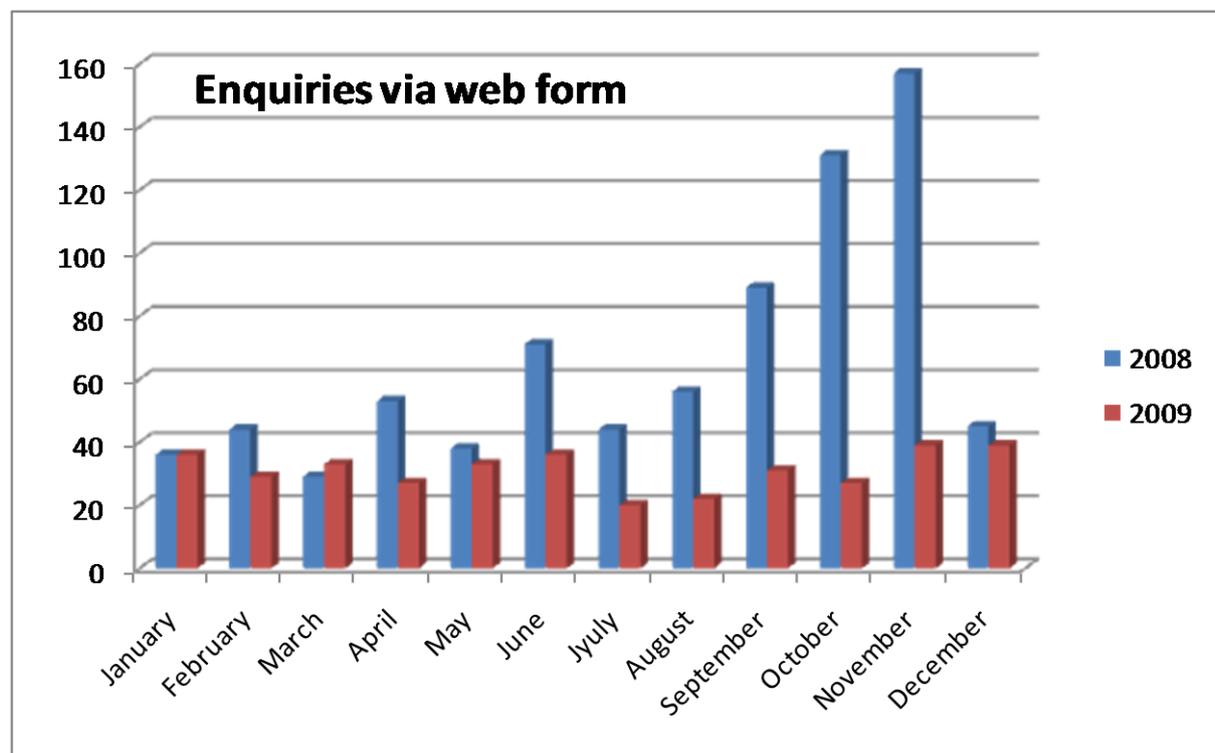
3.10. Does the Helpdesk receive any non-governmental support? (compulsory)

Yes
 No

3.11. How many enquiries does the Helpdesk receive per year? (compulsory)

1-100
 101-1000 year 2007 (June-December) and 2009
 >1000 year 2008

	2007	2008	2009
enquiries via web form	231	793	372
enquiries via phone	143	1 114	453
enquiries total	374	1 907	825
questions total	1122	4 768	2 063



3.12. In what format can enquiries be received by the Helpdesk? (compulsory)

- Email Phone Fax Letter
 Other (please list)

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.

3.13. How are the majority of enquiries received? (compulsory)

- Email Phone Fax Letter
 Other No information

See the previous answer

3.14. Do you provide specific advice to SME's? (compulsory)

- Yes
 No

All companies seeking advice are treated equally.

3.15. Who are the majority of enquiries from? (compulsory)

- Large enterprises Medium enterprises Small-medium enterprises
 Small enterprises No information

We don't request and record the size of the company when it seeks advice. However, we are aware that by far the major part of them is small to medium sized.

3.16. What type of enquiries does the Helpdesk receive? (compulsory)

- | | |
|--|--|
| <input checked="" type="checkbox"/> Pre-registration | <input checked="" type="checkbox"/> SIEFs |
| <input checked="" type="checkbox"/> Registration | <input checked="" type="checkbox"/> REACH-IT |
| <input type="checkbox"/> Evaluation | <input checked="" type="checkbox"/> IUCLID5 |
| <input checked="" type="checkbox"/> Authorisation | <input checked="" type="checkbox"/> Downstream user obligations |
| <input checked="" type="checkbox"/> Restriction | <input checked="" type="checkbox"/> Obligations regarding articles |
| <input checked="" type="checkbox"/> Testing | <input checked="" type="checkbox"/> Safety Data Sheets |
| <input checked="" type="checkbox"/> Enforcement | <input checked="" type="checkbox"/> SVHC |
| <input checked="" type="checkbox"/> CSR preparation | <input type="checkbox"/> Other (please list) |
| <input checked="" type="checkbox"/> CLP | |

Please list the other types of enquiries that the Helpdesk receives.

See the next answer.

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

(12,9 %) Pre-registration	() (%) SIEFs
(1,1 %) Registration	() (%) REACH-IT
() (%) Evaluation	() (%) IUCLID5
(1,7 %) Authorisation	() (%) Downstream user obligations
(1,1 %) Restriction	() (%) Obligations regarding articles
() (%) Testing	(6,8 %) Safety Data Sheets
(0,8 %) Enforcement	() (%) SVHC
() (%) CSR preparation	() (%) Other
() (%) CLP	

We don't keep record of questions coming via the web form according to grouping proposed in this question. Distribution of questions based on the grouping we have in use is as follows (%):

	2007	2008	2009
Substances, mixtures, articles and intermediates	9,7	22,3	18,1
Exposure scenarios	2,5	0,6	1,8
Pre-registration	9,7	16,1	7,3
CSA and CSR	3,0	0,4	3,8
Restrictions	0,4	0,6	2,9
SDS	17,3	3,0	8,8
Authorisation	2,5	1,0	2,9
Registration	0,4	0,6	2,9
Scope and exemptions	17,7	19,4	13,5
Communication in the supply chain	4,6	3,5	5,8
Actors and their obligations	17,7	23,5	22,2
Enforcement	0,8	0,7	1,2
Others	13,5	8,4	8,8

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

(%) Straight forward (%) Complex (%) No information

We regard division of the questions according to the criteria suggested rather subjective and vague. However, it is obvious that in 2007 most of the questions were rather straight forward and the situation has gradually changed during this time period so that towards the end of 2009 the major part of the questions have been rather complex.

3.19. How long, on average, does it take to respond to the following types of questions? (compulsory)

	4 hours	1 day	3 days	1 week	2 weeks	>2 weeks	No info.
Straight forward questions	<input type="checkbox"/>						
Complex questions	<input type="checkbox"/>						

Our target is to provide an answer in a week. Over 90 % of the questions received by phone are tackled the same day. Typical resolution time for web enquiries is 0 to 2 days and 90 % of the questions are tackled within a week.

3.20. Are any types of enquiry outsourced? (compulsory)

Yes

No

3.21. What types of enquiry are outsourced? (compulsory)

Pre-registration

Registration

Evaluation

Authorisation

Restriction

SIEFs

REACH-IT

IUCLID5

Downstream user obligations

Obligations regarding articles

- Testing
- Enforcement
- CSR preparation
- CLP

- Safety Data Sheets
- SVHC
- Other (please list)

Please list the other types of enquiries that are outsourced. (compulsory)

None of the questions are outsourced outside the CAs. All the expertise existing in the CAs is of course accessible when answers for the questions are compiled.

3.22. Does the Helpdesk seek feedback on its performance? (compulsory)

- Yes
- No

3.23. Does the Helpdesk review its performance and consider ways to improve its effectiveness? (compulsory)

- Yes
- No

3.24. What level of cooperation is there between Helpdesks?

(compulsory)

1 = Lowest, 5 = Highest

	1	2	3	4	5
What level of cooperation is there between Helpdesks under REHCORN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
What level of cooperation is there between Helpdesks outside REHCORN?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.25. We regard the cooperation under HelpNet quite well functioning and don't see a need for other kind of cooperation in addition to that.

3.26. How frequently do you use RHEP? (compulsory)

- Daily
- Weekly
- Monthly
- Less frequently

3.27. Has the MS carried out any specific public awareness raising activities?

(compulsory)

- Yes
 No

3.28. What type of activities have been carried out? (compulsory)

- Television
 Newspaper
 Radio
 Speaking events
 Telephone
 Leaflets
 Other (please list)

Please list the other types of activities that have been carried out.

- There are video lectures on web
- Helpdesk has built rather extensive web pages where news on current developments is added regularly.
- Helpdesk has had a stand at trade fairs on several occasions, combined with speaking events
- Helpdesk has sent letters and e-mails for selected target groups such as importers of chemicals, Finnish pre-registrants and industry sector organisations.

3.29. How effective was each type of activity? (compulsory)

Please select the types of activities above before this section can be filled in.

1 = Lowest, 5 = Highest

	1	2	3	4	5
Television	<input type="checkbox"/>				
Newspaper	<input type="checkbox"/>				
Radio	<input type="checkbox"/>				
Telephone	<input type="checkbox"/>				
Leaflets	<input type="checkbox"/>				
Other	<input type="checkbox"/>				

We don't have data available to be able to produce an objective answer to this kind of question. One could think that direct mailing to selected target groups is the most effective way of getting the message through to companies concerned. It seems that communication on pre-registration has reached the target audience rather well since the total number of pre-registrations from Finland was quite high and enforcement authorities have not recorded cases where pre-registration has not been done.

3.30. Do you have a REACH webpage/website? (compulsory)

- Yes
 No

3.31. Do you have a single webpage for REACH or multiple pages? (compulsory)

- Single webpage
 Multiple webpages

REACH&CLP Helpdesk has a single web site that contains an extensive number of pages. In addition to that both CAs (SYKE and Valvira) have some information on REACH and CLP at their web sites, and furthermore, there is quite a lot of information at the web site of the Ministry of Social Affairs and Health.

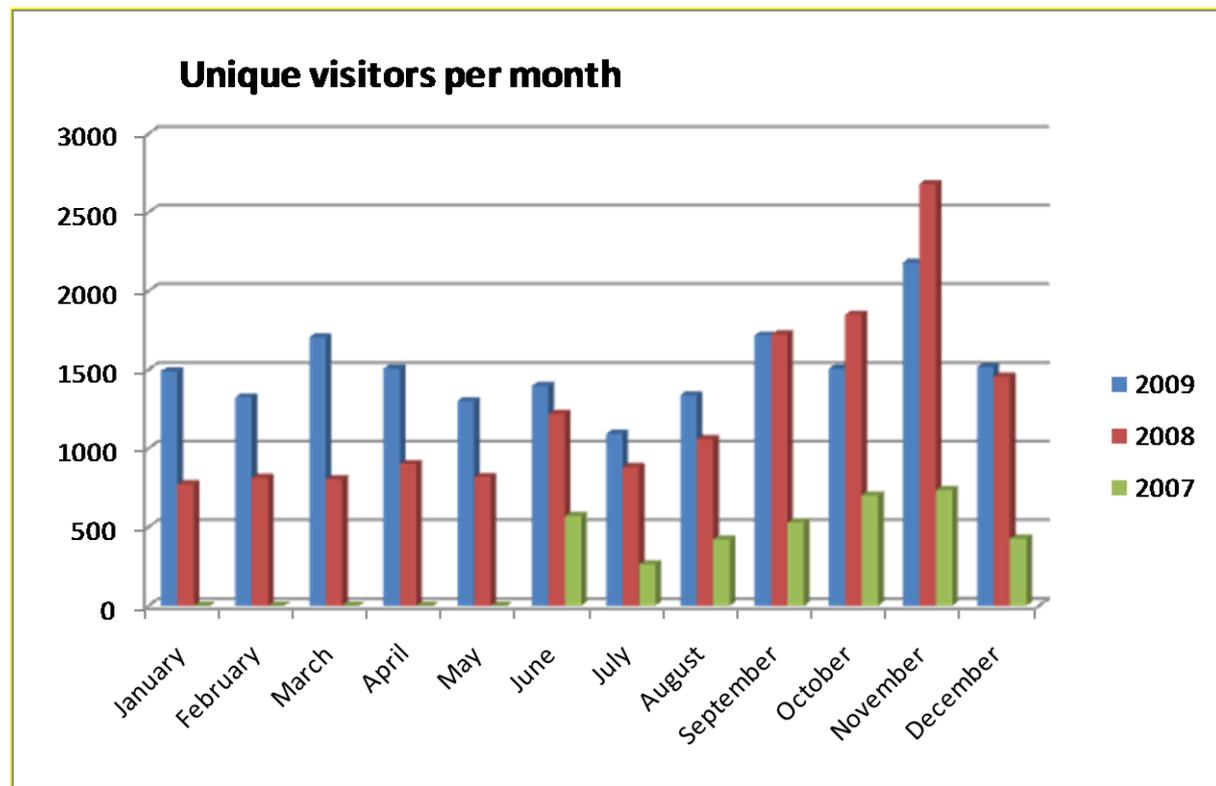
3.32. How frequently is the REACH webpage visited (per month)? (optional)

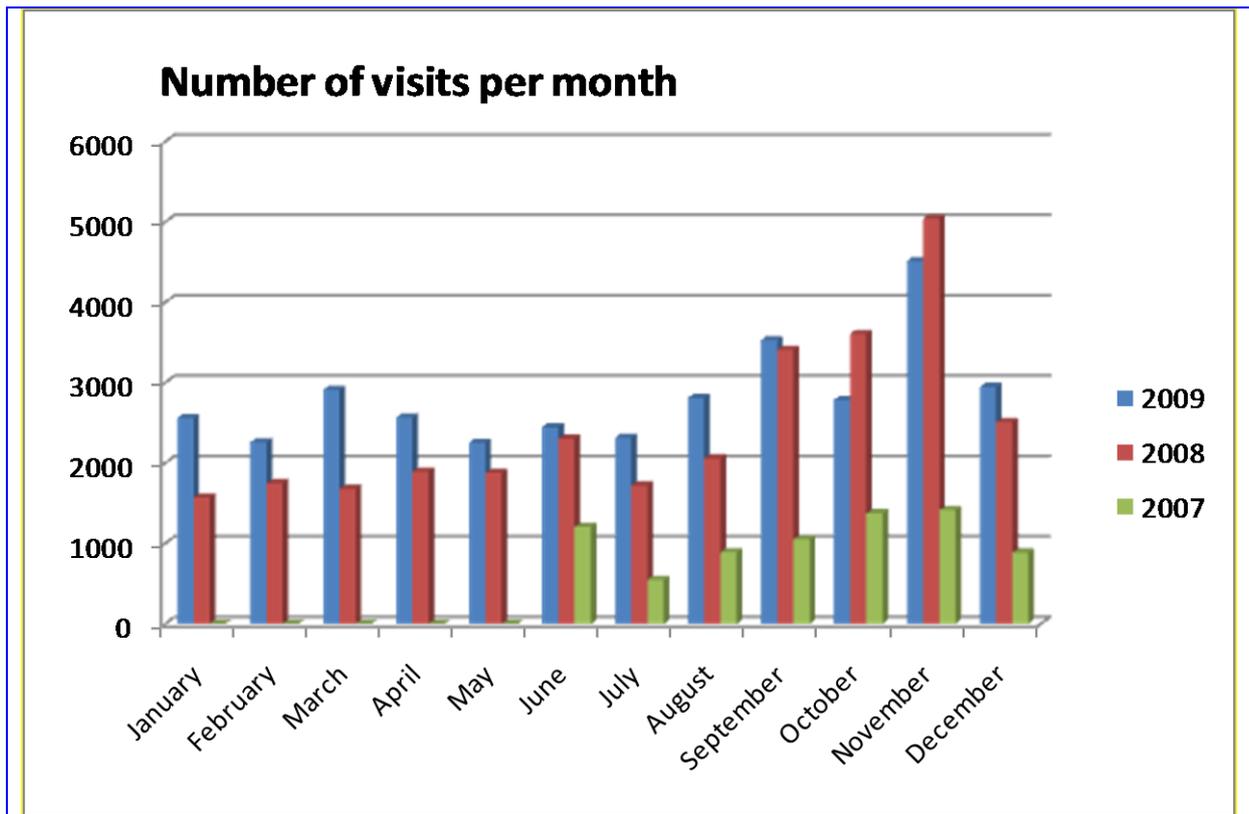
- 1-100
- 101-500
- 501-5,000
- 5,001+
- No information

3.33. Please describe the scope of the number of REACH webpage visits. (compulsory)

Statistics from June 2007 – end 2009 on the use of the web pages of the Finnish REACH&CLP Helpdesk show following numbers of visits:

	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	2 825
Visited pages total:	79 464	243 895	231 269
average per month:	11 352	20 325	19 272





Theme 4 - Information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods

4.1. Does the MS contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees? (compulsory)

- Yes
 No

4.2. What has been the overall public funding on research and development of alternative testing in your MS each year? (compulsory)

- Euros 0-10,000
 Euros 10,001-100,000
 Euros 100,001-1,000,000
 No information

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

5.1. On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

5.2. How could the effectiveness of the Committees be improved? (optional)

The work in the Committees is still at the beginning and it is difficult at this stage to find ways to make the work more effective. The processes in the 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 Report				
<p>6.1. Please name the organisations/institutions that are involved in the evaluation process. (Optional) CAs i.e. the Finnish Environment Institute (SYKE) the National Supervisory Authority for Welfare and Health (Valvira)</p>				
<p>6.2. Please indicate the number of each type of staff that are involved in substance evaluation.</p>				
	0	1-5	6-10	>10
Toxicologist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ecotoxicologist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk Assessor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social-Economic Analyst	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exposure Assessor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please list)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>6.3. 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. (optional)</p>				
<p>6.4. Please list the names of the substances covered in the dossiers that the MS has commented upon. (optional)</p>				
<p>6.5. Please list the names of the substances covered in the dossiers where a draft decision has been made. (optional)</p>				
<p>6.6. Please list the names of the substances covered in the dossiers that the MS has rapporteured. (optional)</p>				
<p>6.7. Please list the names of the substances covered in the dossiers that the MS has completed. (optional)</p>				
<p>6.8. How long, on average, does evaluation of a dossier take (optional)</p> <p><input type="checkbox"/> Up to 1 day</p> <p><input type="checkbox"/> Up to 1 week</p> <p><input type="checkbox"/> Up to 2 weeks</p> <p><input type="checkbox"/> > 2 weeks</p> <p><input type="checkbox"/> No information</p>				

6.9. How many transitional dossiers has the MS completed? ? (optional)

- 1-3
- 4-6
- 7-9
- >9

6.10. How many substances has the MS added to the Community Rolling Action Plan? (optional)

- 0
- 1-3
- 4-6
- 7-9
- >9

6.11. How many of ECHA's draft decisions on dossier evaluation has the MS commented on? (optional)

- 0
- 1-3
- 4-6
- 7-9
- >9

Theme 7 - Annex XV Dossiers

7.1. How many of each type of dossier has the MS prepared? (compulsory)

	0	1-3	4-6	7-9	>9
CLP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restriction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of SVHC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.2. Is the time spent following up your MS dossiers reasonable? (compulsory)

1 = Lowest, 10 = Highest

- 1 2 3 4 5 6 7 8 9 10

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

Due to lack of experience question 7.2 is impossible answer.

7.4. How many of each type of dossier are rapporteured? (compulsory)

	0	1-3	4-6	7-9	>9
CLP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restriction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of SVHC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.5. Is the time spent following up rapporteured dossiers reasonable? (compulsory)

1 = Lowest, 10 = Highest

- 1 2 3 4 5 6 7 8 9 10

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

Due to lack of experience question 7.5 is impossible answer.

7.6. How many of each type of dossier are co-rapporteured? (compulsory)

	0	1-3	4-6	7-9	>9
CLP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restriction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of SVHC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.7. Is the time spent following up co-rapporteured dossiers reasonable? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

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

Due to lack of experience question 7.7 is impossible answer.

7.8. How many dossiers prepared by other MS has the MS contributed to or commented upon? (compulsory)

	0	1-3	4-6	7-9	>9
CLP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restriction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of SVHC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.9. How many dossiers prepared by ECHA has the MS contributed to or commented upon? (compulsory)

	0	1-3	4-6	7-9	>9
Restriction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identification of SVHC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

7.10. What expertise is available for preparing dossiers? (optional)

	0	1-3	4-6	7-9	>9
Chemist	<input type="checkbox"/>				
Toxicologist	<input type="checkbox"/>				
Ecotoxicologist	<input type="checkbox"/>				
Economist	<input type="checkbox"/>				
Enforcement	<input type="checkbox"/>				
Legal	<input type="checkbox"/>				
Policy	<input type="checkbox"/>				
Exposure	<input type="checkbox"/>				
CLP	<input type="checkbox"/>				
Other (please list)	<input type="checkbox"/>				

7.11. If you have specified that there is other expertise is available for preparing CLH dossiers, please provide details here. (optional)

7.12. Is the MS able to access external specialists? (compulsory)

- Yes
 No

7.13. What types of external specialists does the MS have access to? (compulsory)

Depends on the case, inter alia test methods, Qsars ...

7.14. Is the MS satisfied with the levels of access to expertise? (compulsory)

1 = Lowest, 5 = Highest

- 1 2 3 4 5

7.15. Has there been any industry involvement in the preparation of MS dossiers?

(compulsory)

- Yes
 No

7.16. How much involvement has industry had? (compulsory)

1 = Lowest, 5 = Highest

- 1 2 3 4 5

Theme 8 - Information on Enforcement Activities

General Information

General information relating to the submission

8.1. Please enter the MAIN enforcing authority for REACH within the Member State.
(optional)

8.2. Is there more than one enforcing authority for REACH within the Member State?
(compulsory)

- Yes
 No

8.3. Please provide details on the other enforcing authorities for REACH within the Member State. (compulsory)

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:

- 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.)

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 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). They 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

General information on the enforcement strategy (or strategies) in place within the Member State.

8.4. Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH? (compulsory)

Yes

No

8.5. If Yes, is the strategy (or strategies) in line with the strategy devised by the Forum? (compulsory)

Yes

No

8.6. If No, are there any plans for making an enforcement strategy (or strategies)? (compulsory)

Yes

No

8.7. Please outline the enforcement strategy within the Member State in a maximum of 2000 characters. (compulsory)

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

Explanation of the co-ordination, co-operation and exchange of information, between enforcing authorities, with Competent Authorities and internationally.

8.8. 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. (compulsory)

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.

8.9. 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). (compulsory)

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.

2010 Reporting

8.10. Describe the inspection and investigation strategy and methodology. (optional)

8.11. Describe the level and extent of monitoring activities. (compulsory)

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.

8.12. Describe sanctions available to enforcing authorities. (compulsory)

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.

8.13. Describe the referrals from ECHA. (compulsory)

None.

8.14. Describe the referrals from other Member States. (compulsory)

A couple of informal requests have been received.

8.15. Describe any other measures/relevant information. (optional)

2007

Reporting information for 2007

Dutyholders

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

The number of enterprises that manufacture, import, distribute or use substances on their own, in mixtures or in articles is not available for Finland.

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

In 2008 nearly 500 Finnish Companies submitted pre-registrations to ECHA. According to ECHA's survey, Finnish companies are going to submit fewer than 300 registration dossiers in 2010. In addition to that, a small number of Finnish companies acting as Only Representatives submitted pre-registrations for about 750 non-EU companies.

8.7.3. 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? (compulsory)

Regional environment authorities carried out inspections in 350 industrial sites and information on future REACH obligations on use conditions was disseminated in about 5 cases.

The Occupational Health Inspectorates carried out 79 inspections and the Municipal supervisory authorities for chemicals carried out 37 inspections, where REACH was discussed.

All together there were 121 inspections concerning REACH.

8.7.4. State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)

Number is not available.

8.7.5. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.6. State the number of importer dutyholders subject to inspections and investigations.
(compulsory)

Number is not available.

8.7.7. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.8. State the number of distributors subject to inspections and investigations.
(compulsory)

36

8.7.9. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.10. State the number of downstream users subject to inspections and investigations.
(compulsory)

80

8.7.11. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

Inspections	
8.7.12. State the number of inspections that addressed registration. (compulsory)	None.
8.7.13. State the number these cases which were non-compliant. (optional)	None.
8.7.14. State the number of inspections that addressed information in the supply chain. (compulsory)	54
8.7.15. State the number these cases which were non-compliant. (optional)	
8.7.16. State the number of inspections that addressed downstream use. (compulsory)	84
8.7.17. State the number these cases which were non-compliant. (optional)	
8.7.18. State the number of inspections that addressed authorisation. (compulsory)	None.
8.7.19. State the number these cases which were non-compliant. (optional)	None.
8.7.20. State the number of inspections that addressed restriction. (compulsory)	None. REACH restrictions came into force in June 2009.
8.7.21. State the number these cases which were non-compliant. (optional)	None.
8.7.22. State the number of inspections that addressed other REACH duties. (compulsory)	None. (Which duties?)
8.7.23. State the number these cases which were non-compliant. (optional)	None.

Investigations

8.7.24. State the number of investigations prompted by complaints and concerns raised. (compulsory)

None.

8.7.25. State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)

None.

8.7.26. State the number of investigations prompted by monitoring. (compulsory)

None.

8.7.27. State the number of investigations prompted by results of inspection/follow up activities. (compulsory)

19.

8.7.28. State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)

39

8.7.29. State the number of inspections and investigations resulting in verbal or written advice. (compulsory)

74

8.7.30. State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)

None.

8.7.31. State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)

None.

8.7.32. State the number of convictions following legal proceedings. (optional)

None.

Enforcement

8.7.33. State the number of manufacturers subject to formal enforcement. (compulsory)

None

8.7.34. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.35. State the number of importers subject to formal enforcement. (compulsory)

None

8.7.36. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.37. State the number of distributors subject to formal enforcement. (compulsory)

None

8.7.38. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.7.39. State the number of downstream users subject to formal enforcement. (compulsory)

None

8.7.40. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

2008

Reporting Information for 2008

Dutyholders

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

The total number of enterprises that manufacture, import, distribute or use substances on their own, in mixtures or in articles is not available for Finland.

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

In 2008 nearly 500 Finnish Companies submitted preregistrations to ECHA. According to ECHA's survey, Finnish companies are going to submit fewer than 300 registration dossiers in 2010. In addition to that, a small number of Finnish companies acting as Only Representatives submitted preregistrations for about 750 non-EU companies.

8.8.3. 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? (compulsory)

Regional environment authorities carried out inspections in 750 industrial sites and information on future REACH obligations on use conditions was disseminated in about 10 cases.

The Occupational Health Inspectorates carried out 1460 inspections and the Municipal supervisory authorities for chemicals carried out 48 inspections, where REACH was discussed

All together there were 1518 inspections concerning REACH.

8.8.4. State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)

2

8.8.5. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.8.6. State the number of importer dutyholders subject to inspections and investigations.
(compulsory)

2

8.8.7. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.8.8. State the number of distributors subject to inspections and investigations.
(compulsory)

39

8.8.9. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.8.10. State the number of downstream users subject to inspections and investigations.
(compulsory)

1465

8.8.11. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

Inspections

8.8.12. State the number of inspections that addressed registration. (compulsory)

None.

8.8.13. State the number these cases which were non-compliant. (optional)

None.

8.8.14. State the number of inspections that addressed information in the supply chain.
(compulsory)

598

8.8.15. State the number these cases which were non-compliant. (optional)
8.8.16. State the number of inspections that addressed downstream use. (compulsory) 1176
8.8.17. State the number these cases which were non-compliant. (optional)
8.8.18. State the number of inspections that addressed authorisation. (compulsory) None.
8.8.19. State the number these cases which were non-compliant. (optional) None.
8.8.20. State the number of inspections that addressed restriction. (compulsory) None. REACH restrictions came into force in June 2009.
8.8.21. State the number these cases which were non-compliant. (optional) None.
8.8.22. State the number of inspections that addressed other REACH duties. (compulsory) None.
8.8.23. State the number these cases which were non-compliant. (optional) None.
Investigations
8.8.24. State the number of investigations prompted by complaints and concerns raised. (compulsory) None.
8.8.25. State the number of investigations prompted by incidents or dangerous occurrences. (compulsory) None.
8.8.26. State the number of investigations prompted by monitoring. (compulsory) None.

8.8.27. State the number of investigations prompted by results of inspection/follow up activities. (compulsory)

24

8.8.28. State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)

454

8.8.29. State the number of inspections and investigations resulting in verbal or written advice. (compulsory)

760

8.8.30. State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)

86

8.8.31. State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)

None.

8.8.32. State the number of convictions following legal proceedings. (optional)

None.

Enforcement

8.8.33. State the number of manufacturers subject to formal enforcement. (compulsory)

None.

8.8.34. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.8.35. State the number of importers subject to formal enforcement. (compulsory)

None.

8.8.36. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large

<input checked="" type="checkbox"/> No information <input type="checkbox"/> Not applicable
8.8.37. State the number of distributors subject to formal enforcement. (compulsory) None.
8.8.38. Were these mainly: (compulsory) <input type="checkbox"/> Small <input type="checkbox"/> Small-Medium <input type="checkbox"/> Medium <input type="checkbox"/> Large <input checked="" type="checkbox"/> No information <input type="checkbox"/> Not applicable
8.8.39. State the number of downstream users subject to formal enforcement. (compulsory) 86
8.8.40. Were these mainly: (compulsory) <input checked="" type="checkbox"/> Small <input type="checkbox"/> Small-Medium <input type="checkbox"/> Medium <input type="checkbox"/> Large <input type="checkbox"/> No information <input type="checkbox"/> Not applicable
2009 Reporting Information for 2009
Dutyholders
8.9.1. Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH. (optional) Total number of enterprises that manufacture, import, distribute or use substances on their own, in mixtures or in articles is not available for Finland.
8.9.2. Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional) In 2008 nearly 500 Finnish Companies submitted preregistrations to ECHA. According to ECHA's survey, Finnish companies are going to submit fewer than 300 registration dossiers in 2010. In addition to that, a small number of Finnish companies acting as Only Representatives submitted preregistrations for about 750 non-EU companies.
8.9.3. 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? (compulsory) In the Consumer Agency there were 5 cases concerning restrictions in consumer products. Regional environment authorities carried out inspections in 705 industrial sites and information on future REACH obligations on use conditions was disseminated in about 20 cases. The Occupational Health Inspectorates carried out 2463 inspections and the Municipal

supervisory authorities for chemicals carried out 71 inspections, where REACH was discussed.

All together there were 2559 inspections concerning REACH

In addition, the Customs laboratory took 491 samples on restricted substances:

Restriction n:o	substance	number of samples	not in compliance (%)
23	Cadmium	64	5 (7,8 %)
27	Nickel	162	11 (6,8 %)
43	Azodyes	187	23 (12,3 %)
51/52	Phthalates	78	14 (17,9 %)

8.9.4. State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)

10

8.9.5. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.6. State the number of importer dutyholders subject to inspections and investigations. (compulsory)

None.

8.9.7. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.8. State the number of distributors subject to inspections and investigations. (compulsory)

73

8.9.9. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.10. State the number of downstream users subject to inspections and investigations. (compulsory)

2395

8.9.11. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

Inspections

8.9.12. State the number of inspections that addressed registration. (compulsory)

15

8.9.13. State the number these cases which were non-compliant. (optional)

None.

8.9.14. State the number of inspections that addressed information in the supply chain. (compulsory)

741

8.9.15. State the number these cases which were non-compliant. (optional)

8.9.16. State the number of inspections that addressed downstream use. (compulsory)

1997

8.9.17. State the number these cases which were non-compliant. (optional)

8.9.18. State the number of inspections that addressed authorisation. (compulsory)

None.

8.9.19. State the number these cases which were non-compliant. (optional)

None.

8.9.20. State the number of inspections that addressed restriction. (compulsory)

9 inspections, in addition the Customs Laboratory took 491 samples

8.9.21. State the number these cases which were non-compliant. (optional)

2.

More than 10 % of the samples analyzed by the Customs Laboratory were not in compliance with REACH-restrictions

Of cases mentioned in 8.9.3., the 5 Consumer Agency cases were cases of non-compliance of restrictions in consumer products. The cases resulted in voluntary product withdrawals from the market.

8.9.22. State the number of inspections that addressed other REACH duties.
(compulsory)

None.

8.9.23. State the number these cases which were non-compliant. (optional)

None.

Investigations

8.9.24. State the number of investigations prompted by complaints and concerns raised.
(compulsory)

None

8.9.25. State the number of investigations prompted by incidents or dangerous occurrences.
(compulsory)

One.

8.9.26. State the number of investigations prompted by monitoring. (compulsory)

None.

8.9.27. State the number of investigations prompted by results of inspection/follow up activities. (compulsory)

19

8.9.28. State the number of inspections and investigations resulting in no areas of non-compliance.
(compulsory)

708

8.9.29. State the number of inspections and investigations resulting in verbal or written advice.
(compulsory)

1352

8.9.30. State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)

88

8.9.31. State the number of inspections and investigations resulting in initiation of legal proceedings.
(compulsory)

None.

8.9.32. State the number of convictions following legal proceedings. (optional)

None

Enforcement

8.9.33. State the number of manufacturers subject to formal enforcement. (compulsory)

Number is not available.

8.9.34. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.35. State the number of importers subject to formal enforcement. (compulsory)

Number is not available.

8.9.36. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.37. State the number of distributors subject to formal enforcement. (compulsory)

3

8.9.38. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large
- No information
- Not applicable

8.9.39. State the number of downstream users subject to formal enforcement. (compulsory)

88

8.9.40. Were these mainly: (compulsory)

- Small
- Small-Medium
- Medium
- Large

- No information
- Not applicable

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

9.1. Do you think that the effects of REACH would be better evaluated at a Member State (MS) or EU level? (compulsory)

- MS
- EU

9.2. What parameters are available at MS level that could be used to assess the effectiveness of REACH in a baseline study? (compulsory)

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

10.1. Please provide any further information on the implementation of REACH that the MS considers relevant. (optional)

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.

10.2. Do you wish to upload documents in support of this submission (compulsory)

Yes

No

10.3. Please provide a brief description of the documents that you are uploading. Note: You may upload more than one document. (compulsory)

The entire report from Finland in pdf-format, containing also all the information that couldn't be filled in the awkward electronic format. Please note that according to the advice given in the Caracal meeting, there are many points in the electronic form where we have provided **information that is not correct** to be able to proceed in the form. **So please check correct data/information on Finland from the pdf-document that is uploaded.**

Prepared by

Informal task force comprised of officers of the National Supervisory Authority for Welfare and Health and the Finnish Environment Institute

Authorised by

Informal working group comprised of authorities involved in implementation of REACH

Date 28.5.2010.