

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	BG
What reporting period are you reporting on?	2010
Primary contact person's name.	Parvoleta Luleva
Please provide an email address for the primary contact person.	pluleva@moew.government.bg

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

One Competent Authority Responsible for REACH	
What is the name of the organisation where the Competent Authority is situated?	Ministry of Environment and Water
What is the address of the organisation?	22, Maria Louisa Blvd. 1000, Sofia, Bulgaria (main building) 67, "William Gladstone" Str. Sofia 1000, Bulgaria
What is the email address of the organisation?	contact@moew.government.bg
What is the telephone number of the organisation?	+359 2 940 6000
What is the fax number of the organisation?	n.a.
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 Other (please list)

Please list the other skills that staff in this part of the Competent Authority have.	Chemical Engineering Biotechnology (Molecular) Biology Remark: Skills on CLP should be developed, due to the current amendments in the national Chemicals Act, designating the Minister of Environment and Water as a competent authority on CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Pesticides Other
If Other, please list the different legislations here	CLP Regulation POPs Regulation Detergents Regulation Chemical Accidents (Seveso II) Directive Mercury Export Ban Regulation RoHS Directive
Are there any other institutions that the Competent Authority works with in relation to REACH issues?	Yes
Please list the other institutions that the Competent Authority works with.	Ministry of Health, (National Center of Public Health Protection) Ministry of Labour and Social Policy, (General Labour Inspectorate Executive Agency) Ministry of Economy and Energy National Customs Agency (Ministry of Finance)
Does the Competent Authority outsource any of its work?	No
How adequately resourced is the Competent Authority?	5
Space is available below to provide further comments on the resourcing of the Competent Authority.	Since Bulgaria has no experience in the implementation of the previous chemicals legislation, there is little in depth expertise available in this area. The experts in the CA are trained to execute the essential tasks for the implementation of REACH.

Theme 2 - Information on Cooperation and Communication with other Member States, the

How effective is communication between MS for REACH?	9
How could effectiveness of communication between MS be improved?	
How effective is collaboration between MS for REACH?	10
How could effectiveness of collaboration between MS be improved?	

Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	Yes
Please provide further information.	Two-year bilateral project PPA06/BG/7/2 "Implementation of the EU System on Chemicals - REACH in Bulgaria" (Jan 2007 - Dec 2008) was implemented in collaboration with the Ministry of Housing, Spatial Planning and Environment, Chemicals, Waste and Radiation Protection Directorate (VROM/SAS), the Expert Center for Substances of the National Institute for Public Health and the Environment (RIVM/SEC) and the Dutch Environmental Inspection (VROM Inspectorate), and with the technical support of the EVD International Business and Cooperation. The project assisted the Ministry of Environment and Water (REACH CA in Bulgaria) in strengthening the administrative capacity, development of national measures on the implementation and enforcement of REACH and better operation of the national helpdesk, as well as awareness raising of industry.
How effective is MS communication with ECHA?	10
How could effectiveness of communication with ECHA be improved?	
How effective is MS collaboration with ECHA?	10
How could effectiveness of collaboration with ECHA be improved?	
How effective is MS communication with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of communication with the Commission be improved?	
How effective is MS collaboration with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of collaboration with the Commission be improved?	
Has use been made of the safeguard clause of REACH (Art. 129)?	No

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

Please provide the name of the organisation responsible for operating the National Helpdesk for REACH.	Ministry of Environment and Water
What is the address of the Helpdesk?	67, "William Gladstone" Str. Sofia 1000, Bulgaria
What is the web page address of the Helpdesk?	http://www.chemicals.moew.government.bg/chemical/site/Pages/helpdesk.page
What is the email address of the Helpdesk?	chemhelpdesk@moew.government.bg
What is the telephone number of the Helpdesk?	n.a.
What is the fax number of the Helpdesk?	n.a.
Are there any more organisations responsible for operating the National Helpdesk for REACH?	No

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

Toxicologist	
Ecotoxicologist	
Chemist	1-5
Risk Assessor	
Economist	
Social Scientist	
Exposure Assessor	
Other (please list)	1-5
If you have specified that there are a number of other staff that are involved in the Helpdesk, please list the type of staff here.	There are two additional experts with background in environmental sciences.
Is the same Helpdesk used to provide help to Industry on CLP?	Yes
Does the Helpdesk receive any non-governmental support?	No
How many enquiries does the Helpdesk receive per year?	101-1000
In what format can enquiries be received by the Helpdesk?	Email Letter Other (please list)
Please list the other format(s) of enquiries that can be received by the Helpdesk.	An web based registration form has been developed to enable companies to contact the national Helpdesk
How are the majority of enquiries received?	Email

Do you provide specific advice to SME's?	Yes
Who are the majority of enquiries from?	Small-medium enterprises
What type of enquiries does the Helpdesk receive?	Pre-registration SIEFs Registration REACH-IT IUCLID5 Downstream user obligations Obligations regarding articles Safety Data Sheets Enforcement SVHC Other (please list) CLP
Please list the other types of enquiries that the Helpdesk Scope, defining the role, only representative receives.	

For each type of enquiry received, please provide the proportion in percentage of the total	
Pre-registration (%)	39
Registration (%)	28
Enforcement (%)	3
CLP (%)	2
SIEFs (%)	5
REACH-IT (%)	6
IUCLID5 (%)	5
Downstream user obligations (%)	4
Obligations regarding articles (%)	2
Safety Data Sheets (%)	2
SVHC (%)	1
Other (%)	3

What proportion of enquiries received are deemed to be 1) straight forward, 2) complex, OR No information	
Straight forward (%)	80
Complex (%)	17
No information (%)	3

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

Straight forward questions	1 week
Complex questions	2 weeks
Are any types of enquiry outsourced?	No
Does the Helpdesk seek feedback on its performance?	Yes
Does the Helpdesk review its performance and consider ways to improve its effectiveness?	Yes

What level of cooperation is there between Helpdesks?

What level of cooperation is there between Helpdesks under REHCORN?	4
What level of cooperation is there between Helpdesks outside REHCORN?	2
How frequently do you use RHEP?	Monthly
Has the MS carried out any specific public awareness raising activities?	Yes
What type of activities have been carried out?	Newspaper Leaflets Radio Other (please list) Speaking events

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

A broad scale awareness raising campaign was conducted starting the entry into force of REACH Regulation (1 June 2007). This campaign was carried out in close collaboration with the regional inspectorates of environment and water (RIEWs) and various branch associations. The campaign included different initiatives, most notably press conferences, publications in national and regional press, TV and radio coverage. An electronic newsletter has been distributed to over 800 companies. Regional inspectorates also sent information materials to a number of operators. Different seminars and workshops were organized in every regional inspectorate and the relevant stakeholders were invited, including representatives from the Ministry of Environment and Water (MoEW), providing expertise or contributing with presentations. At these meetings general provisions of the Regulation were communicated and translated copies of the Guidance on registration and for data sharing were disseminated. Variety of information materials such as flyers, brochures, newsletters and translations of some of the guidance documents for industry were made available by the helpdesk website:

<http://www.chemicals.moew.government.bg/chemical/site/Pages/helpdesk.page> Five pilot companies were selected in the framework of the project for collaboration between competent authorities of Bulgaria and Netherlands (VROM/SAS and RIVM/SEC) concerning REACH implementation. These companies were consulted about their obligations under the Regulation.

After working with Dutch experts and going through the decision making process, these five pilot companies presented the results of their work at a seminar, organized by the MoEW in front of an audience from over 50 other companies and branch organizations. The results were also presented from the inspectors involved in the process in front of representatives from all the regional inspectorates at another event. The experts from the Helpdesk participated in 52 seminars organized by various branch associations and contributed with presentations or answering questions from industry representatives. Conclusions: - Contacting the branch associations appears to be a very effective approach because the formulated questions are focused on the branch specific problems and our help is more effective and precise. - Working with regional inspectorates facilitated the Helpdesk to reach a great number of very small local companies; - Disseminating information through the supply chain seems to be also a very effective approach because companies inform each other about the requirements of the Regulation and motivate their clients up and down the supply chain to comply with REACH.

How effective was each type of activity?	
Newspaper	3
Radio	3
Speaking events	5
Leaflets	4
Other	5

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.	Weekly average unique visits: 346 Weekly average reloads: 286 Weekly average total: 632 Monthly average unique visits: 1486 Monthly average reloads: 1229 Monthly average total: 2715 More information on statistics at: http://bgcounter.com/?_id=chemical

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?	Euros 100,001-1,000,000

Theme 5 - Information on Participation in REACH Committees (FORUM, MS, RAC, SEAC,

On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are?	9
How could the effectiveness of the Committees be improved?	RAC- remuneration of the RAC members for rapporteurship on CLH proposals to be provided in order to ensure the effectiveness of the Committee in this area CARACAL- Manual of decisions for the implementation of both REACH and CLP is needed in order to keep track on the agreed implementation issues and related decisions Better information exchange between the CARACAL and the Forum would facilitate the enforcement of REACH. This could be done by more extensive and coordinated discussions of overlapping areas of interest.

Theme 6 - Information on Substance Evaluation Activities

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

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

Toxicologist

Ecotoxicologist

Chemist

Risk Assessor

Socio-Economic Analyst

Exposure Assessor

Other (please list)

If you have specified that there are a number of other staff that are involved in substance evaluation, please list the type of staff here.

Please list the names of the substances covered in the dossiers that the MS has commented upon.

Please list the names of the substances covered in the dossiers where a draft decision has been made.

Please list the names of the substances covered in the dossiers that the MS has rapporteured.

Please list the names of the substances covered in the dossiers that the MS has completed.

How long, on average, does evaluation of a dossier take?

How many transitional dossiers has the MS completed?

How many substances has the MS added to the Community Rolling Action Plan?

How many of ECHA's draft decisions on dossier evaluation has the MS commented on?

Theme 7 - Annex XV Dossiers

How many of each type of dossier has the MS prepared?

CLP 0

Restriction 0

Identification of SVHC 0

Is the time spent following up your MS dossiers reasonable? 1

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

How many of each type of dossier are rapporteured?

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

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

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

CLP	1-3
Restriction	0
Identification of SVHC	0
Is the time spent following up co-rapporteured dossiers reasonable?	7

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

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

CLP	1-3
Restriction	1-3
Identification of SVHC	1-3

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

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

Chemist	1-3
Toxicologist	
Ecotoxicologist	1-3
Economist	
Enforcement	1-3
Legal	
Policy	1-3
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?	Toxicologist CLP
Is the MS satisfied with the levels of access to expertise?	3
Has there been any industry involvement in the preparation of MS dossiers?	No

Theme 8 - Information on Enforcement Activities

General Information

Please enter the MAIN enforcing authority for REACH within the Member State.	Regional Inspectorates of Environment and Water within the Ministry of Environment and Water
Is there more than one enforcing authority for REACH within the Member State?	Yes
Please provide details on the other enforcing authorities for REACH within the Member State.	Regional Inspectorates for public health protection within the Ministry of health Executive Agency for Labour Safety within the Ministry of labour and social policy

Enforcement Strategy

Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH?	Yes
If Yes, is the strategy (or strategies) in line with the strategy devised by the Forum?	Yes
Please outline the enforcement strategy within the Member State in a maximum of 2000 characters.	<p>The minister of environment and water with his order No 250/8.4.2009 has issued Guidelines for enforcement of REACH 2009 - 2010, in which the strategy of the REACH enforcement is outlined. It is in line with the document on enforcement strategies for REACH, issued by the Forum, and clarifies the target groups and the enforcement priorities for the abovementioned period. The Guidelines also focus on the coordination and cooperation of the enforcement authorities and provide information about how the planning, performing, reporting and follow-up of REACH inspections should be done, as well as what penalty and administrative measures (mandatory improvement notices, fines, sanctions, restrictions on placing on the market or the production, etc.) should be applied when discovering noncompliance. For 2009/2010 the priorities for the enforcement of REACH are checking compliance with the requirements for (pre-)registration for manufacturers and importers, the availability and the quality of the SDS's within the supply chains, incl. information to the workers, and identification of companies, which produce, place on the market or use SVHCs in order to ensure subsequent compliance with the risk reduction measure proposed (authorizations or restrictions). The document also clarifies the minimum information requirements for companies in order to demonstrate compliance with Art. 36 of REACH. For 2011, the Guidelines will be updated and reissued by the minister of environment and water, the minister of health and the minister of labour and social policy, which will further increase the coordination and the cooperation of the enforcement authorities.</p>

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 minister of environment and water as the Competent authority under Art. 121 of REACH has issued Guidelines for enforcement of REACH 2009 - 2010, in which also issues on the cooperation and coordination between enforcing authorities and the Competent Authority are discussed. A permanent working group on REACH implementation and enforcement is created, with representatives of the three authorities, responsible for the enforcement (Ministry of environment and water, ministry of health, labour safety inspectorate within the ministry of labour and social policy through their regional inspectorates). Experts from the competent authority have regular training workshops for REACH enforcement with inspectors from the enforcement authorities and on regional level, joint inspections of enforcement authorities have also been performed in order to enhance coordination and cooperation between enforcement authorities.

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).

For the reporting period the mechanisms for coordination and cooperation between the enforcing authorities and the Competent Authority have been put into place as of 2008. Since then, regular meetings between representatives of the enforcement authorities on national level have been held and issues of coordination and cooperation have been discussed and resolved. As a result, Guidelines for enforcement of REACH 2009 - 2010 have been issued by the Competent authority. Experts from the Competent authority have regularly participated in training workshops for the enforcement authorities. The enforcement authorities regularly supply information about the enforcement to the Competent authority. In some regions, on a demand driven basis, joint inspections have been performed by the enforcement authorities. The enforcement authorities of the ministry of environment and water and the ministry of health have participated in the first Forum coordinated project on pre-registration and SDS, with more than 250 inspections performed.

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Describe the inspection and investigation strategy and methodology.

See the information above.

Describe the level and extent of monitoring activities.

For the reporting period, the level and extent of monitoring activities on REACH compliance have been defined by the priorities, set in the Guidelines for enforcement of REACH 2009 - 2010. As such, (pre-)registration for manufacturers and importers, the availability and the quality of the SDS's within the supply chains, incl. information to the workers, and identification of companies, which produce, place on the market or use SVHCs in order to ensure subsequent compliance with the risk reduction measure proposed (authorizations or restrictions), were identified. Based on these priorities, the monitoring activities have been concentrated in on-site and desktop inspection of the kind and tonnage of chemicals produced, placed on the market or used, the availability and quality of the SDS of the chemicals, if such required, and the identification of companies that produce or use SVHCs.

Describe sanctions available to enforcing authorities.

Administrative penalties • Fine for natural persons (respectively a pecuniary sanction for legal persons) of 10 000 up to 100 000 BGN (5 113 to 51 129 EUR) for breach of articles 5, 7(3), 8(2), 9(6), 14(1), 14(6), 14(7), 40(3) and 50(4); and • Fine for natural persons (respectively a pecuniary sanction for legal persons) of 5 000 up to 50 000 BGN (2 557 to 25 565 EUR) for breach of articles 6(1), 6(3), 7(1), 7(2), 7(5), 8(3), 9(2), 11(1), 13(1), 13(2), 13(3), 17(1), 18(1), 19(1), 22(1), 22(2), 22(4), 24(2), 25(1), 25(2), 26(1), 26(3), 30(1), 30(2), 30(6), 40(4), 41(4), 46(2), 49, 50(2) and 50(3); • The penalty is doubled in case of recidivism. • Fine for natural persons (respectively a pecuniary sanction for legal persons) of 10 000 up to 100 000 BGN (5 113 to 51 129 EUR) for breach of Articles 56(1), 56(2), 60(10), 65 and 67(1); and • Fine for natural persons, respectively a pecuniary sanction for legal persons, to the amount of 5 000 up to 50 000 BGN (2 557 to 25 565 EUR) for breach of articles 61(1) and 66(1) • The penalty is doubled in case of recidivism. • Fine for natural persons, respectively a pecuniary sanction for legal persons, to the amount of 10 000 up to 100 000 BGN (5 113 to 51 129 EUR) for breach of articles 31(1), 31(2), 31(3), 31(7), 31(9), 32(1), 32(3), 33(1), 34 and 35; and • Fine for natural persons, respectively a pecuniary sanction for legal persons, to the amount of 5 000 up to 50 000 BGN (2 557 to 25 565 EUR) for breach of articles 31(5), 31(8), 32(2), 36(1) and 36(2); • The penalty is doubled in case of recidivism. • Fine for natural persons, respectively a pecuniary sanction for legal persons, to the amount of 10 000 up to 100 000 BGN (5,113 to 51 129 EUR) for breach of articles 37(4), 37(5), 37(6), 37(7), 38(1), 38(3), 38(4), 39(1) and 39(2); and • Fine for natural persons, respectively a pecuniary sanction for legal persons, to the amount of 5,000 up to 50 000 BGN (2 557 to 25 565 EUR) for breach of articles 37(2) and 37(3) • The penalty is doubled in case of recidivism. Moreover, the enforcement authorities can prohibit the placing on the market of substances, which are non compliant with the essential requirements of REACH.

Describe the referrals from ECHA.	n.a.
Describe the referrals from other Member States.	n.a.
Describe any other measures/relevant information.	In 2007, 568 formal letters to potential registrants were sent by the enforcement authorities in order to remind them for the requirements for preregistration of phase-in substances. In 2008 1214 letters were sent to the companies in order to remind them for their preregistration and registration duties. Additional 4116 letters were sent to companies that have been importing substances on their own, in mixtures and articles. Over 1000 leaflets and Guidance notes have been distributed amongst dutyholders who are likely to have duties imposed on them by REACH and 205 companies have been approached in order to verify whether they produce or use SVHCs.

2007

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	1086
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	1599
State the number of manufacturer dutyholders subject to inspections and investigations.	89
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	72
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	24
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	640

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.	1599
State the number these cases which were non-compliant.	128
State the number of inspections that addressed downstream use.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed restriction.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	0

Investigations	
State the number of investigations prompted by complaints and concerns raised.	0
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	0
State the number of investigations prompted by results of inspection/follow up activities.	229
State the number of inspections and investigations resulting in no areas of non-compliance.	1370
State the number of inspections and investigations resulting in verbal or written advice.	227

State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	2
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.	29
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	18
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	0
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	182
Were these mainly:	Small-Medium

2008

Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	884
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	213
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?	904
State the number of manufacturer dutyholders subject to inspections and investigations.	100
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	113

Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	26
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	645
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	13
State the number these cases which were non-compliant.	0
State the number of inspections that addressed information in the supply chain.	722
State the number these cases which were non-compliant.	150
State the number of inspections that addressed downstream use.	0
State the number these cases which were non-compliant.	0
State the number of inspections that addressed authorisation.	75
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.	1
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.	15
State the number of inspections and investigations resulting in no areas of non-compliance.	579
State the number of inspections and investigations resulting in verbal or written advice.	325
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	2
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.	28
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	42
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	10
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	252
Were these mainly:	Small-Medium

2009

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	1227
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	324
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?	2828

State the number of manufacturer dutyholders subject to inspections and investigations.	158
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	169
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	53
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	719
Were these mainly:	Small-Medium

Inspections	
State the number of inspections that addressed registration.	336
State the number these cases which were non-compliant.	14
State the number of inspections that addressed information in the supply chain.	895
State the number these cases which were non-compliant.	201
State the number of inspections that addressed downstream use.	664
State the number these cases which were non-compliant.	28
State the number of inspections that addressed authorisation.	50
State the number these cases which were non-compliant.	0
State the number of inspections that addressed restriction.	1884
State the number these cases which were non-compliant.	31
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.	2
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.	93
State the number of inspections and investigations resulting in no areas of non-compliance.	542
State the number of inspections and investigations resulting in verbal or written advice.	567
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	17
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.	12
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	23
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	0
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	232
Were these mainly:	Small-Medium

Theme 9 - Information on the Effectiveness of REACH on the Protection of Human Health	
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?

Progress in registration, authorisation and restriction
Changes in classification and labelling and in quality of safety data sheets
Production of toxic chemicals
Monitoring persistent and bioaccumulative chemicals

Theme 10 - Other Issues/Recommendations/Ideas

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

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

Meta Informations

Creation date	01-06-2010
Last update date	
User name	ReachBG
Case Number	818166700411415210
Invitation Ref.	
Status	N