

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	CY
What reporting period are you reporting on?	2010
Primary contact person's name.	Leandros Nicolaides
Please provide an email address for the primary contact person.	tkyprianidou@dli.mlsi.gov.cy

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?	Department of Labour Inspection, Ministry of Labour and Social Insurance
What is the address of the organisation?	1493 Nicosia, Cyprus
What is the email address of the organisation?	director@dli.mlsi.gov.cy
What is the telephone number of the organisation?	+35722405623
What is the fax number of the organisation?	+35722663788
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?	Worker protection
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
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Other
If Other, please list the different legislations here	POP's Convention, PIC Convention, SAICM, Partly for chemical weapons convention and dual use products regulation.
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.

Customs Department (control of imports / exports), Consumers Protection Department (restrictions), Department of Agriculture (pesticides, biocides), Health Services (detergents - restrictions) Ministry of Interior (Chemicals in construction products)

Does the Competent Authority outsource any of its work? No

How adequately resourced is the Competent Authority? 4

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

Currently the Chemical's Sector of the Department of Labour Inspection is staffed with 4 Officers. In addition to them the Director of the Department is the representative of Cyprus to the ECHA's Management Board. The main task of the staff of the Chemical's Sector is the enforcement of the existing legislation on dangerous substances, the amendment of certain provisions of the legislation in order to harmonize it with the European acquis and the implementation of the provisions of the Rotterdam Convention on the import and export of certain dangerous substances and mixtures (PIC Convention), as well as the Stockholm Convention on Persistent Organic Pollutants (POPs). With the above legislation the Chemical's Sector aims at achieving complete control of chemical substances, mixtures and products containing dangerous substances, imported, exported or placed on the Cyprus market. Furthermore the staff of the Chemical's Sector actively participates in the majority of the meetings of the Committees of the European Chemicals Agency, in order to subsequently inform all importers, producers and users in Cyprus. In addition, for the effective implementation of REACH and CLP Regulations, two Helpdesks have been established. The staff of the Chemical's Sector also represents the Department of Labour Inspection at the competent authorities meeting for European Regulation 689/2008 and at the meeting of the parties of the Rotterdam Convention. Furthermore the Sector is involved in all international efforts undertaken by the United Nations for the effective control and

management of chemical substances (Strategic Approach to International Chemicals Management - SAICM).

Theme 2 - Information on Cooperation and Communication with other Member States, the European Chemicals Agency (ECHA) and the Commission	
How effective is communication between MS for REACH?	8
How could effectiveness of communication between MS be improved?	Effectiveness of communication can be improved if a central single contact point is assigned for each Member State.
How effective is collaboration between MS for REACH?	7
How could effectiveness of collaboration between MS be improved?	Effectiveness of collaboration between MS can be further improved if harmonised approaches for the implementation of REACH are implemented and central coordination is taking place.
Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	No
How effective is MS communication with ECHA?	9
How could effectiveness of communication with ECHA be improved?	
How effective is MS collaboration with ECHA?	9
How could effectiveness of collaboration with ECHA be improved?	Collaboration with ECHA can be further improved if ECHA staff visit the competent authorities of MS in order to discuss REACH related issues.
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.	Department of Labour Inspection of the Ministry of Labour and Social Insurance
What is the address of the Helpdesk?	1493 Nicosia, CYPRUS
What is the web page address of the Helpdesk?	Under the Department's website www.mlsi.gov.cy/dli there is a box with a link to the REACH Website of the Department
What is the email address of the Helpdesk?	Reach@dlm.mlsi.gov.cy
What is the telephone number of the Helpdesk?	+35722405609
What is the fax number of the Helpdesk?	+35722663788
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)	
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.	Staff with regulatory experience in chemicals
Is the same Helpdesk used to provide help to Industry on CLP?	No
Does the Helpdesk receive any non-governmental support?	No
How many enquiries does the Helpdesk receive per year?	101-1000

In what format can enquiries be received by the Helpdesk?	Email Phone Fax Letter Other (please list)
Please list the other format(s) of enquiries that can be received by the Helpdesk.	Personal meetings arranged at the helpdesk's office after appointment
How are the majority of enquiries received?	Phone
Do you provide specific advice to SME's?	Yes
Who are the majority of enquiries from?	Small enterprises
What type of enquiries does the Helpdesk receive?	Pre-registration SIEFs Registration REACH-IT Restriction Safety Data Sheets Enforcement

For each type of enquiry received, please provide the proportion in percentage of the total enquiries.	
Pre-registration (%)	30
Registration (%)	1
Restriction (%)	2
Enforcement (%)	12
SIEFs (%)	25
REACH-IT (%)	29
Safety Data Sheets (%)	1

What proportion of enquiries received are deemed to be 1) straight forward, 2) complex, OR No information	
Straight forward (%)	70
Complex (%)	30
No information (%)	0

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

Straight forward questions	1 day
Complex questions	3 days
Are any types of enquiry outsourced?	No
Does the Helpdesk seek feedback on its performance?	No
Does the Helpdesk review its performance and consider ways to improve its effectiveness?	Yes

What level of cooperation is there between Helpdesks?

What level of cooperation is there between Helpdesks under REHCORN?	4
What level of cooperation is there between Helpdesks outside REHCORN?	1
How frequently do you use RHEP?	Weekly
Has the MS carried out any specific public awareness raising activities?	Yes
What type of activities have been carried out?	Newspaper Leaflets Radio Other (please list) Speaking events
Please list the other types of activities that have been carried out.	Letters and emails have been sent to companies which are affected by REACH

How effective was each type of activity?

Newspaper	3
Radio	2
Speaking events	4
Leaflets	3
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)?	101-500
Please describe the scope of the number of REACH webpage visits.	Usually these are first-time visits from people, who have not heard before or seek preliminary information on REACH Regulation and need a brief overview on their obligations. Other visitors are searching for the REACH - IT link, which appears on our webpage.

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

Does the MS contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?	No
What has been the overall public funding on research and development of alternative testing in your MS each year?	Euros 0-10,000

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

On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are?	8
How could the effectiveness of the Committees be improved?	The effectiveness of the Committees can be improved if : - All members actively participate in the discussions at the various Committee meetings. - Circa documents are distributed earlier to members. - Sufficient time is allocated for discussions even if this action results to the extension of the duration of each meeting. - More issues are dealt with by teleconferences and webinars. Thus time is saved for necessary discussions. - Systematic and targeted selection of NGO representatives and other participants of open sessions.

Theme 6 - Information on Substance Evaluation Activities

2010 Reporting

Please name the organisations/institutions that are involved in the evaluation process.	Department of Labour Inspection
---	---------------------------------

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

Toxicologist	
Ecotoxicologist	
Chemist	1-5
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?	0
How many of ECHA's draft decisions on dossier evaluation has the MS commented on?	0

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 does not apply 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 does not apply how reasonable the time spent following up your rapporteured dossiers was.

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

CLP 0

Restriction 0

Identification of SVHC 0

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

Space is available below to provide further comments on does not apply how reasonable the time spent following up your co-rapporteured dossiers was.

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

CLP 0

Restriction 0

Identification of SVHC 0

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

Restriction 0

Identification of SVHC	0
------------------------	---

What expertise is available for preparing dossiers?

Chemist	1-3
Toxicologist	0
Ecotoxicologist	0
Economist	0
Enforcement	1-3
Legal	0
Policy	1-3
Exposure	0
CLP	0
Other (please list)	0

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

Is the MS able to access external specialists?	Yes
--	-----

What types of external specialists does the MS have access to?	The Cyprus Competent Authority has signed a cooperation agreement with the Austrian Competent Authority for REACH in order to receive support on possible REACH related activities. We also examine the possibility of outsourcing some risk assessment related work to local specialists.
--	--

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.	Department of Labour Inspection
Is there more than one enforcing authority for REACH within the Member State?	No

Enforcement Strategy	
Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH?	Yes
If Yes, is the strategy (or strategies) in line with the strategy devised by the Forum?	Yes

Please outline the enforcement strategy within the Member State in a maximum of 2000 characters.	The enforcement strategy for REACH implementation is planned and revised annually based on the priorities set by the Department of Labour Inspection. The priorities are determined after consideration of the FORUM priorities, decisions and work programme and also after analysis of the special circumstances and needs at national level. In general enforcement activities include: 1. Targeted campaigns for the inspection of restricted or banned chemicals (Annex XVII) 2. Investigation of complaints (non compliant products containing dangerous chemicals or products not properly packaged and labelled) 3. Participation to FORUM and CLEEN campaigns During the reporting period targeted campaigns were carried out for the determination of (a) Pthalates in toys and child care articles (b) Nickel in jewels and faux bijoux (c) Azocolourants in clothes (d) Aromatic Compounds and Organic Solvents (Benzene, Chloroform, Toluene) in glues, pencils and colours Further to the above, the Chemical 's Sector of the Department of Labour Inspection has actively participated in FORUM Activities and in particular, the control of preregistrations and SDSs (REACH-EN-FORCE-1 project). For this purpose the inspectors of the Department performed inspections which covered the 13% of the preregistrations of Cyprus.
--	---

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.

A Chemicals Council has been established through a provision of the new Chemicals Legislation. The Council acts as a forum of discussion of the various issues related to chemicals management and control and is chaired by the Director of the Department of Labour Inspection (Chief Inspector). The following public authorities and NGOs participate in the Council (total of 17 members): - Ministry of Labour and Social Insurance - Ministry of Agriculture, Natural Resources and Environment - Ministry of Interior - Ministry of Finance (Department of Customs and Excise) - Ministry of Commerce, Industry and Tourism - Ministry of Health (State General Lab) - Ministry of Communications and Works - Consumers Unions (2) - Trade Unions (3) - Employers Organisation (2) - Cyprus Federation of Environmental and Ecological Organisations - Pancyprian Union of Chemists - Cyprus Scientific and Technical Chamber

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).

After the preparation of new or amending legislation aiming at harmonising the Cyprus legislation with the EU Acquis, the draft documents were sent to the Members of the Council for comments, possible input and approval.

2010 Reporting

Describe the inspection and investigation strategy and methodology.

A manual of Inspection and Investigation strategy has been prepared in order to guide the inspectors in applying a harmonised inspection methodology. Copies of this Manual, which includes Standard Operating Procedures for Chemicals Inspection, have been provided to the chemicals inspectors.

Describe the level and extent of monitoring activities.

Monitoring activities include campaigns for preregistration and SDSs control, as well as various other campaigns related to the implementation of Annex XVII restrictions. In particular campaigns have been carried out for the determination of phthalates in toys and childcare articles, Nickel in faux bijoux and azocolours in clothes.

Describe sanctions available to enforcing authorities.	The legislation provides for both administrative and / or criminal sanctions. Breaches of legislation may result upon conviction in the imposition of a fine of up to 80 000 EUR and/or two years of imprisonment. In the case of multiple infringements the fines are cumulative. In the event of the repetition of infringements, the fine cannot exceed 80 000 EUR and the duration of imprisonment cannot exceed four years. In parallel, a procedure for administrative sanctions has been adopted for the specific purpose of enforcing REACH. The national legislation provides for administrative fines of up to 500 EUR per day of infringement and fines of up to 20 000 EUR. Administrative fines are calculated depending on the nature, the seriousness and the duration of infringement. If the infringement does not cease, the Minister may impose an administrative fine of between 100 EUR and 1 000 EUR per day, depending on the severity of the infringement.
Describe the referrals from ECHA.	none
Describe the referrals from other Member States.	none
Describe any other measures/relevant information.	

2007

Dutyholders

Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	500
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	500
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?	92
State the number of manufacturer dutyholders subject to inspections and investigations.	10
Were these mainly:	Small
State the number of importer dutyholders subject to inspections and investigations.	100

Were these mainly:	Small
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.	49
Were these mainly:	Small

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.	65
State the number these cases which were non-compliant.	25
State the number of inspections that addressed downstream use.	57
State the number these cases which were non-compliant.	25
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.	34
State the number these cases which were non-compliant.	25
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.	7
State the number of investigations prompted by incidents or dangerous occurrences.	15
State the number of investigations prompted by monitoring.	9

State the number of investigations prompted by results of inspection/follow up activities.	21
State the number of inspections and investigations resulting in no areas of non-compliance.	0
State the number of inspections and investigations resulting in verbal or written advice.	72
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	1
State the number of inspections and investigations resulting in initiation of legal proceedings.	1
State the number of convictions following legal proceedings.	1

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of importers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of distributors subject to formal enforcement.	1
Were these mainly:	Small
State the number of downstream users subject to formal enforcement.	0
Were these mainly:	Not applicable

2008

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	500
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	500

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?	224
State the number of manufacturer dutyholders subject to inspections and investigations.	62
Were these mainly:	Small
State the number of importer dutyholders subject to inspections and investigations.	100
Were these mainly:	Small
State the number of distributors subject to inspections and investigations.	80
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	40
Were these mainly:	Small

Inspections	
State the number of inspections that addressed registration.	110
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	125
State the number these cases which were non-compliant.	57
State the number of inspections that addressed downstream use.	40
State the number these cases which were non-compliant.	32
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed restriction.	99
State the number these cases which were non-compliant.	36
State the number of inspections that addressed other REACH duties.	0

State the number these cases which were non-compliant.

Investigations

State the number of investigations prompted by complaints and concerns raised.	5
State the number of investigations prompted by incidents or dangerous occurrences.	5
State the number of investigations prompted by monitoring.	2
State the number of investigations prompted by results of inspection/follow up activities.	8
State the number of inspections and investigations resulting in no areas of non-compliance.	9
State the number of inspections and investigations resulting in verbal or written advice.	93
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement

State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of importers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of distributors subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of downstream users subject to formal enforcement.	0
Were these mainly:	Not applicable

2009

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	500
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	500
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?	109
State the number of manufacturer dutyholders subject to inspections and investigations.	21
Were these mainly:	Small
State the number of importer dutyholders subject to inspections and investigations.	100
Were these mainly:	Small
State the number of distributors subject to inspections and investigations.	67
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	40
Were these mainly:	Small

Inspections	
State the number of inspections that addressed registration.	30
State the number these cases which were non-compliant.	1
State the number of inspections that addressed information in the supply chain.	58
State the number these cases which were non-compliant.	15
State the number of inspections that addressed downstream use.	40
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.	
State the number of inspections that addressed restriction.	70
State the number these cases which were non-compliant.	32
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	

Investigations	
State the number of investigations prompted by complaints and concerns raised.	10
State the number of investigations prompted by incidents or dangerous occurrences.	5
State the number of investigations prompted by monitoring.	1
State the number of investigations prompted by results of inspection/follow up activities.	2
State the number of inspections and investigations resulting in no areas of non-compliance.	3
State the number of inspections and investigations resulting in verbal or written advice.	61
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of importers subject to formal enforcement.	0
Were these mainly:	Not applicable
State the number of distributors subject to formal enforcement.	0

Were these mainly:	Not applicable
--------------------	----------------

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

Were these mainly:	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

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?	In Cyprus the effectiveness of REACH in a base line study can be assessed by using the results of inspections and those of the targeted campaigns to enforce provisions of Annex XVII of REACH (phthalates, Nickel, azocolours). The targeted campaigns were carried out during 2008 - 2009 and will continue during 2010. The results of these campaigns for 2008 and 2009 are shown in the attached files (filename: Campaigns 2008-2009.doc).
--	--

Theme 10 - Other Issues/Recommendations/Ideas

Please provide any further information on the implementation of REACH that the MS considers relevant.	A list of seminars on REACH issues is attached (filename: 20100525-REACH Seminars.doc).
---	---

Do you wish to upload documents in support of this submission	Yes
---	-----

Please provide a brief description of the documents that you are uploading. Note: You may upload more than one document.	Attached are the results of the campaigns for 2008 and 2009 and a list of seminars given on REACH issues.
--	---

Meta Informations

Creation date	26-05-2010
Last update date	
User name	ReachCY
Case Number	478987233101614610
Invitation Ref.	
Status	N