

MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	HU
What reporting period are you reporting on?	2010
Primary contact person's name.	Imre Bordás MD
Please provide an email address for the primary contact person.	bordas.imre@okbi.antsz.hu

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?	National Institute of Chemical Safety
What is the address of the organisation?	Nagyvarad ter 2. Budapest Hungary H-1096
What is the email address of the organisation?	bordas.imre@okbi.antsz.hu
What is the telephone number of the organisation?	+361 476 11 95
What is the fax number of the organisation?	+361 476 12 27
What part of REACH does this part of the Competent Authority deal with?	All
From what part of Government does this part of the Competent Authority have authority from?	Health
Are employees in the Competent Authority directly employed by Government (civil servants)?	No
What skills do staff in this part of the Competent Authority have?	Chemistry Enforcement Legal CLP Other (please list)
Please list the other skills that staff in this part of the Competent Authority have.	agriculture, environmental sciences, medical sciences
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Pesticides
Are there any other institutions that the Competent Authority works with in relation to REACH issues?	No
Does the Competent Authority outsource any of its work?	No
How adequately resourced is the Competent Authority?	3
Space is available below to provide further comments on the resourcing of the Competent Authority.	

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

How effective is communication between MS for REACH?	3
How could effectiveness of communication between MS be improved?	A system like RHEP designed for MSCAs could be useful.
How effective is collaboration between MS for REACH?	3
How could effectiveness of collaboration between MS be improved?	A detailed and available list of experts with contact information of all MSCAs could help finding the right person for collaboration in specific issues. Collaboration of MSs with similar background (economical, historical, industrial etc.) in informal groups could help identifying similar problems and finding solutions.
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?	3
How could effectiveness of communication with ECHA be improved?	We are afraid the time of response is too long if sending ECHA a question in e-mail. That could be improved somehow.
How effective is MS collaboration with ECHA?	6
How could effectiveness of collaboration with ECHA be improved?	Updating the CAs about new units and new colleagues working for ECHA (with their expertise) could be helpful, because CAs could immediately find the right unit or person with specific issues.
How effective is MS communication with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of communication with the Commission be improved?	Working documents of meetings are sent too late before the meetings, that could be improved with earlier sending. We propose for the Commission to send notifications to the CA-s in case of amendment of any parts of REACH (eg. Annex II)
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.	Országos Kémiai Biztonsági Intézet (OKBI) - National Institute of Chemical Safety
What is the address of the Helpdesk?	H-1096 Nagyváradi tér 2, Budapest, Hungary
What is the web page address of the Helpdesk?	http://www.okbi.hu/reach
What is the email address of the Helpdesk?	reach.helpdesk@okbi.antsz.hu

What is the telephone number of the Helpdesk?	+36 1 476-1167, +36 1 476-1134
What is the fax number of the Helpdesk?	+36 1 215-6891
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	0
Ecotoxicologist	0
Chemist	0
Risk Assessor	0
Economist	0
Social Scientist	0
Exposure Assessor	0
Other (please list)	6-10
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.	biologist, lawyer and experts in the fields of chemistry, environmental protection and pharmacology
Is the same Helpdesk used to provide help to Industry on CLP?	Yes
Does the Helpdesk receive any non-governmental support?	No
How many enquiries does the Helpdesk receive per year?	101-1000
In what format can enquiries be received by the Helpdesk?	Email Phone Fax Letter
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?	<ul style="list-style-type: none"> Pre-registration SIEFs Registration REACH-IT IUCLID5 Downstream user obligations Restriction Obligations regarding articles Testing Safety Data Sheets Enforcement SVHC CLP
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For each type of enquiry received, please provide the proportion in percentage of the total enquiries.

Pre-registration (%)	2
Registration (%)	2
Restriction (%)	3
Testing (%)	1
Enforcement (%)	10
CLP (%)	5
SIEFs (%)	30
REACH-IT (%)	10
IUCLID5 (%)	10
Downstream user obligations (%)	5
Obligations regarding articles (%)	5
Safety Data Sheets (%)	15
SVHC (%)	2

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

Straight forward (%)	80
Complex (%)	15
No information (%)	5

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?	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
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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?	Leaflets Radio Speaking events

How effective was each type of activity?	
Radio	3
Speaking events	5
Leaflets	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.	text of the REACH and guidance documents, news and events

Theme 4 - Information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods	
Does the MS contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?	No
What has been the overall public funding on research and development of alternative testing in your MS each year?	No information

Theme 5 - Information on Participation in REACH Committees (FORUM, MS, RAC, SEAC, CARACAL, PEG, RCN, REHCORN)	
On a scale of 1-10, how effective do you think the work of the Committees associated with REACH are?	6
How could the effectiveness of the Committees be improved?	Forum: well-organized MS: well-organized RAC: well-organized SEAC:well-organized CARACAL: working documents sometimes are sent too late - there is not enough time for delegations to prepare for the meeting, agenda of the meetings are quite busy - we'd need more time to discuss all opinions, meeting rooms are getting more and more crowded - Caracal would need bigger meeting room PEG: well-organized RCN: well-organized REHCORN: well-organized

Theme 6 - Information on Substance Evaluation Activities	
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Please name the organisations/institutions that are involved in the evaluation process. National Institute of Chemical Safety

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

Toxicologist	0
Ecotoxicologist	0
Chemist	1-5
Risk Assessor	0
Socio-Economic Analyst	0
Exposure Assessor	0
Other (please list)	1-5
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.	biologist, pharmacist, medical doctor
Please list the names of the substances covered in the dossiers that the MS has commented upon.	none
Please list the names of the substances covered in the dossiers where a draft decision has been made.	none
Please list the names of the substances covered in the dossiers that the MS has rapporteured.	none
Please list the names of the substances covered in the dossiers that the MS has completed.	none
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?	

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?	6

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?	5

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

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

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

CLP	0
Restriction	0
Identification of SVHC	0

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

Restriction	0
Identification of SVHC	0

What expertise is available for preparing dossiers?

Chemist	1-3
Toxicologist	0
Ecotoxicologist	0

Economist	0
Enforcement	1-3
Legal	1-3
Policy	0
Exposure	0
CLP	1-3
Other (please list)	1-3
If you have specified that there is other expertise is available for preparing CLH dossiers, please provide details here.	biologist, pharmacist, medical doctor
Is the MS able to access external specialists?	No
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.	Hungarian National Public Health and Medical Officer Service (In Hungarian: Állami Népegészségügyi és Tisztiorvosi Szolgálat - ÁNTSZ)
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.	National Consumer Affairs (regarding ANNEX XVII)

Enforcement Strategy

Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH?	No
If No, are there any plans for making an enforcement strategy (or strategies)?	No
Comments	There is a priority setting in each year for enforcers, which also covers REACH enforcement. That priority setting for REACH was/is in line with the strategies prepared by the Forum.

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 Competent Authority provides regular trainings and guidance for the inspectors, who may also use the Helpdesk Service to get additional help.
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).	The trainings are given at the regional headquarters, so there are more possibilities for inspectors to raise complex issues. Members of the Competent Authority took part in joint inspections as well.

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Describe the inspection and investigation strategy and methodology.	
Describe the level and extent of monitoring activities.	Hungarian National Public Health and Medical Officer Service works in 3 levels (country level, regional level, local level). The monitoring and controlling activity is carried out by local level authorities. The local level is assigned to 81 local institutes, which covers the whole territory of the country. The local institutes control those industrial participants who are situated in their defined area. 7 regional level institutes support the activities at local level. At country level the Office of the Chief Medical Officer and the National Institute of Chemical Safety (as CA) provide annual workplans, trainings, assistance, advices and devices.
Describe sanctions available to enforcing authorities.	Fines, suspension of activities, administrative orders, cessation of distribution
Describe the referrals from ECHA.	There was no such referral till the day of reporting.
Describe the referrals from other Member States.	There was no such referral till the day of reporting.
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.	
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?	0
State the number of manufacturer dutyholders subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of importer dutyholders subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of distributors subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of downstream users subject to inspections and investigations.	0
Were these mainly:	Not applicable

Inspections

State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed restriction.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed other REACH duties.	0
State the number these cases which were non-compliant.	

Investigations	
State the number of investigations prompted by complaints and concerns raised.	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.	0
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.	0
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	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

2008

Dutyholders	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	0
State the number of manufacturer dutyholders subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of importer dutyholders subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of distributors subject to inspections and investigations.	0
Were these mainly:	Not applicable
State the number of downstream users subject to inspections and investigations.	0
Were these mainly:	Not applicable

Inspections	
State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	0
State the number these cases which were non-compliant.	

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

Investigations	
State the number of investigations prompted by complaints and concerns raised.	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.	0
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.	0
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	0
Were these mainly:	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.	
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?	1472
State the number of manufacturer dutyholders subject to inspections and investigations.	30
Were these mainly:	No information
State the number of importer dutyholders subject to inspections and investigations.	25
Were these mainly:	No information
State the number of distributors subject to inspections and investigations.	1357
Were these mainly:	No information
State the number of downstream users subject to inspections and investigations.	60
Were these mainly:	No information

Inspections	
State the number of inspections that addressed registration.	0
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	79
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	35
State the number these cases which were non-compliant.	
State the number of inspections that addressed authorisation.	0
State the number these cases which were non-compliant.	

State the number of inspections that addressed restriction.	1185
State the number these cases which were non-compliant.	57
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.	121
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.	121
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.	0
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	

Enforcement	
State the number of manufacturers subject to formal enforcement.	30
Were these mainly:	No information
State the number of importers subject to formal enforcement.	25
Were these mainly:	No information
State the number of distributors subject to formal enforcement.	1357
Were these mainly:	No information
State the number of downstream users subject to formal enforcement.	60
Were these mainly:	No information

Theme 9 - Information on the Effectiveness of REACH on the Protection of Human Health and the Environment, and the Promotion of Alternative Methods, and Innovation and Competition

Do you think that the effects of REACH would be better evaluated at a Member State (MS) or EU level?	EU
What parameters are available at MS level that could be used to assess the effectiveness of REACH in a baseline study?	Number of inspections carried out, amount of fines, number of non-compliances

Theme 10 - Other Issues/Recommendations/Ideas

Please provide any further information on the implementation of REACH that the MS considers relevant.	In Hungary there are lots of SMEs that can hardly comply with REACH requirements because of financial causes, so it's possible that some of them go bankrupt. As REACH is an extremely difficult piece of legislation even for a jurist, everyday people in industry and economy cope with the requirements of REACH only with great efforts and little success. Inspectors in enforcement would need more and more training for their work.
Do you wish to upload documents in support of this submission	No

Meta Informations

Creation date	31-05-2010
Last update date	
User name	ReachHU
Case Number	586386452161515110
Invitation Ref.	
Status	N