

MS REACH Reporting Questionnaire

General Information

Which Member State are you reporting for? (compulsory)
NORWAY

What reporting period are you reporting on? (compulsory)

2010
2015 or later

Primary contact person's name. (compulsory)
Eli Vike

Please provide an email address for the primary contact person. (compulsory)
eli.vike@klif.no

Theme 1 - Information on the Competent Authority

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

What is the name of the organisation where the Competent Authority is situated?

The Climate and Pollution Agency (compulsory)

What is the address of the organisation? (compulsory)

Climate and Pollution Agency
P.O Box 8100 Dep, N-0032 Oslo

What is the email address of the organisation? (compulsory)
postmottak@klif.no

What is the telephone number of the organisation? (compulsory)
Telephone: +47 22 57 34 00

What is the fax number of the organisation? (compulsory)
Telefax: +47 22 67 67 06

No

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

Norwegian Institute of Public Health

National Institute of Occupational Health

Norwegian Institute for Water Research

Norwegian Institute for Air Research

Norwegian Institute for Agricultural and Environmental Research

Norwegian Polar Institute

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)

Second Competent Authority Responsible for REACH

Not relevant only one Competent Authority for REACH in Norway

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

<p>How effective is communication between MS for REACH? (compulsory) 1 = Lowest, 10 = Highest</p> <p><input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10</p> <p>How could effectiveness of communication between MS be improved? (compulsory)</p> <p>When short time limits are given effective communication is difficult.</p>
<p>How effective is collaboration between MS for REACH? (compulsory) 1 = Lowest, 10 = Highest</p> <p><input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10</p> <p>How could effectiveness of collaboration between MS be improved? (optional)</p> <p>When short time limits are given effective collaboration is difficult.</p>
<p>Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH? (compulsory)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please provide further information.</p> <p>We participate in work related to</p> <ul style="list-style-type: none">- The Stockholm Convention, UN global convention on POPs- The Rotterdam Convention, UN global convention on Prior Informed consent (PIC)- The Convention on Long Range Transboundary Air Pollution (LRTAP) protocol on POPs and protocol on Heavy Metals- Process for Global Mercury Agreement- Strategic Approach to International Chemical Management (SAICM)- OECD groups on chemicals, test guidelines, nanomaterials- Nordic Chemicals Group under the Nordic Council of Ministers projects on REACH, Biocides, GHS, Product Registers, Enforcement, Exposure, Test methods- OSPAR Hazardous Chemicals Group
<p>How effective is MS communication with ECHA? (compulsory) 1 = Lowest, 10 = Highest</p> <p><input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input checked="" type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10</p> <p>How could effectiveness of communication with ECHA be improved? (optional)</p>
<p>How effective is MS collaboration with ECHA? (compulsory) 1 = Lowest, 10 = Highest</p> <p><input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input checked="" type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10</p> <p>How could effectiveness of collaboration with ECHA be improved? (optional)</p>

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)

Invitations and documents to meetings are often sent via e-mail and the lists used differ considerably. Commission should use the same “established” lists – they could be available via CIRCA like the list for CARACAL. MS should also be encouraged to use the same lists when they will share documents/opinions with other MS.

In many cases it might be relevant to establish a sub-group for discussion of proposals instead of putting them directly to the Article 133 Committee. This might be a way to avoid having two Article 133 Committee meetings for the same issues.

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)

See above.

Commission might also establish a CIRCA group for the Article 133 Committee.

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

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

Climate and Pollution Agency

What is the address of the Helpdesk? (compulsory)

Climate and Pollution Agency/ REACH-hjelp

P.O Box 8100 Dep, N-0032 Oslo

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

www.klif.no/reach

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

reach@klif.no

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

47 22 57 34 00 00

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

+47 22 67 67 06

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

Yes

No

Additional Organisation 1

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ecotoxicologist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk Assessor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Economist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social Scientist	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exposure Assessor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please list)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

Other: Legal Advisers and Inspectors

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

- Yes
 No

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

- Yes
 No

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

- 1-100
 101-1000
 >1000

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.

How are the majority of enquiries received? (compulsory)

- Email Phone Fax Letter
 Other No information

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

- Yes
 No

Who are the majority of enquiries from? (compulsory)

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

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 checked="" 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 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.

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

(10 %)	Pre-registration	(5 %)	SIEFs
(10 %)	Registration	(5 %)	REACH-IT
(%)	Evaluation	(%)	IUCLID5
(5 %)	Authorisation	(15 %)	Downstream user obligations
(5 %)	Restriction	(5 %)	Obligations regarding articles
(5 %)	Testing	(20 %)	Safety Data Sheets
(10 %)	Enforcement	(5 %)	SVHC
(%)	CSR preparation	(%)	Other
(%)	CLP		

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

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

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"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Complex questions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are any types of enquiry outsourced? (compulsory)

- Yes
 No

What types of enquiry are outsourced? (compulsory)

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

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

Cooperation with the Norwegian Labour Inspection Authority concerning Safety Data Sheets

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

- Yes
 No

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

- Yes
 No

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

How frequently do you use RHEP? (compulsory)
 Daily Weekly Monthly Less frequently

Has the MS carried out any specific public awareness raising activities? (compulsory)
 Yes
 No

What type of activities have been carried out? (compulsory)
 Television Telephone
 Newspaper Leaflets
 Radio Other (please list) 2008:
 Speaking events

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

Awareness-letter to 24 000 Norwegian companies informing about pre-registration were sent out in 2009.

Workshops have been arranged on preregistration and registration.

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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Newspaper	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Radio	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Telephone	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leaflets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you have a REACH webpage/website? (compulsory)
 Yes
 No

Do you have a single webpage for REACH or multiple pages? (compulsory)
 Single webpage
 Multiple webpages

How frequently is the REACH webpage visited (per month)? (optional)
<input type="checkbox"/> 1-100 <input type="checkbox"/> 101-500 <input checked="" type="checkbox"/> 501-5,000 <input type="checkbox"/> 5,001+ <input type="checkbox"/> No information
Please describe the scope of the number of REACH webpage visits. (compulsory)
The introductory page was most frequently visited. Preliminary data from the period March to May 2010 shows that the introductory page had between 400 and 500 visits per month. Other frequently visited pages are information on registration, information for downstream users including safety data sheets and information on the candidate list.

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? (compulsory)
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
What has been the overall public funding on research and development of alternative testing in your MS each year? (compulsory)
<input type="checkbox"/> Euros 0-10,000 <input type="checkbox"/> Euros 10,001-100,000 <input checked="" type="checkbox"/> Euros 100,001-1,000,000 <input type="checkbox"/> 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? (compulsory)

1 = Lowest, 10 = Highest

1 2 3 4 5 6 7 8 9 10

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

Generally it is important that documents are available on CIRCA well in advance of the meetings to ensure proper discussion within MS before the meetings.

Forum:

Forum had an early start and in a very early stage, the Forum established their rules of procedure and a Work Programme that started several Forum working groups which have been expanded in number. The Forum secretariat has executed its work in a very competent way however the information flow could be improved, due to the high activity and number of running WG Forum. Meeting agendas (Forum) and WG Forum (8 WG running) are extensive. Specific the Circa communication is time consuming due to the fact that it arrives in a multiple order (x), difficult to sort out what is double information. Simpler routines are welcome.

MSC: MSC-meetings are well prepared and organized. In most of the meetings several presentations are given. These presentations are usually interesting, however in the future it would be good if ECHA could give more time for discussion of essential items at the meetings.

RAC: Papers should be presented to the members well in advance of the meetings to ensure everybody to be prepared. Industry and other stakeholders should be reminded to conduct according to the stakeholder rules and not repeat statements and information already submitted in the public consultation.

SEAC: The Committee has so far mostly discussed formal procedures. In the future less time should be allocated to this type of discussions in the meetings. The plenary meetings should focus on restriction and authorization cases in the future.

CARACAL: Documents should be available on CIRCA well in advance of the meeting to ensure proper discussion within MS before the meetings. Experience from discussions of restriction proposals in the past has shown that it has been difficult to have in depth discussion at the CARACAL meetings. It should be considered how to improve the quality of these discussions in the future.

PEG: Meetings should be announced well in advance so that members will be able to attend. Draft documents should be sent out early enough for members to have sufficient time to read them through, and discuss them with colleagues before the deadline for submitting written comments. It is very helpful when the written comments from the members are distributed to the whole group before the meeting, preferably well in advance. Enough time should be allocated for discussions to avoid rushing through the document.

HelpNet (former REHCORN): Presentations should be available on Circa in advance to improve discussions during the meeting. More time for discussions and exchange of opinions and less time on formal procedures would be welcomed.

REACH Committee: In several meetings the committee has not come to a vote because of too short preparatory discussions with member states, and another meeting has to be arranged for the same piece of legislation. This should be avoided, either through the use of CARACAL subgroups or more time for consultation by e-mail before the meeting.

RCN: Initially the task of the network seemed somewhat unclear, but the work of the group is becoming more concrete now. Many presentations – but most of them very interesting.

SON: Papers should be presented to the members well in advance of the meetings to ensure everybody to be prepared. Hopefully this will be improved for the coming meetings.

Theme 6 - Information on Substance Evaluation Activities

2010 Report

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

(optional)

Only dossier evaluation so far.

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

	0	1-5	6-10	>10
Toxicologist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ecotoxicologist	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Social-Economic Analyst	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exposure Assessor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please list)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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)

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

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

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

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

How long, on average, does evaluation of a dossier take (optional)

- Up to 1 day
- Up to 1 week
- Up to 2 weeks
- > 2 weeks
- No information

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

1-3
 4-6
 7-9
 >9

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

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

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

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

2015 or later

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

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

	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"/>

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. (compulsory)

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

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

Please list the names of the substances covered in the dossiers that the MS has rapporteured. (compulsory)
Please list the names of the substances covered in the dossiers that the MS has completed. (compulsory)
Please describe the enforcement responsibility of this authority. (compulsory)
How long, on average, does evaluation of a dossier take? (compulsory) <input type="checkbox"/> Up to 1 day <input type="checkbox"/> Up to 1 week <input type="checkbox"/> Up to 2 weeks <input type="checkbox"/> > 2 weeks <input type="checkbox"/> No information
How many transitional dossiers has the MS completed? (compulsory) <input type="checkbox"/> 1-3 <input type="checkbox"/> 4-6 <input type="checkbox"/> 7-9 <input type="checkbox"/> >9
How many substances has the MS added to the Community Rolling Action Plan? (compulsory) <input type="checkbox"/> 1-3 <input type="checkbox"/> 4-6 <input type="checkbox"/> 7-9 <input type="checkbox"/> >9
How many of ECHA's draft decisions on dossier evaluation has the MS commented on? (compulsory) <input type="checkbox"/> 1-3 <input type="checkbox"/> 4-6 <input type="checkbox"/> 7-9 <input type="checkbox"/> >9
Please give details of any problems encountered during substance evaluations. (optional)

Theme 7 - Annex XV Dossiers

How many of each type of dossier has the MS prepared? (compulsory)					
	0	1-3	4-6	7-9	>9
CLP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the time spent following up your MS dossiers reasonable? (compulsory) 1 = Lowest, 10 = Highest					
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10					
Space is available below to provide further comments on how reasonable the time spent following up your MS dossiers was. (optional)					
Time spent preparing restriction proposal is far more time and resource consuming than expected.					
How many of each type of dossier are rapporteured? (compulsory)					
	0	1-3	4-6	7-9	>9
CLP	<input type="checkbox"/>	<input checked="" 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"/>
Is the time spent following up rapporteured dossiers reasonable? (compulsory) 1 = Lowest, 10 = Highest					
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input checked="" type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10					
Space is available below to provide further comments on how reasonable the time spent following up your rapporteured dossiers was. (optional)					
How many of each type of dossier are co-raporteured? (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"/>
Is the time spent following up co-raporteured dossiers reasonable? (compulsory) 1 = Lowest, 10 = Highest					
<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9 <input type="checkbox"/> 10					
Space is available below to provide further comments on how reasonable the time spent following up your co-raporteured dossiers was. (optional)					

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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>
What expertise is available for preparing dossiers? (optional)					
	0	1-3	4-6	7-9	>9
Chemist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toxicologist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ecotoxicologist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Economist	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Enforcement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Legal	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Exposure	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CLP	<input type="checkbox"/>	<input checked="" 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"/>	<input type="checkbox"/>
If you have specified that there is other expertise is available for preparing CLH dossiers, please provide details here. (optional)					
Is the MS able to access external specialists? (compulsory)					
<input checked="" type="checkbox"/> Yes					
<input type="checkbox"/> No					
What types of external specialists does the MS have access to? (compulsory)					
Scientists in various research institutes (health, occupational health, environment, monitoring) depending on funding.					

Is the MS satisfied with the levels of access to expertise? (compulsory) 1 = Lowest, 5 = Highest <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5
Has there been any industry involvement in the preparation of MS dossiers? (compulsory) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
How much involvement has industry had? (compulsory) 1 = Lowest, 5 = Highest <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5

Theme 8 - Information on Enforcement Activities

General Information
General information relating to the submission
Please enter the MAIN enforcing authority for REACH within the Member State. (optional) The Climate and Pollution Agency (Klif)
Is there more than one enforcing authority for REACH within the Member State? (compulsory) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please provide details on the other enforcing authorities for REACH within the Member State. (compulsory) The Norwegian Labour Inspection Authority The Directorate for Civil Protection and Emergency Planning (DSB) The Petroleum Safety Authority Norway National enforcement authorities dealing with REACH are responsible for compliance within their respective areas of responsibility.
Enforcement Strategy
General information on the enforcement strategy (or strategies) in place within the Member State.
Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH? (compulsory) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No special strategy for enforcement has been developed for REACH. A general strategy for enforcement is an integrated part of the strategic policy of the enforcement authorities where enforcement activities of REACH are included. The Climate and Pollution Agency has implemented the environmental management system (ISO 14001).
If Yes, is the strategy (or strategies) in line with the strategy devised by the Forum? (compulsory) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The enforcement authorities have established common general strategy and definitions to describe the different enforcement activities which are subdivided into "inspection, audit, investigation, monitoring and other measures". However the strategy and definitions are chiefly coincident with what is given in the Forum Working Group paper. We would have appreciated that the definitions used in the Forum Working Group paper had been presented in this questionnaire.
If No, are there any plans for making an enforcement strategy (or strategies)? (compulsory) <input type="checkbox"/> Yes <input type="checkbox"/> No

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

The general strategy is to exercise measures to protect the environment and human health through supervisory activities.

Aims:

To protect the environment and human health

Inspection and control are necessary to ensure compliance with the legislation.

To ensure equality before the law

Enterprises which do not comply with the legislation, may enjoy unfair financial benefits. Inspection and control mean equal competition for business and industry.

To safeguard experience

Control is important for building the competence of the authorities, so that they can make the right demands and choose the right instruments of response.

In the practical way our strategy for enforcement is organised into :
Planning and preparation, performing activities/inspections and evaluation/follow-up.

The phase of planning describes:

- Description/determination of the target group – relevant companies
- selection of companies for audits and inspections,
- methods to find them,(history, different national databases & registers)
- make preparations as project plans, checklists, etc.

The phase of performing supervisory activities describes:

- Site inspections and desk table monitoring – relevant internal & external documents available, checklist, etc.
- Monitoring & inspection of the enterprises (activities, management systems)
- Inspection of articles, monitoring, analyses etc
- Handling of cases – reports/written orders, coercive fines, withdrawal, notify to the police
- (enforcing authorities within SHE-area have established common procedures for performing enforcement (including report format and definition of non-compliance)
-

The phase of follow up describes:

- Reporting & updating in the national databases
- Evaluation & categorisation of the findings
- Collection of statistics
- Project reports, press release, internal & external information etc
- If problems with compliance or regulations – contacts with legal advisors, other authorities etc.

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.

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 responsibility for enforcement of REACH in Norway is placed in four authorities as mentioned under general information where enforcement duties are placed on central level. The main responsibility is covered by Climate and Pollution Agency (Klif), which also is the Competent Authority. There is established a general formal cooperation and information exchange for all enforcement activities within the safety-, health –and environmental area which also cover the REACH enforcement. These authorities have established common procedures for performing control activities, common reporting format and common legal definitions of non-compliance. The authorities have the duty to notify all their annual planned inspections/audits in a common database, which are used in the planning phase to cooperate/coordinate enforcing activities, likewise the finished reports to be notified for information and following up. Common training activities, seminars as well as specific REACH working groups have been carried out.

Co-operation is also carried out with other EU enforcement authorities in different inspection projects within the network CLEEN (Chemical Legislation European Enforcement Network) and with the Nordic countries.

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)

- Seminars on general REACH information to all REACH authorities concerned included the enforcement personnel/inspectors have been performed regularly in the period 2008-2010.
- Training for inspectors at central level has been performed during 2009
- The Forum project REACH-EN-FORCE 1 was carried out as a coordinated project with the Labour Inspectorate Authority
- Inspectors from the Nordic countries meet once a year to exchange experience and present reports on inspection activities

2010 Reporting

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

Inspectors from the four enforcing authorities responsible for REACH inspect companies that are manufacturer, importers, downstream users, distributors of chemical products (substances & mixtures). The companies that import or distribute articles are inspected by Climate and Pollution Agency (chemical properties) and Directorate for Civil Protection and Emergency Planning (physical properties). Inspections take place throughout the country however all reporting & following up are done at central level. The inspector checks that the legislation is complied with, for example that the labeling is correct, SDS is prepared, that articles do not contain any restricted or prohibited substances.

Enforcement is focused on risk reduction/risk based approach. Companies are selected in

those areas where there is a potential for improvement, e.g.:

- companies that import/manufacture and use chemicals and products which contain substances of high concern,
- information on companies or sectors of industry with poor compliance with regard to relevant legislation and permits given (history in general)
- Consumer products containing hazardous substances which are used by sensitive groups (e.g. children) etc.
- when new regulations start to apply

The Norwegian Products Register (Climate and Pollution Agency) contains basic facts on nearly 25.000 chemicals and around 1000 companies. Companies that manufacture or import chemical products classified as dangerous to Norway above 100 kg per year have to notify with composition to the Products Register, which can consequently provide information on status, development and trends in the use of chemicals. Climate and Pollution Agency and the other REACH enforcing authorities use the information in inspection and enforcement and in various types of preventive activity. When it comes to articles, companies have to be found by other means, e.g. through trade associations, customs, advertising, internet etc

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

Climate and Pollution Agency & Labour Inspectorate Authority normally inspects on sites approximately 240 companies per year, in addition desk table monitoring carried out for more than 150 companies. These companies could be manufacturers, importers, distributors or downstream users where chemical substances/ mixtures and articles are a part of the respective company activity. Inspections concerning chemical products are focused on classification, labelling, safety data sheets, new legislation etc. Inspections concerning articles mostly focus on prohibited substances or substances of high concern in articles.

Describe sanctions available to enforcing authorities. (compulsory)

Norway has implemented the REACH regulation into Norwegian law through a special Norwegian regulation ("REACH-forskriften"). Section 7 (§ 7) of this regulation deals with penal measures concerning offences of REACH. According to this section, any violations of the REACH regulation or of decisions made pursuant to REACH shall be subject to penalty under the terms of the regulations concerning penal measures in the legal acts which the Norwegian REACH regulation is laid down pursuant to. In a brief account, any violations may be penalized by fines or imprisonment or both.

Norway has no provision which specifically concerns the use of administrative sanctions with respect to non compliance of REACH. These issues are part of the Norwegian legal acts which the Norwegian REACH regulation is laid down pursuant to. The relevant legal acts are The Pollution Control Act, The Product Control Act, The Fire and Explosion Prevention Act and The Working Environment Act. The rules of enforcement through administrative sanctions in these acts are generally applicable to REACH. In practice, all provisions of REACH can be enforced by the use of administrative measures. This system is equivalent to a "catch all provision". The administrative measures do not necessarily mean that the addressee will have to pay a fine.

To ensure that the REACH regulation or decisions made pursuant to this regulation are complied with, the Norwegian authorities can use the following administrative sanctions:

- Issue order to make sufficient corrections and/or to implement measures within a certain time limit

- Issue order to provide necessary information and/or to initiate necessary investigations
- Issue order to withdraw a product from the market, publishing warnings or the like to distributors or users of a product, or rendering a product harmless
- Impose coercive fines
- Impose temporary prohibition, shutdown of operations
- Notify the police (prosecution by the police)

As mentioned above, any violations of the REACH regulations or of decisions made pursuant to these regulations shall be subject to penalty under the terms of regulations concerning penal measures in The Pollution Control Act, The Product Control Act, The Fire and Explosion Prevention Act and The Working Environment Act.

Please note that answers to this question have already been compiled and reported for the Commission: **Report on penalties applicable for infringement of the provisions of the REACH Regulation in the Member States**. Also, this report has been discussed at a Commission workshop in February 2010.

Describe the referrals from ECHA. (compulsory)

None so far

Describe the referrals from other Member States. (compulsory)

None so far

Describe any other measures/relevant information. (optional)

2007

Reporting information for 2007 (REACH not was not implemented in Norway)
No enforcing activities on REACH.

2008

Reporting Information for 2008

Dutyholders

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

About 1000 companies are registered in the products register. These companies are importers, manufacturers, distributors and formulators of chemical products (substances or mixtures) classified as dangerous according directives 67/548 & 99/45. The total number of dutyholders are very difficult to estimate as REACH in principle covers all substances, i.e. not only substances with dangerous properties. In addition the companies that import, distribute or manufacture articles and some downstream users as end-users and can not to be found in any register.

<p>Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional)</p> <p>About 350 companies are likely to constitute registrants according to the list of preregistered companies in Norway, however our estimates show that number of registrants seem to be quite reduced. Number of manufacturers of substances are not available</p>
<p>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)</p> <p>None inspections or investigations were carried out in 2008. Due to the fact that REACH came into force in Norway 1 June 2008 the resources were used on following up and advice the companies with preregistration. The inspectors brought with them information material in their visits on site and in addition Klif elaborated a general REACH checklist to be used on site inspections to make the companies to be aware of their duties.</p>
<p>State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <p><input 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</p>
<p>State the number of importer dutyholders subject to inspections and investigations. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <p><input 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</p>
<p>State the number of distributors subject to inspections and investigations. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <p><input 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</p>
<p>State the number of downstream users subject to inspections and investigations. (compulsory)</p>

<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
Inspections
State the number of inspections that addressed registration. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed information in the supply chain. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed downstream use. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed authorisation. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed restriction. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed other REACH duties. (compulsory)
State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)

State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)
State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)
State the number of convictions following legal proceedings. (optional)
Enforcement
State the number of manufacturers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of importers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of downstream users subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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

<p>2009 Reporting Information for 2009</p>
<p>Dutyholders</p>
<p>Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH. (optional)</p> <p>About 1000 companies are registered in the products register. These companies are importers, manufacturers, distributors and formulators of chemical products (substances or mixtures) classified as dangerous according to directives 67/548 & 99/45. The total number of dutyholders are very difficult to estimate as REACH in principle covers all substances, i.e. not only substances with dangerous properties. In addition the companies that import, distribute or manufacture articles and some downstream users as end-users and can not be found in any register.</p>
<p>Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional)</p> <p>About 350 companies are likely to constitute registrants according to the list of preregistered companies in Norway. However, our estimates show that number of registrants might be too high.</p> <p>Number of manufacturers of substances are not available</p>
<p>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)</p> <p><i>About 200</i></p>
<p>State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)</p> <p><i>< 10</i></p>
<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input checked="" type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
<p>State the number of importer dutyholders subject to inspections and investigations. (compulsory)</p> <p><i>< 15</i></p>

<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input checked="" type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
<p>State the number of distributors subject to inspections and investigations. (compulsory)</p> <p><i>About 70</i></p>
<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input checked="" type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
<p>State the number of downstream users subject to inspections and investigations. (compulsory)</p> <p><i>About 70</i></p>
<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input checked="" type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
<p>Inspections</p>
<p>State the number of inspections that addressed registration. (compulsory)</p> <p><i>25</i></p>
<p>State the number these cases which were non-compliant. (optional)</p> <p><i>0</i></p>
<p>State the number of inspections that addressed information in the supply chain. (compulsory)</p> <p><i>About 70</i></p>
<p>State the number these cases which were non-compliant. (optional)</p> <p><i>About 60</i></p>

State the number of inspections that addressed downstream use. (compulsory)
About 60
State the number these cases which were non-compliant. (optional)
< 30
State the number of inspections that addressed authorisation. (compulsory)
0
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed restriction. (compulsory)
About 180
State the number these cases which were non-compliant. (optional)
< 10
State the number of inspections that addressed other REACH duties. (compulsory)
0
State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
< 5
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
0
State the number of investigations prompted by monitoring. (compulsory)
< 3
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
0

<p>State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)</p> <p>About 20</p>
<p>State the number of inspections and investigations resulting in verbal or written advice. (compulsory)</p> <p>About 20</p>
<p>State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)</p> <p>About 100</p> <p>Remark; "formal enforcement short of legal proceedings" defined as formal enforcement according to the definition on "subject to formal enforcement" given in the Forum Strategy Paper of March 2009</p>
<p>State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)</p> <p>About 3</p> <p>Remark; "initiation of legal proceedings" defined as formal enforcement according to the definition on "subject to formal enforcement" given in the Forum Strategy Paper of March 2009</p>
<p>State the number of convictions following legal proceedings. (optional)</p> <p>No information - not decided yet</p>
<p>Enforcement</p>
<p>State the number of manufacturers subject to formal enforcement. (compulsory)</p> <p>< 3</p>
<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input checked="" type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
<p>State the number of importers subject to formal enforcement. (compulsory)</p> <p>< 5</p>
<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input checked="" type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>

State the number of distributors subject to formal enforcement. (compulsory)
About 50
Were these mainly: (compulsory)
<input type="checkbox"/> Small
<input checked="" type="checkbox"/> Small-Medium
<input type="checkbox"/> Medium
<input type="checkbox"/> Large
<input type="checkbox"/> No information
<input type="checkbox"/> Not applicable
State the number of downstream users subject to formal enforcement. (compulsory)
About 50
Were these mainly: (compulsory)
<input type="checkbox"/> Small
<input checked="" type="checkbox"/> Small-Medium
<input type="checkbox"/> Medium
<input type="checkbox"/> Large
<input type="checkbox"/> No information
<input type="checkbox"/> Not applicable

2015 or later

Describe the inspection and investigation strategy and methodology. (optional)
Describe the level and extent of monitoring activities. (compulsory)
Describe sanctions available to enforcing authorities. (compulsory)
Describe the referrals from ECHA. (compulsory)
Describe the referrals from other Member States. (compulsory)
Describe any other measures/relevant information. (optional)

Year 1
Reporting information for the 1st year of the 5 year period. e.g. If reporting in 2015, enter reporting information for 2010 in this section.

Please select the year you are reporting for (year 1 of the reporting period) (compulsory)
<input type="checkbox"/> 2010
<input type="checkbox"/> 2015
<input type="checkbox"/> 2020
<input type="checkbox"/> 2025

Dutyholders
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH. (optional)
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional)
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)
State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of importer dutyholders subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of downstream users subject to inspections and investigations. (compulsory)

<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
Inspections
<p>State the number of inspections that addressed registration. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed information in the supply chain. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed downstream use. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed authorisation. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed restriction. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed other REACH duties. (compulsory)</p>

State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)
State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)
State the number of convictions following legal proceedings. (optional)
Enforcement
State the number of manufacturers subject to formal enforcement. (compulsory)

<p>Were these mainly: (compulsory)</p> <input 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
<p>State the number of importers subject to formal enforcement. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <input 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
<p>State the number of distributors subject to formal enforcement. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <input 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
<p>State the number of downstream users subject to formal enforcement. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <input 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
<p>Year 2 Reporting information for the 2nd year of the 5 year period. e.g. If reporting in 2015, enter reporting information for 2011 in this section.</p>
<p>Please select the year you are reporting for (year 2 of the reporting period) (compulsory)</p> <input type="checkbox"/> 2011 <input type="checkbox"/> 2016 <input type="checkbox"/> 2021 <input type="checkbox"/> 2026

Dutyholders

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

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

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)

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

<p>Were these mainly: (compulsory)</p> <input 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
<p>State the number of downstream users subject to inspections and investigations. (compulsory)</p>
<p>Were these mainly: (compulsory)</p> <input 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
<p>Inspections</p>
<p>State the number of inspections that addressed registration. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed information in the supply chain. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed downstream use. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed authorisation. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>

State the number of inspections that addressed restriction. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed other REACH duties. (compulsory)
State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)

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

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

Enforcement

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

- Small
- Small-Medium

- Medium
- Large
- No information
- Not applicable

Year 3

Reporting information for the 3rd year of the 5 year period. e.g. If reporting in 2015, enter reporting information for 2012 in this section.

Please select the year you are reporting for (year 3 of the reporting period) (compulsory)

- 2012
- 2017
- 2022
- 2027

Dutyholders

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

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

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)

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

Inspections

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

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

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

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

State the number of inspections that addressed downstream use. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed authorisation. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed restriction. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed other REACH duties. (compulsory)
State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)

State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)
State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)
State the number of convictions following legal proceedings. (optional)
Enforcement
State the number of manufacturers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of importers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to formal enforcement. (compulsory)
Were these mainly: (compulsory)

<input 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
State the number of downstream users subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
Year 4 Reporting information for the 4 th year of the 5 year period. e.g. If reporting in 2015, enter reporting information for 2013 in this section.
Please select the year you are reporting for (year 3 of the reporting period) (compulsory) <input type="checkbox"/> 2013 <input type="checkbox"/> 2018 <input type="checkbox"/> 2023 <input type="checkbox"/> 2028
Dutyholders
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH. (optional)
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional)
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)
State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

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

Were these mainly: (compulsory)

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

Inspections

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

State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed information in the supply chain. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed downstream use. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed authorisation. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed restriction. (compulsory)
State the number these cases which were non-compliant. (optional)
State the number of inspections that addressed other REACH duties. (compulsory)
State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)

State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)
State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)
State the number of convictions following legal proceedings. (optional)
Enforcement
State the number of manufacturers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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

State the number of importers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of downstream users subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
Year 5
Reporting information for the 5 th year of the 5 year period. e.g. If reporting in 2015, enter reporting information for 2014 in this section.
Please select the year you are reporting for (year 3 of the reporting period) (compulsory) <input type="checkbox"/> 2014 <input type="checkbox"/> 2019 <input type="checkbox"/> 2024 <input type="checkbox"/> 2029
Dutyholders
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH. (optional)
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH. (optional)

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)
State the number of manufacturer dutyholders subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of importer dutyholders subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to inspections and investigations. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of downstream users subject to inspections and investigations. (compulsory)

<p>Were these mainly: (compulsory)</p> <p><input type="checkbox"/> Small</p> <p><input type="checkbox"/> Small-Medium</p> <p><input type="checkbox"/> Medium</p> <p><input type="checkbox"/> Large</p> <p><input type="checkbox"/> No information</p> <p><input type="checkbox"/> Not applicable</p>
Inspections
<p>State the number of inspections that addressed registration. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed information in the supply chain. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed downstream use. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed authorisation. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed restriction. (compulsory)</p>
<p>State the number these cases which were non-compliant. (optional)</p>
<p>State the number of inspections that addressed other REACH duties. (compulsory)</p>

State the number these cases which were non-compliant. (optional)
Investigations
State the number of investigations prompted by complaints and concerns raised. (compulsory)
State the number of investigations prompted by incidents or dangerous occurrences. (compulsory)
State the number of investigations prompted by monitoring. (compulsory)
State the number of investigations prompted by results of inspection/follow up activities. (compulsory)
State the number of inspections and investigations resulting in no areas of non-compliance. (compulsory)
State the number of inspections and investigations resulting in verbal or written advice. (compulsory)
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings. (compulsory)
State the number of inspections and investigations resulting in initiation of legal proceedings. (compulsory)
State the number of convictions following legal proceedings. (optional)
Enforcement
State the number of manufacturers subject to formal enforcement. (compulsory)

Were these mainly: (compulsory) <input 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
State the number of importers subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of distributors subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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
State the number of downstream users subject to formal enforcement. (compulsory)
Were these mainly: (compulsory) <input 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

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? (compulsory)

- MS
 EU

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

Enforcement :

Inspection and control are necessary to ensure compliance with the legislation, i.a. as a parameter to indicate the level of compliance of the duty holder. In addition as a tool to build competence of the authorities as well as of the industry to choose the right instruments to improve the effectiveness of REACH. Inspection and control mean in addition equal competition for business and industry.

Norwegian Pollutant and Transfer Register (PRTR) contains data from Norwegian processing industry with respect to annual discharge/emissions, processing conditions, waste generated. Use of PRTR may give supportive information to identify use, calculate exposure scenarios and in general indicate the impact on environment from substances used in the different processing activities.

The Norwegian Product Register in the Climate and Pollution Agency and the Nordic SPIN data base, www.spin.net, could be used to get information on substances in preparations (use categories, tonnage, release estimates).

Theme 10 - Other Issues/Recommendations/Ideas

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

We would appreciate if the following issues would be considered on the future implementation of REACH:

The 0.1% trigger limit in articles:

The Norwegian CA's view is that an entire complex article as well as parts/components of the complex article, comply with the definition of an article given in the REACH regulation, article 3(3). Consequently, the 0.1 % trigger limit should also apply to parts/components of complex articles, not only to the entire article. The principle "Once an article - Always an article" should apply.

The 0.1 % trigger limit should be calculated as the average concentration of any object that has a shape, surface or design which entails compliance with the definition of an article (article 3(3)). It does not make a difference whether or not such an article has been joined together with other articles to form a larger article.

This interpretation of the 0.1 % trigger limit is significant in order to secure sufficient information in the supply chain to allow safe use of substances of very high concern (SVHC) in articles in accordance with article 33. It will benefit both the human health (employees, consumers) and the environment. In addition this interpretation is important in order to make sure that companies are prepared for potential applications for authorisation of SVHC substances being added to the Annex XIV list.

Compliance check regarding dossier evaluation (REACH article 41):

It is of importance that ECHA in addition to compliance checks of the information requirements in Annexes VI-XI, also takes compliance checks of other information in the registration dossiers - as for instance industries estimates of DNEL and PNEC values. If DNEL/PNEC values are inadequately derived, this can result in incorrect conclusions in the chemical safety reports and the risk management measures proposed. Human health and the environment may suffer if the risks are not properly controlled.

Nanomaterials:

Even though nanomaterials (NM) are covered by REACH, there are still in our view concern whether the legislation and its guidance's are sufficient to secure safe nanomaterials. One of our main concerns is that NM with different properties than their bulk counterpart will be subject to the same information requirements, as one substance in one dossier. We are of the opinion that in general NM should be regarded as substances on their own, to ensure safe use.

We appreciate the initiative from the Commission regarding the three REACH implementation projects on nanomaterials. The outcome of these projects should be used to consider specific amendments of REACH, for instance introduction of additional information requirements in point 2 in Annex VI (identification of the substance). This is necessary to make sure that information requirements and risk assessment procedures for NM detects potential risk as efficient as for other chemicals.

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

Yes

No

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

Prepared by Eli Vike

Authorised by Anne Mari Opheim

Date 31 May 2010