

## MS REACH Reporting Questionnaire

General Information	
Which Member State are you reporting for?	RO
What reporting period are you reporting on?	2010
Primary contact person's name.	Luminita Tirchila, Mariana Mihalcea Udrea, Mihaela Albulescu
Please provide an email address for the primary contact person.	luminita.tirchila@mmediu.ro, m.mihalcea@anpm.ro, mihaela.albulescu@gmail.com

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

### More than one Competent Authority Responsible for REACH

First Competent Authority	
What is the name of the organisation where the Competent Authority is situated?	Ministry of Environment and Forests
What is the address of the organisation?	12, Libertatii blvd., 5th district, Bucharest
What is the email address of the organisation?	www.mmediu.ro ; srp@mmediu.ro
What is the telephone number of the organisation?	+4 021 316 02 43 ; +4 021 316 02 15
What is the fax number of the organisation?	+4 021 317 40 70; +4 021 316 61 38
What part of REACH does this part of the Competent Authority deal with?	CLP Other (please list)
Please list the other parts of REACH that this part of the Competent Authority deals with here.	Coordination of activities related to REACH and CLP
From what part of Government does this part of the Competent Authority have authority from?	Environment
Are employees in the Competent Authority directly employed by Government (civil servants)?	Yes
What skills do staff in this part of the Competent Authority have?	Chemistry Ecotoxicity Legal Policy CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Pesticides Other
If Other, please list the different legislation here	fertilisers Regulation EC no. 2003/2003

### Second Competent Authority

What is the name of the organisation where the Competent Authority is situated?	National Environmental Protection Agency- NEPA
What is the address of the organisation?	Splaiul Independentei nr.294, 6th district, Bucharest , postal code 060031
What is the email address of the organisation?	www.anpm.ro; serviciul_chimicale@anpm.ro
What is the telephone number of the organisation?	+4021 207 11 01, +4 021 202 47 91
What is the fax number of the organisation?	+4021 207 11 03; +4021 207 11 54
What part of REACH does this part of the Competent Authority deal with?	Evaluation Restriction Helpdesk CLP Risk Assessment
From what part of Government does this part of the Competent Authority have authority from?	Environment
Are employees in the Competent Authority directly employed by Government (civil servants)?	Yes
What skills do staff in this part of the Competent Authority have?	Chemistry Toxicology Ecotoxicity Legal Exposure CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Pesticides Other
If Other, please list the different legislation here	POPs, F+gases
Are there any more Competent Authorities responsible for REACH?	Yes

### Third Competent Authority

What is the name of the organisation where the Competent Authority is situated?	The National Environmental Guard
What is the address of the organisation?	78, Unirii Ave, Bl. J2, District 3, Bucharest
What is the email address of the organisation?	gardamediu@gnm.ro
What is the telephone number of the organisation?	+ 4021 326 89 70
What is the fax number of the organisation?	+ 4021 326 89 71
What part of REACH does this part of the Competent Authority deal with?	CLP Other (please list)
Please list the other parts of REACH that this part of the Competent Authority deals with here.	Enforcement of REACH and CLP
From what part of Government does this part of the Competent Authority have authority from?	Environment
Are employees in the Competent Authority directly employed by Government (civil servants)?	Yes

What skills do staff in this part of the Competent Authority have?	Chemistry Toxicology Enforcement CLP
What other chemical legislation are the staff of the REACH CA involved in?	Import/Export Biocides Pesticides Other
If Other, please list the different legislation here	SEVESO Directive, GLP, waste , pollution control (POPs)
Are there any more Competent Authorities responsible for REACH?	No

## 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?	7
How could effectiveness of communication between MS be improved?	The effectiveness of communication between MS will be improved when an electronic system for information exchange regarding REACH inspections will be functional.
How effective is collaboration between MS for REACH?	7
How could effectiveness of collaboration between MS be improved?	Forums for information exchange on REACH implementation. To be seen the diversity of penalties under REACH, for example. And also the need for collaboration for substance proposals as SVHC.
Are there any special projects/cooperation on chemicals that the MS participates in with other MS outside of REACH?	Yes
Please provide further information.	POPs management, BAT forums Bilateral cooperation, Hungarian Romanian Joint Commission on Environment Protection, 2009 TAIEX projects on detergents, F-gases, mercury, VOC and CLP
How effective is MS communication with ECHA?	7
How could effectiveness of communication with ECHA be improved?	The effectiveness of communication will be improved when the MSCAs will have access to ECHA electronic tools for information exchange.
How effective is MS collaboration with ECHA?	8
How could effectiveness of collaboration with ECHA be improved?	Training courses in relevant areas could be useful
How effective is MS communication with the Commission (specifically Article 133 Committee)?	8
How could effectiveness of communication with the Commission be improved?	
How effective is MS collaboration with the Commission (specifically Article 133 Committee)?	8

How could effectiveness of collaboration with the Commission be improved?	
Has use been made of the safeguard clause of REACH (Art. 129)?	No

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

Please provide the name of the organisation responsible for operating the National Helpdesk for REACH.	National Environmental Protection Agency- NEPA
What is the address of the Helpdesk?	Splaiul Independentei nr.294, 6th district, Bucharest , postal code 060031
What is the web page address of the Helpdesk?	<a href="http://reach.anpm.ro">http://reach.anpm.ro</a>
What is the email address of the Helpdesk?	<a href="http://reach.anpm.ro/helpdesk.aspx">http://reach.anpm.ro/helpdesk.aspx</a>
What is the telephone number of the Helpdesk?	+4021 212 5052
What is the fax number of the Helpdesk?	+4021 316 7996
Are there any more organisations responsible for operating the National Helpdesk for REACH?	No

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

Toxicologist	
Ecotoxicologist	
Chemist	1-5
Risk Assessor	
Economist	
Social Scientist	
Exposure Assessor	
Other (please list)	1-5
If you have specified that there are a number of other staff that are involved in the Helpdesk, please list the type of staff here.	Geologist, administrative science
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 Other (please list)
Please list the other format(s) of enquiries that can be received by the Helpdesk.	Office consultations, organised meetings or specific activities as workshops and conferences.
How are the majority of enquiries received?	Email
Do you provide specific advice to SME's?	Yes
Who are the majority of enquiries from?	Medium enterprises

What type of enquiries does the Helpdesk receive?	Pre-registration SIEFs Registration REACH-IT Evaluation IUCLID5 Authorisation Downstream user obligations Restriction Obligations regarding articles Testing Safety Data Sheets Enforcement SVHC CSR preparation Other (please list) CLP
Please list the other types of enquiries that the Helpdesk receives.	General information on REACH, training opportunities

For each type of enquiry received, please provide the proportion in percentage of the total enquiries.	
Pre-registration (%)	0
Registration (%)	0
Evaluation (%)	0
Authorisation (%)	0
Restriction (%)	0
Testing (%)	0
Enforcement (%)	0
CSR preparation (%)	0
CLP (%)	0
SIEFs (%)	0
REACH-IT (%)	0
IUCLID5 (%)	0
Downstream user obligations (%)	0
Obligations regarding articles (%)	0
Safety Data Sheets (%)	0
SVHC (%)	0
Other (%)	19,8 (%)

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

How long, on average, does it take to respond to the following types of questions?	
Straight forward questions	3 days

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

What level of cooperation is there between Helpdesks?	
What level of cooperation is there between Helpdesks under REHCORN?	4
What level of cooperation is there between Helpdesks outside REHCORN?	3
How frequently do you use RHEP?	Daily
Has the MS carried out any specific public awareness raising activities?	Yes
What type of activities have been carried out?	Television Telephone Newspaper Leaflets Radio Other (please list) Speaking events
Please list the other types of activities that have been carried out.	Video conferences, e-mail notifications

How effective was each type of activity?	
Television	3
Newspaper	3
Radio	3
Speaking events	4
Telephone	4
Leaflets	5
Other	5
Do you have a REACH webpage/website?	Yes
Do you have a single webpage for REACH or multiple pages?	Multiple webpages
How frequently is the REACH webpage visited (per month)?	101-500
Please describe the scope of the number of REACH webpage visits.	For information and link accessing helpdesk

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

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

What has been the overall public funding on research and development of alternative testing in your MS each year? 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? 7

How could the effectiveness of the Committees be improved?

The effectiveness of the Committees is affected by the lack of human resources at MS level. For instance, some of the FORUM projects have to be postponed due to this reason. Improvement of cooperation between MS competent authorities is also important for the effectiveness of the Committees.

### Theme 6 - Information on Substance Evaluation Activities

#### 2010 Reporting

Please name the organisations/institutions that are involved in the evaluation process. we are not officially involved yet.

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

Toxicologist	0
Ecotoxicologist	0
Chemist	1-5
Risk Assessor	1-5
Socio-Economic Analyst	0
Exposure Assessor	0
Other (please list)	0

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

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

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

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

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

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

How many transitional dossiers has the MS completed?

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

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

### Theme 7 - Annex XV Dossiers

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

CLP 0

Restriction 0

Identification of SVHC 0

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

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

#### How many of each type of dossier are rapporteured?

CLP 0

Restriction 0

Identification of SVHC 0

Is the time spent following up rapporteured dossiers reasonable? 1

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

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

CLP 0

Restriction 0

Identification of SVHC 0

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



Space is available below to provide further comments on 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	0
Toxicologist	0
Ecotoxicologist	0
Economist	0
Enforcement	0
Legal	0
Policy	0
Exposure	0
CLP	0
Other (please list)	0

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

Is the MS able to access external specialists? Yes

What types of external specialists does the MS have access to? toxicologist, ecotoxicologist

Is the MS satisfied with the levels of access to expertise? 3

Has there been any industry involvement in the preparation of MS dossiers? No

## Theme 8 - Information on Enforcement Activities

### General Information

Please enter the MAIN enforcing authority for REACH within the Member State. National Environmental Guard

Is there more than one enforcing authority for REACH within the Member State? No

### Enforcement Strategy

Has an overall strategy (or strategies) been devised and implemented for the enforcement of REACH? No

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

Comments The enforcement strategy will be in line with the strategy established 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 Ministry of Environment and Forests assures the coordination between the National Environmental Guard (the enforcement authority) and The National Environment Protection Agency (the Competent Authority).
- There are common meetings for information exchange between the authorities.
- The enforcement authority has access to the web site of CA.

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).

- Till January 2008 it was a single Competent Authority for REACH, responsible both for implementation and for enforcement: The National Agency for Dangerous Substances and Preparations and internal mechanisms assured the cooperation and the coordination between the regulatory and inspections departments..
- Before and after January 2008 the Ministry of Environment and Forests assured the coordination of implementation and enforcement activities by the permanent exchange of information with the authorities and by periodic meetings.
- Joint training for authorities was organised in the reporting period in the framework of different projects.
- The Ministry of Environment and Forests, The National Environment Protection Agency and the National Environmental Guard participated in a PHARE project (2006/018-147.02.02.02) for technical assistance for Romanian companies in view of REACH implementation. Common guidance materials were elaborated and common conferences were organised in all the regions of the country.

## 2010 Reporting

Describe the inspection and investigation strategy and methodology.	A list of companies with possible duties under REACH was elaborated. A form for REACH inspections was elaborated. Before the national legislation for REACH enforcement was in force, the inspections on chemicals legislation were aimed to raise the awareness of the Romanian companies concerning their roles and duties under REACH. After the national legislation with REACH penalties (HG 477/2009) entered into force (23.05.2009) REACH enforcement actually started.
Describe the level and extent of monitoring activities.	Monitoring activities for REACH enforcement were organised for the companies where non-compliances with REACH provisions were observed at the first inspection. The main non-compliances were related to the Safety Data Sheets.
Describe sanctions available to enforcing authorities.	The fines for REACH non-conformities are structured on three levels: light (1625 - 3750 EURO), medium (3750 - 7500 EURO) and heavy (7500 - 12500 EURO).
Describe the referrals from ECHA.	X
Describe the referrals from other Member States.	X
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.	2000
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	500
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	140
State the number of manufacturer dutyholders subject to inspections and investigations.	35
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	28
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	20
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	20
Were these mainly:	Small-Medium

### Inspections

State the number of inspections that addressed registration.	63
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	140
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	57
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.	13
State the number of inspections and investigations resulting in no areas of non-compliance.	87
State the number of inspections and investigations resulting in verbal or written advice.	53
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	140
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

<b>2008</b>
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<b>Dutyholders</b>	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	2000
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	500
What was the total number of inspections and investigations carried out by enforcing authorities in which REACH was discussed and/or enforced for this year?	275
State the number of manufacturer dutyholders subject to inspections and investigations.	47
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	24
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	62
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	142
Were these mainly:	Small-Medium

<b>Inspections</b>	
State the number of inspections that addressed registration.	71
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	275
State the number these cases which were non-compliant.	

State the number of inspections that addressed downstream use.	142
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 33 inspection/follow up activities.	33
State the number of inspections and investigations resulting in no areas of non-compliance.	152
State the number of inspections and investigations resulting in verbal or written advice.	123
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	0
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

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

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

**2009**

<b>Dutyholders</b>	
Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by REACH.	500
Provide an estimate of the above dutyholders who are likely to constitute registrants as defined by REACH.	70
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?	144
State the number of manufacturer dutyholders subject to inspections and investigations.	11
Were these mainly:	Small-Medium
State the number of importer dutyholders subject to inspections and investigations.	7
Were these mainly:	Small-Medium
State the number of distributors subject to inspections and investigations.	25
Were these mainly:	Small-Medium
State the number of downstream users subject to inspections and investigations.	81
Were these mainly:	Small-Medium

<b>Inspections</b>	
State the number of inspections that addressed registration.	18
State the number these cases which were non-compliant.	
State the number of inspections that addressed information in the supply chain.	144
State the number these cases which were non-compliant.	
State the number of inspections that addressed downstream use.	81
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.	0

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

Investigations	
State the number of investigations prompted by complaints and concerns raised.	2
State the number of investigations prompted by incidents or dangerous occurrences.	0
State the number of investigations prompted by monitoring.	0
State the number of investigations prompted by results of inspection/follow up activities.	18
State the number of inspections and investigations resulting in no areas of non-compliance.	94
State the number of inspections and investigations resulting in verbal or written advice.	50
State the number of inspections and investigations resulting in formal enforcement short of legal proceedings.	144
State the number of inspections and investigations resulting in initiation of legal proceedings.	0
State the number of convictions following legal proceedings.	0

Enforcement	
State the number of manufacturers subject to formal enforcement.	11
Were these mainly:	Small-Medium
State the number of importers subject to formal enforcement.	7
Were these mainly:	Small-Medium
State the number of distributors subject to formal enforcement.	25
Were these mainly:	Small-Medium
State the number of downstream users subject to formal enforcement.	81
Were these mainly:	Small-Medium

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



Do you think that the effects of REACH would be better evaluated at a Member State (MS) or EU level?	EU
What parameters are available at MS level that could be used to assess the effectiveness of REACH in a baseline study?	In a base line study for REACH effectiveness assessment, some parameters from the first MS report on REACH for the Commission are useful but for the reported period is difficult to make an assessment because REACH effects interfere with the economic crisis.

Theme 10 - Other Issues/Recommendations/Ideas	
Please provide any further information on the implementation of REACH that the MS considers relevant.	
Do you wish to upload documents in support of this submission	Yes
Please provide a brief description of the documents that you are uploading. Note: You may upload more than one document.	<ul style="list-style-type: none"> <li>• Helpdesk Report of ROMANIA, Template for REACH Helpdesk reporting at 7th and 8th REHCORN meeting, 15-16 October 2009</li> <li>• Helpdesk Report of ROMANIA, Template for REACH Helpdesk reporting at 1st HelpNet meeting 9-10 February 2010</li> <li>• Helpdesk report of Romania to ECHA</li> <li>• Theme 3 Real Data - Please take as real the data as completed in this document because this IPM don't let us to complete in it.</li> </ul>

Meta Informations	
Creation date	11-11-2010
Last update date	
User name	ReachRO
Case Number	932594604231031510
Invitation Ref.	
Status	N