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COMPLETE

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PAGE 2: Part I – General Information about Respondents

Q1: **Address**	
Contact name	
Organisation/company	
Country	Belgium
Email Address	
Q2: **If you have a Transparency Register ID number, please provide it below. If your organisation is not registered, you have the opportunity to register now by following this link. If your entity responds without being registered, the Commission will consider its input as that of an individual/private person and, as such, will publish it separately.**	
Q3: **Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution. Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.**	My contribution may be published but should be kept anonymous; I declare that none of it is subject to copyright restrictions that prevent publication
Q4: **We might need to contact you to clarify some of your answers. Please state your preference below:**	I am available to be contacted
Q5: **Please indicate whether you are replying to this questionnaire as:**	An industry association
Q6: **If a business or industry association, please indicate your field(s) of interest or activity(ies) - the letters in between brackets correspond to NACE codes [multiple choice]:**	Manufacture of food products (C10), Manufacture of beverages (C11)
Q7: **For businesses, please indicate the size of your business:The definition of small and medium-sized enterprises depends on the staff headcount and either the annual turnover or the balance sheet of the company. Please consult the following website: http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition/index_en.htm**	Medium-sized enterprise (under 250 employees)

Q8: Please indicate the level at which your organisation is active:	EU

PAGE 3: Part II – General Questions

Q9: How important is it in your view that there is chemical and chemical-related legislation* at EU-level in order to achieve the following objectives? (1 = not important; 5= very important)*This comprises the chemical-related provisions in all legislation within the scope of this fitness check. It encompasses legislation governing hazard identification and classification, as well as risk management measures, including chemical-related aspects of legislation on worker safety, transport, environmental protection, chemicals controls and supporting legislation, excluding REACH. The full list of legislation can be found here.The internal market of the European Union (EU) is a single market in which the goods, services, capital and persons can move freely across borders. One of the key objectives of chemical and chemical-related legislation is to have a single market for chemical substances and mixtures, as well as products containing chemicals.**

Protecting human health	5
Protecting the environment	4
Ensuring a well-functioning internal market**	5
Stimulating competitiveness and innovation	5

Q10: Do you think the EU chemical and chemical-related legislation has been effective in achieving the following objectives? (1= not effective, 5= very effective). Please only consider chemical-related provisions in the legislation.

Protecting human health	5
Protecting the environment	4
Ensuring a well-functioning internal market	3
Stimulating competitiveness and innovation	3

Q11: If you think the EU chemical and chemical-related legislation is not effective (1) or only somewhat (2,3) effective, please indicate what you believe are the main reasons for this limited effectiveness in the following table:

Protecting human health	No opinion or not applicable
Protecting the environment	No opinion or not applicable
Ensuring a well-functioning internal market	The legislation is unclear, The legislation is not adapted to the issues at stake, The legislation is not effectively implemented
Stimulating competitiveness and innovation	The legislation is not adapted to the issues at stake, The legislation is not effectively implemented

Q12: To what extent do you consider that EU chemical and chemical-related legislation has had an added value above what could have been achieved through action at a national level? (1= no value, 5= a very high added value)

EU-level legislation adds value to national level action	5

PAGE 4: Part III - Specific Questions

Q13: For businesses and industry associations - Please select the legislation that regulates or otherwise affects your sector's or your company's activities.For other stakeholders - Please select the legislation you are familiar with.	Biocidal products (Regulation (EU) No 528/2012), Contaminants in food and feed (Regulation (EEC) No 315/93 and Directive 2002/32/EC) , Residues of pesticides (Regulation (EC) No 396/2005)

PAGE 5: Effectiveness

Q14: In the EU legislative framework for chemicals, risk management measures are, in some cases, determined directly based on the identified hazard using generic risk considerations (e.g. widespread exposure or exposure of vulnerable groups), which justify the automatic adoption of such measures. In other cases, the risk management measures are determined by a specific risk assessment that assesses the probability of adverse health and environmental effects resulting from the specific exposure scenarios associated with the proposed use(s) of the chemical. In your view, do you think EU chemical and chemical-related legislation should, in general:	c. Remain as it is because the balance is more or less right (i.e. the legislation ensures appropriate application of specific risk assessments and generic risk considerations)
Q15: In your view, apart from the hazard and/or risk of a chemical substance or mixture, are all relevant considerations taken into account in regulatory decision making on risk management (e.g. whether there will be combined effects of chemicals, whether there are certain vulnerable groups, whether there will be impacts on jobs or on the competitiveness of EU industry, etc.)? Please explain your answer.	No, If you answered no, please explain which considerations are not (sufficiently) taken into account and, if relevant, explain which legislation you are referring to. We consider that all relevant considerations are not systematically taken into account in risk management. We explain our answer on a two specific case study studies referring to multiple use/multiple source substances – ex ample Chlorate, and changes in maximum residue levels (MRLs) – example fosetyl. [SEE ADDITIONAL COMMENTS SUBMITTED IN PDF DOCUMENT ON THESE TWO CASE STUDIES] First case: Multiple use/source substances (the example of chlorate) 1. Outline of the principal issue Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending Council Directive 91/414/EEC has laid down harmonized MRLs for pesticide residues in food and feed in the European Union. According to Article 3 of Regulation (EC) No 396/2005 (Definitions) pesticide residues means: "Residues, including active substances, metabolites and/or breakdown or reaction products of active substances currently or formerly used in plant protection products as defined in article 2, point 1 of Directive 91/414/EEC, which are present in or on the products covered by Annex I to this Regulation, including in particular those which may arise as a result of use in plant protection, in veterinary medicine and as a biocide". Several problems have arisen, or may yet arise, with

substances which may have more than one source: • Substances which are currently used or were formerly used in plant protection products but can also be found as contaminants and/or are naturally occurring (e.g. mercury, nicotine, copper and bromide) • Substances which are used in plant protection products and in veterinary medicines (e.g. cypermethrin), including those not listed in Regulation (EU) No 37/2010 • Substances which are used in plant protection products and/or as biocides and are found in food and feed (e.g. Sanitisers / disinfectants used responsibly by the food industry under GMP to clean food contact surfaces and equipment; DEET as a repellent) • Substances intentionally used in, or otherwise migrating from, for example, food contact materials (e.g. biphenyl, ortho-phenylphenole and diphenylamine), including substances listed in Regulation (EU) No 10/2011 • Substances to which the default value of 0,01 mg/kg applies but which are used as ingredients including additives according to Regulation (EC) No 1333/2008 and flavourings according to Regulation (EC) No 1334/2008 (e.g. olive oil, sodium chloride, lecithin and eugenol) Due to this definition, recent issues occur following the finding of low levels of chlorate, being a by-product of chlorine building agents used by the municipal water supply and industry to disinfect potable water and used by industry under GMP to clean food contact surfaces & equipment or by using drinking water as an ingredient, etc. These low levels of chlorate will trigger regulatory actions as it currently stands under Regulation 396/2005. Description of the current concrete chlorate case in detail: Chlorate is a known break down product of agents used for the chlorination of water or for the disinfection of surfaces & equipment like sodium hypochlorite (NaOCl). The presence of chlorate in food and drinks may be due to the use of chlorinated drinking water from the municipal water supplies or from wells during cultivation of plants and during food processing, the treatment of e.g. washing water by the food manufacturers for hygienic purposes or using drinking water as a food ingredient. Drinking water legislation in the EU is not fully harmonized. The use of chlorinating agents for drinking water disinfection is not a mandatory requirement in the EU; however, in several Member States chlorination is applied to ensure safe drinking water, which complies with the EU-Drinking water Directive . In late 2013, the State food control laboratory CVUA (Stuttgart, Germany) detected chlorate levels (in the part-per-billion range) in samples of vegetables and fruits placed on the German Market. The CVUA laboratory could not pinpoint the source of the widespread contamination, stipulating different possibilities such as for example chlorinated water, atmospheric precipitation / rainwater contamination, uptake by plants through (contaminated) soil, or even illegal use of chlorate as a herbicide . Immediate follow-up by the food industry indicates that the most common source of occurrence of chlorate in foods is through the use of chlorinated water, and not through the illegal

application of chlorate as a herbicide. This questions the validity of a default level of 0.01 mg/kg, which does not consider the “multiple use” of substances. Cleaning agents / sanitisers / disinfectants have been used for decades in a responsible manner by the food industry for the cleaning of food contact surfaces and are an integral part of Good Manufacturing Practices. Disinfectants play an essential role in the control of microbial, viral or parasitic pathogens, limiting their occurrence in food and water and thereby mitigating acute risks to human health. The respondent believes the question of residues should be further considered since active substances under normal conditions of disinfection (i.e. the conditions of authorisation of disinfectants) can lead to trace levels in food or feed, rather than automatically treating any such presence as a potential illegal non authorised plant protection use. This is confirmed through the provision of data to the European Commission which shows that the presence of chlorate is mainly due to the use of chlorinated drinking water and/or chlorinated water for washing/blanching/cooling. The same approach is warranted when chlorate occurs in food as an unavoidable impurity of some common production processes. With respect to food additives food manufactures are required to comply with Regulation (EU) 231/2012. The use of authorised substances should not trigger the setting of restrictive MRL when they are used according to good manufacturing practices. The European Association Specialised Nutrition Europe (SNE) presented data to the Commission showing that the presence of chlorate in Infants and young children nutrition is not due to the use of chlorate as an agent for plant protection, but due to other sources and that chlorate is present at levels that frequently exceed the default MRL of 0.01 mg/kg. At the current status of knowledge, chlorate can occur in food from various sources: • Drinking water – chlorinated by the municipal water supply – used along the food chain for irrigation, washing etc. • Water – chlorinated by the food manufacturer to maintain hygiene status e.g. for washing fruits & vegetables • Raw materials / ingredients – potable water is a key component of preparation, and extraction of key ingredients • Food additives / processing aids: for example some of which are used as pH adjustment or for bleaching • Potable water used as ingredient or direct consumption • Sanitisers / disinfectants used responsibly by the food industry under GMP to clean food contact surfaces and equipment Entries from more than one source are realistic and also have to be taken into account. 2. Suggestion of simplification The definition “pesticides residues” should only cover the residues of active substances used as plant protection products, their metabolites and/or reaction products. Residues from veterinary drugs should only be covered by Regulation (EU) No 37/2010 resp. Regulation (EC) No 479/2009. Contaminants should be covered by Regulation (EEC) No 315/93 and Regulation (EC) 1881/2006, additives by Regulation (EC) No 1333/2008 and flavourings by

by Regulation (EC) No 1333/2008 and flavourings by Regulation (EC) No 1334/2008. In our understanding, European legislation is based on the principle of cause. For pesticide residues this means, they have to derive from a treatment with plant protection products and/or products for storage treatment. The definition “pesticide residues” should not be used for food compounds and ingredients (including additives and flavourings) and other substances not apparent to be plant protection products. Additionally, there should be no MRL for those compounds, ingredients and substances. It should be clarified that in cases where the source is unknown, the provisions of Regulation (EC) No 396/2005 should not be applied. Instead, a risk assessment should be done to ensure the protection of the consumers, and the evaluation of the results should be based solely on this risk assessment. In addition, the source should be identified to allow a proper categorisation of the findings as soon as possible. In the case of chlorate a harmonised approach at EU level should be considered. In the meantime a temporary measure to avoid potential food safety risks and disruption of trade within the EU market should be defined and applied. These measures can be in the form of levels for intra community trade rather than setting temporary MRLs under Regulation 396/2005. 3. Policy context Pesticides: The use of chlorate as a herbicide was banned in 2008 in the EU (ref. Commission Decision 2008/865/EC of 10 November 2008), due to its possibly harmful effects on human health for workers. These effects were related to the exposure hazards of the pure (solid) substance to operators using the pesticide (pure chlorate is a fire hazard). The authorization of plant protection products containing chlorate as the active substance was withdrawn in 2010. Therefore, the 0.01 mg/kg default MRL applies. A default level of 0.01 mg/kg is applying to pesticide residues in infant and young children food products which has so far been laid down in vertical Directives (e.g. Directive 2006/141/EC). Similar rules will also apply in the future based on delegated acts. The requirements regarding infant and follow-on formula have already been adopted as Commission Delegated Regulation 2016/127/EU. Any amendments of Regulation 396/2005 will not apply to these rules as they are laid down in special legislation. Biocides: Biocidal products of the main group “disinfectants” are necessary and sometimes essential for ensuring the hygiene of food commodities, in particular to ensure their compliance with microbiological criteria. Taking this into account, any policy approach should find the right balance between two objectives: (a) Limiting consumer exposure to residues of disinfectants, and (b) Having effective tools available to ensure that organisms are controlled to the extent that they cannot cause harm to human health The use of biocides for disinfection purposes is regulated by the Biocidal Products Regulation 528/2012. The disinfectant hypochlorite is a notified “old active substance” for all product types belonging to the main group “disinfectants” (e.g. for food and feed production, for

drinking water) and thus allowed to be used in the EU for use as a biocide . As hypochlorite is an oxidizing agent, it reacts readily ensuring thereby its' role as disinfectant; one of the reaction or decomposition products in an aqueous matrix is the chlorate -ion. Hypochlorite is legitimately applied in some Member States to disinfect water to render it potable. Potable Water: WHO recommends chlorination of drinking water. "Chloramine and chlorine disinfectant residuals, for example, are deliberate additives, and their presence confers a benefit" with chlorate recognized as one of the major by-products. The WHO has set a provisional guideline level of 0.7 mg/l for chlorate in drinking water. In Switzerland, a tolerance level of 0.2 mg/l for chlorate in drinking water has been set. EFSA opinion on Chlorate: In 2014 the European Food Safety Authority collected monitoring data generated by Member States and food business operators to investigate the presence of residues of chlorate in food and drinking water. Those data indicated that chlorate is present at levels that frequently exceed the default MRL of 0.01 mg/kg. These findings indicate that even if good hygiene practices are used, in order to ensure an adequate level of hygiene of food products, it is currently not possible to achieve levels compliant with the current MRL of 0.01 mg/kg. EFSA established a tolerable daily intake (TDI) of 3 µg/kg body weight per day and an acute reference dose of 36 µg/ kg body weight in its opinion issued in 2015 . As illustrated with the concrete case of chlorate, problems have arisen because of an inappropriate interpretation of the definition of "pesticides residues". This definition should only cover the residues of active substances used as plant protection products, their metabolites and/or reaction products. This would avoid setting MRL systematically in Reg. 396/2005 for substances which are not used as plant protection products and avoid the many issues that come with this approach as demonstrated above. 4. Current state of Play The Commission currently discusses with member states the setting of temporary MRLs for chlorate for different commodities under Regulation 396/2005. Besides specific measures have to be taken with regard to trace levels of biocides in infant and young children food products where currently a special default level of 0.01 mg/kg applies. Industry continues to collect chlorate presence data and to identify the root cause. Food industry is confronted with the uncertainty, how the presence of trace levels of chlorate will be handled in future considering that the use of disinfectants in food manufacturing is essential for food safety and too low levels of disinfectants might not fulfil the purpose of ensuring food safety. Concluding remarks In conclusion we consider that this issue could be solved by the following principles: • The main use/main entry of the substance should be defined and should there be the need for a limit, it should be set in the legislation representing the main use/entry. • In case the main use is a plant protection product use, the MRL may stay in Reg. 396/2005 but should be adapted in order

to take into account the other uses/entry of the substance. Two more points should be mentioned in this context. Moreover Tthe absence of standardised analytical methods is an issue when working with complex matrices and when working close to the limit of detection (which is notably the case with the default plant protection product MRL of 0.01 mg/kg for multiple use/entry substances). The fact that risk management measures are not based on risk-benefit analysis could lead to economic impairs for food and feed companies. Indeed, as explained above, some substances which are not used as plant protection products are sometimes applied a default MRL or a very low specific MRL which does not fit the actual use of the substance and lead to measures restricting or even banning the substance in question. On that basis, the companies using the impacted substance may see a decrease in its competiveness as compared to those companies not using the concerned substance. Second case – Changes in MRL (the example of Fosetyl) Background Regulation (EC) 396/2005 defines the residue for fosetyl as the "sum of fosetyl, phosphonic acid and their salts, expressed as fosetyl". However, there are other sources of phosphonates and phosphorous acid, such as potassium phosphonate and disodium phosphonate which are used in third countries as components of plant strengtheners and fertilizers. When phosphonates were classified in the EU as pesticides in 2013, the default MRL for fosetyl was not reassessed to take into account other sources of residues. Phosphourous acid was detected in walnuts for the first time in Germany at the end of 2013. As the amount of phosphorous acid exceeded the maximum residue level of fosetyl (2 mg/kg, limit of determination), the product was withdrawn despite the fact that the pesticide had not been applied. In early 2014, Member States and food business operators shared information with the European Commission showing the presence of phosphonates in certain products above the MRL. The subsequent monitoring data collected showed that the phosphonate presence frequently exceeded the MRL, but residues of fosetyl and its salts remained below the limit of determination. In order to avoid significant market disruptions in the trade of products already treated with phosphonate-containing products, and following a Statement by EFSA concluding that no health risks were posed for consumers, temporary MRLs were set by Regulation (EU) No 991/2014 of 19 September 2014. These temporary MRLs were initially applicable until 31 December 2015. Research and monitoring of residues on tree nuts started in 2014 in the United States. Tree nut growers were advised concerning the use of phosphonates in order to comply with EU MRLs. However, the biological cycle is a crucial limiting factor to develop the necessary data required to submit an application to revise the MRL or request an import tolerance. With this in mind, the 15-month timeframe established by the Commission was insufficient to complete the studies, analyse the results and submit the dossier for a revision. As a consequence

the dossier for a revision. As a consequence, concerns on the risk of significant supply disruption were raised again by food business operators and Member States, leading to the extension of the temporary MRLs until 1 March 2019 (applying retroactively from 1 January 2016) as established by Regulation (EU) 2016/75 of 21 January 2016. This new deadline should allow now for the dossier for MRL revision to be completed and submitted for evaluation. Suggestion of simplification As in the case of chlorates, the definition of fosetyl residues could have taken into account other alternative sources of phosphonates in a clear way for both controlling authorities and food business operators. This would have prevented a situation where a pesticide is not used but its 'residues' can be nevertheless found. Another crucial element that should be revised is the actual length of transitional periods and temporary MRLs, in order to take into account the following elements: • harvest calendars (including PPP applications) and biological cycles: for example, if an active substance is banned or its MRL significantly reduced, it is necessary to consider when the harvest will take place. If the new MRLs apply before the harvest period and does not allow for enough time to adjust to the new requirements, this is likely to lead to a significant amount of product being non-compliant with subsequent disruption of the supply chain. • shelf life, logistics and business decisions: food production can involve taking decisions a long time in advance, such as supplying contracts or storing raw materials for extended periods (e.g. a whole year, until the new crop is available). Food processing can entail maturing periods up to several months, and final products can have long shelf-lives (1-5 years). • sourcing alternatives: in some cases, production of commodities can be restricted to few origins, often with a leading non-EU country supplying over a third or a half of the total imports to the EU. Sufficient transitional time is vital for food business operators to ensure that their suppliers are/can be compliant, and if not, find an alternative of the same quality and similar price, or in case no alternative can be found, take the necessary decisions to avoid or mitigate economic losses and production disruptions.

Q16: In your view, to what extent are the following elements of the overall EU legislative framework for chemicals satisfactory? (1= not satisfactory, 5= very satisfactory)

Transparency of procedures	3
Speed with which hazards/risks are identified	3
Speed with which identified risks are addressed	4
Time to allow duty holders to adapt	3
Predictability of the outcomes	3
Clarity of the legal texts	3
Guidance documents and implementation support	3
Effective implementation and enforcement across Member States	3
Consistent implementation and enforcement across Member States	3
Please explain your answers and list any other aspect you consider relevant. If you have specific legislation in mind, please specify it.	• Lack of transparency of procedures: impacted stakeholders are not always clearly and timely informed of the discussions taking place in the Standing Committees and the governmental expert group meetings; in particular standing committees are not transparent. The minutes of the meetings are on the public website only after several weeks. • The time to allow duty holders to adapt is not always sufficient. • Temporary and transitional measures often fail to take into account harvesting timeframes, or the availability of alternative, compliant ingredients and compliant origins. • The legal text sometimes lacks clarity: it is notably the case for the definition of “residues” in Reg. 396/2005 which is key in order to understand the scope of the legislation. In the Pesticide Regulation, a “pesticide MRL” is defined as “the upper legal level of a concentration for a pesticide residue in or on food or feed […] based on good agricultural practice (GAP) and the lowest consumer exposure necessary to protect vulnerable consumers”. Plant protection products MRLs are not risk-based thresholds, but are rather maximum residues that should be present following a safe use of the plant protection product. The definition of “pesticide residues” as used in the Pesticides Regulation should thus only cover the residues of plant protection products, strictly (single use as PPP). It should not apply to food compounds, ingredients and other substances which are not used as plant protection products. • Guidance documents are often developed too late to allow business operators, in particular small and medium sized enterprises to implement any new regulations timely and correctly.

Q17: In your view, to what extent are the following elements of risk management satisfactory? (1= not satisfactory, 5= very satisfactory)

Hazard identification criteria	4
Risk assessment and characterisation	4
Hazard and risk communication measures to consumers (e.g. labels, pictograms, etc.)	3
Risk management measures restricting or banning the use of chemicals	3
If you answered 1, 2 or 3 above and would like to provide further information (in particular on specific pieces of legislation), please explain your answers.	Regarding the Risk management measures restricting or banning the use of chemicals, it is primordial that a risk-benefit-analysis becomes part of the process of setting limits for biocides in foods (Regulation (EU) No 528/2008 and implication on Regulation (EU) No 396/2005 when multiple use/entry substances are concerned). Not only the risk related to traces of biocides in food should be considered but also potential food safety risks due to the uncontrolled growth of micro-organisms, pests, etc. when biocidal products cannot be used in an efficient way any longer.

Q18: Safety data for chemicals is subject to quality requirements, notably Good Laboratory Practice (GLP), aimed at ensuring the reliability and reproducibility of the data. Do you consider these requirements to be appropriate?

Respondent skipped this question

PAGE 6: Efficiency

Q19: In your view, what are the most significant benefits generated for EU society by the EU chemical and chemical related legislation? (one or more answers possible)

Respondent skipped this question

Q20: In your view, what are the most significant costs incurred by EU society due to EU chemical and chemical related legislation? (one or more answers possible)

Respondent skipped this question

Q21: In your view, do any of the following requirements in the legislative framework lead to significant costs for companies?

Risk management measures under the different legislation

,

Understanding and keeping up-to-date with changes in legal requirements

,

Other (please specify)
Lack of coherence between different policies and regulatory requirements. In the case of the food sector, quite often environmental and agricultural policies and the food safety legislation are not aligned. An example of this inconsistency is the use of mineral oil in paper and board: For ecological purposes, cardboard packaging material is largely produced using recycled paper, which can contain significant quantities of mineral oils that might migrate from the cardboard to the foodstuff and therefore this material is not suitable for food packaging. There are also inconsistent expectations in agricultural practices: Minimum tillage is promoted by DG Environment as an environment and biodiversity friendly practice, but this growing technique is contrary to the advice of DG Agriculture as it can lead to a highly undesirable increase of Fusarium toxins (Don1 for example in wheat or other crops). And even within the same area of legislation we can find some examples of non-aligned rules, which lead often to a non-compliance issues in the food industry (e.g. dual use substances when the default pesticide MRLs are applied to active substances which are not used as pesticides). Especially small and medium sized enterprises often have difficulties in understanding and keeping up-to-date with changes in legal requirements. The fact that risk management measures are not based on risk-benefit analysis could lead to economic impairs for food and feed companies. Indeed, as explained above, some substances which are not used as plant protection products are sometimes applied a default MRL or a very low specific MRL which does not fit the actual use of the substance and lead to measures which will lead to measures restricting or even banning the substance in question. This may create important costs to the companies as: • They will not be allowed to use the substance anymore and will have to switch substance in a short period of time • It could also lead to a reduction of the competitiveness of the companies using a banned product as compared to companies which use another substance Also, changesChanges in MRLs revisions, not allowing sufficient time for primary producers and food business operators in general to adapt, can entail economic costs in terms of supply contracts that can no longer be honoured, shortage of commodities, raising prices, food waste, and even production disruption in highly specialised companies.

Q22: Are there specific requirements in the EU chemicals legislative framework which lead to particularly significant costs for authorities?

Respondent skipped this question

PAGE 7: Relevance

Q23: To what extent has the EU legislative framework for chemicals contributed to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives? (1= no contribution, 5= a large contribution)

Respondent skipped this question

Q24: To what extent does the existing EU legislative framework sufficiently address emerging areas of concern, e.g. arising from advances in science and technology? (1= emerging areas of concern are not sufficiently addressed, 5 = emerging areas of concern are sufficiently addressed)

Novel areas of concern sufficiently addressed by framework	I don't know

PAGE 8: Coherence

Q25: Please indicate the extent to which you agree with the following statements relating to the EU chemicals legislation framework overall

The EU chemicals legislation framework contains gaps and missing links	Neutral
The EU chemicals legislation framework has overlaps	Neutral
The EU chemicals legislation framework is internally inconsistent	Neutral

Q26: Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between the different pieces of legislation which are under the scope of this fitness check. Please only consider aspects related to hazard identification, risk assessment and risk management of chemicals. The legislation covered by this fitness check can be found here.

Respondent skipped this question

Q27: Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between legislation which are covered by this fitness check and any other legislation you consider relevant as regards the regulation and risk management of chemicals.

Respondent skipped this question

PAGE 9: Part IV: Specific questions on the CLP Regulation

Q28: CLP communicates hazards to workers and consumers through various label elements, including danger words, pictograms, hazard statements and precautionary statements. (1= not effective; 5= very effective)

Respondent skipped this question

Q29: Do the hazard classes in the CLP Regulation cover all relevant hazards?	*Respondent skipped this question*
Q30: How effective is the support to companies through formal guidance documents and national helpdesks? (1= not effective; 5= very effective)	*Respondent skipped this question*
Q31: To what extent is CLP enforced in a harmonised manner across Member States?	*Respondent skipped this question*
Q32: To what extent are the current elements relating to the CLP classification criteria satisfactory? (1= not satisfactory; 5= very satisfactory)	*Respondent skipped this question*
Q33: CLP is revised on a regular basis through adaptations to technical progress. Do transitional periods allow sufficient time to implement new or revised classification criteria?	*Respondent skipped this question*
Q34: To what extent are the current elements of the procedures for harmonised classification & labelling (CLH) satisfactory? (1= not satisfactory; 5= very satisfactory)	*Respondent skipped this question*

PAGE 10: Part V: Additional comments

Q35: In case you have any additional comments with relevance for this public consultation, please insert them here.	*Respondent skipped this question*