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PAGE 2: Part I – General Information about Respondents

Q1: Address	
Contact name	Susanne Smolka
Organisation/company	Pesticide Action Network Germany
Country	Germany
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.	316946621911-92
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 under the name indicated; 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:	A non-governmental organisation (NGO)
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]:	*Respondent skipped this question*
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	*Respondent skipped this question*

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

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	5
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	3
Protecting the environment	3
Ensuring a well-functioning internal market	5
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	The legislation is not effectively implemented
Protecting the environment	The legislation is not effectively implemented
Stimulating competitiveness and innovation	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	4

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.**	Classification, labelling and packaging (Regulation No (EC) 1272/2008) , Plant protection products (Regulation (EC) No 1107/2009) , Biocidal products (Regulation (EU) No 528/2012), Water Framework (Directive 2000/60/EC), Persistent organic pollutants (Regulation (EC) 850/2004) , Residues of pesticides (Regulation (EC) No 396/2005) , Drinking Water (Directive 98/83/EC)

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:

b. Be more oriented towards generic risk considerations (i.e. take more cautious approaches, despite the possibility that certain uses of a chemical that are in the interest of society might be restricted)
,

If you answered a or b, please explain
From the PAN Germany point of view it is vital to keep the hazard based identification and classification in the CLP-Regulation as well as the hazard based approach for the regulation of active substances of very high concern according to the PPPR and the BPR (Regulation (EU) 1107/2009 and Regulation (EU) 528/2012). Pesticides and biocides must be bioavailable to fulfil their intended purpose and as consequence those substances enter the environment, leading to exposures of humans, wildlife, and ecosystems. However, several obligations in the legislation such as the comparative assessment and derogation provisions for identified substances of high concern prevent negative developments for the society as mentioned under answer (b). PAN Germany advocates widening the range of uses that are covered by generic risk assessments (or hazard based exclusion provisions), particularly focussing on situations where there is exposure of the general public and the environment. Important areas for extension include, but are not limited to, food contact materials, toys, furniture and certain construction materials The shortcoming of the regulative risk assessment has long been the subject of discussion. For example a systematic lack of exposure data frequently leads to high levels of uncertainties meaning that the establishment of acceptable exposure levels are ultimately political rather than scientific decisions. Studies indicate significant pollution on a continental scale and they indicate that Regulation such as the PPPR may still underestimate the level exposure and of damage to Europe's freshwater ecosystems, not least because there is a need to consider the overall ‘toxic pressure’ on those ecosystems — from mixtures of chemicals in particular (Malaj, E. et al., 2014: DOI:10.1073/pnas.1321082111). Hazard based approaches are incorporated into several pieces of EU legislation since more than 20 years and the FAO considers a „progressive ban of highly hazardous pesticides“ since 2006 (PAN Germany: http://www.pan-germany.org/download/stop_pesticide_poisonings_141002.pdf). Companies have switched to alternative chemicals, materials, technologies pest management approaches in order to comply with the obligations, so legislation significantly triggered innovation. This concept supports the important principles of the EU such as sustainability.

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.
A greater emphasis should be put on adequate implementation and enforcement. The continuous high level of environmental impacts of pesticide/biocides (see reference under question 14) and the large number of notifications through the EU Rapid Alert System for dangerous products (RAPEX) regarding harmful chemicals in consumer products which pose a serious risk show that there are still many gaps that need to be closed, see http://europa.eu/rapid/press-release_IP-16-1507_en.htm Humans and wildlife are exposed, amongst others, to industrial chemicals, pesticides and biocides with endocrine disrupting properties. Many of these chemicals will have additive adverse effects at specific endpoints. Single substance risk assessment is not adequately protective to prevent possible mixture effects, see e.g. Martin et al. Environmental Health 2013, 12:53 http://www.ehjournal.net/content/12/1/53. Additional uncertainty factors are needed to address risks from cumulative exposures from different sources for some substance groups. In other cases, for some substance groups, additional generic risk considerations should lead to the implementation of 'hazard based' cut off or bans to prevent continued exposures. In addition toxicological assessments have to consider the risk of vulnerable groups generally. Other relevant considerations that are not taken into account include a lack of adequate exposure information (including environmental monitoring and human biomonitoring data). Risk assessment and risk management measures should be reviewed for new pesticides, biocides (and for other new chemicals or new usages if necessary) by post-authorisation monitoring, especially to survey the accuracy of the predicted environmental exposure concentrations.

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	1
Speed with which hazards/risks are identified	2
Speed with which identified risks are addressed	1
Time to allow duty holders to adapt	5
Predictability of the outcomes	4
Stability of the legal framework	5
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
Public awareness and outreach	2
International collaboration and harmonisation	4
Please explain your answers and list any other aspect you consider relevant. If you have specific legislation in mind, please specify it.	PAN Germany is concerned about the lack of transparency, for example EFSA´s refusal to publish industry studies on which it has based its opinions. A first positive step is the announcement by EFSA in October 2015 to improve data transparency. However, it will take several more years before EFSA will share data submitted by companies as part of product risk assessments. The process from the identification of hazards and risks until the implementation of Regulations as well as the implementation of risk mitigation measures or the phase-out of chemicals of concern within legislations takes too much time. For example: The Water Framework Directive priority substances should have been tackled by Member States by 2010. The data on how this was done has just been published at the end of 2015, with still around half of the Member States delaying adoption of the river basin management plans. Also the lack of regulations on nanomaterials and the stalled implementation of criteria for the identification of endocrine disruptor pesticides and biocides according to the PPPR and the BPR are examples of how the regulation of hazardous substances is delayed for years. More information is needed on which chemicals are contained in consumer products to allow for an informed choice. A positive example is the mandatory ingredient list for cosmetics and personal care products and the right to know provisions under the BPR with regard to biocide-treated articles.

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

Hazard identification criteria	3
Risk assessment and characterisation	2
Hazard and risk communication measures to consumers (e.g. labels, pictograms, etc.)	3
Hazard and risk communication measures to workers (e.g. labels, pictograms, safety data sheets etc.)	4
Risk management measures restricting or banning the use of chemicals	2

Risk management measures regulating the safe use of chemicals (e.g. packaging requirements or requirements for the use of personal protective equipment)	2
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.	From the PAN Germany point of view the criteria used for hazard assessment provides scientific-based information for classification and regulation of chemicals. However, the hazard assessment needs to be improved to close current gaps. In particular endpoints need to added such as endocrine disruption or neurotoxicity. Risk assessment does not take into account exposures to mixtures, low dose effects or long-term environmental effects, vulnerable periods of exposure, etc. Risk communication: Both, consumers and workers lack information on the substances that are present in articles and lack information on the substances of very high concern in all types of goods and packaging. We therefore welcome the consumer right to know provisions laid down in the BPR for biocide-treated articles. Hazard pictograms and hazard statements is useful, but more targeted awareness raising activities are needed, as recommended in ECHA´s study from 2012`Communication on the safe use of chemicals.´ (https://echa.europa.eu/documents/10162/13559/clp_study_en.pdf. A positive example is the provision under the BPR, that “Member States shall take necessary measures to provide the public with appropriate information about the benefits and risks associated with biocidal products and ways of minimising their use” (BPR, Art. 17(5)). The CLP-Regulation and other regulations need additional provisions and harmonisation concerning the regulation of the increasing online-market. Declaration provisions are insufficient and do not ensure that consumers are adequately informed before they buy products in online-shops. In addition, the access to and the understanding of safety data sheets are often insufficient for non-professional users. An example is the inconsistency between CLP and BPR: There are specific labelling provisions for biocidal products which are going beyond CLP-provisions, e.g. the mandatory declaration of all active substances and their concentrations and the information if the product contains nanomaterials. According to CLP online retailers have to provide hazard pictograms and the product name without any further product information, such as the active substances. Online shops should provide an easy access to ALL information for the digital offer, as provided at the real product. This enables an informed choice before purchase. The risk management measures restricting or banning the use of chemicals are insufficient to protect the population and the environment adequately

	because of the extremely slow implementation of those measures and its insufficient surveillance. Proper use: We are still missing a harmonized framework for the sustainable use of biocides (in coherence with the Framework Directive addressing pesticide use) which implements EU-wide provisions referring to training, certification, rules of integrated pest management, quality of spray equipment and others.
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?**	No, If you answered no, please explain your answer It is important that classification is not just based on studies done to 'Good Laboratory Practice'(GLP), as other studies may examine endpoints that are not covered by established GLP methods, and can be of equal or higher scientific quality. GLP is a measure of good laboratory practice, not good study design, execution or interpretation. Systematic peer-review criteria should be applied impartially to both GLP and non-GLP studies in order to prepare accurate and robust conclusions. • Myers et al.(2009): Why Public Health Agencies Cannot Depend on Good Laboratory Practices as a Criterion for Selecting Data: The Case of Bisphenol A. Environmental Health Perspectives 117 • Saal v. and Myers (2010): Good Laboratory Practices Are Not Synonymous with Good Scientific Practices, Accurate Reporting or Valid Data. Environmental Health Perspectives 118, doi:10.1289/ehp.0901495 • PAN Europe & Generation Future (2014): Missed & Dismissed – Pesticide Regulators ignore the legal obligation to use Independent science for deriving safe exposure levels: http://www.pan-europe.info/old/Resources/Reports/PANE%20-%202014%20-%20Missed%20and%20dismissed.pdf

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)	Reducing the exposure of consumers and of citizens in general to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc. , Reducing the exposure of workers to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc. , Reducing the damage to the environment and to eco-systems and, therefore, avoiding the costs of treating contaminated water, restoring impacted fisheries, cleaning-up of contaminated land, compensating for reduced crop pollinisation, etc. , Encouraging research and innovation, generating new jobs, and improving the competitiveness of the EU chemicals industry by encouraging/supporting a shift towards green, sustainable chemistry and a circular economy
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)	Costs for authorities at EU level , Costs for authorities at national level
Q21: In your view, do any of the following requirements in the legislative framework lead to significant costs for companies?	Other (please specify) We would like to point out that the legislative framework lead to significant benefits for companies with respect to the effective protection of safety and health of workers and the prevention of claims of damages.

Q22: Are there specific requirements in the EU chemicals legislative framework which lead to particularly significant costs for authorities?	Yes, If you answered yes, please indicate what these are. A better implementation of the polluters pay principle is needed. Many functions of authorities are currently paid by the tax of the citizens, e.g. environmental and food monitoring or information campaigns on risk reduction. For compensation of those costs PAN Germany is recommending risk-related levies or taxes by the producers. We therefore welcome the provision under Art. 80(2) of the BPR which provides that Member States may levy annual fees with respect to biocidal products made available on their markets. The Commission guidance states that this could either be set at the same level for all products, could be a percentage of the value of the sale of each biocidal product during the preceding year, or “the annual fee could also be proportional to the degree of risk of the biocidal product, as for instance reflected in the number of R-phrases on its labelling. The higher the degree of risk, the higher the fee would be.” (see also: EU Commission report: “Analysis of measures geared to the sustainable use of biocidal products”, 2015). Approval and authorisation of substances or products are covered by fees, paid by the applicants. There is the possibility of conflict of interest for authorities when the applicant has a free choice and the budget of authorities depends on the number of applications. Therefore we propose that the allocation key of administration work should lay in the hand of the officials (for example the EU Commission) and not in the hand of the industry.

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)

Framework has led to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives	3

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	2
Please comment	The existing EU legislative framework has not yet been sufficiently addressed emerging areas of concern such as nanomaterials, endocrine disrupters, developmental neurotoxicity and imunotoxicity, mixture toxicity, low dose and non-monotonic adverse effects, cumulative exposures, environmental risks of pharmaceuticals/veterinary pharmaceuticals, the risk of pest resistances and of antimicrobial/antibiotic resistances induced by chemicals, e.g. by specific disinfectant biocides. In addition, there is a need to update existing test methods to include additional endpoints for endocrine disrupters, and a need for new tests to cover 'new' endocrine disrupting mechanisms. See the following reports for details: • Hass, U. et al. (2013): CeHOS, Danish Centre On Endocrine Disrupters, 52 p. Information/testing strategy for identification of substances with endocrine disrupting properties • Kortenkamp A. et al. (2012): State Of The Art Assessment Of Endocrine Disrupters: http://ec.europa.eu/environment/chemicals/endocrine/pdf/sota_edc_final_report.pdf • OECD ENV/JM/MONO (2012)23: Detailed review paper on the state of the science on novel in vitro and in vivo screening and testing methods and endpoints for evaluating endocrine disruptors

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	Agree
The EU chemicals legislation framework has overlaps	Disagree
The EU chemicals legislation framework is internally inconsistent	Agree

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.

Gaps or missing links	Gaps or missing links: PAN Germany advocates the expansion of the CLP classification criteria to also address additional properties, which are already considered in other legislation but not in CLP: POPs, PBTs / vPvBs, allergenic properties, nanomaterials, endocrine disruptors, and other relevant environmental endpoints such as bee/pollinator toxicity. We are also of the opinion that the process for harmonising industry classifications needs to be accelerated, and even more, efforts are needed for the adoption of harmonised classifications. Although coherence is implemented into substance related legislation such as PPPR or BPR and the Water Framework Directive (WFD) the feedback from WFD to the other Regulations is insufficient to stricktly implement strictly risk mitigation measure (restrictions or ban) for those chemicals listed as priority/priority hazardous substances under the WFD.
Inconsistencies	From our point of view there can be good reasons to implement legal provisions to specific chemical uses or intrinsic properties. In consequence not all “inconsistencies” between different legislation in themselves are negative. Pesticides and biocides for example are intended to be harmful, that´s their purpose. They are bioavailable and they are released into the environment. This needs stringent and strictly protection standards for human health, non-target organisms and ecosystems.

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.

Veterinary pharmaceuticals are not covered by this fitness check. But once released in the environment veterinary pharmaceuticals interact with the ecosystem and can cause environmental damage due to their substance properties as other chemicals do. Some active veterinary pharmaceutical substances are even identical to active substances used as pesticides like Cypermethrin, Deltamethrin or Imidacloprid. Veterinary pharmaceuticals are authorized for an unlimited period of time. Little is known about old products that have been authorized before the environmental risk assessment became obligatory and a review scheme, as it exists for pesticides and biocides, is not in place. That means that a big part of pharmaceuticals is released into the environment day by day with unknown environmental effects. It is known that especially among anti-parasitics there are veterinary products containing substances which are persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB). Those substances are of high environmental concern and there is an urgent need to keep them from the environment. But neither in the current legislation for veterinary pharmaceuticals nor in the proposal for a regulation on veterinary medicinal products the inclusion of hazard based exclusion criteria for the environment, as included in the Plant protection products (PPPR) Regulation (EC) No 1107/2009) or in the Biocidal Products Regulation (BPR, Regulation (EU) 528/2012) are in place. PAN Germany considers it necessary to react to this inconsistency between different legislations and to improve coherence between the veterinary legislation and the PPPR/ BPR by implementing regular review schemes and hazard based exclusion criteria in the environmental risk assessment of veterinary pharmaceuticals. As for PPPR and BPR derogation provisions should be implemented. If alternative are not available derogations must ensure that essential treatment can still be provided to secure animal welfare.

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)

To what extent are CLP labels effective in communicating hazards to workers?	4
To what extent are CLP labels effective in communicating hazards to consumers?	4

Q29: Do the hazard classes in the CLP Regulation cover all relevant hazards?

Environmental	No
Physical	Yes
Human health	No
Please list any hazard classes that are not covered	The CLP classification criteria provide a scientific basis for identifying hazardous properties of substances and mixtures, thus establishing a clear, predictable and systematic approach for identification. This system is essential for the protection of workers, farmers and consumers, ranging from communication about hazards and risks to providing comparable data sets for substance/product comparability, alternatives assessment and the substitution with safer alternatives. It is also the appropriate basis for implementing measures for environmental protection. We believe that hazard categories for endocrine disruption, neurotoxicity, allergenic properties, nanomaterials, for PBT / vPvBs, for bee toxicity, and for the potential of AMR (antimicrobial/antibiotic resistance) should be added. There is a need to update existing and to extend test methods to take into consideration many new scientific insights such as vulnerable effect windows in development, epigenetics or additional endpoints such as immunotoxicity, neurotoxicity, endocrine disruption or toxicity to bees/pollinators.

Q30: How effective is the support to companies through formal guidance documents and national helpdesks? (1= not effective; 5= very effective)

Helpdesks	3
Please add further details as necessary	National helpdesks are a key tool to provide support for companies. Companies who provides less hazardous alternatives or non-chemical alternatives should also be supported by national helpdesks to improve comparative assessments, public consultations on candidates of substitution and to promote innovations towards sustainable development

Q31: To what extent is CLP enforced in a harmonised manner across Member States?

Enforcement is not harmonised across most Member States

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Please add further details as necessary
The ECLIPS project report shows very high deficiencies in quality of MSDS sheets throughout the EU, including wrong classification of substances and mixtures. ECLIPS Working Group. European Classification and Labelling Inspections of Preparations, including Safety Data Sheets. FINAL REPORT. CLEEN, 2004. http://www.cleen-europe.eu/projects/ECLIPS.html

Q32: To what extent are the current elements relating to the CLP classification criteria satisfactory? (1= not satisfactory; 5= very satisfactory)

If you answered 1, 2 or 3 and would like to provide further information, please explain your answer

The CLP classification criteria provide a scientific basis for identifying hazardous properties of substances and mixtures, thus establishing a clear, predictable and systematic approach for identification. This system is essential for the protection of workers, farmers and consumers, ranging from communication about hazards and risks to providing comparable data sets for substance/product comparability, alternatives assessment and the substitution with safer alternatives. It is also the appropriate basis for implementing measures for environmental protection. We believe that hazard categories for endocrine disruption, neurotoxicity, allergenic properties, nanomaterials, for PBT / vPvBs and for bee toxicity should be added. There is a need to update existing and to extend test methods to take into consideration many new scientific insights such as vulnerable effect windows in development, epigenetics or additional endpoints such as immunotoxicity, neurotoxicity, endocrine disruption or toxicity to bees/pollinators.

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?

Transition period is sufficient,

Please elaborate if you answered that the transition period is too short or too long.
We believe that the time for companies to adapt to technical progress is sufficient taking into account that it takes several years since a substance is proposed for a harmonised classification and transition periods are considered.

Q34: To what extent are the current elements of the procedures for harmonised classification & labelling (CLH) satisfactory? (1= not satisfactory; 5= very satisfactory)

Transparency of the procedures	4
Involvement of stakeholders	3
Quality of scientific data and related information	2
Speed of the procedure	1

If you answered 1, 2 or 3 and would like to provide further information, please explain your answers
The CLH process is extremely slow, for example only 13 substances have been classified (harmonised) as carcinogens in the last five years. It took over 30 years to classify asbestos as a carcinogen!

PAGE 10: Part V: Additional comments

Q35: In case you have any additional comments with relevance for this public consultation, please insert them here.	We would like to highlight that the online questionnaire likely to lead to ambiguous interpretation. The answer to several questions depends on the legislation in question, on specific substance groups or other details but there is no free text field available or there is a free text field but the questions are very broad in scope.