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PAGE 2: Part I – General Information about Respondents

Q1: Address

Contact name	Cedric Lynch
Organisation/company	none
Country	UK
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.

Respondent skipped this question

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 citizen

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: Not applicable

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	3
Protecting the environment	3
Ensuring a well-functioning internal market**	I don't know
Stimulating competitiveness and innovation	I don't know

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	2
Protecting the environment	1
Ensuring a well-functioning internal market	2
Stimulating competitiveness and innovation	1

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 adapted to the issues at stake
Protecting the environment	The legislation is not effectively implemented
Ensuring a well-functioning internal market	The legislation is not adapted to the issues at stake
Stimulating competitiveness and innovation	The legislation is not adapted to the issues at stake

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	1
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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.

I am not familiar with any of the pieces of legislation listed above

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:

d. I don't know

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.

There are restrictions (often, fortunately, not in practice enforced) on common household products that would if enforced stop them being sold or given to the users. For example: kids could now refuse to do the washing-up because the washing-up liquid is since a couple of years ago labelled "keep out of reach of children"!! Will soap be next, so they can't wash properly? Already they cannot legally oil their bicycles or fit or remove batteries in their toys because the oil and the batteries now carry this label. As for repairing a cycle tyre with rubber solution or making or mending a toy with glue like I used to do when I was a kid..... A couple of days ago I bought a tin of "Isopon P38" car-body filler, which is the same as it has been for 30 years including the picture of the Austin Maestro on the label - except that now it bears the words "For Professional Use Only". As far as I can see this is due to Brussels's "CLP directive". Will the police now have to set up in addition to the Drug Squad and the Vice Squad an Amateur Isopon Squad? "M'lud, the first defendant was observed to buy from the second defendant a tin of Isopon which he then took home and applied to a vehicle that is registered in his own name; this violated the provisions of the CLP Directive in constituting a conspiracy by the first and second defendants to cause an amateur use of the said Isopon, and I urge you to impose the maximum sentence possible". [The maximum sentence for conspiracy in the UK is life imprisonment].

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

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	I don't know	
Speed with which identified risks are addressed	I don't know	
Time to allow duty holders to adapt	I don't know	
Predictability of the outcomes	I don't know	
Stability of the legal framework	I don't know	
Clarity of the legal texts	1	
Guidance documents and implementation support	1	
Effective implementation and enforcement across Member States	1	
Consistent implementation and enforcement across Member States	1	
Public awareness and outreach	1	
International collaboration and harmonisation	1	
Please explain your answers and list any other aspect you consider relevant. If you have specific legislation in mind, please specify it.		This legislation will if enforced prohibit many traditional hobbies and home maintenance activities. Just tell us how to use the stuff safely, which is usually a matter of commonsense (try not to breathe the fumes, wash it off if it gets on you, don't get it in your food or drink, take any waste to the council tip, don't flush it down the drain etc). Just ban stuff that cannot be used (carefully, for its intended use) without hazard to health or the environment.

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

Hazard identification criteria	I don't know
Risk assessment and characterisation	1
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.)	5
Risk management measures restricting or banning the use of chemicals	1
Risk management measures regulating the safe use of chemicals (e.g. packaging requirements or requirements for the use of personal protective equipment)	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.	You should ban only those chemicals whose risks are not removed by the practice of commonsense in their use. Children should be taught the safe use of chemicals; my father taught me that I should assume that everything is poisonous unless I knew that it wasn't and had correctly identified it. He also said "if you can smell it, you are breathing in too much of it".

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?

I don't know

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 workers to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc.

Reducing the damage to the environment and to ecosystems and, therefore, avoiding the costs of treating contaminated water, restoring impacted fisheries, cleaning-up of contaminated land, compensating for reduced crop pollinisation, etc.

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 society in general

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

I don't know

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

I don't know

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

I don't know

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)

To what extent are CLP labels effective in communicating hazards to workers? I don't know

To what extent are CLP labels effective in communicating hazards to consumers? I don't know

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

Environmental I don't know

Physical I don't know

Human health I don't know

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

Guidance documents No experience

Helpdesks No experience

Industry association guidance and materials No experience

Other (training, conferences, etc.) No experience

Q31: To what extent is CLP enforced in a harmonised manner across Member States? I don't know

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

Ease of implementation for duty holders I don't know

Appropriateness of classification criteria and methods for substances I don't know

Appropriateness of classification criteria and methods for mixtures I don't know

International harmonisation through the Globally Harmonised System (GHS) I don't know

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? I don't know or have no opinion

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

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	I don't know
Involvement of stakeholders	1
Quality of scientific data and related information	I don't know
Speed of the procedure	I don't know

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

There is no consultation of the general public, people (especially children) following or wishing to follow hobbies, etc.

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
