

Member States Reporting under REACH art. 117 / CLP art.46

Fields marked with * are mandatory.

Introduction

General Information

Please note that depending on what your answers are throughout the questionnaire, hidden questions may show up, so please disregard the numbering in case it does not follow a logic order.

A glossary is available in the section 'background document'.

*1. Which Member State are you reporting for?

Bulgaria

*2. Primary contact person's name

Parvoleta Luleva, Head of Hazardous Chemicals Department, Preventive Activities Directorate, Ministry of Environment and Water

*3. Please provide an email address for the primary contact person

pluleva@moew.government.bg

Theme 1 - Information on the Competent Authority

4. Please explain how Competent Authorities are organised for the operation of REACH in your country? *(Please note that this Section does not include information on enforcement authorities that will be covered under Theme 9 on enforcement)*

The Ministry of Environment and Water is the REACH Competent Authority according to Article 121. For performing its tasks under REACH the The Ministry of Environment and Water cooperates with other national authorities. For more details see question 17.

*5. How many Competent Authorities are responsible for REACH?

A description of each Competent Authority will be asked in the following sections. Similar series of questions corresponding to the number of Competent Authorities you enter will appear below.

1

One / First Competent Authority Responsible for REACH

*6. What is the name of the Competent Authority?

Ministry of Environment and Water

*7. What is the address of the Competent Authority?

22, Maria Louisa Blvd.
1000, Sofia, Bulgaria (main building and official address for correspondence)
67, William Gladstone Str.
1000, Sofia, Bulgaria

*8. What is the email address of the Competent Authority?

malinov@moew.government.bg

*9. What is the telephone number of the Competent Authority?

+359 2 940 6000

*10. What part of REACH does this part of the Competent Authority deal with?

Please choose one or more answers.

- All
- Evaluation
- Risk Assessment
- Helpdesk
- Authorisation
- Restriction
- Registration
- Other

*11. From what part of Government does this part of the Competent Authority have authority from?

Please choose one or more answers.

- Environment
- Occupational Health and Safety
- Public Health
- Consumer Protection
- Economy/Industry
- Other

*12. Please specify the number of staff of the Competent Authority working on the implementation of REACH:

8

*13. Do you have specialised staff in the following categories? Please quantify these skills in FTE (Full Time Equivalent).

For a definition of Full Time Equivalent, please refer to the glossary.

	Number of FTE
Toxicologist	0
Ecotoxicologist	0
Chemist	5
Exposure Assessor	0
Risk Assessor	0
Risk manager	0
Economist	0
IT	0
Communication	0
Other	3

*14. Is the level of expertise of the Competent Authority adequate to deal with all requirements under REACH?

Since no sufficient expertise is available in the Ministry, especially in toxicology and exposure assessment, external experts in specific areas have been co-opted in the work of the newly established Committee on Substance Evaluation under the Minister of Environment and Water. This committee consists of experts from different scientific institutes and universities with background and expertise in toxicology, ecotoxicology, biology, chemistry, medicine and pharmacy for the purposes of the Substance evaluation.

*15. Are the staff of the REACH Competent Authority involved in other chemical legislation?

- Yes
 No

*16. What other chemical legislation are the staff of the REACH Competent Authority involved in?

Please choose one or more answers.

- PIC Regulation
 Food legislation
 Workers Protection legislation
 Cosmetics
 Medical devices
 Biocides
 CLP
 Pesticides
 POPs
 Other

*If Other, please list the different legislations here:

Detergents Regulation, Seveso Directive, Mercury Export Ban Regulation, RoHS Directive

*17. Are there any other institutions (agency, institute, regional authorities) that the Competent Authority works with in relation to REACH issues?

- Yes
 No

*If Yes, please list the other institutions that the Competent Authority works with:

Ministry of Health, National Center of Public Health and Analyses under the Ministry of Health, Executive Agency "General Labour Inspectorate" under the Ministry of Labour and Social Affairs, Ministry of Economy, National Customs Agency under the Ministry of Finance

*18. Does the Competent Authority outsource any of its work?

- Yes
 No

*19. Does the Competent Authority have appropriate financial resources?

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
 2
 3
 4
 5

*20. Does the Competent Authority have appropriate technical resources (understood in terms of expertise, skills and competences of the staff)?

- 1
 2
 3
 4
 5

*21. Does the Competent Authority have appropriate human resources (understood in terms of number of staff)?

- 1
 2
 3
 4
 5

22. Space is available below to provide further comments on the resourcing of the Competent Authority.

Theme 2: Information on cooperation and communication with other Member States, the European Chemicals Agency (ECHA) and the Commission

*23. How could the communication and collaboration for REACH between Member States be improved?

1800 character(s) maximum

The existing ways of communication and information exchange, in particular RIME, are effective enough. The incorporation of information features concerning REACH in ICSMS will facilitate the work of the National Enforcement Authorities.

*24. How could the collaboration with other agencies in your country be improved?

1800 character(s) maximum

The Competent Authority is to be allowed to access the data base to the National Customs Agency for the purposes of REACH enforcement.
Broadening of the scope of accreditation of the Executive Environmental Agency in order to be able to perform analysis concerning the control of REACH requirements as regards substances subject to authorisation and restriction.
Conducting of joint trainings between the National Enforcement Authorities and the Competent Authority in order to exchange useful information.

***25. How could the communication and collaboration with ECHA be improved?**

1800 character(s) maximum

We would appreciate if in the process of planning of the meetings both ECHA and the Commission exchange in advance information so that to avoid any overlaps in the dates of the different meetings taking into account the limited human resources in the smaller countries. The meeting documents (in particular for CARACAL and REACH Committee) should also be uploaded well in advance in order to allow sufficient time for preparation and proper participation. We would appreciate to receive in advance a tentative timetable of all workshops for the Competent Authorities at the end of the previous year. This would ensure and facilitate preparation and the proper participation in the workshops/meetings.

***26. How could the exchange of information and dialogue between Member States and the Commission be improved?**

1800 character(s) maximum

see the comments in question 25
More transparency is needed on how ECHA's recommendations for prioritisation of SVHCs for Annex XIV are taken into account by the Commission.

Theme 3: Operation of the national helpdesk

***27. Please provide the name of the organisation(s) responsible for operating the Helpdesk(s) for REACH.**

Ministry of Environment and Water.

***28. What is (are) the address(es) of the Helpdesk(s)?**

67, William Gladstone Str.
1000, Sofia, Bulgaria

*29. What is (are) the web page address(es) of the Helpdesk(s)?

`http://www.chemicals.moew.government.bg/feedback/request.do`

*30. What is (are) the email address(es) of the Helpdesk(s)?

N/A

*31. What is (are) the telephone number(s) of the Helpdesk(s)?

N/A

*32. What is the institutional structure of the Helpdesk(s)?

- Separate independent entity(ies)
- Part of Competent Authority
- Part of business association/chamber of commerce
- Other

*33. Please quantify these skills in FTE (Full Time Equivalent).

	Number of FTE
Toxicologist	0
Ecotoxicologist	0
Chemist	2
Exposure Assessor	0
Risk Assessor	0
Risk manager	0
Economist	0
IT	0
Communication	0
Other	2

*34. Is the level of expertise adequate to respond to all enquiries?

- Yes
 No

*35. For which topics does the national helpdesk feel it necessary to refer the enquirer to the ECHA helpdesk?

Questions concerning ECHA's IT tools and questions related to transfer of ownership, merging or splitting of companies.

*36. What are the services offered by the Helpdesk?

Please choose one or more answers.

- Website
 Newsletter
 Advice services
 Trainings
 Mediation / conflict resolution
 Other

*37. In which language(s) are these services accessible?

Bulgarian mainly. Written responses could also be provided in English

*38. Is the same Helpdesk used to provide help to Industry on CLP?

- Yes
 No

*39. Does the Helpdesk receive any non-governmental support?

- Yes
 No

*40. Please describe the Helpdesk quality assurance mechanisms:

We are conducting surveys after the events we organize to seek feedback from the participants on the topics presented at the particular event and about the topics that have to be included in future events as well as the quality of the work and information.

*41. Is ISO9000 norm in place?

- Yes
 No

42. How many enquiries does the Helpdesk receive per year?

	1 - 100	101 - 1000	> 1000
*2010	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2011	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2014	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*43. How are the majority of enquiries received?

Please choose one or more answers.

- Email
- Phone
- Fax
- Letter
- Other
- No information

*44. Do you provide specific advice to SME's?

- Yes
- No

If yes, please specify how this advice is customized for the needs of SMEs.

If further information or advice is needed, we organize topic/substance specific meetings/trainings with representatives of the companies.

*45. What is the company size of enquirers? (please specify the percentage of the total each of them represent)

If no information is available for a specific type of company, please indicate N/A in the corresponding box.

	%
Large enterprises	19.1
Medium enterprises	23.6
Small enterprises	34.83
Micro enterprises	11.24
Other	11.24

*46. For each type of enquiry received, please provide the percentage of the total number of enquiries during the reporting period:

Pre-registration

Please insert a figure. The individual percentages should add up 100% altogether.

%

*Registration

%

*Evaluation

%

*Authorisation

%

*Restriction

%

*Testing (Information requirement/registration)

%

*Data sharing

%

*Enforcement

3.46 %

*CSR preparation

0.58 %

*CLP Classification

2.88 %

*CLP Labelling

4.32 %

*CLP Packaging

1.44 %

*CLP Classification and labelling inventory

3.75 %

*SIEFs

0.29 %

*REACH-IT

4.90 %

*IUCLID5

0.29 %

*Downstream user obligations

2.59 %

*Only representative obligations

0.58 %

*Obligations regarding articles

0.86 %

*Safety Data Sheets

5 %

*SVHC

0.29 %

*Other

1.44 %

*47. Are enquiries received mostly:

'Straight-forward' is understood as those enquiries that can be answered without performing any prior research.

'Complex' is understood as those enquiries that require a minimum level of research before been answered or that demand exhaustive elaboration.

- Complex
- Straightforward
- No information

*48. What proportion of enquiries received are deemed to be: 1) straight forward

Please provide an approximate estimation as an average per year. The individual percentages should add up 100% altogether.

90 %

*2) complex

10 %

49. How long, on average, does it take to respond to the following types of questions?

	4 hours	1 day	3 days	1 week	2 weeks	> 2 weeks	No info
*Straight forward questions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Complex questions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*50. Are any types of enquiry outsourced?

- Yes
 No

*52. Does the Helpdesk seek feedback on its performance?

- Yes
 No

*If yes please specify by whom and what the result was:

We are conducting surveys after the events we organize to seek feedback from the participants about the topics presented at the particular event and about the topics that have to be included in future events. Untill now we have received possitive remarks and the proposed topics for next events help us plan our future activites so as to be most helpful to the industry.

*53. Does the Helpdesk review its performance and consider ways to improve its effectiveness?

- Yes
 No

*If yes, what were the measures taken to improve its effectiveness?

We conduct meetings among each other to discuss complex questions, issues rised by the stakeholders and the planned events. In addition we constantly actualize the information published on our website.

54. How could the cooperation between Helpdesks under Helpnet be improved?

1800 character(s) maximum

We are satisfied with the cooperation between Helpdesks under Helpnet.

55. How could the cooperation between Helpdesk outside Helpnet be improved?

1800 character(s) maximum

*56. How frequently do you use HelpEx?

- Daily
- Weekly
- Monthly
- Less frequently

Theme 4: Awareness raising activities

*57. Has the Member State carried out any specific awareness raising activities?

- Yes
- No

*58. What types of activities have been carried out?

Please choose one or more answers.

- Television spots
- Articles in Newspapers
- Radio spots
- Speaking events
- Information seminar
- Telephone surveys
- Leaflets and newsletters
- Articles in industry magazines
- Website / Social Media
- Other

*59. Who is the target audience for your awareness raising activities?

Please choose one or more answers.

- Consumers directly
- Consumers indirectly through multipliers (media, associations etc)
- SME in downstream sectors
- All companies in downstream sectors
- SMEs in chemicals sector
- All companies in chemicals sector
- Other

*If 'Other', please specify:

Consultants.

60. Please describe how the information was adapted for the specific target audience:

61. How effective was each type of activity?

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

If you have not ticked an activity in question 59, please state N/A.

	1	2	3	4	5	N/A
*Television spots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Articles in Newspaper	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Radio spots	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Speaking events	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Information seminar	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Telephone surveys	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Leaflets and newsletters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Articles in industry magazines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Websites / social media	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

*62. Do you measure the effectiveness of the activities?

- Yes
- No

*63. If yes, how?

We conducted a survey with representatives of different stakeholders incl. the industry associations.

*64. Do you have a REACH webpage/website?

- Yes
- No

65. Do you have a single webpage for REACH or multiple pages?

- Single webpage
- Multiple webpages

66. How frequently is the REACH webpage visited (per month)?

- 1-100
- 101-500
- 501-5000
- 5001+
- No information

Theme 5: Information on the promotion of the development, evaluation and use of alternative test methods

*67. Does the Member State contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?

- Yes
- No

*68. What has been the overall public funding on research and development of alternative testing in your Member States each year?

- Euros 0-10,000
- Euros 10,001-100,000
- Euros 100,001-1,000,000
- More than Euros 1, 000, 000
- No information

69. Please mention other relevant activities carried out on information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods:

(Q) SAR models (IN SILICO assessment of bioactive compounds: application to priority objects for the human health and the environment, National Fund of Scientific Research (N DTK 02/58);
Characterisation, chemical representation and modelling of UVCB substances - European Chemicals Agency - Contract: ECHA/2011/172;
Optimized Strategies for Risk Assessment of Industrial Chemicals through Integration of Non-Test and Test Information (OSIRIS), VI Framework program - Contract no. GOCE-CT-2007-037017;
OPENTOX - an open source predictive toxicology framework;
Case Studies on the Development and application of IN SILICO techniques for environmental hazard and risk assessment.

Theme 6: Information on participation in REACH Commission and ECHA expert groups / committees (Forum, REACH Committee, MSC, RAC, SEAC, CARACAL, RCN, Helpnet)

*70. How effective is the work of the FORUM Committee?

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
 2
 3
 4
 5

71. Please specify if needed:

1800 character(s) maximum

72. How could the effectiveness be improved?

1800 character(s) maximum

Better information exchange between the CARACAL and the Forum would facilitate the enforcement of REACH. This could be done by more extensive and coordinated discussions of overlapping areas of interest.

*73. How effective is the work of the REACH Committee?

- 1
- 2
- 3
- 4
- 5

74. Please specify if needed:

1800 character(s) maximum

The documents for the meetings are not uploaded on time.

75. How could the effectiveness be improved?

1800 character(s) maximum

MSC/RAC/SEAC opinions to be uploaded as supporting documents to the draft COM regulations/implementing decisions (e.g. CLP ATPs, amendments of Annex XIV and XVII and authorisation decisions).

*76. How effective is the work of the Member States Committee (MSC)?

- 1
- 2
- 3
- 4
- 5

77. Please specify if needed:

1800 character(s) maximum

78. How could the effectiveness be improved?

1800 character(s) maximum

*79. How effective is the work of the Risk Assessment Committee (RAC)?

- 1
- 2
- 3
- 4
- 5

80. Please specify if needed:

1800 character(s) maximum

RAC opinions not published on time on the website. The selection of RAC experts is not transparent.

81. How could the effectiveness be improved?

1800 character(s) maximum

*82. How effective is the work of the Socio-Economic Committee (SEAC)?

- 1
- 2
- 3
- 4
- 5

83. Please specify if needed:

1800 character(s) maximum

It would be good if the procedures are optimized and streamlined.

84. How could the effectiveness be improved?

1800 character(s) maximum

*85. How effective is the work of the CARACAL (Competent Authorities for Reach and CLP)?

- 1
- 2
- 3
- 4
- 5

86. Please specify if needed:

1800 character(s) maximum

The number of topics in the agenda need to be optimised and streamlined.
The focus should be on the themes that matter most and for which discussion is necessary.

87. How could the effectiveness be improved?

1800 character(s) maximum

All meeting documents have to be uploaded well in advance in accordance with the agreed rules of procedure. This would allow sufficient time for better preparation and proper participation in the discussions.

*88. How effective is the work of the Risk Communication Network (RCN)?

- 1
- 2
- 3
- 4
- 5

89. Please specify if needed:

1800 character(s) maximum

There is no information about any activities of the Risk Communication Network (RCN).

90. How could the effectiveness be improved?

1800 character(s) maximum

*91. How effective is the work of the HelpNet Committee?

- 1
- 2
- 3
- 4
- 5

92. Please specify if needed:

1800 character(s) maximum

93. How could the effectiveness be improved?

1800 character(s) maximum

Theme 7: Information on Dossier Evaluation and Substance Evaluation activities

Dossier evaluation

*94. Has the Member State been involved in Dossier evaluation within the reporting period?

- Yes
 No

Substance evaluation

*102. Has the Member State been involved in substance evaluation within the reporting period?

- Yes
 No

Theme 8: Annex XV Dossiers (restriction and identification of SVHC) and other points related to the identification of SVHC

Annex XV Restriction Dossiers

*115. Has the Member State been involved in the preparation of Annex XV Restriction Dossiers within the reporting period?

- Yes
 No

Annex XV SVHC Dossiers

*131. Has the Member State been involved in the preparation of Annex XV SVHC Dossiers?

- Yes
 No

Other points related to the identification of SVHC

145. Do you consider that there is enough coordination between ECHA and Member States during the implementation of the SVHC Roadmap?

- Yes
 No

146. What were the financial and human resources dedicated to SVHCs identification (both screening and preparation of an Annex XV dossier) before and after the agreement on the SVHCs Roadmap in March 2013?

We have received more financial and human resources after the agreement on the SVHCs Roadmap in March 2013.

Theme 9: Information on REACH enforcement activities

General information

*147. Please explain how the enforcement of REACH is organised in your country; please concentrate on the changes from the last reporting:

For a definition of 'enforcement', please refer to the glossary.

There are no changes from the last reporting period.
16 Regional Inspectorates of Environment and Water are in charge of the following parts of REACH: registration, data sharing, communication in the supply chain (focused on the production and formulation of chemicals at industrial sites), DUs' duties, authorisation, restrictions (substances of ENV concern);
28 Regional Health Inspectorates are in charge of the following parts of REACH: communication in the supply chain (focused on retailers and distributors placing chemicals on the market), restrictions (substances of HH concern);
Executive Agency "General Labour Inspectorate" is in charge of the following parts of REACH: access to information for workers, safety and health at workplace involving hazardous chemicals (in particular SVHCs), exposure control at working environment.

*148. Are the national enforcement authority(ies) in charge of REACH, only dealing with REACH?

- Yes
 No

*If No, what are their additional responsibilities?

Besides REACH the Regional Inspectorates of Environment and Water are in charge of the environmental legislation (Seveso Directive, IPPC Directive, Waste preventive legislation, PIC Regulation, POPs Regulation, The Detergents Regulation). The Regional Health Inspectorates are in charge of the legislation concerning human health. Executive Agency "General Labour Inspectorate" is in charge of the labour legislation.

149. Describe the general status of the resources allocated to enforcing authorities for tasks related to the enforcement of REACH (assessment of annual budget and staff):

1800 character(s) maximum

Enforcement Strategy(ies)

General information on the enforcement strategy (or strategies) in place within the Member State

***150. Has an overall strategy been devised and implemented for the enforcement of REACH?**

For a definition of 'enforcement', please refer to the glossary.

- Yes devised
 Yes implemented
 No

***151. Is(are) the strategy(ies) in line with the strategy devised by the Forum?**

Forum strategy as described in the document "Strategies for enforcement of Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and of Regulation (EC) No. 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP)" as adopted at the 9th meeting of the Forum on 1-3 March 2011.

- Yes
 No

***152. Please outline the enforcement strategy within the Member State:**

The minister of environment and water with his order No 250/8.4.2009 has issued Guidelines for enforcement of REACH, in which the strategy of the REACH enforcement is outlined. It clarifies the target groups and the enforcement priorities. The Guidelines also focus on the coordination and cooperation of the enforcement authorities and provide information about how the planning, performing, reporting and follow-up of REACH inspections should be done, as well as what penalty and administrative measures (mandatory improvement notices, fines, sanctions, restrictions on placing on the market or the production, etc.) should be applied when discovering noncompliance. Guidance document concerning inspections related to substances subject to authorisation was prepared.

***153. What type of activities does this strategy entail?**

The Enforcement Authorities create and maintain a dossier of each company subject to enforcement. This dossier contains information about the company and the conducted enforcement activities. The inspectors are entitled to request information or documents or take samples for analysis. Target groups for enforcement are manufacturers, importers, ORs, DUs, distributors, manufacturers/importers of articles. Inspections for conducted registration/pre-registration, SDS in accordance with the requirements of REACH, implementation of the risk management measures provided in the SDS, information in the supply chain, substance subject to authorisation or restrictions have high priority.

*154. Is this enforcement strategy publicly available?

- Yes
 No

*Please provide the link:

http://www3.moew.government.bg/files/file/Chemicals/REACH/Ykazania/ukazania_REACH_enforcement.pdf

Inspection strategy

156. Describe the REACH inspection strategy:

For a definition of 'inspection', please refer to the glossary.

The strategy entails inspections of duty holders both documentary and on site, including joint inspections. The inspections could be planned or not. Joint inspections are planned in advance and one of the inspectors is designated as coordinator.

When during an inspection an enforcement authority notices possible non-compliance(s) of the competences of another enforcement authority, the latter sends an observation letter containing all the facts about the possible non-compliance/breach.

An Instruction for planning and reporting of the environmental inspections incl REACH and CLP was issued in 2010. It is available on the following internet address:

<http://www3.moew.government.bg/files/file/KKD/Normativni%20aktove/Instrukcia.doc>

*157. How has the inspection strategy evolved from 2010 to 2014?

The inspection strategy currently includes analytical tests of certain groups of substances subject to restriction.

Guidance document concerning inspections related to substances subject to authorisation was prepared.

*158. Does your inspection strategy consider the enforcement strategy developed by the FORUM and the activities carried out there?

Forum strategy as described in the document "Strategies for enforcement of Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and of Regulation (EC) No. 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP)" as adopted at the 9th meeting of the Forum on 1-3 March 2011.

- Yes
 No

Please provide examples:

159. Please provide the total number of inspectors that attended training on REACH in your Member States in the reporting period (2010-2014)?

63

Co-ordination, co-operation and exchange of information

Explanation of the co-ordination, co-operation and exchange of information, between enforcing authorities, with Competent Authorities and other authorities from other Member States

***160. Please outline the mechanisms/procedures put in place to ensure cooperation, coordination and exchange of information on REACH enforcement between enforcing authorities and other authorities (within or outside your Member State):**

Standing Committee for implementation of REACH is established under the Ministry of Environment and Water, Order of the Minister of Environment and Water of 2009. It includes representatives from the Ministry of Environment and Water, the Ministry of Economy and the Executive Agency "General Labour Inspectorate".

The Ministry of Environment and Water organizes every year workshops for training and exchange of information between the Competent Authority and the Enforcement Authorities.

Joint inspections are planned in advance and one of the inspectors is designated as coordinator.

The Ministry of Environment and Water prepares Recommendations in detail for the planned inspections.

In case of non planned inspections (results of concerns and complains all the relevant Enforcement Authorities are duly informed in order its representatives to take part of the inspection.

Specific provisions for coordination of the enforcement authorities on REACH restrictions, in particular on:

1. Enforcement activity plans coordination in respect to natural and legal persons and the hazardous substances, subject to inspection activity.
2. Information exchange as regards the enforcement activity at central and regional level, including inspections of companies from the same supply chain.
3. Joint inspections, when appropriate.

***161. 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):**

Joint inspections were conducted between inspectors from the Regional Inspectorates of Environment and Water and the Regional Health Inspectorates concerning cement containing chromium VI.

Joint inspections were conducted between inspectors from the Regional Inspectorates of Environment and Water and the Executive Agency "General Labour Inspectorate" during the REF-2 project.

The Customs Agency provides information to the Ministry of Environment and Water upon request for example for the REF-3 project, for import of articles containing asbestos fibers, import of charcoal and tyres containing PAHs.

*162. From Forum activities, which ones do you consider most relevant to enhance coordination, cooperation and exchange of information among Member States:

The projects REF-2 and especially REF-3 and other joint projects including information about them, such as: Forum REACH Enforcement Project on Annex XVII Restrictions concerning PAHs in extender oils and tyres. Forum advices on the enforceability of the Annex XV proposal for restriction.
Information from the interlinks procedures and the corresponding guidance provided in RIPE.

Please provide examples:

See above.

*163. Provide details on enforcement activities carried out with other Member States outside the remit of the Forum:

None.

164. Describe any other measures/relevant information:

For a definition of 'measure', please refer to the glossary.

2010-2014 Reporting on enforcement activities

Number of dutyholders

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

For a definition of 'dutyholder' please refer to the glossary.

The dutyholder principal role is the highest position the dutyholder has within the supply chain. For example, if a manufacturer of a substance is also a downstream user of others, then its principal role should be regarded as manufacturer.

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of dutyholders	1291	1194	1283	1214	1300

166. Provide an estimate of the above dutyholders who are likely to be considered as registrants as defined by REACH:

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of dutyholders	197	223	135	400	298

*167. What was the total number of official controls such as inspections or investigations or monitoring, or other enforcement measures carried out by enforcing authorities in which REACH was covered and/or enforced during the reporting period?

For definitions of 'investigation' or 'monitoring', please refer to the glossary.

78763

*168. State the number of **manufacturers** subject to enforcement activities:

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of manufacturers	259	334	275	262	274

Were these mainly:

For definitions of micro, small and medium-sized enterprises, please refer to the glossary.

The category 'not applicable' can be filled in case you have information on the size of industry but it does not allow you to complete the three categories (Small, Medium, Large).

	Micro	Small	Medium	Large	No information	N/a
*2010	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2011	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*169. State the number of **only representatives** subject to enforcement activities:

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of only representatives	N/A	2	N/A	4	4

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2010	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*2011	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*2012	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*2013	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*170. State the number of **distributors** subject to enforcement activities:

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of distributors	74	78	78	88	59

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2010	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2011	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*171. State the number of **downstream users** subject to enforcement activities:

If no information is available for a specific year, please indicate N/A in the corresponding box

	2010	2011	2012	2013	2014
Number of downstream users	875	948	919	856	1004

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2010	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2011	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*172. State the number of **importers** subject to enforcement activities:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of importers	131	188	124	149	78

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2010	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2011	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Number of official controls prompted by...

*173. Have there been complaints or concerns received by enforcing authorities in relation to alleged contraventions of the REACH Regulation?

Controls are understood as inspections or investigations or monitoring, or other enforcement measures carried out by enforcing activities.

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	14	14	12	6	6

*174. Incidents (e.g. accidents such as poisoning or other dangerous occurrences)?

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	0	1	2	0	0

***175. Monitoring activities?**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	66	55	55	51	54

***176. Results of an inspection?**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	770	452	356	513	386

Number of official controls which addressed...

***177. Registration:**

Controls are understood as inspections or investigations or monitoring, or other enforcement measures carried out by enforcing activities.

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	197	223	135	186	298
Cases of non-compliance found	2	52	3	23	11

***178. Registration and notification of substances in Articles:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	N/A	N/A	N/A	N/A	N/A
Cases of non-compliance found	N/A	N/A	N/A	N/A	N/A

***179. Information in the supply chain:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	17376	15721	12284	12322	14508
Cases of non-compliance found	179	134	726	608	511

***180. Duty to communicate information on substances in articles:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	240	149	151	108	115
Cases of non-compliance found	0	0	0	0	0

***181. Restrictions:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	13741	14792	14338	12620	13811
Cases of non-compliance found	28	19	37	15	14

***182. Authorisations:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	1	8	13	14	33
Cases of non-compliance found	0	0	1	0	0

***183. Imported goods:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	131	188	124	159	78
Cases of non-compliance found	13	38	22	35	24

Number of official controls which resulted in...

***184. No areas of infringement found:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	643	636	689	727	812

***185. Verbal or written advice:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	1282	944	828	833	769

***186. Legal proceedings:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	1	2	3	3	1

***187. Convictions:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	1	2	3	3	1

188. Other:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2010	2011	2012	2013	2014
Number of controls	8	9	2	3	0

If 'Other', please specify:

Imposed fines and sanctions.

189. Please provide information on difficulties encountered during REACH official controls:

The high number of the official controls on some parameters (supply chain and restrictions) is due to the different approach of reporting the controls by the different NEAs, e.g. the number of controls reported by the the health inspectorates is counted in most cases by products and/or duties in each company and not by dutyholders.

190. Please provide information on good practices related to REACH official controls:

There are other activities of the Bulgarian competent authority, which we consider important:

1. We have performed a survey on the BG labs and analytical method for enforcement of REACH Annex XVII restrictions.
2. We have performed a research in connection with the request of several MS for the perposes of preparing of Annex XV restriction dossiers regarding the folowing substances and substances in articles: Methanol (PL), BPA in thermal papers (FR), Cellulose wadding insulation materials with ammonium salt additives (FR), Sulphuric acid (BE).

Sanctions

191. Describe the different sanctions that can be used in case of contravention of REACH, e.g. enforcement notices and other sanctions such as on-the-spot fines or undertakings, official reprimands such as formal cautions or warnings, and legal proceedings (whether criminal or civil in nature):

The answer to this question is to be given only if the position has changed since the last reporting period.

The sanctions have not been changed since the last reporting period.

Appeals

192. Please state the number of appeals against REACH enforcement National Enforcement Authority decisions in your Member State in the reporting period (2010 – 2014):

9

193. Please state the number of REACH enforcement National Enforcement Authority decisions in your Member State that were overturned by ruling of a domestic or EU court of law in the reporting period (2010-2014):

3

Theme 10: CLP enforcement activities

General information

*194. Please explain how competent authorities are organised for the enforcement of CLP in your country; please concentrate on the changes from the last reporting:

1800 character(s) maximum

No changes from the last reporting period.

*195. How many authorities are in charge of CLP enforcement? Please provide their names:

28 Regional Health Inspectorates are the main enforcement authorities (classification, packaging and labeling) and 16 Regional Inspectorates of Environment and Water (notifications according to Art. 40 of CLP).

196. Describe the general status of the resources allocated to enforcing authorities for tasks related to the enforcement of CLP (assessment of annual budget and staff):

1800 character(s) maximum

Enforcement Strategy(ies)

General information on the enforcement strategy (or strategies) in place within the Member State

*197 Has an overall strategy or strategies been implemented for the enforcement of the CLP Regulation?

- Yes
 No

*202. Are there any plans for making (an) enforcement strategy(ies)?

- Yes
 No

Inspection Strategy

203. Describe the CLP inspection strategy:

For a definition of 'inspection', please refer to the glossary.

Regional Health Inspectorates are the lead enforcement authorities in terms of CLP. They are responsible for the control of classification, packing and labelling of the chemical substances and mixtures and specific articles placed on the market according to the CLP regulation. The Regional Inspectorates of Environment and Water are in charge of the submission of notifications in accordance with Art. 40 of CLP.

*204. How has the inspection strategy evolved from 2011 to 2014?

no change

*205. Does your inspection strategy consider the enforcement strategy developed by the FORUM and the activities carried out there?

Forum strategy as described in the document "Strategies for enforcement of Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and of Regulation (EC) No. 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP)" as adopted at the 9th meeting of the Forum on 1-3 March 2011.

- Yes
 No

Please provide examples:

206. Please provide the total number of inspectors that attended training on CLP in your Member State in the reporting period (2011-2014):

Co-ordination, co-operation and exchange of information

Explanation of the co-ordination, co-operation and exchange of information, between enforcing authorities, with Competent Authorities and other authorities from other Member States

*207. Please outline the mechanisms/procedures put in place to ensure cooperation, coordination and exchange of information on CLP enforcement between enforcing authorities and other authorities (within or outside your Member State):

Joint inspections, when appropriate, are organised and one of the inspectors is designated as a coordinator. In case of non planned inspections (resulting from concerns and complains) all the relevant enforcement authorities are invited to take part in a joint inspection, if appropriate, etc.

*208. 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):

See above.

2011-2014 Reporting on enforcement activities

*209. What was the total number of official controls, such as inspections or investigations, or other enforcement measures carried out by enforcing authorities in which CLP was covered and/or enforced during the reporting period?

For a definition of 'inspection' and 'investigation', please refer to the glossary.

	2011	2012	2013	2014
Number of controls	11042	9758	7933	11113

multipaging

210. If applicable, please add a description of the other enforcement measures carried out in this reporting period:

1800 character(s) maximum

Number of dutyholders

211. Provide an estimate of the total number of dutyholders who are likely to have duties imposed on them by CLP:

For a definition of 'dutyholder', please refer to the glossary.

The dutyholder principal role is the highest position the dutyholder has within the supply chain. For example, if a manufacturer of a substance is also a downstream user of others, then its principal role should be regarded as manufacturer.

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of dutyholders				

Dutyholders subject to official controls

*212. State the number of **manufacturers** subject to enforcement activities under CLP:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of manufacturers	151	302	314	527

Were these mainly:

For definitions of micro, small and medium-sized enterprises, please refer to the glossary.

The category not applicable can be filled in case you have information on the size of industry but it does not allow you to complete the three categories (Small, Medium, Large).

	Micro	Small	Medium	Large	No information	N/a
*2011	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2012	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*2014	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*213. State the number of **distributors** subject to enforcement activities under CLP:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of distributors	871	3122	3490	4071

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2011	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2014	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*214. State the number of **downstream users** subject to enforcement activities under CLP:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of downstream users	467	2156	2513	2890

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2011	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2014	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*215. State the number of **importers** subject to enforcement activities under CLP:

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of importers	98	417	374	469

Were these mainly:

	Micro	Small	Medium	Large	No information	N/a
*2011	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2012	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2013	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*2014	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Number of official controls prompted by...

*216. Have there been complaints or concerns received by enforcing authorities in relation to alleged contraventions of the CLP Regulation?

Controls are understood as inspections or investigations or monitoring, or other enforcement measures carried out by enforcing activities.

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	76	46	87	54

*217. Incidents (e.g. accidents such as poisoning or other dangerous occurrences)?

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	0	0	0	0

***218. Monitoring activities?**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	34	203	104	111

***219. Results of an inspection?**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	N/A	N/A	N/A	N/A

Number of official controls which addressed...

***220. Hazard classification:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	2809	9758	7933	11113
Cases of non-compliance found	48	136	41	217

***221. Hazard communication in the form of labelling:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	2902	9758	7933	11113
Cases of non-compliance found	72	617	525	679

***222. Packaging:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	2655	9758	7933	11113
Cases of non-compliance found	18	57	31	82

***223. Harmonisation of classification and labelling of substances:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	1875	3142	2576	4972
Cases of non-compliance found	3	24	132	39

***224. Notification to the classification and labelling inventory according to Article 40:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	555	526	458	673
Cases of non-compliance found	40	21	5	4

***225. Other common provisions, such as the obligation to maintain information and requests for information:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	N/A	N/A	N/A	N/A
Cases of non-compliance found	N/A	N/A	N/A	N/A

***226. Imported goods:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	415	576	578	1103
Cases of non-compliance found	30	90	216	259

***227. Other CLP obligations:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	N/A	N/A	N/A	N/A
Cases of non-compliance found	N/A	N/A	N/A	N/A

Number of official controls which resulted in...

***228. No areas of infringement found:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	2178	8834	6988	12671

***229. Verbal or written advice:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	111	220	163	172

***230. Legal proceedings:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	9	13	36	13

***231. Convictions:**

If no information is available for a specific year, please indicate N/A in the corresponding box.

	2011	2012	2013	2014
Number of controls	8	10	5	12

232. Other:

	2011	2012	2013	2014
Number of controls	50	273	210	161

If 'Other', please specify:

Issued orders for suspension on sale and use of certain non-compliant chemical substances and mixtures, and withdraw or recall of the products from the market by the end user.

Sanctions

233. Describe the different sanctions that can be used in case of contravention of the CLP Regulation, e.g. enforcement notices and other sanctions such as on-the-spot fines or undertakings, official reprimands such as formal cautions or warnings, and legal proceedings (whether criminal or civil in nature):

The answer to this question needs only be given if the position has changed since the last reporting period or is different to that provided by virtue of CLP Article 47.

There is no change since the last reporting period.

Appeals

234. Please state the number of appeals against CLP enforcement National Enforcement Authority decisions in your Member State in the reporting period (2011 – 2014):

1

235. Please state the number of CLP enforcement National Enforcement Authority decisions in your Member State that were overturned by ruling of a domestic or EU court of law New Number Question in the reporting period (2011 – 2014):

Other enforcement activity not covered elsewhere

236. Provide details on enforcement activities carried out at the request / suggestion of ECHA:

237. Provide details on enforcement activities carried out at the request of other Member States, e.g. where cross-border issues are detected and communicated:

238. Detail any other measures taken pursuant to articles 46(1) and 47 of the CLP Regulation, or any other information you wish to provide for the purposes of this part of the Report:

For a definition of 'measure', please refer to the glossary.

The high number of the official controls is due to the different approach of reporting the controls by the health inspectorates, i.e. by products and/or duties in each company instead of by dutyholders.

Theme 11: 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

239. Do you think that the effects of REACH would be better evaluated at a Member State or at EU level?

- Member State level
- EU level

240. Please provide a brief explanation of your response:

1800 character(s) maximum

The economical conditions in the different member states are different. The requirements for the manufacturers, importers and DUs are the same within the EU and that provides for an easier access to the market of all member states. The risk from the chemicals is reduced, although the registration process and the substitution of certain substances with safer alternatives and/or technologies might be costly. The quality of the information provided from the industry is increasing. The relationship between the participants in the supply chain is improved. Common indicators and benchmarks should be established in order to be assessed REACH on EU level.

241. What parameters are available at Member State level that could be used to assess the effectiveness of REACH in a baseline study?

1800 character(s) maximum

Theme 12: Other issues / recommendations / ideas

242. Please provide any further information on the implementation of REACH that the Member State considers relevant:

2500 character(s) maximum

*243. Do you wish to upload documents in support of this submission?

- Yes
 No

You may upload one or more documents.

Background Documents

Glossary (/eusurvey/files/457b4be8-39e0-4dc4-87ba-703092ec1ddb)

Contact

✉ lise.oules@milieu.be
