

# **Your Voice In Europe: ROADMAP feedback for Operation of the REACH Regulation - Report and REFIT evaluation**

## **User's data:**

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## **Related document: Operation of the REACH Regulation - Report and REFIT evaluation**

## **Feedback:**

*The SE MSCA welcomes the roadmap for the Reach evaluation. Although the roadmap specifies clearly several issues, there is still room for further improvements to clarify the ongoing processes. Please see our comments in more details in the attached document.*

## SE MSCA comments to the roadmap for the Reach Refit evaluation

The SE MSCA welcomes the roadmap for the Reach evaluation. It contributes to our understanding of the process and clarifies to some extent its goal and content.

### General comments

Although the roadmap specifies clearly several issues, there is still room for further improvements to facilitate for the MSs to follow the process and to plan for appropriate contributions to the Reach evaluation.

The published Roadmap has, according to our knowledge, not been officially communicated to the MSs. We understand that this published roadmap is the one announced in the paper (CA/87/2015) submitted to the Caracal meeting in October 2015. Even if we are not the intended target group that this roadmap wishes to reach, it would have been helpful for us to get information on the publication of the roadmap as early as possible.

The roadmap is complex and includes a considerable number of different assignments that would be delivered at different points in time. However, the roadmap does not specify when these deliveries will occur, which makes our planning difficult. We would, therefore, like to ask the Commission to visualise the timetable for the various parts. A more detailed timetable would help us to allocate time at the appropriate occasions e.g. when a new report is presented or when consultations are launched. Ideally, this timetable should also include activities within other on-going processes that may have impact on Reach evaluation, like Refit-platform and development of the circular economy package.

### Specific comments

#### *D. Evidence base*

We support that this knowledge base has been compiled. However it would be helpful to have a timeline to see which issues that have already been finalised and when upcoming issues could be expected.

Regarding the ongoing thematic studies the aim of submission of those studies was not totally clear when the first reports arrived and were communicated to the MS at different Caracal meetings. Therefore, it would be beneficial if some more time would be given to send additional comments to these early studies. For other reports a time line of the publishing would be helpful.

Page 7. The REACH report 2017 consultation strategy would benefit from some further explanation and clarification.

From the planned consultation activities it is unclear whether studies published earlier from 2014 until now will be launched for new consultation from now. We would welcome such an opportunity since it was not possible at an earlier stage to understand the full context of these studies.

The time plan for the public consultation in Q2/Q3 2016 seems strange since Q2 is almost over already.

Is the mentioned consultation strategy already published? In such case where and when?

*E: Other relevant information/remarks*

It is said that the evaluation will be “carried out in full coordination” with the fitness check as well as other related aspects. We would suggest that COM could visualise this for better clarification and particularly highlight the time lines of those activities and coordination points.

Reach report focus on years 2010-2016. The Commission should not expect too much relevant input from processes that are not implemented yet or those which are not yet fully implemented, e.g. Review of registration requirements for low tonnage (1-10 t/y).

#### *C1. Scope of the evaluation*

We support that assessments and evaluations of the listed topics are made. However we would appreciate some more clarity behind the information given in the list.

I. It would be valuable to point out if these are reports already submitted and thus already available for the commission.

IV. The aim of the separate bullet points of this list is sometimes unclear. E.g. It is not evident if each point corresponds to a certain report from a work already finished and presented or a work that is expected to be submitted at a later stage. Thus an amendment to this list including a time line and preferably some kind of relation between interconnected activities would be of great help for our understanding.

The specific point “Information on substances in articles” is not clear. It is impossible to understand from what perspective the issue will be regarded in this review.