

Questionnaire: Impacts from the REACH 2018 registration deadline on economic operators

Introduction

According to the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation, all manufacturers and importers of chemical substances in the European Union (EU) had to submit information to the European Chemicals Agency (ECHA) on the properties and uses of all substances above 1 tonne per year, by May 2018 (hereafter 2018 REACH registration deadline).

The **European Commission (DG GROW)** has contracted a study to better understand the impacts on businesses of the 2018 REACH registration requirements. Consultants from **Wood**, together with partners from **Milieu Consulting SPRL** and **Peter Fisk Associates (PFA) Brussels**, are delivering this study. A key element is feedback on the costs and benefits from the REACH 2018 registration exercise. A good quality input from you will help improve the REACH registration process.

This consultation is open for 12 weeks and will close on Monday 10 August 2020.

The questions focus on the latest REACH registration deadline of 2018 and is aimed at all businesses, of all sizes and operating in any sector who registered substances and stakeholders with experience with the process. This includes those from the United Kingdom.

How to submit your response

We estimate that the questionnaire will take up to 30 minutes to complete. If you are not able to answer a question, just go to the next one. An estimate is more useful than no information at all. The questionnaire is accessible in **English, French, German, Spanish, Italian and Polish**. You can submit your reply in any of the 23 official EU languages. *Contributions in English are welcome as they will help to process the survey more swiftly.* If you prefer to respond over the phone in **French, German or Italian**, please contact the project team below to arrange this.

Confidentiality and protection of personal data

Confidential information will not be provided to any third party and the study report will contain data only in an aggregated format. The report will not mention specific companies by name and will exclude confidential business information. (e.g. by use of ranges and aggregated values). For more details, please use the contact details below. A privacy statement is below.

This privacy statement explains how your personal data will be handled:

[Privacy Statement.pdf](#)

Contact details for project team

Please direct any questions to the following three mailboxes, to ensure a prompt response:

- Kastalie Bougas: +44 7976 614 385, kastalie.bougas@woodplc.com (Project Manager)
- David Tyrer: +44 7712 077 838, david.tyrer@woodplc.com (Project Director, any urgent queries or concerns)

To help us provide a quick response, ***please also cc Wood Chemicals in all queries***: chemical-innovation@woodplc.com

Questionnaire

Identification of respondent

1. General information

Name of organisation:

Contact name:

Contact email

2. Please describe what type of organisation you are from? *Note, your answer will affect which questions you are asked.*

- A company
- A trade association, business association or sector group representative
- A consultant
- EU Institution (including Agencies)
- International organisation (e.g. UN, OECD)
- National public authority; regional, local and municipal authority
- Non-governmental organisation (NGO)
- Research, academia or think tank
- Other

Please state:

3. Where is your company's headquarters located?

- In the European Union
Note for the purposes of this survey the United Kingdom is included as an EU Member.
- Outside the European Union
- Other

In which Member State?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

Where is it located?

Please state:

4. Where is your organisation located?

Inside the EU

Note for the purposes of this survey the United Kingdom is included as an EU Member.

Beyond the EU

Other

In which Member State are most of your members based?

Austria

Belgium

Bulgaria

Croatia

Cyprus

Czechia

Denmark

Estonia

Finland

France

Germany

Greece

Hungary

Ireland

Italy

Latvia

Lithuania

Luxembourg

Malta

Netherlands

Poland

Portugal

Romania

Slovak Republic

Slovenia

Spain

Sweden

United Kingdom

Approximately how many member companies are there?

Where is it located?

Approximately how many member companies are there?

Please state:

5. What is your experience with the 2018 REACH registration deadline?

- I have in-depth experience and I will answer questions on average costs faced by 2018 REACH registrants, based on my experience of typical members or clients (*costs are an important aspect of our study, by filling them in you will help us a lot*)
- I have general experience with REACH and will answer questions on my overall reflections of the 2018 REACH registration process

6. What was the role of your organisation in the 2018 REACH registration? Please tick all that apply

- Only representative (OR)
- Manufacturer(s) of substances
- Importer(s) of substances or mixtures
- Distributor/wholesale/retailer(s) of chemical substances or mixtures
- Suppliers of articles (Manufacturer/importer/distributor of articles)
- Downstream User (Companies using chemicals, including manufacturers where chemicals are not the main business, such as food, construction or cleaning companies)
- Formulator(s) (downstream users producing mixtures, usually supplying them further down the supply chain or directly to consumers)
- End user(s) (using substances or mixtures but not supplying them further)
- Other

Please state:

7. Please describe how your organisation was involved with the 2018 REACH registration deadline? What activities did you undertake and for who? Please describe in a few words

8. Which company size did you state in your 2018 REACH registration(s)? For only representatives (OR), describe the entity you represented. For further information on these groupings see: <https://echa.europa.eu/support/small-and-medium-sized-enterprises-smes>

- Larger Enterprise (More than 250 employees / More than or equal to €50 million turnover)
- Medium-sized enterprise (50 – 249 employees / ≤ € 50 m turnover or €43 million balance sheet)
- Small enterprise (10 - 49 employees / ≤ € 10 m turnover or balance sheet)
- Micro Enterprise (1 – 9 employees / ≤ € 2 million turnover or balance sheet)
- Not applicable
- I do not know

9. Based on the main products or services sold by your organisation(s), please indicate the main sector that you operate in (please tick all c.>20% of annual turnover). For only representatives (OR), describe the entity you represented, for trade associations, please reply on behalf of your members.

- Agriculture, forestry and fishing; Mining and quarrying
- Manufacture of food products, beverages or tobacco products
- Manufacture of textiles wearing apparel or leather and related products
- Manufacture of wood and of products of wood and cork; furniture; paper and paper products; printing and reproduction of recorded media; games and toys
- Manufacture of coke and refined petroleum products; basic chemicals, fertilisers, plastics and synthetic rubber in primary forms; pesticides and other agrochemical products; paints, varnishes and similar coatings, printing ink and mastics; soap and detergents, cleaning preparations, perfumes and toilet preparations; other chemical products (other chemical products or man-made fibres)
- Manufacture of basic pharmaceutical products and pharmaceutical preparations; medical and dental instruments and supplies
- Manufacture of rubber and plastic products or other non-metallic mineral products
- Manufacture of basic metals, fabricated metal products, computer, electronic and optical products, electrical equipment and other machinery and equipment
- Manufacture of motor vehicles, trailers and semi-trailers, other transport equipment
- Electricity, gas, steam and air conditioning supply; Water supply; sewerage; waste management and remediation activities
- Construction, wholesale and retail trade; transporting and storage
- Professional, scientific and technical activities *Note this includes consultancy services.*
- Other

Please specify:

Costs of registration

The questions below aim to capture your overall experience of the **2018 REACH registration deadline and its cost**. If the question is not relevant or you do not know, please tick that box and move on to the next section.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank.

Registration experience

10. In which REACH registration deadline(s) do you have experience from? Please tick all that apply.

- 2010
- 2013
- 2018

11. For the 2018 REACH registration deadline only, do you know how many substances your organisation registered? Please select all that apply

- Yes, for 1-10 tonnes band
- Yes, for 10-100 tonnes band
- Only the total number of substance registrations known (do not know the tonnage band)
- Not applicable to my organisation

Number of substance registrations in **1 to 10 tonnes band**

Number of substance registrations in **10 to 100 tonnes band**

Number of substance registrations (where I do not know the tonnage band)

12. On average, what was the overall approximate cost per substance registration to comply with the 2018 REACH registration deadline?

*This estimate should include all costs incurred, for example administration/liaison, preparing and submitting the dossier, testing costs, access to data, undertaking CSA/CSR and updating Safety Data sheets, and fees to ECHA. If it is easier to provide a total lump sum for all of your registrations, please tick the box. **Note an approximate estimate is sufficient. Please first select a box, then an option to enter the costs will appear.***

- Approximate average costs per substance registration in the 1 to 10 tonnage band
- Approximate average costs per substance registration in the 10 to 100 tonnage band
- I don't know
- It is easier for me to provide total costs for all of the registrations listed in question 11 in one figure

Approximate average costs per substance registration in the **1 to 10 tonnage band** (€)

Approximate average costs per substance registration in the **10 to 100 tonnage band** (€)

13. Can you provide the total cost of all your 2018 REACH registrations listed in your answer to Question 11?

- Yes (a box will appear for you to enter the total cost)
- I don't know

Total cost of all of your 2018 REACH registrations listed in your answer to Question 11 (€)

14. A European Commission study published in 2015 predicted the costs of the 2018 REACH registration (<http://ec.europa.eu/DocsRoom/documents/14581/attachments/1/translations/en/renditions/native>). The average cost of 2018 registration per substance was estimated to be **€13,000** (for 1-10 tonne) and **€253,000** (for 10-100 tonne substances). *This estimate included administration/liaison, preparing and submitting the dossier, testing costs, access to data, undertaking CSA/CSR and updating Safety Data Sheets, and fees to ECHA.*

Based on your experience, how did the average costs actually incurred by your organisation – or by members, clients where applicable - compare to these predictions?

	More than 3 x higher	1-3 x higher	The same (approx.)	1-3 x lower	More than 3 x lower	I don't know	Not applicable to my organisation
1-10 tonne substances, i.e. €13,000 (total costs, per substance, per registrant)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10-100 tonne substances, i.e. €253,000 (total costs, per substance, per registrant)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Direct Costs

15. Based on your previous answers, the following question looks at costs of different components of the registration. For each element, please estimate the **approximate average cost per registration in your company**.

Fees payable to ECHA and the costs of consultants are covered in separate questions. Please answer in EURO, if a different currency is used, please state this.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank.

15.1 Cost for preparing the Registration Dossier

This includes the costs of drafting, finalising a technical registration dossier and submitting it, including all

administrative data and producing study summaries for the relevant Annexes VII to XI. **This does not include chemical safety assessment (CSA)/ chemical safety reports (CSR).**

1 to 10 tonnage band substance: € (average costs for registration, per substance)

10 to 100 tonnage band substance: € (average costs for registration, per substance)

15.2 Composition of the dossier

	Yes, for all information requirements	Yes, for over 75% of the information requirements	Yes, for 50-75% of the information requirements	Yes, for 25%-50% of the information requirements	Yes, for less than 25% of the information requirements	For no information requirements	Not applicable	Don't know
Were laboratory test /studies needed for all information requirements? 1 to 10 tonnage band substance:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Were laboratory test /studies needed for all information requirements? 10 to 100 tonnage band substance:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Did you use read across to predict the properties of one								

<p>substance from the properties of another substance? 1 to 10 tonnage band substance:</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Did you use read across to predict the properties of one substance from the properties of another substance? 10 to 100 tonnage band substance:</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Testing costs - excluding letter of access

Please provide the approximate average cost per registration

15.3 Physicochemical requirement study costs (Annex VII)

1 to 10 tonnage band substance:

- Less than €5,000
- €5,001 - €20,000
- €20,001 - €35,000
- €35,001 - €50,000
- Over €50,000
- Not applicable
- Don't know

10 to 100 tonnage band substance:

- Less than €5,000
- €5,001 - €20,000
- €20,001 - €35,000
- €35,001 - €50,000
- Over €50,000
- Not applicable
- Don't know

15.4 Toxicological requirement study costs (Annex VII and Annex VIII)

1 to 10 tonnage band substance:

- Less than €5,000
- €5,001 - €20,000
- €20,001 - €35,000
- €35,001 - €50,000
- Over €50,000
- Not applicable
- Don't know

10 to 100 tonnage band substance:

- Less than €50,000
- €50,001 - €150,000
- €150,001 - €250,000
- €250,001 - €350,000
- €350,001 - €500,000
- Over €500,000
- Not applicable
- Don't know

15.5 Ecotoxicological requirement study costs (Annex VII and Annex VIII):

1 to 10 tonnage band substance:

- Less than €5,000
- €5,001 -€15,000
- €15,001 - €30,000
- €30,001 -€50,000
- Over €50,000
- Not applicable
- Don't know

10 to 100 tonnage band substance:

- Less than €5,000
- €5,001 - €15,000
- €15,001 - €30,000
- €30,001 -€50,000
- €50,001 - €100,000
- Over €100,000
- Not applicable
- Don't know

15.6 Costs of read-across and quantitative structure relationship models (QSARs)

Do you know the cost of quantitative structure relationship models (QSARs) / read across studies for **1-10 tonnage substance**?

- Yes (*a box will appear to enter the cost*)
- Not applicable
- Don't know

Cost of quantitative structure relationship models (QSARs) / read across studies for **1-10 tonnage band substance**

€ (average costs for registration, per substance):

Do you know the cost of quantitative structure relationship models (QSARs) / read across studies for **10-100 tonnage substance**?

- Yes (*a box will appear to enter the cost*)
- Not applicable
- Don't know

Cost of quantitative structure relationship models (QSARs) / read across studies for **10-100 tonnage band substance**

€ (average costs for registration, per substance)

15.7 Costs of Chemical Safety Assessment and Chemical Safety Reports

Do you know the costs for a chemical safety assessment (CSA) producing chemical safety reports (CSR) for **10-100 tonnage substance**?

- Yes *(a box will appear to enter the cost)*
- Not applicable
- Don't know

Costs for a chemical safety assessment (CSA) producing chemical safety reports (CSR)

10 to 100 tonnage band substance: € (average costs for registration, per substance)

15.8 Costs associated with Letters of Access

1 to 10 tonnage band substance:

- Less than €5,000
- €5,001 – €15,000
- €15,001 – €25,000
- €25,001 – 50,000
- More than €50,000
- Not applicable
- Don't know

10 to 100 tonnage band substance:

- Less than €5,000
- €5,001 – €15,000
- €15,001 – €25,000
- €25,001 – €50,000
- More than €50,000
- Not applicable
- Don't know

15.9 Cost of legal support

Do you know the costs of legal support for **1-10 tonnage substance**?

- Yes *(a box will appear to enter the cost)*
- Not applicable
- Don't know

Costs of legal support for **1-10 tonnage substance**

€ (average costs for registration, per substance)

Do you know the costs of legal support for **10-100 tonnage substance**?

- Yes *(a box will appear to enter the cost)*
- Not applicable
- Don't know

Costs of legal support for **10-100 tonnage substance**

€ (average costs for registration, per substance)

15.10 Cost of training and other changes

Do you know the costs of training or of changes to company systems for **1-10 tonnage substances**?

- Yes *(a box will appear to enter the cost)*
- Not applicable
- Don't know

Costs of training or of changes to company systems for **1-10 tonnage substance**

€ (average costs for registration, per substance)

Do you know the costs of training or of changes to company systems for **10-100 tonnage substances**?

- Yes *(a box will appear to enter the cost)*
- Not applicable
- Don't know

Costs of training or of changes to company systems for **10-100 tonnage substance**

€ (average costs for registration, per substance)

15.11 Other costs

Did you incur any other costs and/or have further comments? *Select all that apply*

- Yes, for 1-10 tonnage substance *(a box will appear for you to enter further information)*
- Yes, for 10-100 tonnage substance *(a box will appear for you to enter further information)*
- No

Please describe (1-10 tonnage substance):

Please describe (10-100 tonnage substance):

16. What were the key factors behind the costs of the 2018 REACH registration, per substance, in your company (or based on your experience of the deadline) Please list up to 3 issues and order by importance, 1 being the most important.

16.1 For substance registrations in 1 to 10 tonne band.

	1	2	3
The costs of accessing existing data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of additional testing and/or generating new data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of other external support, via consultants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The data was of poor quality and required additional work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We could not rely on read-across for our dossier	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The low number of registrants to share costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the substance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (if selected, please specify in text box below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected in Question 16.1, please specify further:

16.2 For substance registrations in 10 to 100 tonne band.

	1	2	3
The costs of accessing existing data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of additional testing and/or generating new data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of other external support, via consultants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The data was of poor quality and required additional work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We could not rely on read-across for our dossier	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The low number of registrants to share costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the substance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (if selected, please specify in text box below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected in Question 16.2, please specify further:

17. What actions were taken by your company or organisation to lower costs spent on REACH registrations?

Resources and Consultants

The following questions focus on the use of internal staff and/or external consultancy support for 2018 REACH registration activities.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank.

18. How did your company resource its REACH registration activities? Please tick all that apply.

	2018	2013	2010
Within our company: Dedicated REACH manager/unit or team responsible for Health Safety and Environment (HSE) compliance or allocate duties ad hoc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We outsourced some REACH registration work to consultants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We outsourced all REACH registration work to consultants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We outsourced some REACH registration laboratory work to technical specialists	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We outsourced all REACH registration laboratory work to technical specialists	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Don't know	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If 'Other' was selected in Question 18, please provide further detail specifying the registration deadline it relates to.

19. Based on your answer to Question 11, how many registrations for the 2018 REACH registration deadline did consultants prepare or help prepare?

	For all our registrations	For over 75% of our registrations	Between 50% and 75% of our registrations	Between 25% and 50% of our registrations	Less than 25% of our registrations	Don't know
Substance registrations in 1 to 10 tonne band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Substance registrations in 10 to 100 tonne band	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. Can you list the main tasks that the consultants carried out for you for substance registrations in 1 to 10 tonne band?

Can you list the main tasks that the consultants carried out for you for substance registrations in 10 to 100 tonne band?

21. What was the main reason for using consultants for the 2018 REACH registration deadline? For example technical expertise, lack of resources in company, need for advice on the procedure?

22. What further support would you like to see, if any, for companies from ECHA and national helpdesks, for example?

23. In your company, how many people were allocated to REACH 2018 registration activities in Full Time Equivalent (FTE)?

- Less than 1
- 1
- 2-5
- 6-15
- More than 15
- Do not know
- Not applicable

24. Do you agree or disagree with the following statements, based on your 2018 REACH registration experience? *(Select all that apply)*

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
It was easy to hire staff in our organisation to meet 2018 REACH registration requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hiring REACH registration staff in our organisation has become easier between the 2010 and 2018 deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is limited availability of external consultants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

There is limited availability of laboratory capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The services provided by external consultants were of good quality.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The quality of services provided by external consultants have improved between the 2010 and 2018 deadlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The cost of services provided by external consultants are high	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The cost of services provided by external consultants have remained stable since 2010	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered 'Other' to Question 24, please provide further information:

Costs to update registrations

Information submitted to ECHA should be kept up to date. It is the responsibility of the registrant to update registrations if new information is available. This section asks a series of questions about the extent of REACH registration dossier updates, the cost of this and any challenges encountered.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank. For only representatives (OR), describe the entity you represented.

25. Has your company updated any of your existing registrations?

- Yes, updates to registrations from the 2018 deadline
- Yes, updates to registrations from the 2010 and/or the 2013 deadline
- Yes, updates to new registrations
- No
- No, but we intend to in the future
- I don't know

How many updates have you made in total?

Which parts of the dossiers have you updated?

Why not?

26. On average what was the approximate cost of the update, per substance?

	Less than €1,000	€1,001 - €10,000	€10,001 - €30,000	€30,001 - €50,000	€50,001- €100,000	Over €100,000	I don' t know	Not applicable
1-10 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10- 100 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
100- 1000 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

27. What was the most expensive part of the dossier to update?

	Testing costs	QSARs / read across studies	Costs for a chemical safety assessment (CSA) and producing chemical safety reports (CSR)	Safety Data Sheet (SDS)	Letter of access	I don't know	Other
1-10 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10-100 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
100-1000 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide further detail for 'Other' (1-10 tonnes per annum)

Please provide further detail for 'Other' (10-100 tonnes per annum)

Please provide further detail for 'Other' (100-1000 tonnes per annum)

28. Do you agree or disagree with the following statements on the challenges associated with updating registrations? Please answer all.

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
Updating our dossiers was a complex process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Updating our dossiers was affordable to my business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The update was expensive because of new data, study requirements or other technical issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We encountered problems relating to data-sharing, cost sharing or communication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Did you encounter any other issues associated with updating registrations?

SIEF and registration consortia

There are several ways that companies can organise cooperation under REACH. Participation in a **SIEF (substance information exchange forum)** was mandatory for phase-in substances until the 2018 REACH registration deadline. Now co-registrants are encouraged to use similar, informal communication platforms. Membership of a **consortium** is voluntary. Participants' of one or more informal communication platforms can form a consortia, and agree arrangements (scope, purpose, duration, conditions for membership or leaving etc.) themselves.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank. For only representatives (OR), describe the entity you represented.

29. Did you participate in SIEF and/or consortia to comply with the REACH 2018 registration deadline?

	Yes	No	Don't know
SIEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consortia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How many SIEF?

How many Consortia?

30. What were your share of the costs associated with the joint registration for the 2018 REACH registration deadline? (This includes joint registration and SIEF administrative costs, the costs of liaising with other parties, etc.) This figure should exclude Letter of Access costs.

	Less than €1,000	€1,000 – €10,000	€10,001 - €20,000	More than €20,000	I don't know	Not applicable to my organisation

1-10 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10-100 tonnes per annum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

31. For the 2018 REACH registration deadline, did you face any significant problems or challenges in relation to the operation of SIEFs or consortia?

	Yes, and these were resolved	Yes, and these were not resolved	No	I do not know
SIEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consortia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

32. Were you aware of any significant problems or challenges in relation to the operation of SIEFs or consortia for the 2018 REACH registration deadline?

	Yes, and these were generally resolved	Yes, and these were generally not resolved	No	I do not know
SIEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consortia	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

33. For SIEFs, what are your views on the following for the 2018 REACH registration deadline?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
The costs were unaffordable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Participation required too much time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A dispute with pricing policies, cost sharing or price of data or unexpected costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Challenges with communication or transparency of decision making	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issues with protection of intellectual property	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issues with protection of confidential data or sensitive information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Some participants were unfairly advantaged or disadvantaged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected in Question 33, please specify:

34. Did you opt-out from the joint submission of data in any SIEFs for the substances you registered in 2018?

- Yes
- No
- Don't know

35. Why was this?

36. For Consortia, what are your views on the following for the 2018 REACH registration deadline?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
The costs were unaffordable and/or participation required too much time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A dispute with pricing policies, cost sharing or price of data or unexpected costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Challenges with communication or transparency of decision making	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issues with protection of intellectual property	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issues with protection of confidential data or sensitive information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Some participants were unfairly advantaged or disadvantaged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected for Question 36, please specify:

37. In the past, the fairness and transparency of the cost sharing within SIEF was identified as a problem and the European Commission introduced new measures in 2016. Thinking about how the SIEF process has changed since 2016, if at all, do you agree with the following?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The process overall is easier	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process overall is more transparent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication within the SIEFs has improved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process overall is fairer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pricing policies are fairer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is more affordable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is easier for SMEs to participate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please state below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected in Question 37, please state:

38. Do you have any other thoughts on how SIEF or Consortia work, including their advantages?

Competitiveness

Economic Impact and Competitiveness

This section covers any effects on your company exports, imports, competitiveness, trade or market share. Please consider the degree to which this was as a direct result of 2018 REACH registration deadline activities.

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank. For only representatives (OR), describe the entity you represented.

39. How did the 2018 REACH registration deadline impact your business or businesses you represent?

	Decreased significantly	Decreased slightly	No impact	Increased slightly	Increased significantly	Don't know
Your profits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Your operating costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Your business's market share	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of sales to other EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of sales outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of imports of chemical substances/ mixtures/ articles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The investment of your business in research and development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of raw materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The number of competitors in our market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Were there any other impacts on your business not listed above? Please specify:

40. Based on the cost of the 2018 registration deadline, what actions have you taken on portfolios and prices in your company or observed in those you represent? Please tick all that apply.

- We did not change anything
- We absorbed the 2018 REACH registration costs, reducing our profit margins
- We raised prices to cover the 2018 REACH registration costs
- We withdrew specific products from the market
- We decided to withdraw from specific markets
- We changed portfolio composition – with lower or similar margin products
- We changed portfolio composition – with higher margin products
- Other
- I don't know

Please specify 'Other':

41. Are you able to specify the approximate percentages for your answer above to 'We raised prices to cover 2018 REACH registration costs'?

- Yes (a box will appear to input % increase in prices)
- No

We raised prices to cover 2018 REACH registration costs (% increase in prices)

Are you able to specify the approximate percentages for your answer above to 'We withdrew specific products from the market'?

- Yes (a box will appear to input % of the portfolio)
- No

We withdrew specific products from the market (% of the portfolio)

Are you able to specify the approximate percentages for your answer above to 'We decided to withdraw from specific markets'?

- Yes (a box will appear to input % of total turnover)
- No

We decided to withdraw from specific markets (% of total turnover)



42. To your knowledge, how did the 2018 REACH registration deadline impact EU businesses, if at all?

	Decreased significantly	Decreased slightly	No impact	Increased slightly	Increased significantly	Don't know
Profits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Operating costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business's market share	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of sales to other EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of sales outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The volume of imports of chemical substances/ mixtures/ articles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The investment of business in research and development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of raw materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The number of competitors active in the market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please state in next question)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If 'Other' was selected for Question 42, please state:

43. Based on the cost of the 2018 REACH registration deadline, what portfolio and price changes were you aware of, if any? Please tick all that apply

	Few examples	Numerous examples	Widespread effect observed
2018 REACH registration costs were absorbed reducing profit margins	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2018 REACH registration costs resulted in raised prices to cover these costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific products were withdrawn from the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Companies withdrew from specific markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in portfolio composition – with lower or similar margin products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in portfolio composition – with higher margin products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I don't know	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Or

Nothing significant changed

Please specify:

Small and Medium Enterprises (SMEs)

44. In your experience, what specific challenges did you observe for Small and Medium Enterprises (SMEs) compared to other companies? Note this could relate to affordability, access to specialist resources - including consultants - SIEF arrangements etc.

Communication obligations

Registrants must communicate with downstream users in the preparation of dossiers. This includes information about uses, conditions of use and risk management measures. This may involve providing a

safety data sheet to downstream users for substances or providing information on substances in articles. *For only representatives (OR), describe the entity you represented.*

For trade associations, business associations and consultants, please provide estimates of typical average costs paid by clients or members, where able. Otherwise leave this section blank. For only representatives (OR), describe the entity you represented.

45. Did you consider that costs associated with communication obligations as part of the 2018 REACH registration were a significant cost for your business?

- Yes
- No

46. To what extent do you agree or disagree with the following statements about your communication obligations for the 2018 REACH registration deadline?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
The costs were affordable for our business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New ways of working with our supply chain was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complicated data requirements was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Understanding our obligations was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The time it consumed for our staff was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A lack of a single standard format for safety data sheets (SDS) was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor communication from others' in the supply chain was a major cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
This part of the process could be improved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any other comments, did you encounter any other challenges or issues? (please state):

What were the costs for the preparation of Safety Data Sheet and translation? *Please leave question blank if you do not know*

(€)

47. Did you consider that costs associated with communication obligations as part of the 2018 REACH registration was a significant cost to business?

- Yes
- No

48. To what extent do you agree or disagree with the following statements about communication obligations for the 2018 REACH registration deadline?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
The costs were affordable for businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New ways of working within supply chains was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complicated data requirements was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Companies understanding their obligations was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The time it consumed for company staff was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A lack of a single standard format for safety data sheets (SDS) was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Problems with poor communication across the supply chain was a major cost driver	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
This part of the process could be improved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any other comments, are you aware of any other challenges or issues? (please state)

49. How could this part of the process be improved?

Benefits

50. Whilst it's a legal requirement for placing substances on the EU market, has your company seen any wider benefits from registering substances under REACH?

For only representatives (OR), describe the entity you represented.

- Yes, already
- No, but we expect to in the future
- No and we don't expect to in the future

51. Whilst it's a legal requirement for placing substances on the EU market, have you observed any wider benefits from the REACH registration obligation?

- Yes, already
- No, but we expect to observe these in the future
- No and we don't expect to observe these in the future

52. What benefits has your company seen - or you expect - from the REACH registration?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
Our company has reduced hazardous chemical use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Our portfolio now contains more substances with lower hazards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information to our customers has reduced our potential liabilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information to our customers has improved their risk management measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We have improved risk management measures in our company	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We changed our supplier to one with better risk management measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A REACH registration is a competitive advantage to our business – beyond the legal requirement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We have increased research, development and innovation, accelerating new product development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We have used the REACH registration information to comply with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We have used the REACH registration information to comply with legislation outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has improved the functioning of the EU market via increased transparency, fairness etc	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

53. What benefits have you observed from the 2018 REACH registration? *Please select all that apply.*

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	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
Hazardous chemical use has reduced in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More of the EU chemical market comprise substances with lower hazards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information to customers has reduced potential liabilities to EU business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information to customers has improved downstream risk management measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk management measures in EU companies have improved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Companies have changed suppliers to those with better risk management measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A REACH registration is a competitive advantage to EU business – beyond the legal requirement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
As a result, research and development or innovation has increased or new product development has accelerated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
REACH registration information data is used to comply with other EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
REACH registration information is used to comply with legislation outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has improved the functioning of the EU market via increased transparency, fairness etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

54. Could you expand on your answers above?

55. To what extent do you think the information received with the extended Safety Data Sheets (eSDS) led to changes in activities to protect health, safety or the environment to date?

	Decreased significantly	Decreased slightly	No impact	Increased slightly	Increased significantly	Don't know
Changes in personal protection for workers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of emission reduction facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adoption of new safety instructions for workers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Change in product /article composition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other changes introduced (e.g. buildings and equipment, please state below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide more information on other changes introduced:

Lessons learned and improvements over time

56. In comparison to the previous REACH registration deadlines, how did the 2018 REACH registration deadline compare?

	Strongly disagree	Slightly disagree	Slightly agree	Strongly agree	Don't know /No opinion
The process was easier	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The total cost of a substance registration was cheaper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process was fairer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The process was more transparent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There was more effective support available to all business via ECHA and national helpdesks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There was more specific effective support available to SMEs via ECHA and national helpdesk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The communication obligations were easier to comply with	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please state below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide more information on 'Other':

Any further information

57. Is there is any other information you would like to provide on the impacts of the 2018 REACH registration deadline?

Further discussion

58. Would you be prepared to have a further discussion with the consultant team so they may obtain further detail on some of your answers? If yes, the team will contact you using the contact information given above.

- Yes
- No

[Submit survey](#)
