Preparation for implementation of the legislative package REACH

1. Basic information
1.1 CRIS Number: 2004/016-829.02.01 Twinning No: PL2004/IB/EN/01
1.2 Title: Preparation for implementation of the legislative package REACH.
1.3 Sector: Internal market.
1.4 Location: Poland.

2. Objectives

2.1 Overall objective
Implementation in Poland of the new UE policy concerning chemicals, contained in the legislative package REACH.

2.2 Project purpose
Preparation of the public administration institutions involved in implementation of the legislative package REACH, i.e. the Bureau for Chemical Substances and Preparations, the State Sanitary Inspection and other supervisory bodies including custom services, and also industry, NGOs acting in the field of the chemicals sector development, scientific units and education institutions for performance of their duties after entering of provisions of the REACH regulation into force.

Dissemination of knowledge of Registration, Evaluation, Authorisation and Restriction of Chemicals referred hereinafter as the REACH regulation.

2.3 Justification
Referring to the Comprehensive monitoring report on Poland’s preparations for membership by the European Commission:
The legislation concerning chemicals and genetically modified organisms (GMOs) is in place and is in line with the acquis, except for biocides. Administrative capacities are in place and function. Implementing measures in the area are proceeding as planned. Authorisation procedures for biocides need to be established by the day of accession. Co-ordination between the organisations involved needs to be continued and enhanced.

3. Description

3.1 Background and justification:
On 7 May, 2003 The European Commission presented for consultation with Member States and other stakeholders (i.e. industry, NGOs, third countries, etc.) an initial draft of a regulation concerning REACH, a new policy in the area of chemicals. Following this stage the official proposal for the REACH regulation, was adopted by the Commission and submitted to the co-legislators (European Parliament and Council), with references COM(2003)644 final of 29.10.2003; title: Proposal for a Regulation of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (Reach), establishing a European Chemicals Agency and amending Directive 1999/45/EC and Regulation (EC) {on Persistent Organic Pollutants} AND Proposal for a Regulation of the European Parliament and of the Council amending Council Directive 67/548/EEC in order to adapt it to Regulation (EC) of the European Parliament and of the Council concerning the registration, evaluation, authorisation and restriction of chemicals. Implementation of the new policy will cause fundamental changes in legislation concerning the manufacture and importation of chemicals, placing on the market and use of chemical substances and preparations, and substances in articles. REACH is to replace about 40 currently binding Community legal regulations. The basic assumption for the new policy is to implement the same requirements for all substances – the division of substances into new and existing ones, in terms of hazard identification and risk
management, will practically cease to exist. Moreover, a registration procedure covering a significant number of substances (about 30,000) is planned to be implemented. It is estimated that about 3,000 of substances will be registered by Polish companies. An authorisation procedure will be applied to some groups of substances. Restrictions will be put on the use of some substances and other uses or substances may be banned altogether. An obligation of chemical safety assessment will be put on producers and importers of chemical substances. The public administration office responsible for cooperation with the European Chemicals Agency, i.e. the Bureau for Chemical Substances and Preparations, will perform tasks covering evaluation of substances. Taking into account the share of Polish chemical industry in the EU chemical industry it may be estimated that Polish authorities will be responsible for evaluation of 2-4% of registered substances.

Introduction into life of rules of the new policy in the area of chemicals will probably coincide with implementation in the EU of the global system of classification and labelling of chemical substances and their mixtures (General Harmonisation System - GHS), which differs from the classification and labelling system binding in the EU at present.

Implementation of new regulations will require organisational changes in central offices jointly responsible for legislative activities concerning chemicals, environment, plant protection means, product safety, consumer safety etc., development of human resources of the Bureau for Chemical Substances and Preparations, development of rules of close cooperation of state institutions acting in the area with industry and scientific-research institutions, strengthening of institutions authorised to control observance of a new law, strengthening of the position of those NGOs which act in favour of development of the chemicals sector.

It is estimated that the assignment of new duties resulting from implementation of the new legislation in the area of chemicals to central administration would require employment of about twenty of people and providing them with appropriate training. At present there is a lack of staff technically prepared for fulfilling enforcement within the scope specified by the new regulations. The existing enforcement authorities will be able to take over the control obligations related to the application of the new system after appropriate training. It is estimated that it would be necessary to train more than two hundred workers of enforcement authorities in the country.

The range of tasks, which will be put on industry, allows to foresee that large number of people, who will be directly employed in industrial companies (big ones) or experts from consulting firms providing services to the small and medium enterprise sector and also employees of scientific-research units, will apply provisions of the REACH regulation.

A separate cycle of training on classification and labelling rules, which will be implemented under the GHS system, should be planned for two hundred workers of enforcement authorities in the country.

3.2 Linked activities:

Linked activities under the PHARE program:

In 1998 in Poland the PHARE/SIERRA PL 9212/01/04/L001/045/95 project Approximation of the laws of the Republic of Poland and the European Communities relating to the protection of health and life of humans was implemented. Its major part dealt with the transposition into the Polish legislation of the Community rules concerning chemicals. A result of the project was inter alia implementation of the amended act on chemical substances and preparations and drafts of most of executive regulations to this act.

In the years 2002-2003 under the PHARE project PL0102.09 Chemicals directives and administration the Community legislation concerning market turnover of chemicals was implemented into the Polish legislation in particular:

1. There were established conditions for performance by the Inspector for Chemical Substances and Preparations as a central body, tasks assigned to the competent authority in the meaning of provisions of art. 16(1) of the Directive 67/548/EEC.

2. Supervisory bodies were strengthened, in particular Sanitary Inspection, labour inspection and inspection of environment protection, in order to prepare them for performance of tasks laid down under provisions of the appropriate EU acts concerning market turnover of chemicals and use of chemical agents in work environment.
3. There were established conditions for performance of the required tasks by the unit being a competent authority for performance of tasks concerning registration of biocides. 4. The legal basis were established in order to implement the system of Good Laboratory Practice in Poland. The authority was established which is responsible for introduction of those rules. The national system of Good Laboratory Practice is in the process of establishing. 5. Under the PHARE Project PL0102.09 “Chemicals directives and administration” platform of communication between authorities, NGOs, industry and research institutions was established.

The PHARE project 2002/000-580.02.02 „Strengthening of the administrative capacity for risk assessment and chemicals control” is currently being implemented. Results of the project, which are planned to be achieved, the part of which is in the phase of implementation are as follows:

1. Development of inventory of new substances placed on the market within the territory of Poland.
2. Improvement in capabilities of competent authorities responsible for assessment of risk posed by chemicals used in Poland.
3. Assessment of risk posed by new substances placed on the market within the territory of Poland.
4. Provision, through development of human resources and infrastructure, of full implementation of the Community legislation and practice concerning placing on the market and use of chemicals, and improved surveillance of placing on the market and use of chemicals.
5. It is planned to prepare a few workshops and seminars concerning the legislative package REACH. First REACH workshop will be held on 17 February 2004.

Linked activities under other programs and support financed from domestic and foreign resources:

In the years 1995-1997 the Committee for Scientific Research and the Ministry of Health and Social Welfare commissioned the Institute of Occupational Medicine in Łódź to execute a project aimed to adjust Polish laboratories of Sanitary Inspection to accreditation requirements laid down in the European Standard EN 45001 and the ISO Guide No. 25.

In the years 1997-1998 Poland benefited from assistance provided by the British Know How Fund in the area of Technical Assistance in the Implementation in Poland of European Union regulations concerning classification and labelling of chemicals.

In September 1998 TAIEX together with the Ministry of Health and Social Welfare organised a conference in Poland on Approximation of Polish legislation on chemicals to the Community legislation attended by the representatives of the Parliament, government, industry and scientific institutions supporting transposition of the Community legislation concerning chemicals into the Polish legislation.

In 1998 Poland benefited from assistance of the Danish School of Public Administration within the framework of the project Tideover resources – Approximation of Legislation, the objective of which was implementation in Poland of the Council Directive 98/8/EC concerning the placing of biocidal products on the market.

In the years 1999-2000 Poland was assisted by Denmark under the co-operation agreement between the Ministry of Environment in Poland and the Environment Protection Agency in Denmark as a result of which Danish specialists explained the rules of surveillance of the market of chemicals in Denmark.

3.3 Results:

The Bureau for Chemical Substances and Preparations being prepared as the central unit to co-operate with the European Chemicals Agency, the European Commission and Member States on the REACH issue by the date of entering of provisions of the REACH regulation into force. Providing for functioning of provisions of the REACH regulation in Poland through:

1) The State Sanitary Inspection being prepared to act as the central authority enforcing provisions of the REACH regulation by the date of entering of provisions of the REACH regulation into force.
2) Other supervisory bodies (Inspection of Environment Protection, Labour Inspection, Trade Inspection, custom services and Sanitary Inspection of the Ministry of Internal Affairs and Administration) being prepared to enforce provisions of the REACH regulation by the date of enforcement of the REACH provisions.

3) Industry being prepared for implementation of the REACH regulation by the date of entering of provisions of the REACH regulation into force.

4) Platform for exchange of information on the REACH regulation established either by the end of the year 2006 or by the date of entering of provisions of the REACH regulation into force, whatever comes first.

5) Rules of Good Laboratory Practice disseminated to the units which test substances and preparations on their physical-chemical characteristics, toxicity and eco-toxicity, and also other accredited laboratories by the end of the year 2006.

6) Provisions of the REACH regulation, the new EU policy in the area of chemicals, disseminated to NGOs acting in the field of the chemicals sector development, scientific units and education institutions by the end of the year 2006.

3.4 Activities

**Contract 1 – twinning – Institution Building**

1. Preparation of the Bureau for Chemical Substances and Preparations as the central unit co-operating with the European Chemicals Agency, the European Commission and Member States including preparation of representatives of Poland to relevant committees of the Agency through:

1) training for the Bureau staff

2) creating in the Bureau a platform for co-operation of the Bureau with the European Commission, the Agency envisaged in provisions of the REACH regulation and the authorities competent in this area in other EU Member States.

2. Training for the State Sanitary Inspection in the country in order to prepare it for acting as the central supervisory body enforcing provisions of the REACH regulation. Performance of training having as an aim to prepare other supervisory bodies (Labour Inspection, Inspection of Environment Protection, Trade Inspection, custom bodies, the Ministry of Internal Affairs and Administration).

3. Development of guidance to industry on coping with the REACH requirements concerning risk assessment in order to prepare industry services for providing for data on risks.

4. Dissemination of knowledge on REACH for authorities, scientific and educational institutions, NGOs and industry. Preparing seminars, dissemination conferences, establishing of platform for NGOs enabling them to exchange opinions on the REACH.

5. Promotion of rules of Good Laboratory Practice among the units which test substances and preparations on their physical-chemical characteristics, toxicity and eco-toxicity, and also other accredited laboratories through presentations on gatherings, conferences, seminars, and through making the information accessible on the Bureau internet sites, as well.

Given the importance of the REACH package and its impact, and considering stages of legislative proceedings to be performed by the Parliament/Council in the course of the co-decision procedure – attention will be paid to the further changes in the text of the legislative proposal and the training activities will be adapt appropriately during the project implementation. That is in order to shape further the responsibilities of the national authorities they will have to perform.

It is expected that the UE expert assistance would be provided under the twinning co-operation. The project implementation will be assisted by one long-term expert and specified number of short-term experts. It is envisaged that all of project’s experts should possess knowledge on existing regulations in the area of chemicals and on new policy covered by REACH proposal.
**Contract 2 - Technical Assistance 1**

Extension of scope of training on the REACH including institutions educating in a post-graduate system. Preparations of programmes and teaching materials for a course on toxicology, ecotoxicology and risk assessment.

**Contract 3 – Technical Assistance 2**

Training for industrial associations in order to prepare industry for functioning under the REACH regulation. Preparation of programmes and teaching materials. Training of 150 individuals who may act as trainers and advisers to the industry. Training will involve and will be done in close cooperation with the Polish Chamber of Chemical Industry (Polska Izba Przemyslu Chemicznego - PIPC) and other industrial associations which can help to reach to the companies with the training activities and can further develop the training programme. The training programme will aim at future responsibilities of companies as the REACH will have a huge impact for companies and industrial associations.

Introduction into life of the REACH regulation will significantly extend the scope of obligations of producers and importers of chemical substances and it will concern substances in its pure state and also as components of preparations, and in specified cases substances incorporated into articles, as well. The REACH system applies regardless of the classification of a substance.

**3.5 Lessons learned**

Problems encountered during implementation of the preceding PHARE projects were related to implementation of investment contracts. The problems were related first of all to delayed announcement of tenders. On the basis of the so far experience it is planned to start with tender procedures as early as possible.

**4. Institutional Framework**

4.1. The draft REACH regulation, which is directly implemented into the national legislation, lays down an obligation of establishing a competent authority and also supervisory bodies, which are responsible for observance of provisions of the regulation. In accordance with the currently binding law the basic administrative bodies responsible for chemicals control in Poland are the Bureau for Chemical Substances and Preparations and the existing supervisory bodies, in particular, sanitary inspection. These bodies will also be responsible for chemicals control under the REACH regulation.

4.2. The project will not change this institutional framework.

4.3. The authority and the bodies will be the main beneficiaries of the project.

**5. Detailed Budget (in EURO)**

<table>
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<tr>
<th></th>
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The co-financing funds for the project implementation will be available.
6. Implementation Arrangements

6.1 Implementing Agency
PAO: Mr. Tadeusz Kozek, Under-secretary of State at the Office of the Committee for European Integration; Aleje Ujazdowskie 9, 00-918 Warsaw; phone +48 22 455 52 41, fax +48 22 455-52-43.
CFCU: Foundation Co-operation Fund, CFCU Director, ul. Górniośląska 4a, 00-444 Warsaw, tel. +48 22 450-98-90, 450-99-00, fax. +48 22 450-99-05.
CFCU is responsible for handling tendering, contracting and payments of contracts on behalf of the Minister of Health, who is responsible for preparing and implementation of the project.

6.2 Twinning
One long-term expert and a number of short-term experts will assist in project implementation:
- one long-term expert - consultations continually throughout 12-month stay in Poland
- short-term experts – consultations on specific issues specified by the beneficiary.
Beneficiary institution – the Ministry of Health
Contact:
Direct – Dr Jerzy Majka – Inspector for Chemical Substances and Preparations, the Bureau for Chemical Substances and Preparations, ul. Świętej Teresy 8, 91-348 Łódź; phone +48 42 63-14-679, 63-14-687; fax: +48 42 63-14-679
Supervision: Mr. Andrzej Trybusz – Chief Sanitary Inspector, the Chief Sanitary Inspectorate; ul Długa 38/40; 00-238 Warsaw, phone: +48 22 635-15-59, fax: +48 22 635-92-90.

6.3 Non-standard aspects
Tendering will follow EDIS procedures and the Polish Public Procurement Law.

6.4 Contracts
Three contracts will be provided for, including one for institution building and two for technical assistance.
Contract 1 – Twinning –1,940,000 € (TF - 1,500,000 €, national parallel co-financing –440,000 €)
Contract 2 –Technical assistance 1 – TF 250,000 € - gross value
Contract 3 –Technical assistance 2 – TF 250,000 € - gross value

7. Implementation Schedule

7.1 Start of tendering
Development of Specification of Substantial Procurement Requirements (SIWZ) – I quarter 2005

7.2 Start of project activity
III quarter 2005

7.3 Project completion
I quarter 2007

8. Sustainability
1) Increase in a number of employees of the Bureau for Chemical Substances and Preparations up to 40 people in 2005 and providing financial resources in the Bureau’s budget for 2005 and the next years, allocated for Bureau operating function with extended range of tasks is foreseen.
2) It is foreseen that a group of inspectors, who will continuously perform the duties related to supervision of marketing and use of chemicals, will be separated from other staff members of the Sanitary Inspection.
3) Providing for financial resources in the budget of Sanitary Inspection is foreseen in 2005 and the next years. The resources will be allocated for maintenance and operating of laboratories established under the Phare projects: PL0102.09 „Chemicals directives and administration”, PHARE 2002/000-580.02.02 „Strengthening of the administrative capacity for risk assessment and chemicals control”.

Preparation for implementation of the legislative package REACH
9. Conditionality and sequencing

The Office for Chemical Substances and Preparations employs 20 people. Increase in a number of employees of the Bureau for Chemical Substances and Preparations by 20 people.

Separation of a group of inspectors at appropriate administrative levels of the Sanitary Inspection who will supervise compliance of marketing and use of chemicals with provisions of the REACH regulation.
## Annex 1: Logframe Planning Matrix

<table>
<thead>
<tr>
<th>Overall objective</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
<th>Programme name and number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementation in Poland of a new EU policy concerning chemicals, contained in the legislative package REACH.</td>
<td>Preparation of administrative bodies, industry, non-government organisations and also scientific and education units for implementation of provisions of the REACH regulation in Poland.</td>
<td>Reports on project implementation progress</td>
<td></td>
</tr>
<tr>
<td>Contracting period expires on</td>
<td>Disbursement period expires on</td>
<td>Total budget 2.440.000 EUR</td>
<td>Transition Facility Budget 2.000.000 EUR</td>
</tr>
</tbody>
</table>

### Project Purpose (Immediate Objectives)

<table>
<thead>
<tr>
<th>Project Purpose (Immediate Objectives)</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preparation of the public administration institutions involved in implementation of the legislative package REACH, i.e. the Bureau for Chemical Substances and Preparations, the State Sanitary Inspection and other supervisory bodies including custom services, and also industry, NGOs acting in the field of the chemicals sector development, scientific units and education institutions for performance of their duties after entering of provisions of the REACH regulation into force. Dissemination of knowledge of Registration, Evaluation, Authorisation and Restriction of Chemicals referred hereinafter as the REACH regulation.</td>
<td>Training of staff and attendance at seminars, consultations and conferences concerning the REACH. Publication and other means of dissemination of knowledge of the REACH regulation</td>
<td>Reports on project implementation progress</td>
<td>Development of human resources of the Bureau for Chemical Substances and Preparations – by 20 people. Separation of a group of staff members of the State Sanitary Inspection responsible for chemicals control. Establishing of framework of institutional co-operation between industry and non-government organisations (NGOs).</td>
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### Results

<table>
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<tr>
<th>Results</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
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<tbody>
<tr>
<td>The Bureau for Chemical Substances and Preparations being prepared as the central unit to co-operate with the European Chemicals Agency, the European Commission and Member States on the REACH issue by the date of entering of provisions of the REACH regulation into force. Providing for functioning of provisions of the REACH regulation in Poland through: 1) The State Sanitary Inspection being prepared to act as the central authority enforcing provisions of the REACH regulation by the date of entering of provisions of the REACH regulation into force. 2) Other supervisory bodies (Inspection of Environment Protection, Labour Inspection, Trade Inspection, custom services and Sanitary Inspection of the Ministry of Internal Affairs and Administration) being prepared to enforce provisions of the REACH regulation by the date of</td>
<td>Number of employees of the Bureau for Chemical Substances and Preparations. Training for 50 – 80 people – employees of Sanitary Inspection, performed. Training for representatives of other supervisory bodies – about 150 people in total, performed.</td>
<td>Quarterly reports prepared by the office of a long-term expert Quarterly reports prepared by the office of a long-term expert Quarterly reports prepared by the office of a long-term expert</td>
<td>Development of detailed tasks for the Bureau for Chemical Substances and Preparation as a central unit co-operating with the European Chemicals Agency, the European Commission and Member States in the area of the REACH. Development of detailed tasks for the State Sanitary Inspection as a central body supervising observance of provisions of the REACH regulation. Training for representatives of industry, labour inspection, inspection of environment protection, trade inspection, custom bodies, MSWiA concerning rules for functioning of the REACH system. Determination of way of stimulation of industry and non-government organisations (NGOs).</td>
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</table>
enforcement of the REACH provisions.
3) Industry being prepared for implementation of the REACH regulation by the date of entering of provisions of the REACH regulation into force.
4) Platform for exchange of information on the REACH regulation established either by the end of the year 2006 or by the date of entering of provisions of the REACH regulation into force, whatever comes first.
5) Rules of Good Laboratory Practice disseminated to the units which test substances and preparations on their physical-chemical characteristics, toxicity and eco-toxicity, and also other accredited laboratories by the end of the year 2006.
6) Provisions of the REACH regulation, the new EU policy in the area of chemicals, disseminated to NGOs acting in the field of the chemicals sector development, scientific units and education institutions by the end of the year 2006.

<table>
<thead>
<tr>
<th>Activities</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
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</table>
| Contract 1 – twinning - Institution building | Preparation of the Bureau for Chemical Substances and Preparations as the central unit co-operating with the European Chemicals Agency, the European Commission and Member States including preparation of representatives of Poland to relevant committees of the Agency through:  
- training for the Bureau staff  
- creating in the Bureau a platform for co-operation of the Bureau with the European Commission, the Agency envisaged in provisions of the REACH regulation and the authorities competent in this area in other EU Member States.  
Training for the State Sanitary Inspection in the country in order to prepare it for acting as the central supervisory body enforcing provisions of the REACH regulation. Performance of training having as an aim to prepare other supervisory bodies (Labour Inspection, Inspection of Environment Protection, Trade Inspection, custom bodies, the Ministry of Internal Affairs and Administration). Development of guidance to industry on coping with the REACH requirements concerning risk assessment in order to prepare industry services for | Guidance to industry on risk assessment issued.  
2 conferences (seminars) performed.  
Number of presentations at conferences, gatherings and so on concerning Good Laboratory Practice.  
Date of placing information on internet sides of the Bureau.  
Publications and other activities disseminating knowledge of the REACH | Project implementation progress report.  
Quarterly reports prepared by the office of a long-term expert |
| Contract 2 – TA 1 - Extension of scope of training on the REACH including institutions educating in a post-graduate system. Preparations of programmes and teaching materials for a course on toxicology, ecotoxicology and risk assessment. | Contract 2 – TA 1 - concerns institution building and includes twinning – 1.940.000 € |
| Contract 3 – TA 2 – Training for industrial associations in order to prepare industry for functioning under the REACH regulation. Preparation of programmes and teaching materials. Training of 150 individuals who may act as trainers and advisers to the industry. Training will involve and will be done in close co-operation with the Polish Chamber of Chemical Industry (Polska Izba Przemyslu Chemicznego - PIPC) and other industrial associations which can help to reach to the companies with the training activities and can further develop the training programme. The training programme will aim at future responsibilities of companies as the REACH will | Contract 3 – TA 2 – concerns institution building and includes twinning – 1.940.000 €  
250.000 € |
| | | | Appropriate experts available.  
Valuable training programmes available. |
providing for data on risks.
Dissemination of knowledge on REACH for authorities, scientific and educational institutions, NGOs and industry. Preparing seminars, dissemination conferences, establishing of platform for NGOs enabling them to exchange opinions on the REACH.
Promotion of rules of Good Laboratory Practice among the units which test substances and preparations on their physical-chemical characteristics, toxicity and eco-toxicity, and also other accredited laboratories through presentations on gatherings, conferences, seminars, and through making the information accessible on the Bureau internet sites, as well.
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**Technical assistance: Contract 2 - Technical Assistance 1**
Extension of scope of training on the REACH including institutions educating in a post-graduate system. Preparations of programmes and teaching materials for a course on toxicology, ecotoxicology and risk assessment.

**Contract 3 – Technical Assistance 2**
Training for industrial associations in order to prepare industry for functioning under the REACH regulation. Preparation of programmes and teaching materials. Training of 150 individuals who may act have a huge impact for companies and industrial associations.- 250.000 €
as trainers and advisers to the industry. Training will involve and will be done in close co-operation with the Polish Chamber of Chemical Industry (Polska Izba Przemysłu Chemicznego - PIPC) and other industrial associations which can help to reach to the companies with the training activities and can further develop the training programme. The training programme will aim at future responsibilities of companies as the REACH will have a huge impact for companies and industrial associations.

Introduction into life of the REACH regulation will significantly extend the scope of obligations of producers and importers of chemical substances and it will concern substances in its pure state and also as components of preparations, and in specified cases substances incorporated into articles, as well. The REACH system applies regardless of the classification of a substance.

<table>
<thead>
<tr>
<th>Date of Drafting</th>
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<td>Planning Period</td>
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Annex 2 – 3 Implementation, contracting and disbursement schedules

Preparation for implementation of the legislative package REACH

<table>
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Legend: D= design of sub-projects; C= tendering and contracting; I= contract implementation and payment