**ECRAN** **IED/Chemicals Working Group**

## Activity 2.8.2 Capacity building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED

**TITLE OF THE TRAINING / EVENT**

***Capacity building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED -* General Introductory Module/Procedures**

Date 13, 14, 15 May 2014

**Background**

In the REACH regulation, various stakeholders will have their specific roles, responsibilities and competences identified. The know-how regarding the hazards and potential risks of chemicals lays with the manufacturers and importers and with the national agencies/authorities. The so called “exposure scenarios” in the REACH system are the Conditions of use for specific chemicals.

REACH is complemented by the new Regulation for Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation, January 2009). This Regulation incorporates the classification criteria and labelling rules agreed at UN level, the so-called Globally Harmonised System of Classification and Labelling of Chemicals (GHS). It is based on the principle that the same hazards should be described and labelled in the same way all around the world. Using internationally agreed classification criteria and labeling elements is expected to facilitate trade and to contribute towards global efforts to protect humans and the environment from hazardous effects of chemicals.

It should be noted that REACH and CLP are regulations and therefore directly applicable. As they enter into force, they will automatically form part of Member States’ national laws. In order to enable REACH and CLP to operate effectively in practice, Member States are obliged to establish the necessary arrangements for their implementation. The Regulations have EEA relevance, i.e. they are binding also for Norway, Iceland and Lichtenstein. As the EEA agreement is allowing for free movement of goods, it is important that EEA countries have the same approach in enforcing REACH and CLP as Member States, thus ensuring level playing field for their industry and high level of protection for both man and environment.

Enforcement of REACH and CLP means, generally, a range of actions that national authorities initiate to verify the compliance of the duty holders with REACH and CLP Regulations. For example, this includes checking whether the substance has been registered or pre-registered or verifying the presence and correctness of the Safety Data Sheets.

The IED is the successor of the IPPC Directive and in essence, it is about minimising pollution from various industrial sources throughout the European Union. Operators of industrial installations operating activities covered by Annex I of the IED are required to obtain an integrated permit from the authorities in the EU countries. About 50.000 installations were covered by the IPPC Directive and the IED will cover some new activities which could mean the number of installations rising slightly.

An important synergy between REACH and the Industrial Emissions Directive is that information on the substance under the registration and authorisation procedures may be used to support the development of BAT reference documents. The risk assessment of substances under REACH that are manufactured or placed on the market in quantities of 10 tonnes or more per year comprises the complete life-cycle of the substance and therefore includes the use and manufacture of these substances in industrial installations covered by this Directive and options to avoid and control emissions. In this respect, Recitals (14) and (21) of REACH state that the information yielded on substances may also be used in risk management procedures under other EU legislation.

Most of the ECRAN beneficiary countries are at a different level when it comes to transposition of the EC chemicals legislation and additional efforts are needed in the area of its implementation. The REACH and CLP regulations, interlinked amongst other with the Industrial Emissions Directive (IED), are covering major chapters of chemicals legislation and industrial pollution control.

**Objectives of the Workshop:**

*Overall objective*

The overall objective is to strengthen regional cooperation between the EU candidate countries and potential candidates in the fields of environment and climate action and to assist them on their way towards the transposition and implementation of the EU environmental and climate policies and instruments which is a key precondition for EU accession.

*Specific objectives of the assignment*

Within the scope of regional cooperation and assistance in transposition and implementation of EU environmental legislation, the specific objective of the assignment is to provide assistance in strengthening the institutions and building capacity in complying with the EC Chemicals legislation.

Emphasis will be placed on the REACH and CLP Regulations, interlinked with the Industrial Emissions Directive as these are covering major chapters in chemicals legislation and industrial pollution control

**Beneficiaries**

The beneficiaries are the Ministries of Environment of the beneficiary countries (Albania, Bosnia and Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Kosovo\*[[1]](#footnote-1), Montenegro, Serbia and Turkey). In addition the other ministries and other bodies and institutions will need to be actively engaged in so far as their work is relevant for the scope of ECRAN.

**Expected results**

The following result is expected for this activity

* improved functioning of the environmental authorities and related authorities envisaged to be responsible for implementation of the REACH/CLP regulations and IED ;
* streamlined working methods and implementation of best practice in the region moving towards EU standards.

**Draft Agenda Outline and List of Confirmed Participants**

**DAY 1:**

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| **Topic: Capacity building on compliance with chemicals legislation, with emphasis on REACH/CLP linked to IED - General Introductory Module/Procedures**  **Co-Chairs:  tbd**  **Venue: ???** | | | | |
| **Start** | **Finish** | **Topic** | **Speaker** | **Sub topic/Content** |
| 08:30 | 08:45 | ***Registration*** | | |
| 08.45 | 09.00 | Opening | Host country representative – tbd  Ike van der Putte (ECRAN –ECENA Coordinator) | * Welcome * Introduction of trainers * Introduction of participants |
| 09.00 | 09.15 | Introduction | Ike van der Putte (ECRAN –ECENA Coördinator) | * Explanation of the training programme * Information on ECRAN * Defined ECENA activities |
| 9.15 | 10.00 | Introduction on general EU chemical legislation | Arnold van der Wielen | * Overview and introduction on general EU chemical legislation including PIC, POPs, PPP, Biocides and mercury regulations * The relationship between these legislation |
| 10.00 | 10.45 | Introduction on the REACH and CLP Regulations | Arnold van der Wielen | * Historical background of chemicals legislation, REACH and CLP in particular * General approach of REACH and CLP * Relationship between REACH, CLP and other EU legislations |
| 10.45 | 11.00 | ***Coffee Break*** | | |
| 11.00 | 12.30 | Roundtable discussion –approximation status of REACH/CLP/IED | Ike van der Putte/ Arnold van der Wielen | * Every participating country has 10 min to introduce the status of approximation of chemicals legislation in particular REACH and IED |
| 12.30 | 13.30 | ***Lunch*** | | |
| 13.30 | 14.30 | REACH specific: Registration | Martin Murin | * Scope and timelines of REACH (including case study) * Procedure of REACH registration * Roles and responsibilities (Example and case study) |
| 14.30 | 15.30 | REACH specific: Evaluation, Authorisation and Restriction | Martin Murin/Shufan Qi | * Evaluation, authorisation and restriction under REACH from organisational and procedural aspects * Obligations of authorities and industries in authorisation and restriction * Communication |
| 15.30 | 15.45 | ***Coffee Break*** | | |
| 15.45 | 16.15 | IT organization under REACH | Shufan Qi | * Development of REACH IT and IUCLID 5 * Function of REACH IT and IUCLID 5 * Example of IUCLID 5 |
| 16.15 | 17.00 | Consortium and (pre-) Substance Information Exchange Forum (SIEF) under REACH | Martin Murin | * Information on consortium and pre-SIEF and SIEF * Legal context, formation and functions of SIEF * SIEF activities * Formation of consortium for REACH registration |

**DAY 2:**

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| **Topic: /facilitator**  **Venue:** | | | | |
| **Start** | **Finish** | **Topic** | **Speaker** | **Sub topic/Content** |
| 9.00 | 9.15 | Welcome coffee and  summary of day 1 | Ike van der Putte |  |
| 9.15 | 10.15 | Basic toxicology and risk assessment under REACH (60 min) | Ike van der Putte/ Shufan Qi | * Basics toxicology * Principle of risk assessment * Chemical risk assessment under REACH * Approaches * Computer models * Guidance |
| 10.15 | 10.45 | CLP specific – Regulation | Shufan Qi | * Content of the Regulation * CLP Timelines * Changes compared to the old EU system |
| 10.45 | 11.00 | ***Coffee Break*** | | |
| 10.45 | 11.15 | CLP specific – Implementation | Shufan Qi | * Implementation of the Regulation * Hazard and safety communication * Safety Data Sheet |

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| 11.15 | 12.30 | Case study 1 on classification and labelling  Or  Case study 2 discharge of chemicals and ecotox effects | Martin Murin  Ike van der Putte | * Goal of the case study 1 is a brief practical introduction into classification and labelling for environmental and eco-toxicological properties * Goal of case study 2 is to learn how to calculate environmental concentrations in a river; how to select toxicity data for risk assessment, how to calculate a PNEC and assess the risk for aquatic organisms down stream of a discharge point |
| 12.30 | 13.30 | ***Lunch*** | | |
| 13.30 | 14.00 | Chemical Safety report and SDS | Arnold van der Wielen | * Structure and content of Chemical Safety Report * ECHA guidance for Chemical Safety Report |
| 14.00 | 14.30 | Enforcement of the REACH and CLP Regulations in EU member states | Ike van der Putte | * Requirements for enforcement * The function and activities of Forum * Example: enforcement in the Netherlands |
| 14.30 | 15.00 | REACH/IED intro | Gisela Holzgraefe | * Substances in permitting and inspection. * the regulatory cycle of IED * relevant procedures on substances in IED/REACH |
| 15.00 | 15.15 | ***Coffee Break*** | | |
| 15.15 | 16.15 | REACH /IED | Gisela Holzgraefe | * Substances in IED inspection tasks * Relevance of interactions between IED and REACH * Interlink analysis REACH /IED |
| 16.15 | 17.00 | Preparation visit Factory (ferro nickel?) | Gisela Holzgraefe/Participants and trainers | * Mixture or article? - Obligation for registration. * BREF/BAT- emission control * Checklist for SDS * Checklist Personal Protection Equipment (PPE) |

**DAY 3:**

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| **Topic: Visit to PILOT FACTORY**  **Venue:** | | | | |
| 9.00 | 15.00 | Visit to PILOT FACTORY | All participants |  |
|  |  | Preliminary discussion in the factory office |  | * Review documentation (monitoring data, quality checks, site plans and permits. Is necessary documentation in place. Comments and questions |
|  |  | Divide into groups with chairman and reporter each. Chairman has allocated specific responsibilities to each member of the group |  |  |
|  |  | Site visit |  | * Request site staff to provide guides: groups to see the entire site, but focus on areas: like handling storage, dust abatement, waste handling and filling stations, cleanliness of factory, evaluate surrounding area, maintaining and sampling. * Each member of the group will make their own inspection and make notes and compare results later in the group |
|  |  | Return to Meeting room at the factory |  | * General comments on visit site and any further questions |
|  | 15.00 | ***Return to meeting room in the hotel*** | | |

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| 16.15 | 16.45 | Visit report preparation in groups |  |  |
| 16.45 | 17.30 | Presentation of reports by members of the group |  | * Conclusions of site visit * Suggested follow-up actions |
| 17.30 |  | ***Closure*** | | |

**List of confirmed participants**

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| **No.** | **Person** | **Contact Data** |
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1. This designation is without prejudice to positions on status, and is in line with UNSCR 1244 and the ICJ opinion on the Kosovo declaration of independence. [↑](#footnote-ref-1)