Environment and Climate Regional Accession Network ECRAN

Environment and Climate Regional Accession Network (ECRAN)

Workshop Report on Compliance with REACH/CLP Regulations

16-17 September 2015, Zagreb

Enviroment and Climate Regional Accession Network ECRAN

ENVIRONMENTAL AND CLIMA REGIONAL NETWORK FOR ACCESSION - ECRAN

WORKSHOP REPORT

Activity 1.2.4

COMPLIANCE WITH REACH/CLP REGULATIONS

Zagreb, 16-17 September 2015

This Project is funded by the European Union

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LIST OF ABREVIATIONS	
AN	Ammonium Nitrate
CA	Competent Authority
CITA	Croatian Institute for Toxicology and Antidoping
CLEEN	Chemicals Legislation European Enforcement Network
CLP	Classification, Labelling and Packaging
CMR	Carcinogenic, Mutagenic, Reprotoxic
DU	Downstream User
EC	European Commission
ECHA	European Chemicals Agency
ENV	Environmental
EU	European Union
GHS	Globally Harmonised System
IED	Industrial Emissions Directive
IMPEL	The European Union Network for the Implementation and Enforcement of Environmental Law
NPK	Nitrogen, Phosphorous, and Potassium
OR	Only Representative
REACH	Registration, Evaluation, Authorisation and Restrictions of Chemicals
SDS	Safety Data Sheets
SVHC	Substance of very high concern
TFS	Transfrontier Shipment of Waste
UAN	Urea Ammonium Nitrate

I. Background/Rationale

Within the RENA programme, the objective of the ECENA Working Group on Environmental Compliance and Enforcement was to improve the ability of RENA member countries to implement and enforce the EU environmental and climate acquis by increasing the effectiveness of inspecting bodies and promoting compliance with environmental requirements.

The activities for the period 2010-2013 were based on a Multi Annual Work Plan, covering the following areas:

- Training and exchange,
- Institutional and methodological development,
- Cross border enforcement.

The activities planned under ECRAN in this area will build on the results achieved under RENA. Since the work of inspectors and permit writers has to be more coordinated and connected to other activities within the environmental protection area, it has been decided that ECENA under ECRAN should be of cross cutting nature. This is particularly important as the work of ECENA is dealing with both implementation and enforcement of the EU acquis. Cooperation with policy makers and law drafters has to be strengthened in order to enable developing better implementable legislation.

The work plan covers the full period of ECRAN (i.e. October 2013 – October 2016). Under this ECENA work plan, the following specific activities have been decided to be implemented:

1.2.1 Capacity building on compliance with environmental legislation

1.2.2 External country assessments

1.2.3 Methodological development - application of IRAM/easy Tools

1.2.4 Compliance with REACH/CLP Regulations;

1.2.5 Trans frontier Shipment of Waste (TFS);

1.2.6 Inspection and enforcement in other policy areas;

1.2.7 Inspector's participation in networking activities.

The beneficiaries are the Ministries of Environment of the beneficiary countries (Albania, Bosnia and Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Kosovo*[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.

The overall objective of ECRAN 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

[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.

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on their way towards the transposition and implementation of the EU environmental and climate policies, political targets and instruments which is a key precondition for EU accession.

Activity1.2.4 Compliance with REACH/CLP Regulations

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) sets the framework for the control of chemicals in the EU for the foreseeable future.

It entered into force on 1 June 2007. However, most of its provisions only came into force on 1 June 2008. CLP stands for Classification, Labelling and Packaging. The CLP Regulation entered into force in January 2009, and the method of classifying and labelling chemicals it introduced is based on the United Nations' Globally Harmonised System (GHS). REACH and CLP regulations are closely linked to each other. Introductory presentations for inspectors have been given on the REACH and CLP regulations in the Cluster 1 activity of RENA WG 4, including some downstream consequences and linkages of REACH/CLP with IED, SEVESO and Waste management.

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.

Enforcement of REACH and CLP is a national responsibility, therefore each EU Member State, must ensure that there is an official system of controls and lay down legislation specifying penalties for non-compliance with the provisions of REACH.

The enforcement of the requirements of the REACH and CLP Regulations involves many different enforcement authorities and other bodies. The environmental inspectorate can play a coordinating role. There is a need for a national strategy defining the needs for co-operation and coordination between these enforcement authorities to ensure effective and efficient enforcement of REACH and CLP. A key element in any strategy is to define the roles and responsibilities of the various groups involved. This would allow for an efficient enforcement process, avoiding gaps and dealing with any overlaps in the enforcement competencies and responsibilities.

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 and compliance. 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.

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In the series of two 2-day workshops, including a 1-day site visit/common inspection the following subjects are to be handled:

- Background and basics REACH and CLP;
- Roles and responsibilities under REACH;
- Enforcement strategies;
- Cooperation and coordination between enforcement authorities;
- Minimum Criteria for REACH and CLP inspections;
- Linkage of REACH and IED;
- Downstream consequences of REACH/CLP on other legislation (including SEVESO and Waste)

The present training course in Zagreb is the first in the series.

Chapter 2 describes the background and objectives of activity 1.2.4 with the 1st ECRAN Regional Workshop on Compliance with REACH/CLP regulations.

Chapter 3 describes the EU policy and legislation covered by the training;

Chapter 4 presents the workshop proceedings and Chapter 5 presents the evaluation. Furthermore the following Annexes are attached:

- Annex I: the agenda;
- Annex II: List of participants;
- Annex III: Power point presentations (downloadable under separate cover):

http://www.ecranetwork.org/ECENA

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II. Objectives of the training

General objectives

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

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 enforcement aspects of the REACH and CLP Regulations, interlinked amongst other with the Industrial Emissions Directive as these are covering major chapters in chemicals legislation and industrial pollution control

Target group

The target institutions and beneficiaries are the environmental inspectors and permit writers of the Ministries of Environment in Albania, Bosnia and Herzegovina, the Former Yugoslav Republic of Macedonia, Kosovo*, Montenegro, Serbia and Turkey

Results/outputs

The following result are expected for this activity

- Improved functioning of the environmental authorities and related authorities envisaged to be responsible for implementation and enforcement of the REACH/CLP regulations ;
- Streamlined working methods and implementation of best practice in the region moving towards EU standards.

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III. EU policy and legislation covered by the training

The two EU regulations REACH and CLP contain the basic rules for chemicals control at EU level. The principal components of REACH are summarised in the following way: Ref 1.[2], (Ref 2)[3]

- Registration: Manufacturers and importers have to register substances handled in quantities of least 1 tonne per year. Data (test results) have to be reported in the registration, as well as a separate risk assessment for each use recommended by the registrant (chemical safety report) if the volume handled exceeds 10 tonnes. The chemical safety report contains exposure scenarios with more or less detailed conditions for the handling of hazardous substances that must be followed.
- Information requirements: requirements to be met by safety data sheets for professional users of chemicals, which supplement the labelling under the CLP Regulation and contain exposure scenarios. There is also a limited obligation to inform about substances of very high concern in articles.
- Downstream users who are not manufacturers or importers but who use a substance in their activity may, in certain cases, be obliged to produce their own chemical safety report.
- Evaluation of registrations must be done firstly to check that the registrations received are correct and secondly in the form of an in-depth substance evaluation of the substances on a priority list.
- Authorisation has to take place for substances that have particularly hazardous properties for the environment or human health. Such substances are placed on a candidate list and transferred successively to a list in Annex XIV with a timetable for authorisation.
- Restrictions are bans or other restrictions on particular substances and specified uses. Annex XVII contains restriction rules for 60 substances and a long list of chemicals of very high concern for health (CMR substances) that may only be sold for professional use.

In the REACH regulation, various stakeholders will have their specific roles, responsibilities and competences identified, but the main concept of REACH is that manufacturers and importers are responsible for the safe use of chemicals by themselves and by the downstream users. The know-how regarding the hazards and potential risks of chemicals lays primarily with the manufacturers and importers and in a derived manner 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 Harmonized

[2] REF 1) Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC .

[3] REF 2) Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures amending and repealing Directive 67/548/EEC and 1999/45/EC, and Regulation (EC) No 1907/2006.

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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 labelling elements is expected to facilitate trade and to contribute towards global efforts to protect humans and the environment from hazardous effects of chemicals.

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IV. Highlights from the training workshop

Reference is made to Annex I for the agenda and Annex III for the presentations.

Day 1 – Hotel International, Zagreb, 16 September

1. A welcome was given by Ms Sandra Bucan, head inspector, head of Sector, Ministry of Environmental and Nature Protection, Directorate for Inspection Affairs, Croatia.
2. The workshop was chaired by Mr. Ike van der Putte (ECRAN ECENA coordinator) starting with a short welcoming and introduction on ECRAN and the ECENA Programme. The information on ECRAN and ECENA has been given including a project summary, results to be achieved, structures and planned activities. The trainers and experts , Mr. Arnold van der Wielen (ECRAN SSTE), TAIEX experts Mr. Martin Murin, Ms. Sandra Pezelj Meštrić , Ms.Miljenka Kliček , Ms. Gisela Holzgraefe, Ms. Luleva Parvoleta and invited experts from Croatia, Ms. Alka Coporda (Croatian Institute for Toxicology and Antidoping) and Ms. Mirela Mavrinac (INA d.d., Zagreb) were introduced.
3. An introductory round was held among the participants with the question on the years of experience as inspectors, permit writers and policymakers/other fields. The results showed that most of participants have extensive knowledge and experience in inspection and permit writing. Four persons also have participated in the workshops of the IED/Chemicals Working Group of ECRAN.

	Years of experience		
	1 – 5 years	***5 – 10 years***	***More than 10 years***
Inspectors	1	6	17
Permit writers	1	3	1
Policy makers/others		1	1

4. *Introduction on the REACH and CLP Regulations*. Mr. Arnold van der Wielen gave a brief overview of the main elements of REACH and CLP with an introduction on the history, the problems with chemicals and the legal structures. The REACH and CLP organisation, critical timelines and the relationship of REACH/CLP with other parts of chemicals legislation received special attention. Risk management is considered as the central issue.

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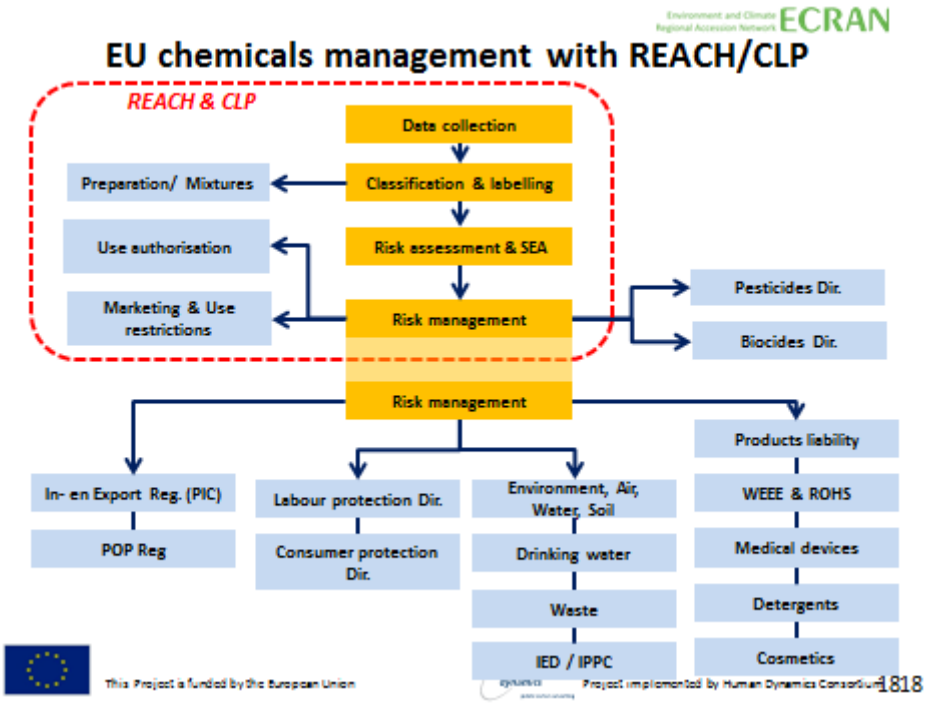

5. *Roundtable discussion on approximation status of REACH/CLP*. The roundtable discussion concentrated on some approximation elements considering that REACH and CLP are regulations. A summary giving a brief overview of some elements are given in the Table below. It can be concluded that in general a considerable amount of work is still to be done in the majority of countries and that capacity for implementation is limited.

Country	KS	SR	MN	MD	TK	AL
Inventory of chemicals	-	+	-+	-	+	-
Helpdesk available	-	+	-	-	+	-
Legislation (transposable elements)						
CLP	+	+	+	-	+	-
SDS	+	+	+	-	+	-
Capacity for implementation	limited	limited	limited	limited	limited	limited

6. *Introduction on hazard and risk assessment under REACH.* Mr. Martin Murin gave a general introduction on the methodologies applied in hazard and risk assessment under REACH. Hazard vs. Risk terminology was explained and the EU risk assessment guidance documents were presented. Based on effect assessment methodologies on one hand and exposure assessment methodologies on the other hand, a so called risk characterization can be made and risk management measures can be taken. The differences in the approach for environmental risk assessment (ecosystems) and the approach in human health risk assessment received specific attention.
7. *REACH Specifics – Enforcement.* The enforcement aspects of REACH and CLP were briefly introduced by Mr. Ike van der Putte. The reasons for enforcement (creating a level playing field) and the various activities of the networks in environmental and chemicals management and enforcement (CLEEN, IMPEL, ECHA FORUM) were presented in a historical context. A general

methodology in inspection of manufacturers was given, followed by a description of the differences in enforcement systems that exist in EU member states. A specific explanation was given for the Netherlands. The presentation was finalised by giving an overview of the relationships of REACH with other types of legislation, which are of crucial importance considering enforcement and the enforcement indicators that are presently studied.

8. *SDS and inspection on SDS.* Mr. Arnold van der Wielen explained the function of the Safety Data Sheet under REACH. The SDS is the key instrument for the information flow down the supply chain, because: it informs the downstream user about the dangerous properties & potential hazards during normal handling and use; it recommends necessary measures to manage the risk to health & environment (storage, use, disposal); it provides the basis for the assessment of hazards / risks. Control of SDSs consist of 4 steps:
   - Step 1: Control of general requirements;
   - Step 2: Control of hazard identification and composition;
   - Step 3: Consistency check of the information in the different sections of SDS;
   - Step 4: Consistency check with Exposure Scenario sections.

The details in every step were explained including examples of datasheets. An important element was also a consistency check between the various sections. Various examples were given including the check of SDSs (Ammonium nitrate) issued by the fertilizer industry to be visited on day 3 (PETROKEMIJA d.d., Kutina).

9. *REACH/CLP implementation and enforcement in Croatia.* Ms. Alka Coporda of the Croatian Institute for Toxicology and Antidoping gave an explanation on the REACH and CLP responsibilities in Croatia. The competent authority (CA) for chemicals and biocidal products is the Ministry of Health, dealing with Regulation (EU) No. 1907/2006 (REACH), Regulation (EU) No. 1272/2008 (CLP), and Regulation (EU) No. 689/2008 (Export/Import/PIC).The supervision on chemicals (production, use, import) falls under the Sanitary Inspection as part of the Ministry of Health. The CA cooperates with the Croatian Institute for Toxicology and Antidoping. The Institute keep records of annual data of importing/producing of (dangerous) hazardous chemicals (based on national ordinance from 2006.) and keeps the register of SDSs (industrial chemicals, biocidal products and plant protection products) (from 2006.) Other responsibilities and activities are training and supporting the helpdesks for REACH and CLP.

Ms. Sandra Pezelj Meštrić of the Directorate for Inspection of the Ministry of Environmental and Nature Protection gave a brief presentation covering: 1) REACH & CLP timeline; 2) Croatia's road to EU membership; 3) Transfer of rights and obligations from OR to a (new) EU manufacturer and 4)REACH and inspection. On 1July 2013 Croatia became an EU member state. Before that date, a manufacturer was represented by an Only Representative (OR) for export to the EU. This situation changed after membership, in which responsibilities went to the manufacturer as the legal entity. The various requirements were described for the involved parties and recommendations were given. The results of the negotiations in EU membership included a direct allocation of responsibilities from the OR to the manufacturer without additional costs and a 6 months delay for the second phase-in deadline. Inspection of the manufacturer (company) lies in the hands of the Ministry of Health (Sanitary Inspection) for chemicals and of the Ministry of Environment (Environmental inspection)

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for waste and (external safety). In the latter aspect also the National Protection and Rescue is involved.

Ms. Miljenka Kliček of the Directorate for Inspection of the Ministry of Environmental and Nature Protection gave a presentation covering: 1) the legal framework; 2) enforcement strategies; 3) relation to other legislation- IED and SEVESO; 4) cooperation and coordination between enforcement authorities and 5) minimum criteria for inspections. It was clarified that REACH and CLP are regulations and are directly applicable to national law. There are linkages of REACH/CLP with IED, SEVESO and Waste management in the national legislation in Croatia. Effective enforcement is needed to create a level playing field and to ensure safety for man and environment. The annual plan for inspections was presented as an example showing that various inspection bodies were cooperating in the inspection work in Croatia.

Ms. Mirela Mavrinac, HSE Expert in the Oil Company INA, briefly introduced the REACH/CLP implementation process from the perspective of the INA Oil Company. Starting from the changed position of the Company as a manufacturer in an EU member state, the registration process of the produced chemicals was described. Information in the registration dossier must be compatible with information in the SDS (16 Chapters) and the exposure scenario. The Croatian Institute for Toxicology and Antidoping (CITA) keeps a register of the SDSs of substances produced and imported in Croatia. The challenge during REACH implementation and future challenges were described.

10. *Enforcement of REACH and CLP in practice (1).* Ms. Gisela Holzgraefe of the Ministry of Energy Transition, Agriculture, Environment and Rural Areas, Germany, presented an Explanatory on guidance in REACH/CLP inspection within the framework of ECHA FORUM activities. The specifics of IED inspection requirements and those of REACH/CLP were described. Against the background of the FORUM projects outcomes it was explained that the manuals in these projects were useful for inspection purposes.
11. *Enforcement of REACH and CLP in practice (2).* Ms. Parvoleta Luleva, Head of Hazardous Chemicals Department, Preventive Activities Directorate of the Ministry of Environment and Water, Bulgaria, described the practical experience in enforcement of REACH/CLP in Bulgaria and the interaction with the ECHA FORUM. The task of the enforcement authorities in Bulgaria are for REACH:

Regional Inspectorates of Environment and Water: registration, data sharing, communication in the supply chain (focused on production and formulation of chemicals at industrial sites), DUs' duties, authorisation, restrictions (substances of ENV concern);

Regional Health Inspectorates: communication in the supply chain (focused on retailers and distributers placing chemicals on the market), restrictions (substances of HH concern);

Executive Agency "General Labour Inspectorate": access to information for workers, safety and health at workplace involving hazardous chemicals (in particular SVHCs), exposure control at working environment;

The coordination and cooperation between the authorities is described and also the enforcement strategies, approaches and tools used in Bulgaria. Activities are also carried within the projects under the ECHA FORUM.

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12. *Preparation for the site visit.* The participants were divided into four groups to identify main issues in different fields of the fertilizer company (PETROKEMIJA d.d., Kutina) to be visited on day 3, considering REACH/CLP interactions.

Day 2 – Visit to the PETROKEMIJA d.d., Kutina, 17 September

The visit started with an introductory presentation by Mr. Damir Pirsic, who served as an only representative for the Petrokemija fertilizer company and later after EU membership of Croatia had the role of the manufacturer of chemicals within the REACH system.

Petrokemija has around 1600 Employees and its ownership is 81% Government and 19% private investment.

Petrokemija produces fertilizers using natural mineral raw materials, natural gas, atmospheric nitrogen and oxygen. With the use of appropriate technological processes basic chemicals are produced from these raw materials which in turn serve as raw materials for fertilizers. According to the composition, fertilizers are either simple or compound or complex and blended, and by their aggregate state they are solid (granular and prilled) or liquid.

Products are:

- Nitrogen Fertilizers (a.o. urea);
- Complex NPK fertilizers;
- NPK fertilizers with micro-nutrients;
- Liquid fertilizers;
- Basic technical products and chemicals including;
- Urea 46% N for use in industry;
- Nitrogen (Barett) solution, 41% N;
- AN - ammonium nitrate porous 34.8% N (low density);
- AN - ammonium nitrate 34.8% N technical (high density);
- Nitric acid (56 - 60% m/m);
- Sulfuric acid 98% m/m;
- Ammonia liquid, anhydrous 82.3% N;
- Sulfuric acid for batteries 32 ° B;E

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- Ammonia water 25% NH3;
- Phosphoric acid 28% m/m and 54% m/m;
- Hexafluorosilicic acid.

The annual production capacity of fertilizer products are

Basic chemicals:

- Ammonia, liquid, anhydrous 82.3%N = 450,000 t/y
- Nitric acid 100% = 415,000 t/y

Fertilizers:

- CAN 27% N = 400,000 t/y
- UREA 46% N = 500,000 t/y
- NPK fertilizers = 600,000 t/y

Alternative to the 27% N CAN, the CAN Plant can produce:

- Agricultural AN 33.5% N = 500 t/d
- UAN 30% N - urea ammonium nitrate = 650 t/d
- Barret solution 41%N = 147 t/d
- Ammonia water 20.5% N = 45 t/d

After a general presentation the site visit was carried out by bus tour around and in the fertilizer complex.

After the tour a round table discussion was held in which also the environmental department of Petrokemija participated.

The training participants had been divided into four groups to assess specific issues in relation with REACH/CLP:

Group 1. Chemicals (SDS and local legal framework).Specific issues on SDS were for the factory in the beginning that suppliers of additives did not want to disclose the information on their chemicals. This was improved in a later stage when signing of contracts were required by the suppliers. SDSs of the chemicals comes from the consortia involved in REACH registration. It was noted that there are some inconsistencies regarding the information in SDSs (e.g. Ammonium nitrate) issued by the company and the outcome of registrations (DNELs). Also the emergency number in this case still refers to Slovenia. An update was in process.

Group 2. Production process safety. Petrokemija is a higher tier SEVESO installation. Damage of the ammonia storage tank is considered as a worst case scenario in hazard and consequence analysis. No severe accidents has occurred in the factory since its existence. The SDS was considered as an important tool not only for safety at the workplace but also for firefighters in deciding what type of extinguishers are to be used for the different chemicals in process and storage.

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Group 3. IPPC permit and emissions. The emission and discharge values of the chemicals are based on the requirements as stated in the IPPC permit. The monitoring results are also in line with air quality standards, with Ammonia close to the limit values. The use of SDS data (REACH/CLP) in IPPC permitting and SEVESO reports was debated. This element are also to be clarified in the guidance documents that are to be issued in future.

Group 4. Waste management. The connection between waste management and REACH is typically to be seen in the various streams of waste, recycled wastes and by-products. Phosphogypsum was considered as a by-product, which is stored in a permitted depot. When a by-product (for example hexafluorosilic acid for sand paper) is brought on the market, it is required to be registered under REACH, depending on the tonnage band. Petrokemija had some examples for the latter chemicals that have been registered now under REACH.

The meeting and site visit was closed by thanking Mr. Damir Pirsic and his colleagues of Petrokemija for their openness in answering the questions and the sharing of information also from other departments of the factory.

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V. Evaluation

The following summary of the training evaluation report, developed on the basis of analysis of the training questionnaires can be given. A number of 34 out of 40 participants filled the evaluation form. It shows that the expectations of the workshop were met.

The majority of the trainees indicated that their expectations for the workshop were met. The trainees indicated that the training was of a high quality and fit for its purpose. The trainees also expressed their wish to have more practical work/case studies in the following trainings

Statistical information

1.1	Workshop Session	Capacity building on compliance with REACH/CLP Regulations, Zagreb, Croatia, 16-17 September 2015
1.2	Facilitators name	Ike van der Putte/ Arnold van der Wielen/ Martin Murin/ Sandra Pezelj Meštrić/Miljenka Kliček/Gisela Holzgraefe/ Luleva Parvoleta/ Alka Coporda/ Mirela Mavrinac
1.3	Name and Surname of Participants (evaluators) optional	As per participants' list

Your Expectations

Please indicate to what extent specific expectations were met, or not met:

My Expectations	My expectations were met		
	Fully	**Partially**	**Not at all**
1. Filling gaps in knowledge (several IED, inspections, general and specific)	IIIII IIIII IIIII IIIII IIIII I (76%)	IIIII III (24%)	
2. Practical experience of the new Member States and Candidate Countries	IIIII IIIII IIIII IIIII IIIII II (79%)	IIIII II (21%)	

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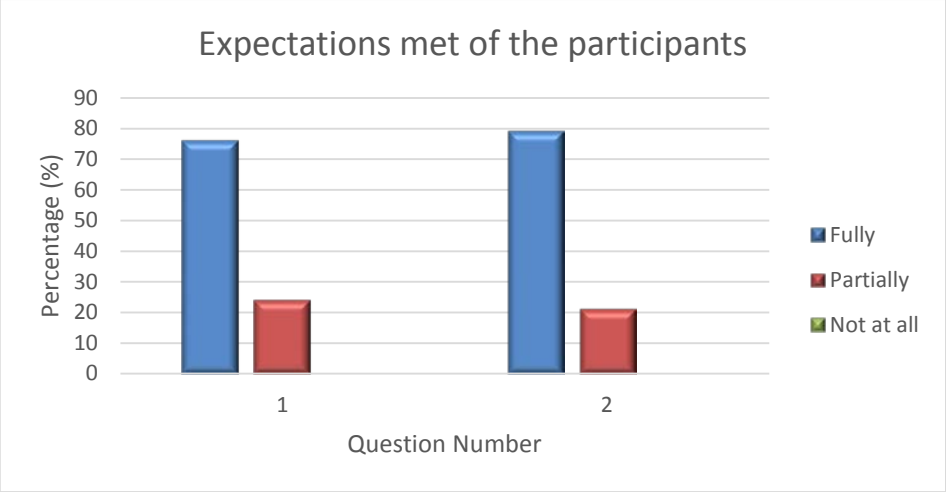

Workshop and Presentation

Please rate the following statements in respect of this training module:

Aspect of Workshop	Excellent	Good	Average	Acceptable	Poor	Unacceptable
1. The workshop achieved the objectives set	IIIII IIIII IIIII IIIII IIII (71%)	IIIII I (18%)	IIII (11%)			
2. The quality of the workshop was of a high standard	IIIII IIIII IIIII I (47%)	IIIII IIIII III (38%)	IIIII (15%)			
3. The content of the workshop was well suited to my level of understanding and experience	IIIII IIIII IIIII III (53%)	IIIII IIIII I (32%)	IIIII (15%)			
4. The practical work was relevant and informative	IIIII IIIII IIIII IIIII I (62%)	IIIII IIIII I (32%)	II (6%)			
5. The workshop was interactive	IIIII IIIII IIIII II (50%)	IIIII IIIII II (35%)	IIIII (15%)			
6. Facilitators were well prepared and knowledgeable on the subject matter	IIIII IIIII IIIII IIIII IIII (71%)	IIIII III (23%)	II (6%)			
7. The duration of this workshop was neither too long nor too short	IIIII IIIII IIIII IIIII (59%)	IIIII IIIII I (32%)	III (9%)			
8. The logistical arrangements (venue, refreshments, equipment) were satisfactory	IIIII IIIII IIIII IIII (56%)	IIIII IIIII II (35%)	II (6%)	I (3%)		
9. Attending this workshop was time well spent	IIIII IIIII IIIII IIIII I (62%)	IIIII IIII (27%)	IIII (11%)			

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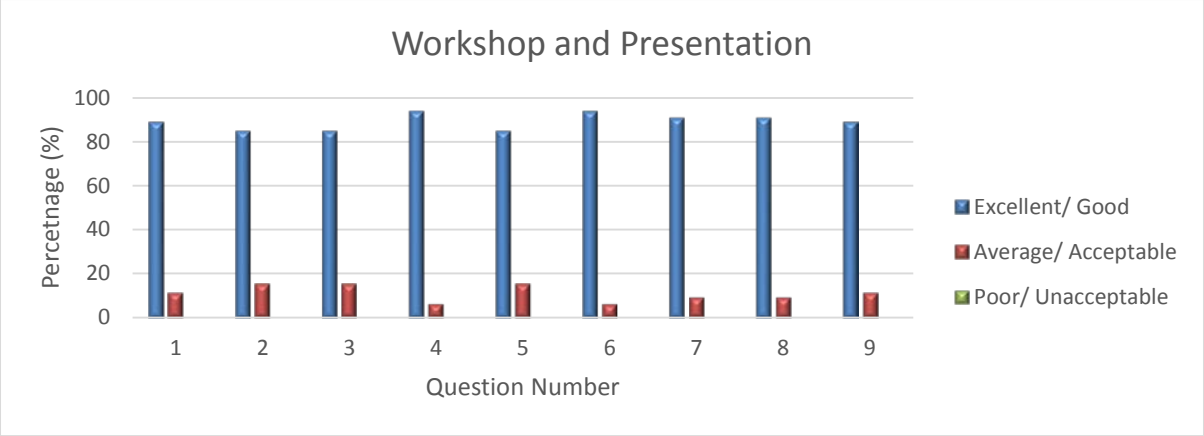

Comments and suggestions

I have the following comment and/or suggestions in addition to questions already answered:

Workshop Sessions:

- Good
- Site visit should provide opportunity to step outside the bus
- Please continue with site visit as it gives practical insight

Facilitators:

- Were at a high international level
- good

Workshop level and content:

- Good
- More of these workshops are needed

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ANNEX I – Agenda

Day 1 : Wednesday 16 September 2015

Topic: Capacity building on compliance and enforcement of REACH/CLP regulations

Chair and Co-Chairs: Mrs. Anita Patekar/ Mr. Ike van der Putte

Venue: TBD

Start	Finish	Topic	Speaker	Sub topic/Content
08:30	**09:00**	**Registration**		
9.00	9.15	Opening	Host country representative – tbd Ike van der Putte (ECRAN –ECENA Coordinator)	- Welcome - Introduction of trainers - Introduction of participants
9.15	9.45	Introduction on the REACH and CLP Regulations	Arnold van der Wielen (ECRAN SSTE)	- Historical background of chemicals legislation, REACH and CLP in particular - General approach of REACH and CLP - Relationship between REACH, CLP and other EU legislations
9.45	10.15	Roundtable discussion – approximation status of REACH/CLP	Ike van der Putte (ECRAN –ECENA Coordinator) Arnold van der Wielen (ECRAN SSTE)	- Every participating country introduces the status of approximation/implementation of chemicals legislation in particular enforcement aspects in REACH and CLP
10.15	10.45	Introduction on hazard and risk assessment under REACH	Martin Murin, Ekotoxikologické centrum Bratislava s.r.o. TAIEX Expert	-General introduction on the methodologies applied in hazard and risk assessment under REACH
10.45	11.00	***Coffee Break***		
11.00	11.45	REACH Specifics -	Ike van der Putte,	- Requirements for enforcement - The function and activities of

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		Enforcement	ECRAN	Forum - Example: enforcement in the Netherlands
11.45	12.30	SDS and inspection on SDS	Arnold van der Wielen, ECRAN	- Structure and content of SDS - Check on SDS
12.30	13.30	***Lunch Break***		
13.30	14.00	REACH/CLP implementation and enforcement in Croatia	Ms Alka Coporda, Croatian Institute for Toxicology and Antidoping Sandra Pezelj Meštrić Miljenka Kliček Directorate for Inspection Ministry of Environmental and Nature Protection	- Introduction on the experience in Croatia on approximation/implementation of chemicals legislation in particular enforcement aspects in REACH and CLP (part 1)
14.00	14.30	REACH implementation in INA d.d	Mavrinac Mirela, INA d.d., Zagreb, BF Corporate centre, SD&HSE Sector Anita Milošić Directorate for Inspection Ministry of Environmental and Nature Protection	- Introduction on the experience in Croatia on approximation/implementation of chemicals legislation in particular enforcement aspects in REACH and CLP (part 2)
14.30	15.00	Enforcement REACH/CLP in practice (1)	Gisela Holzgraefe, Ministry of Energy Transition, Agriculture, Environment and Rural Areas, Germany	- Explanatory on guidance in REACH/CLP inspection within the framework of ECHA FORUM activities
15.00	15.15	***Coffee Break***		
15.15	16.00	Enforcement of REACH/CLP in	Parvoleta Luleva Head of Hazardous Chemicals	- Practical experience in enforcement of REACH/CLP in Bulgaria

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		practice (2)	Department Preventive Activities Directorate Ministry of Environment and Water, Bulgaria	- Interaction with the ECHA FORUM
16.00	17.00	Preparation visit Factory	Ms. Gisela Hozgraefe Ministry of Energy Transition, Agriculture, Environment and Rural Areas, Germany, TAIEX Expert /Participants and trainers	

Day 2 : Thursday 17 September 2015

Topic: Visit to Pilot Factory TBD

Chair and Co-Chairs: Ike van der Putte/Anita Patekar

Venue: PETROKEMIJA d.d., Kutina, a petrochemical SEVESO plant. (www.petrokemija.hr)

Start	Finish	Topic	Speaker	Sub topic/Content
08:00	**09:15**	**Transport from the hotel to the pilot site installation**		
9.15	10.15	Preliminary discussion in the factory office with presentations from the factory	All participants	- Review documentation (chemicals information (such as SDS, labels) monitoring data, quality checks, site plans and permits. Is necessary documentation in place. Comments and questions
		Divide into groups with chairman and reporter each.	All participants	

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		Chairman has allocated specific responsibilities to each member of the group		
10.15	12.15	Site visit		
12.15	13.30	Return to Meeting room at the factory	All participants	- General comments on visit site and any further questions
13.30	14.30	Lunch break		-
14.30	16.00	***Transport back, return to meeting room in the hotel***		
16.00	16.45	Visit report preparation in groups	All participants	
16.45	17.30	Presentation of reports by members of the group	All participants	- Conclusions of site visit - Suggested follow-up actions
17:30		***Closure***		

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ANNEX II – Participants

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ANNEX III – Presentations (under separate cover)

Presentations can be downloaded from:

http://www.ecranetwork.org/Files/Workshop_Presentations,_REACH-CLP,_September_2015,_Zagreb.zip

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