Member States Reporting under REACH art. 117

Fields marked with * are mandatory.

General Information

Please note that depending on what your answers are throughout the questionnaire, hidden questions may show up, so please disregard the numbering in case it does not follow a logic order.

A glossary is available in the section 'background document'.

1.Which Member State are you reporting for?*

Belgium

2. Primary contact person's name*

3. Please provide an email address for the primary contact person*

info@environment.belgium.be

Theme 1 - Information on the Competent Authority

4. Please explain how Competent Authorities are organised for the operation of REACH in your country? *(Please note that this Section does not include information on enforcement authorities that will be covered under Theme 9 on enforcement)*

There is 1 Competent Authority in Belgium.

5. How many Competent Authorities are responsible for REACH?*

A description of each Competent Authority will be asked in the following sections. Similar series of questions corresponding to the number of Competent Authorities you enter will appear below.

1

One / First Competent Authority Responsible for REACH

6. What is the name of the Competent Authority?*

Risk Management of Chemical Substances Unit
Department of Product Policy and Chemical Substances
DG Environment
Federal Public Service
Health, Food Chain Safety and Environment

7. What is the address of the Competent Authority? *

Eurostation-Blok II
2nd Floor
Victor Hortaplein 40, box 10
B - 1060 Brussels
BELGIUM

8. What is the email address of the Competent Authority?*

catheline.dantinne@environnement.belgique.be

9. What is the telephone number of the Competent Authority?*

+32(0)2 524.95.87

10. What part of REACH does this part of the Competent Authority deal with?*

Please choose one or more answers.

- ~~All~~
- **Evaluation**
- **Risk Assessment**
- ~~Helpdesk~~
- **Authorisation**
- **Restriction**
- **Registration**
- **Other**

If Other, please list the other parts of REACH that this part of the Competent Authority deals with:*

CLH, nano, endocrine disruptors, PBT, read across, REACH & other legislation

11. From what part of Government does this part of the Competent Authority have authority from?*

Please choose one or more answers.

- **Environment**
- ~~Occupational Health and Safety~~
- **Public Health**
- ~~Consumer Protection~~

- [ ] ~~Economy/Industry~~
- [ ] ~~Other~~

If Other, please list the other part of Government the Competent Authority gets authority from: *

NA

12. Please specify the number of staff of the Competent Authority working on the implementation of REACH:*

12

13. Do you have specialised staff in the following categories? Please quantify these skills in FTE (Full Time Equivalent).*

For a definition of Full Time Equivalent, please refer to the glossary.

	Number of FTE
Toxicologist	2
Ecotoxicologist	2.5
Chemist	1
Exposure Assessor	0,5
Risk Assessor	1
Risk manager	2
Economist	0
IT	0.5
Communication	0
Other	2.5

14. Is the level of expertise of the Competent Authority adequate to deal with all requirements under REACH?*

No, BECA outsources some expertise (eg . by public tender).

We estimate that our staff is inadequately resourced for the following reasons:

- **An insufficient number of employees,**
- **Lack of expertise in socio-economic analysis and risk communication, lack of expertise for specific endpoints in toxicology, specific expertise e.g. epidemiology, process engineering,**
- **Reduced operating funds.**

15. Are the staff of the REACH Competent Authority involved in other chemical legislation?*

- **Yes**
- ~~No~~

16. What other chemical legislation are the staff of the REACH Competent Authority involved in?*

Please choose one or more answers.

- [ ] **PIC Regulation**
- [ ] ~~Food legislation~~
- [ ] ~~Workers Protection legislation~~
- [ ] ~~Cosmetics~~
- [ ] ~~Medical devices~~
- [ ] ~~Biocides~~
- [ ] **CLP**
- [ ] ~~Pesticides~~
- [ ] **POPs**
- [ ] **Other**

If Other, please list the different legislations here:*

Mercury, SAICM, Nanomaterials, OECD, endocrine disrupters, PBT

17. Are there any other institutions (agency, institute, regional authorities) that the Competent Authority works with in relation to REACH issues?*

- ( ) **Yes**
- ( ) ~~No~~

If Yes, please list the other institutions that the Competent Authority works with:*

- Walloon Region - Directorate-General for Agriculture, Natural Resources and the Environment (DGARNE),
- Brussels-Capital's Region - Brussels Institute for the Management of the Environment (BIME),
- Flemish Government - Environment, Nature and Energy Department - Environment Inspection Service,
- Federal Public Service Economy, Self Employed and Energy (Helpdesk),
- Federal Public Service Employment, Labour and Social Dialogue,
- Customs government,
- Scientific Institute of Public Health.

18. Does the Competent Authority outsource any of its work?*

- ( ) **Yes**
- ( ) ~~No~~

If yes, please provide details on who the Competent Authority outsources parts of its work to:*

External technical experts and scientists.

The BE legislator has established a Scientific Committee REACH whose members are working for universities and scientific institutes. This committee can offer advice to the BECA.

And on what type of expertise is outsourced:*

Specific fields of (eco)toxicology, risk management, endocrine disruptor, market study

19. Does the Competent Authority have appropriate financial resources?*

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
- 2
- x **3**
- 4
- 5

20. Does the Competent Authority have appropriate technical resources (understood in terms of expertise, skills and competences of the staff)?*

- 1
- 2
- 3
- x **4**
- 5

21. Does the Competent Authority have appropriate human resources (understood in terms of number of staff)?*

- 1
- x **2**
- 3

- 4
- 5

22. Space is available below to provide further comments on the resourcing of the Competent Authority.

The absence of the compensation for the CLH work in RAC has an negative impact on staff capacity. This is a reason why Belgium has no second RAC member.

Theme 2: Information on cooperation and communication with other Member States, the European Chemicals Agency (ECHA) and the Commission

23. How could the communication and collaboration for REACH between Member States be improved?*

1,800 character(s) maximum

RiME meetings are a good platform for communication between MS. Collaboration is more and more effective (on specific substances, in the context of RMO analysis for instance).

24. How could the collaboration with other agencies in your country be improved?*

1,800 character(s) maximum

From early 2013 on, in Belgium the coordination of the implementation of REACH is laid down in a Cooperation Agreement between the different federal and regional authorities competent for REACH. The Agreement has the force of law.

Financial resources by these authorities are foreseen for the coordination (secretariats of 3 committees : policy, enforcement, scientific) by 2 FTE and for the external expertise by the scientific committee (Scientific Committee REACH).

The policy committee is in particular a forum to exchange information on general (policy) issues and to approve initiatives of the BECA (for substance evaluation, Annex XV, …). The collaboration with the other BE authorities is a learning process and the policy committee facilitates the communication between the BE authorities . The exchange of information on substances that give concern on the environment and occupational health should be further improved to initiate action by BECA.

25. How could the communication and collaboration with ECHA be improved?*

1,800 character(s) maximum

The communication via email from ECHA to MS could be improved. In order to avoid the loss of emails, as happened previously, ECHA is suggested to use the same mailing list as the COM or to clearly identify the group concerned, e.g., differentiate between the MS and the CA.

For some aspects (e.g. Security Officers Network), the communication by ECHA is well improved : the information on the roles and tasks are well defined, answers are provided to questions within a reasonable time.

26. How could the exchange of information and dialogue between Member States and the Commission be improved?*

1,800 character(s) maximum

We welcome the arrival of CIRCA in 2013, however we would appreciate the upload of documents on due time before meeting (10 calendar days is a minimum).
The internal communication between the different entities of the Commission could be improved in order to avoid problems.

Theme 3: Operation of the national helpdesk

27. Please provide the name of the organisation(s) responsible for operating the Helpdesk(s) for REACH.*

Federal Public Service Economy, SMEs, Self-employed and Energy

28. What is (are) the address(es) of the Helpdesk(s)? *

50, rue du Progrès
B-1210 Brussels
BELGIUM

29. What is (are) the web page address(es) of the Helpdesk(s)?*

FR: https://economie.fgov.be/fr/themes/entreprises/secteurs-specifiques/industries-chimiques-et
NL: https://economie.fgov.be/nl/themas/ondernemingen/specifieke-sectoren/chemische-industrie-en

30. What is (are) the email address(es) of the Helpdesk(s)?*

reachinfo@economie.fgov.be

31. What is (are) the telephone number(s) of the Helpdesk(s)?*

+ 32 (0) 800 120 33

32. What is the institutional structure of the Helpdesk(s)?*

X Separate independent entity(ies)

- Part of Competent Authority
- Part of business association/chamber of commerce
- Other

If other, please specify*

33. Please quantify these skills in FTE (Full Time Equivalent).*

	Number of FTE
Toxicologist	
Ecotoxicologist	
Chemist	2
Exposure Assessor	
Risk Assessor	
Risk manager	
Economist	0
IT	
Communication	
Other	0

34. Is the level of expertise adequate to respond to all enquiries?*

X Yes

○ No

If 'no', please specify what expertise is missing:*

35. For which topics does the national helpdesk feel it necessary to refer the enquirer to the ECHA helpdesk?*

REACH-IT, IUCLID

36. What are the services offered by the Helpdesk?*

Please choose one or more answers.

- [X] Website
- [X] Newsletter
- [ ] Advice services
- [ ] Trainings
- [ ] Mediation / conflict resolution
- [X] Other

If 'Other', please specify:*

- Presentations / workshops
- Regular meetings with industry representatives

37. In which language(s) are these services accessible?*

French, Dutch & English

38. Is the same Helpdesk used to provide help to Industry on CLP?*

- ( ) Yes
- [X] No

39. Does the Helpdesk receive any non-governmental support?*

- ( ) Yes
- [X] No

40. Please describe the Helpdesk quality assurance mechanisms:*

Each answer is checked by a second person.

41. Is ISO9000 norm in place?*

- ( ) Yes
- X No

42. How many enquiries does the Helpdesk receive per year?

	1 - 100	101 - 1000	> 1000
2015*	( )	X	( )
2016*	( )	X	( )
2017*	( )	X	( )
2018*	( )	( )	( )
2019*	( )	( )	( )

43. How are the majority of enquiries received?*

Please choose one or more answers.

- X Email
- [ ] Phone
- [ ] Fax
- [ ] Letter
- [ ] Other
- [ ] No information

44. Do you provide specific advice to SME's?*

- ( ) Yes
- X No

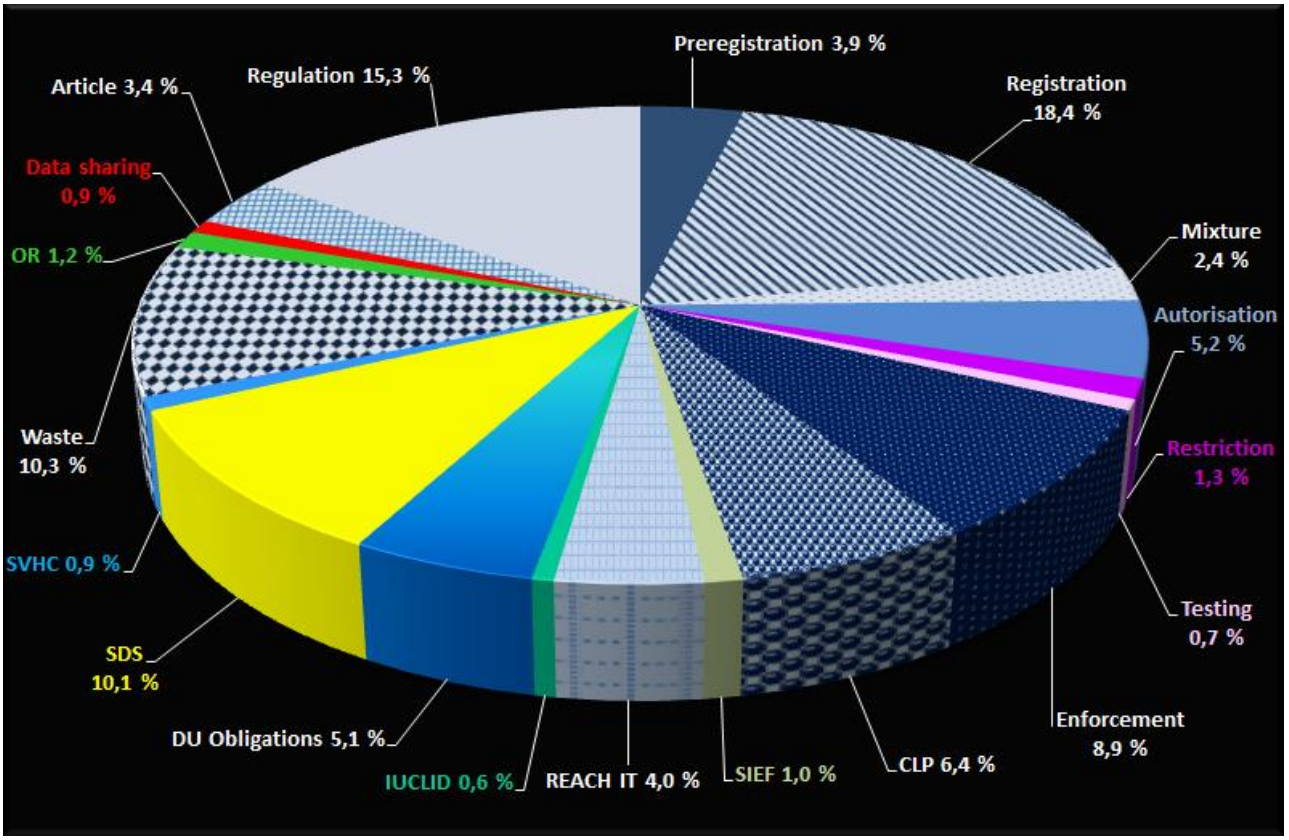
If yes, please specify how this advice is customized for the needs of SMEs.

45. What is the company size of enquirers? (please specify the percentage of the total each of them represent)*

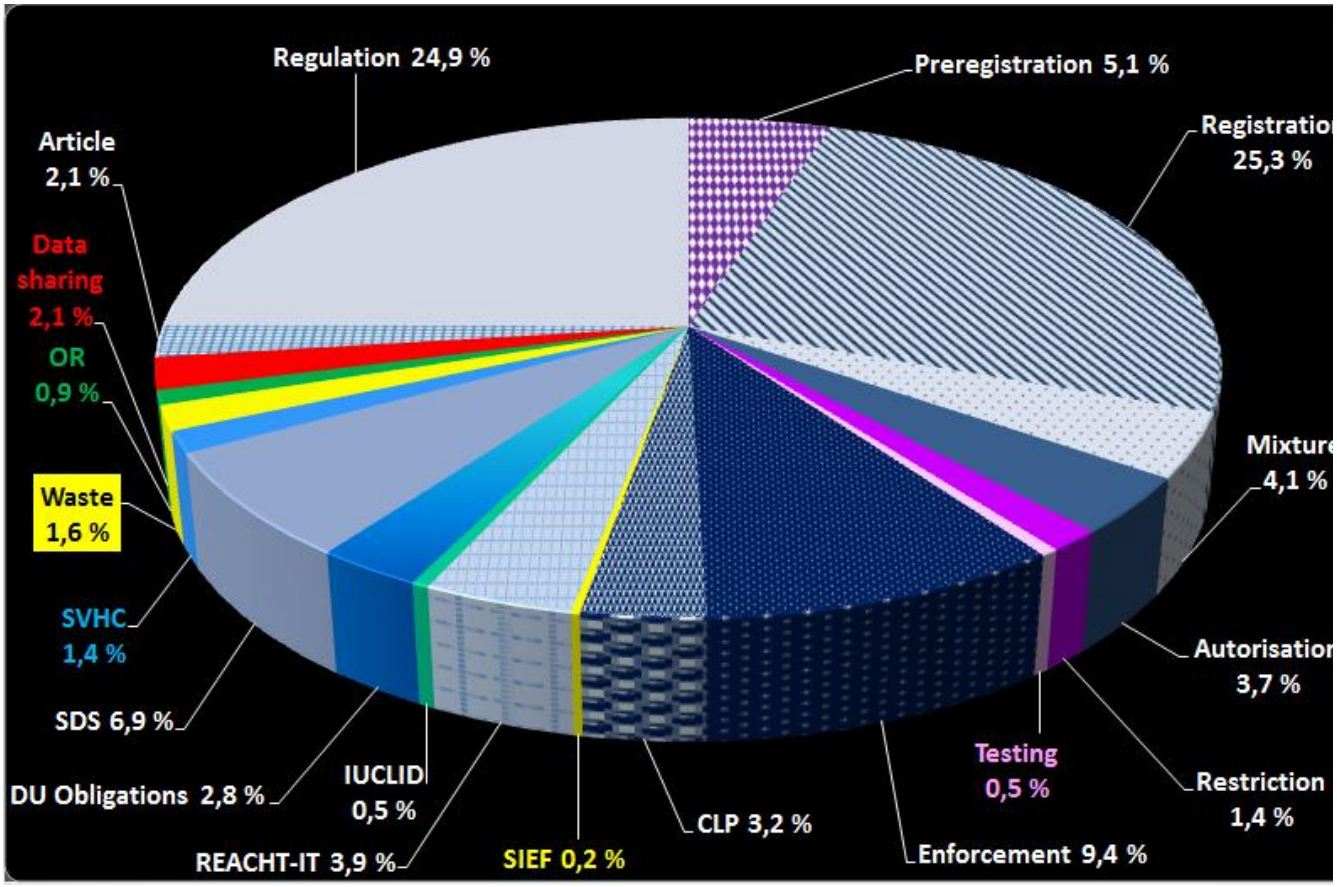
If no information is available for a specific type of company, please indicate N/A in the corresponding box.

	%
Large enterprises	N/A
Medium enterprises and Small enterprises	80-90%
Micro enterprises	N/A
Other	N/A

46. For each type of enquiry received, please provide the percentage of the total number of enquiries during the reporting period: **YEAR 2015 + 2016**



46. For each type of enquiry received, please provide the percentage of the total number of enquiries during the reporting period: **YEAR 2017**



Pre-registration*

Please insert a figure. The individual percentages should add up 100% altogether.

2015 + 2016 : 3,9 %
2017: 5,1 %

Registration*

2015 + 2016 : 18,4 %
2017 : 25,3 %

Evaluation*

2015 + 2016 : 0 %
2017 : 0 %

Authorisation*

2015 + 2016 : 5,2 %
2017 : 3,7 %

Restriction*

2015 + 2016 : 1,3 %
2017 : 1,4 %

Testing (Information requirement/registration)*

2015 + 2016 : 0,7 %
2017 : 0,5 %

Data sharing*

2015 + 2016 : 0,9 %
2017 : 2,1 %

Enforcement*

2015 + 2016 : 8,9 %
2017 : 9,4 %

CSR preparation*

2015 + 2016 : 0 %
2017 : 0 %

CLP Classification*

2015 + 2016 : 6,4 %
2017 : 3,2 %

CLP Labelling*

Included in CLP Classification

CLP Packaging*

Included in CLP Classification

CLP Classification and labelling inventory*

Included in CLP Classification

SIEFs*

2015 + 2016 : 1,0 %
2017 : 0,2 %

REACH-IT*

2015 + 2016 : 4,0 %
2017 : 3,9 %

IUCLID*

2015 + 2016 : 0,6 %
2017 : 0,5 %

Downstream user obligations*

2015 + 2016 : 5,1 %
2017 : 2,8 %

Only representative obligations*

2015 + 2016 : 1,2 %
2017 : 0,9 %

Obligations regarding articles*

2015 + 2016 : 3,4 %
2017 : 2,1 %

Safety Data Sheets*

2015 + 2016 : 10,1 %
2017 : 6,9 %

SVHC*

2015 + 2016 : 0,9 %
2017 : 1,4 %

Other*

2015 + 2016 : 28 %
2017 : 30,6 %

47. Are enquiries received mostly:*

'Straight-forward' is understood as those enquiries that can be answered without performing any prior research.
'Complex' is understood as those enquiries that require a minimum level of research before been answered or that demand exhaustive elaboration.

- [X] Complex
- [ ] Straightforward
- [ ] No information

48. What proportion of enquiries received are deemed to be: 1) straight forward*

Please provide an approximate estimation as an average per year. The individual percentages should add up 100% altogether.

50 %

2) complex*

50 %

49. How long, on average, does it take to respond to the following types of questions?

	4 hours	1 day	3 days	1 week	2 weeks	> 2 weeks	No info
Straight forward questions*	○	○	X	○	○	○	○
Complex questions*	○	○	○	X	○	○	○

50. Are any types of enquiry outsourced?*

- X Yes
- ○ No

51. What types of enquiry are outsourced?*

Please choose one or more answers.

- ☐ Pre-registration
- ☐ Registration
- ☐ Evaluation
- ☐ Authorisation
- ☐ Restriction
- ☐ Testing
- ☐ Enforcement
- ☐ CSR preparation
- X CLP
- ☐ SIEFs
- X REACH-IT
- X IUCLID5
- ☐ Downstream user obligations
- ☐ Obligations regarding articles
- ☐ Safety Data Sheets
- ☐ SVHC
- X Other (please list)

If Other, please list the other types of enquiries that are outsourced:*

Biocides

52. Does the Helpdesk seek feedback on its performance?*

X Yes

○ No

If yes please specify by whom and what the result was:*

Feedback received from clients and federations. Results: prompt response, helpful and clear guidance.

53. Does the Helpdesk review its performance and consider ways to improve its effectiveness?*

X Yes

○ No

If yes, what were the measures taken to improve its effectiveness?*

Preparation of 'standard answers'. Continuous update of questions database.

54. How could the cooperation between Helpdesks **under** Helpnet be improved?

1,800 character(s) maximum

The cooperation between helpdesk works very well. The Helpex helps a lot to answer the questions received by the Belgian REACH helpdesk.

55. How could the cooperation between Helpdesk **outside** Helpnet be improved?

1,800 character(s) maximum

The Belgian helpdesk REACH is already working with the Belgian federations but also the European federations. An important element is the distribution of information through the conferences, workshop ...

56. How frequently do you use HelpEx?*

- ( ) Daily
- (X) Weekly
- ( ) Monthly
- ( ) Less frequently

Theme 4: Awareness raising activities

57. Has the Member State carried out any specific awareness raising activities?*

- (X) Yes
- ( ) No

58. What types of activities have been carried out?*

Please choose one or more answers.

- [ ] Television spots
- [ ] Articles in Newspapers
- [ ] Radio spots
- [X] Speaking events
- [ ] Information seminar
- [ ] Telephone surveys
- [X] Leaflets and newsletters
- [ ] Articles in industry magazines
- [X] Website / Social Media
- [ ] Other

If other, please list the activities that have been carried out:*

59. Who is the target audience for your awareness raising activities?*

Please choose one or more answers.

- [ ] Consumers directly
- [ ] Consumers indirectly through multipliers (media, associations etc)
- [ ] SME in downstream sectors
- [ ] All companies in downstream sectors
- [ ] SMEs in chemicals sector
- [x] All companies in chemicals sector
- [ ] Other

If 'Other', please specify:*

60. Please describe how the information was adapted for the specific target audience:

61. How effective was each type of activity?

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

If you have not ticked an activity in question 59, please state N/A.

	1	2	3	4	5	N/A
Television spots*	○	○	○	○	○	X
Articles in Newspaper*	○	○	○	○	○	X
Radio spots*	○	○	○	○	○	X
Speaking events*	○	○	○	X	○	○
Information seminar*	○	○	○	○	○	X
Telephone surveys*	○	○	○	○	○	X
Leaflets and newsletters*	○	○	X	○	○	○
Articles in industry magazines*	○	○	○	○	○	x
Websites / social media*	○	○	○	X	○	○
Other*	○	○	○	○	○	X

62. Do you measure the effectiveness of the activities?*

○ Yes

X No

63. If yes, how?*

64. Do you have a REACH webpage/website?*

X Yes
○ No

65. Do you have a single webpage for REACH or multiple pages?

○ Single webpage
X Multiple webpages

66. How frequently is the REACH webpage visited (per month)?

○ 1-100
○ 101-500
○ 501-5000
○ 5001+
X No information

Theme 5: Information on the promotion of the development, evaluation and use of alternative test methods

67. Does the Member State contribute to EU and/or OECD work on the development and validation of alternative test methods by participating in relevant committees?*

○ **Yes**
○ ~~No~~

68. What has been the overall public funding on research and development of alternative testing in your Member States each year?*

○ ~~Euros 0-10,000~~
○ ~~Euros 10,001-100,000~~
○ ~~Euros 100,001-1,000,000~~
○ ~~More than Euros 1, 000, 000~~
○ **No information**

69. Please mention other relevant activities carried out on information on the Promotion of the Development, Evaluation and Use of Alternative Test Methods:

No information

Theme 6: Information on participation in REACH Commission and ECHA expert groups / committees (Forum, REACH Committee, MSC, RAC, SEAC, CARACAL, RCN, Helpnet)

70. How effective is the work of the FORUM Committee?*

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
- 2
- ➔ 3
- 4
- 5

71. Please specify if needed:

1,800 character(s) maximum

There are opportunities for improvement.

72. How could the effectiveness be improved?

1,800 character(s) maximum

Effectiveness could be improved e.g.

- by reducing the time alotted to information transfer during plenary meetings (pure messaging) and replacing this by decision making events;
- by reducing the time alotted to contemplations/discussions during plenary meetings (e.g. LESS Break Out Groups sessions and replacing this by focusing more on handing out practical instruments/tools in support of inspection work;
- by structuring communication in replacement of present disperse messaging interaction
- by empowering WGs / individual WG members towards entrepreneurship and innovation (e.g. LESS ECHA MORE MS)

73. How effective is the work of the REACH Committee?*

- 1
- 2
- x **3**
- 4
- 5

74. Please specify if needed:

1,800 character(s) maximum

The effectiveness is depending on the subject. The lobbying of the industry has sometimes too much influence on the work of the REACH Committee. The presidency of the Committee lacks sometimes neutrality.

The role of the RAC / SEAC Secretariat representative (by ECHA) could be more active during the Committee meeting.

We have seen an improvement in the quality of the preparatory documents. However the delay for delivery is not satisfactory.

75. How could the effectiveness be improved?

1,800 character(s) maximum

See above

76. How effective is the work of the Member States Committee (MSC)?*

- ~~1~~
- ~~2~~
- ~~3~~
- x **4**
- ~~5~~

77. Please specify if needed:

Efficiency seems to have increased in 2017.

78. How could the effectiveness be improved?

1,800 character(s) maximum

- **Some remarks were already mentioned in the previous reports of 2010 & 2015 and no favorable change was observed. Therefore, Belgium asks the Commission to take carefully into account the comments and the suggestions of improvements made by the Member States.**

- **Information obtained by ECHA (and its experts) should reach the members in due time in order to prepare for the meetings.**

- **Although timing within the REACH procedures is limited, it is important to allow room for consulting experts on the issues that are being discussed.**

- **New information often comes up within the meeting discussions. This doesn't leave time for verification or consultation within the MS.**

- Specific expertise is sometimes lacking.

79. How effective is the work of the Risk Assessment Committee (RAC)?*

- ~~1~~
- ~~2~~
- x **3**
- ~~4~~
- ~~5~~

80. Please specify if needed:

1,800 character(s) maximum

RAC benefits from the experience of several members who were involved in former scientific committees. Also the support of the RAC secretariat is very helpful.

81. How could the effectiveness be improved?

1,800 character(s) maximum

Some remarks were already mentioned in the previous reports of 2010 & 2015 and no favorable change was observed. Therefore, Belgium asks the Commission to take carefully into account the comments and the suggestions of improvements made by the Member States.

The workload has considerably increased for the last years due to the higher number of submitted dossiers (application for authorisation).
As a consequence, the pressure is increasing for the members due to the short time for commenting the dossiers. The fast track procedure is time gaining , but has a negative impact on quality of the assessment by the RAC.
Some members are lacking of experiences as well as support from their MS, which restrict them to take the rapporteurship for dossiers.
Another issue is the lack of coordination between the different EU committees (SCOEL,BPC,EFSA…)

The non-remuneration of the members for CLH dossiers.

ECHA should provide a substantial remuneration for the Member States that nominate committee members in order to ensure a full participation of all members.

Although the workload of this committee will continue to rise, it is advisable not to exceed a frequency of 5-6 meetings/year of maximum 3-4 days/meeting. Priority should be given to careful planning of meeting agendas to allow for sufficient time for substance-related discussions.

82. How effective is the work of the Socio-Economic Committee (SEAC)?*

- ~~1~~
- ~~2~~
- ~~3~~
- X ~~4~~
- ~~5~~

83. Please specify if needed:

1,800 character(s) maximum

In general SEAC works quite efficiently.

The guidance provided to rapporteurs (authorisation) by ECHA is extensive and greatly appreciated. ECHA sometimes tries to push the opinions too fast through the Committees, but speed for speed's sake is way of working that should be avoided and the independence of the rapporteurs should be respected.

In the last couple of years the Commission has also become too involved in the plenary discussions in terms of content.

Some members are lacking experience as well as support from their MS, which restrict them to take the rapporteurship for dossiers. It is also clear that not all members are contributing equally which puts even more strain on the members that actually do take up rapporteurships.

Rapporteur appreciate the fact that ECHA has taken measure to increase the time of consultation to 2 weeks in general.

Don't have specific view on the new way to register to be rapporteur.

84. How could the effectiveness be improved?

1,800 character(s) maximum

Care should be taken that all members have an equal workload and that they remain able to act independently. They must not be forced to arrive at their conclusions rashly and be given sufficient time to do their work in a conscientious fashion. The last couple of years more members have been taking part in the different processes, but this can still be improved.

The restriction process has gained momentum since 2010 and many problems have already been acknowledged and resolved. Other ways to increase the effectiveness are being sought by the restriction Task Force and will show their usefulness (or not) in the coming years.

85. How effective is the work of the CARACAL (Competent Authorities for Reach and CLP)?*

- 1
- 2
- **3**
- 4
- 5

86. Please specify if needed:

The group deals with political issues and the interpretation of REACH where all the MS are represented, together with the COM and ECHA. It enables to have a real overview of the REACH discussion in all the other fora and to identify the gaps and needs.

1,800 character(s) maximum

87. How could the effectiveness be improved?

1,800 character(s) maximum

Some remarks were already mentioned in the previous reports of 2010 & 2015 and no favorable change was observed. Therefore, Belgium asks the Commission to take carefully into account the comments and the suggestions of improvements made by the Member States.

The duration/frequency of the meetings should be adapted. In its current form, all the agenda points cannot be discussed in detail. Furthermore, the political and technical discussions are mixed. It is suggested to have some more logic grouping of the agenda points. We also would like to have clear decision after a discussion in the CARACAL – some agenda point were discussed several times without conclusions .

88. How effective is the work of the Risk Communication Network (RCN)?*

- ~~1~~
- ~~2~~
- ~~3~~

x ~~4~~

- ~~5~~

89. Please specify if needed:

1,800 character(s) maximum

90. How could the effectiveness be improved?

1,800 character(s) maximum

91. How effective is the work of the HelpNet Committee?*

1
2 X 3
4
5

92. Please specify if needed

1,800 character(s) maximum

Many documentations, guidance and information are given during the Helpnet Committee.

93. How could the effectiveness be improved?

1,800 character(s) maximum

No opinion

Theme 7: Information on Dossier Evaluation and Substance Evaluation activities

Dossier evaluation

94. Has the Member State been involved in Dossier evaluation within the reporting period?*

- ~~Yes~~
- **No**

95. How many testing proposal draft decisions have you evaluated within the reporting period?*

Please insert a figure.

2015, 2016, 2017 : 0

96. How many proposals for amendment have you issued within the reporting period?*

Please insert a figure.

2015, 2016, 2017 : 0

97. On average how many persons-days are dedicated per year to dossier evaluation (excluding presence in the Member State Committee)?*

Please insert a figure.

5 days

98. Do you outsource dossier evaluation to external contractors?*

- ~~Yes~~
- **No**

If yes, please specify the expertise outsourced:*

99. Do you consider that the dossier evaluation process, as currently structured, has to date served its purpose?*

- ~~Yes~~
- **No**

100. How could it be improved?

1,800 character(s) maximum

The quality of many registration dossiers is not good enough to fulfill the purposes of the REACH registration process. The compliance check of only 5% of the dossiers is not good enough to ensure the good functioning of the key processes of REACH such as substance evaluation. Lots of time is spend on this process (decision making), while many dossiers are still not compliant. Efficiency should increase in the decision making phase.

The Forum could also help on issues about registration dossiers that are not (to be) managed through compliance check or substance/dossier evaluation.

We recommend a pilot project seeking at checking the conformity of the registration dossiers with the reality on the field (for instance: are all applications by covered companies indeed included in the dossier? are all the potential exposures included? Is the volume range correct? Is the trade name(s) of the substance correct?).

It is important to launch this initiative in the frame of the Forum activities as the collaboration on such initiative is considered as an important enabling factor and also because the exchange on information to validate the gathered data might prove necessary for the validation.

101. Have you carried any follow-up actions in relation to dossier evaluation within the reporting period?*

- **Yes**
- ~~No~~

If yes, please describe enforcement actions and results obtained:

ECHA issued a certain amount of SONCs (statement of non-compliance) following dossier evaluation decisions for BE companies. Sometimes the company contacted spontaneously the BECA or the Enforcement Department, willing to update their dossier in order to end the SONC. In the other cases the Enforcement Department made a site visit in order to urge the company to update their dossier. Close cooperation and good communication between BECA, the enforcement department and ECHA was necessary to manage the SONCs. In general the companies are willing to update their dossier with the right information.

Substance evaluation

102. Has the Member State been involved in substance evaluation within the reporting period?*

- **Yes**
- ~~No~~

103. How many substances evaluated resulted in a draft decision within the reporting period?*

Please insert a figure.

2015: 4 from 2014 evaluations, however, 1 needed to be dropped due to seize manufacture
2016: 3 from 2015 evaluations
2017: 1 from 2016 evaluations
2018: 1 from 2017 evaluations

104. On average, how many person-days have been employed in the evaluation of each substance within the reporting period?*

Please insert a figure.

62 person-days (8h/day)

105. On average, how many person-days have been employed in the decision-making of each substance within the reporting period?*

Please insert a figure.

12 person-days

106. Indicate if possible what tasks have been most demanding in terms of resources:

Searching for additional information in scientific literature on transformation products and/or constituents

Understanding and evaluating in depth information on specific topics

Developing a solid argumentation to support the Draft Decision

Formulating the Draft Decision in a legally correct way

Writing out the SEV report, which is lengthy and the draft decision which requires careful consideration (legal, scientific, proportionality, …)

107. Please indicate the number of each type of staff that are involved in substance evaluation:

	0	1-5	6-10	>10
Toxicologist*		x		
Ecotoxicologist*		x		
Chemist*		x		
Risk Assessor*	x			
Social-Economic Analyst*	x			
Exposure Assessor*		x		
Other (please list):*				

If Other, please list:*

108. Do you outsource substance evaluations to external contractors?*

- **Yes**
- ~~No~~

If yes, please specify the expertise outsourced:*

Genotox, ED, read-across

109. Have you collaborated with other Member States in any of these evaluations within the reporting period?*

- **Yes**
- ~~No~~

If yes, please specify the nature of the collaboration:*

Preparing in mutual conciliation draft decisions of very similar substances

110. Have you initiated any action under other REACH processes as a consequence of substance evaluation performed by you or another Member States (e.g. Annex VI dossier for harmonised C&L, annex XV dossier for SVHC ID or restriction, other non-REACH regulatory action) within the reporting period?*

- **X** Yes
- ~~**No**~~

If yes, please specify the action:*

Anne XV C&L dossier for 1,2,4-triazole and 2,4,6-TTBP

111. What are the financial resources dedicated by your Member State to substance evaluation?

Financial resources can be allocated to substance evaluation for scientific advices on specific topics – it's done case by case (less than 40.000€/y)

112. Do the fees delivered for evaluation equate the financial resources involved in substance evaluation?

- ~~Yes~~
- **No**

113. Do you foresee an increase of resources dedicated to substance evaluation in the coming years?

- ~~Yes~~
- **No**

114. Have you encountered any problems while carrying out the substance evaluation?

- **Yes**
- ~~No~~

/If yes, please specify:

A correct evaluation asks sometimes for specific scientific knowledge that is very difficult to find

Understanding and applying the administrative protocols (IUCLID) to exchange information is far from straightforward.

The bad quality of some registration dossiers makes the evaluation more difficult.

Theme 8: Annex XV Dossiers (restriction and identification of SVHC) and other points related to the identification of SVHC

Annex XV Restriction Dossiers

115. Has the Member State been involved in the preparation of Annex XV Restriction Dossiers within the reporting period?*

- ~~**Yes**~~
- **No**

116. How many Annex XV restriction dossiers has the Member State prepared within the reporting period?*

Please insert a figure.

nihil

117. Among these how many were co-prepared with other Member States/ECHA?*

Please insert a figure.

N/A

118. How many person-days were dedicated to the development of Annex XV restriction dossiers?*

Please insert a figure.

N/A

119. How many person-days were dedicated to the assessment of Annex XV restriction dossiers?*

Please insert a figure.

N/A

120. How many times a representative of your Member State has been nominated rapporteur under the Risk Assessment Committee (RAC) within the reporting period?*

Please insert a figure.

2015 : 1 (CLH) ; 2016 : 0 : 2017 : 0

121. How many times a representative of your Member State has been nominated rapporteur under the Socio-Economic Committee (SEAC) within the reporting period?*

Please insert a figure.

2015 : 1 (autorisation _MRBC) + 8 (MINECO)
2016 : 1 (autorisation _MRBC) + 13 (MINECO)
2017: 0 (autorisation _MRBC) + 1 (MINECO)

122. How many times a representative of your Member State has been nominated co-rapporteur under the Risk Assessment Committee (RAC) within the reporting period?*

Please insert a figure.

2015 : 0 **; 2016 : 0 ; 2017 : 0**

123. How many times a representative of your Member State has been nominated co-rapporteur under the Socio-Economic Committee (SEAC) within the reporting period?*

Please insert a figure.

2015 : 0 (autorisation_MRBC) + 0 (MINECO)
2016 : 4 (autorisation_MRBC) + 0 (MINECO)
2017 : 9 (autorisation_MRBC) + 0 (MINECO)

124. What expertise is available for preparing Annex XV restriction dossiers (available FTE per year)

NIETS INVULLEN of 0

	0	1-3	4-6	7-9	>9
Chemist*	○	○	○	○	○
Toxicologist*	○	○	○	○	○
Ecotoxicologist*	○	○	○	○	○
Epidemiologist*	○	○	○	○	○
Economist*	○	○	○	○	○
Enforcement*	○	○	○	○	○
Legal*	○	○	○	○	○
Policy*	○	○	○	○	○
Exposure Assessor*	○	○	○	○	○
Risk Assessor*	○	○	○	○	○
Other (please list):*	○	X	○	○	○

If Other, please list:* **0.5 = policy, legal, enforcement support**

125. Do you outsource Annex XV restriction dossiers?*

- ~~Yes~~
- No

If yes, please specify the expertise outsourced:*

126. Is the Member State satisfied with the levels of access to outsourced expertise?*

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
- 2
- 3
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

127. Has there been any enterprises consultation/involvement in the preparation of Member State dossiers? *

- Yes
- No

128. If yes, what was the level of involvement of enterprises in the preparation of Member State dossiers?*

1 = Very low (not involved at all); 2 = Low (involved but not of any great significance); 3 = Medium (reasonably involved); 4 = Hig (highly involved); 5 = Very high (fully involved)

- 1
- 2
- 3
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

129. Among these enterprises, were there SMEs also consulted/involved in the preparation of Member State dossiers?*

- Yes
- No

130. If yes, what was the level of involvement of SMEs in the preparation of Member States dossiers?*

1 = Very low (not involved at all); 2 = Low (involved but not of any great significance); 3 = Medium (reasonably involved); 4 = Hig (highly involved); 5 = Very high (fully involved)

- 1
- 2
- 3
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

Annex XV SVHC Dossiers

131. Has the Member State been involved in the preparation of Annex XV SVHC Dossiers?*

- **Yes**
- ~~No~~

132. How many Annex XV SVHC dossiers has the Member State prepared within the reporting period?*

Please insert a figure.

2015 : 2

2016 : 0

2017: 0

133. Among these how many were co-prepared with other Member State/ECHA?*

Please insert a figure.

2015 :
2016 : N/A
2017: N/A

134. How many person-days were dedicated to the development of Annex XV SVHC dossiers?*

Please insert a figure.

2015 :
2016 : N/A
2017: N/A

135. How many person-days were dedicated to the assessment of Annex XV SVHC dossiers?*

Please insert a figure.

2015 :
2016 : 3 person-days (dossiers of other MS)
2017: 6 person-days (dossiers of other MS)

136. How many times a representative of your Member State has been nominated rapporteur under the Member States Committee (MSC) within the reporting period?*

Please insert a figure.

2015 : 0 but we don't know exactly what is meant here with 'rapporteur'.

2016: 0 but we don't know exactly what is meant here with 'rapporteur'.

2017: 0 but we don't know exactly what is meant here with 'rapporteur'.

137. How many dossiers prepared by other Member States has the Member State contributed to or commented upon within the reporting period?*

Please insert a figure.

2015 : 3 SVHC dossiers
2016: 3 SVHC dossiers

2017: 10 SVHC dossiers

138. What expertise is available for preparing Annex XV SVHC dossiers (in FTEs available per year)?

	0	1-3	4-6	7-9	>9
Chemist*		x			
Toxicologist*		x			
Ecotoxicologist*		x			
Economist*	x				
Enforcement*	x				
Legal*		x			
Policy*		x			
Exposure Assessor*		x			
Risk Assessor*	x				
Other*					

If other, please specify:*

139. Do you outsource the preparation of Annex XV SVHC dossiers?*

- ~~Yes~~
- **No**

If yes, please specify the expertise outsourced:*

140. Is the Member States satisfied with the levels of access to outsourced expertise?*

1 = Very low (not appropriate at all); 2 = Low (of some relevance but not of any great significance); 3 = Medium (reasonably appropriate); 4 = High (highly appropriate); 5 = Very high (completely appropriate)

- 1
- 2
- 3
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

141. Has there been any enterprises consultation/involvement in the preparation of Member State dossiers?*

- **Yes**
- ~~No~~

142. If yes, what was the level of involvement of enterprises in the preparation of Member State dossiers?*

1 = Very low (not involved at all); 2 = Low (involved but not of any great significance); 3 = Medium (reasonably involved); 4 = Hig (highly involved); 5 = Very high (fully involved)

- 1
- 2
- **3**
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

143. Among these enterprises, were there SMEs also consulted/involved in the preparation of Member State dossiers?*

- ~~Yes~~
- **No**

144. If yes, what was the level of involvement of SMEs in the preparation of Member State dossiers?*

1 = Very low (not involved at all); 2 = Low (involved but not of any great significance); 3 = Medium (reasonably involved); 4 = Hig (highly involved); 5 = Very high (fully involved)

- 1
- 2
- 3
- 4
- 5

Please provide additional comment if needed:

1,800 character(s) maximum

Other points related to the identification of SVHC

145. Do you consider that there is enough coordination between ECHA and Member States during the implementation of the SVHC Roadmap?

- **Yes**
- ~~No~~

If No, how could this be improved?

146. What were the financial and human resources dedicated to SVHCs identification (both screening and preparation of an Annex XV dossier) before and after the agreement on the SVHCs Roadmap in March 2013?

Theme 9: Information on REACH enforcement activities N/A

Theme 10: CLP enforcement activities N/A

Theme 11: Information on the effectiveness of REACH on the protection of human health and the environment, and the promotion of alternative methods, and innovation and competition

239. Do you think that the effects of REACH would be better evaluated at a Member State or at EU level?

- ~~Member State level~~
- **EU level**

240. Please provide a brief explanation of your response:

1,800 character(s) maximum

As a result of the Belgian policy :

- Environmental monitoring (air and water) is carried out at the regional level, but it is quite unrealistic to monitor all substances covered by Reach,

- Human biomonitoring is carried out at the federal level and the FASFC (The Belgian Federal Agency for the Safety of the Food Chain) contributes to the analysis contaminants found in the food chain.

In Flanders human biomonitoring (HBM) is specifically mentioned as a legal instrument for evidence-based environmental health policy making. HBM has been financed by the Flemish Government since 2002. A large number of environmental pollutants have been measured in a representative sample of the Flemish population in 3 age groups: newborns and their mothers, adolescents and adults. In addition to the general HBM, specific human biomonitoring is carried out in known hot spots (e.g. repetitive measurement of lead in blood near a zinc smelter in Hoboken). One of the primary goals of HBM in Flanders is the determination of time trends of biomarker measurements to evaluate the effect of existing policies and measures. One of the new aims is to obtain reference values for the Flemish population, not only for traditional pollutants but also for newer emerging chemicals. The reference values will be the basis for comparison with data from international studies, and for the comparison with data from high risk populations e.g. residents of specific locations (hot spots) within Flanders or specific subgroups in the population which may be vulnerable due to specific diets, habits, social behavior, health status etc.
As the Flemish human biomonitoring program is framed in a program for action, the study results are always coupled to environmental monitoring and modeling data in the phased policy translation process of the results (http://www.milieu-en-gezondheid.be/English/).

241. What parameters are available at Member State level that could be used to assess the effectiveness of REACH in a baseline study?

1,800 character(s) maximum

Theme 12: Other issues / recommendations / ideas

242. Please provide any further information on the implementation of REACH that the Member State considers relevant:

2,500 character(s) maximum

1. Recommendations

Access to external specialists

Due to budget restrictions, the access to external specialists is quite limited. Difficulties are also encountered in identifying and contacting the Belgian expert networks (e.g. bioaccumulation for substances with a specific character such as highly fluorinated compounds**). It seems that ECHA is in a better position to identify the experts available in the different fields of REACH and therefore to develop such expert networks.**

Data for nanomaterials

Currently, there is a lack of data provided by industry on nanomaterials within the registration framework. An overview of the type of data on nanomaterials provided by industry is needed by the MSs in order to obtain information on f.e. the possible adaptations made to the proposed tests, the eventual specific characterization of the nanomaterials, the availability of a review containing information on (eco)toxicity of the nanomaterial, etc.

2. Issue

CMR substances

In particular for CMRs classified substances (ref: Article 68(2)): We acknowledge the progress made in relation to this topic. Nevertheless, we emphasize the need to achieve results timely in order to implement this article to protect consumers from the CMRs substances. We are also in favor of the plans to prioritize the CLH work for the classification of (potential) CMR substances and believe that COM/ECHA should offer the necessary support to reach that goal.

243. Do you wish to upload documents in support of this submission? *

- O **Yes**
- O ~~No~~

If Yes, please provide a brief description of the documents that you are uploading (you may upload more than one document):*

1. **Annex 1 Rapport Helpdesk 2017 19 Mars 2018.docx**

The document refers to the "*Theme3 - Operation of the National Helpdesk and Provision of Communication to the Public of Information on Risks of Substances*".

It describes more in detail the activities of the Belgian Helpdesk for the year 2015.

Please upload your file

You may upload one or more documents.