

## ΝΕΑ ΔΗΜΟΣΙΑ ΔΙΑΒΟΥΛΕΥΣΗ (ΕΡΕΥΝΑ)

### ΑΦΟΡΑ ΤΟΝ ΕΥΡΩΠΑΪΚΟ ΚΑΝΟΝΙΣΜΟ ΓΙΑ ΤΗΝ ΚΑΤΑΧΩΡΙΣΗ, ΑΞΙΟΛΟΓΗΣΗ, ΑΔΕΙΟΔΟΤΗΣΗ ΚΑΙ ΤΟΥΣ ΠΕΡΙΟΡΙΣΜΟΥΣ ΤΩΝ ΧΗΜΙΚΩΝ ΠΡΟΪΟΝΤΩΝ (REACH)

Ο Ευρωπαϊκός κανονισμός REACH αποτελεί την κύρια νομοθετική πράξη που ισχύει για την κατασκευή, τη διάθεση στην αγορά και τη χρήση ουσιών, είτε ως έχουν είτε σε παρασκευάσματα και αντικείμενα. Ως εκ τούτου, ο κανονισμός REACH έχει αντίκτυπο στους περισσότερους βιομηχανικούς τομείς και ισχύει για τις περισσότερες εταιρείες της Ευρωπαϊκής Ένωσης, συμπεριλαμβανομένων πολλών Μικρομεσαίων Επιχειρήσεων (ΜμΕ).

Ο κανονισμός REACH αυτή τη στιγμή αναθεωρείται στο πλαίσιο του Προγράμματος Βελτίωσης της Καταλληλότητας και της Αποδοτικότητας του Κανονιστικού Πλαισίου της Ευρωπαϊκής Επιτροπής (REFIT).

Η αξιολόγηση αυτή, REACH REFIT 2017, θα εξετάσει σε ποιο βαθμό ο Ευρωπαϊκός Κανονισμός REACH λειτουργεί σωστά και θα διερευνήσει από που προκύπτουν τυχόν δυσλειτουργίες. Ακόμα, θα προσδιορίσει τις ανάγκες για προσαρμογή και θα προτείνει συστάσεις για τη βελτίωση της εφαρμογής του κανονισμού. Η αξιολόγηση REFIT θα επικεντρωθεί επίσης στον προσδιορισμό δυνατοτήτων για τη μείωση του φόρτου και την απλούστευση των διαδικασιών.

**Βάσει του κανονισμού REACH, οι ΜμΕ έχουν τις ίδιες ευθύνες με τις μεγάλες επιχειρήσεις και δεν μπορούν να απαλλάσσονται από οποιοδήποτε απαιτήσεις για τη χημική ασφάλεια.** Ωστόσο, ο κανονισμός REACH έχει λάβει υπόψη την ιδιαιτερότητα των ΜΜΕ σε μια σειρά από τρόπους, όπως μειώσεις των τελών και επιβαρύνσεων που καταβάλλονται στον Ευρωπαϊκό Οργανισμό Χημικών Προϊόντων (ECHA), απαιτήσεις δοκιμών οι οποίες αυξάνονται σταδιακά με τις ποσοτικές κατηγορίες με βάση τον όγκο της παραγωγής, διαφορετικές προθεσμίες καταχώρισης ανάλογα με την ποσότητα, κ.λπ. Παρά τα μέτρα αυτά, **οι ΜμΕ αντιμετωπίζουν περισσότερες δυσκολίες όσον αφορά τη γνώση και την εκπλήρωση όλων των υποχρεώσεών τους σύμφωνα με τον κανονισμό REACH.**

Συνεπώς, η συμβολή σας σε αυτή την έρευνα θα βοηθήσει την Ευρωπαϊκή Επιτροπή να συγκεντρώσει πληροφορίες και να αξιολογήσει τις επιπτώσεις του κανονισμού REACH στις ΜμΕ. Η ανατροφοδότηση αυτή θα χρησιμοποιηθεί για τη διαμόρφωση μιας ολοκληρωμένης πρότασης προς όφελος των ΜμΕ.

Γι' αυτό παρακαλούμε όπως συμπληρωθεί το ερωτηματολόγιο που ακολουθεί και σταλεί στο φαξ. 22661044 ή στο email [stalo@ccci.org.cy](mailto:stalo@ccci.org.cy) **το αργότερο μέχρι τις 28 Δεκεμβρίου 2016.**

Σας πληροφορούμε ότι το ερωτηματολόγιο αποτελείται από ερωτήσεις πολλαπλής επιλογής (multiple choice) γι' αυτό δεν χρειάζεται πολύς χρόνος για τη συμπλήρωσή του.

Σας ευχαριστούμε εκ των προτέρων και αναμένουμε τη θετική σας ανταπόκριση.

Με εκτίμηση,

Στάλω Δημοσθένους Κούλεντρου  
Ανώτερη Λειτουργός, ΚΕΒΕ  
Τμήμα Εκπαίδευσης & Ευρωπαϊκών Προγραμμάτων  
Enterprise Europe Network



# SME Panel – REACH REFIT evaluation

Fields marked with \* are mandatory.

## Introduction

### *The 2017 REACH REFIT evaluation (REACH review 2017)*

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The European Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) is currently reviewed, to monitor progress made in achieving its objectives.

This 2017 REACH REFIT evaluation will examine to which extent REACH is fit for purpose

The evaluation will look into what works well and what does not work well, and will investigate why. It will also identify needs for adjustment and propose recommendations to improve the implementation of REACH. The REFIT evaluation will also focus on identifying potential for burden reduction and simplification.[1]

This consultation is an opportunity for SMEs affected by REACH to voice their views and opinions on how best to address the topics of particular relevance for them.

Information collected through this consultation will be used in the process of setting the direction for future EU initiatives on REACH.

[1] The roadmap of the 2017 REACH REFIT evaluation provides further details about the objectives, scope and activities planned  
[http://ec.europa.eu/smart-regulation/roadmaps/docs/2017\\_env\\_005\\_reach\\_refit\\_en.pdf](http://ec.europa.eu/smart-regulation/roadmaps/docs/2017_env_005_reach_refit_en.pdf)

## A – Company profile

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**\* A1 – Size - Please indicate which of the following best describes the size of your company /your group of companies?**

- microenterprise
- small enterprise
- medium-sized enterprise
- large enterprise

**\* A2 - Geographical location –**

**a) Please indicate in which country your company is based:**

- BE
- BG
- CZ
- DK
- DE
- EE
- IE
- EL
- ES
- FR
- HR
- IT
- CY
- LU
- HU
- MT
- NL
- AT
- PL
- PT
- RO
- SI
- SK
- FI
- SE
- UK
- Iceland
- Liechtenstein
- Norway
- Other

**\*b) Please indicate in which country/ies your company regularly sell products and/or services:**

- |  |                                 |                                  |
|--|---------------------------------|----------------------------------|
| <input type="checkbox"/> BE            | <input type="checkbox"/> BG     | <input type="checkbox"/> CZ      |
| <input type="checkbox"/> DK            | <input type="checkbox"/> DE     | <input type="checkbox"/> EE      |
| <input type="checkbox"/> IE            | <input type="checkbox"/> EL     | <input type="checkbox"/> ES      |
| <input type="checkbox"/> FR            | <input type="checkbox"/> HR     | <input type="checkbox"/> IT      |
| <input type="checkbox"/> CY            | <input type="checkbox"/> LU     | <input type="checkbox"/> HU      |
| <input type="checkbox"/> MT            | <input type="checkbox"/> NL     | <input type="checkbox"/> AT      |
| <input type="checkbox"/> PL            | <input type="checkbox"/> PT     | <input type="checkbox"/> RO      |
| <input type="checkbox"/> SI            | <input type="checkbox"/> SK     | <input type="checkbox"/> FI      |
| <input type="checkbox"/> SE            | <input type="checkbox"/> UK     | <input type="checkbox"/> Iceland |
| <input type="checkbox"/> Liechtenstein | <input type="checkbox"/> Norway | <input type="checkbox"/> Other   |

**\*A3 - Role under REACH**

- Manufacturer of chemical substances[1]
- Importer[2]
- Formulator[3]
- Distributor[4]
- Only representatives[5]
- Downstream user (industrial or professional user)[6]
- Supplier (producer/importer/ wholesaler/retailer) of articles[7]
- I don't know

[2] Manufacturer means any natural or legal person established within the EU who manufactures a substance within the EU

[3] Importer means any natural or legal person established within the EU who is responsible for import

[4] Formulators produce mixtures (e.g. paints, adhesives, detergents), which are usually supplied further downstream

[5] Distributor means any natural or legal person established within the EU, including a retailer, who only stores and places on the market a substance, on its own or in a mixture for third parties

[6] Non-EU suppliers may appoint an only representative for the purpose of acting as a registrant established in the EU

[7] Downstream user (industrial or professional user) means any natural or legal person established within the EU, other than the manufacturer or the importer, who uses a substance, either on its own or in a mixture, in the course of their industrial or professional activities. Industrial users are workers who use chemical products in an industrial site, large or small. Professional users are workers who use chemical products outside an industrial setting (e.g. workshop, client site, educational or healthcare establishment) such as construction, mobile cleaning companies or professional painters.

[8] Article means an object given a special shape, surface or design that determines its function to a greater extent than its chemical composition does (e.g. clothing, furniture, electronics and practically all objects of modern life)

## **B – Information in the company about REACH**

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**\* In which of the following sectors are you involved? Please tick all that apply.**

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Basic chemicals                  | <input type="checkbox"/> Speciality chemicals                  | <input type="checkbox"/> Formulation of chemical products    |
| <input type="checkbox"/> Metals                           | <input type="checkbox"/> Adhesives and glues                   | <input type="checkbox"/> Fertilisers                         |
| <input type="checkbox"/> Polymers                         | <input type="checkbox"/> Cosmetics                             | <input type="checkbox"/> Personal care products              |
| <input type="checkbox"/> Retail                           | <input type="checkbox"/> Textiles                              | <input type="checkbox"/> Automotive                          |
| <input type="checkbox"/> Plastics                         | <input type="checkbox"/> Toys                                  | <input type="checkbox"/> Synthetic Rubber                    |
| <input type="checkbox"/> Veterinary medicines             | <input type="checkbox"/> Lubricants and oils                   | <input type="checkbox"/> Dyes and Pigments                   |
| <input type="checkbox"/> Crop protection                  | <input type="checkbox"/> Paper and pulp                        | <input type="checkbox"/> Consumer chemicals                  |
| <input type="checkbox"/> Aerosols                         | <input type="checkbox"/> Fuels                                 | <input type="checkbox"/> Electronics                         |
| <input type="checkbox"/> Detergents and cleaning products | <input type="checkbox"/> Paints, inks and coatings             | <input type="checkbox"/> Auxiliaries for industry            |
| <input type="checkbox"/> Aerospace and Defence            | <input type="checkbox"/> Other manufacturing                   | <input type="checkbox"/> Agriculture                         |
| <input type="checkbox"/> Construction                     | <input type="checkbox"/> Motor vehicle repair                  | <input type="checkbox"/> Professional painting or decoration |
| <input type="checkbox"/> Cleaning services                | <input type="checkbox"/> Other professional users of chemicals |  |

**\* B4 – Please indicate your level of satisfaction with availability of information about REACH and about how it affects your company**

- Not satisfied
- Rather not satisfied
- Satisfied
- Very satisfied

**B5 – What are the most used sources of information about REACH for your company**

	Never used	Rarely used	Occasionally used	Sometimes used	Often used	I am not aware of this source of information
Business partners - Suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business partners - Customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business partners - Consultants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business partners - Law firms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National, regional or local level- Helpdesks (or other public authorities' sources)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

National, regional or local level - Chambers of Commerce	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National, regional or local level - Inspectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industry associations - Sector-specific	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU level - ECHA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU level - European Commission	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Other (please specify):

**B6 – a) Several mechanisms have been put in place to inform and support companies about REACH requirements and how to comply. To what extent do they facilitate the implementation of REACH by your company?**

	Not useful at all	Slightly useful	Somehow useful	Substantially useful	Very useful	I am not aware of this mechanism or procedure
Information and guidance published by ECHA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information and guidance published at national, regional or local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information and guidance - Sector-specific guidelines by industry associations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

National helpdesk support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower information requirements for substances registered in low volumes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of fees payable to ECHA (e.g. registration, application for authorisation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exemption for R&D activities (i.e. PPORD – Product and Process Oriented Research and Development)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulation on data sharing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify):

**B6 – b) Please suggest any possible improvement or new mechanism to inform and support companies.**

## **C – Effects of REACH on your company**

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**\*C7 – a) Has REACH increased your total production costs?**

- Yes to a significant extent\*
- Yes but to an insignificant extent\*
- No
- I don't know

\*Please indicate % in case of choosing option A or B.

 %

**\*C7 – b) If REACH has increased your costs, were you able to pass this increase on (fully or partly) to your customers?**

- Yes fully (above 90%)
- Yes to a significant extent (50 – 90%)
- Yes to a small extent (below 50%)
- No
- I don't know

**C7 – c) On your total REACH compliance costs, how much do the fees paid to ECHA represent?  
Please rank <10%, 10 - 25%, 25 – 40%, 40 – 65%,>65%)**

	< 10%	10 – 25%	25 – 40%	40 – 65%	>65%
Registration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Authorisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**C8 – What are the main costs that your company incurs in relation to REACH?**

	Not an important cost	Slightly important cost	Moderately important cost	Considerably important cost	Very important cost	I don't know / Cost not relevant for the company
Preparation of registration dossier(s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Testing requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information in the supply chain, including dealing with (e)Safety Data Sheets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fulfilling requirements on substances in articles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Authorisation: preparation of application (s) for authorisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Authorisation: costs to replace SVHC (s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance with restrictions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fees payable to ECHA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost for training of staff for familiarisation with the REACH Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs for internal technical /legal management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Costs for external technical /legal support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Loss of business to big companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Loss of business to imports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**C9 – What are the main challenges for your company when complying with REACH?**

	Not an important challenge	Slightly important challenge	Moderately important challenge	Considerably important challenge	Very important challenge	I don't know / Not relevant for the company
Administrative costs (e.g. financial and human resources)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity (legal text, guidance, IT tools,...)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Frequency of updates (e.g. candidate list, IT tools,...)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Availability of information and relevant tools (e.g. guidance, IT support) in national languages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparation of registration dossier(s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information in the supply chain, including dealing with (e)Safety Data Sheets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fulfilling requirements on substances in articles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preparation of applications for authorisation (s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Compliance with restrictions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Substitution of substances of very high concern (SVHC(s))	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relationship between REACH and other chemicals legislation (e. g. CLP, environment, consumer protection, worker protection)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**C 10 - a) Has implementing of REACH generated new opportunities and benefits for your company?**

	Not an important opportunity or benefit	Slightly important opportunity or benefit	Moderately important opportunity or benefit	Considerably important opportunity or benefit	Very important opportunity or benefit	I don't know / Not relevant for the company
Improved branding /image with customers /consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of chemical risks for products manufactured	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of chemical risks for workers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of chemical risks for the environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Access to new markets and customers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New business opportunities linked to better information on chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Substitution of hazardous chemicals (SVHCs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Focus company activities on emerging markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify):

**C10 –b) Open question: If you have quantitative estimates for some of the benefits mentioned above, please provide them (in EUR). Please indicate also what the type of benefits for which you provide those estimates.**

**C11 – What have been the effects of REACH on the operations of your company?**

	Substantially negative	Slightly negative	No effect	Slightly positive	Substantially positive	I don't know
Access to raw materials /availability of chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to the EU internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Access to external markets (outside EU)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractual relations with business partners	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Turnover	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes to the portfolio of chemical substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management of the company's legal obligations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Climate for Investment decisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify):

**C12 – What were the effects of REACH on the research, development and innovation carried out by your company?**

	Substantially negative	Slightly negative	No effect	Slightly positive	Substantially positive	I don't know
R&D budget	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Staff dedicated to R&D	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
R&D and innovation outcome (new products, processes, services)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify):

**D – Experience with public authorities**

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**D13 – How would you rate the replies obtained to your question(s) concerning REACH from National helpdesks[1]?**

	Not at all satisfactory	Rather unsatisfactory	Neutral	Rather satisfactory	Very satisfactory	I don't know
Content (helpfulness and accuracy) of the reply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Time needed to get the reply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] National helpdesks are established in each EU Member State to give advice on the provisions of REACH.

**D14 – What is your experience with the work of the different authorities (e.g. helpdesks, Competent Authorities, enforcement authorities) responsible for REACH in your country?**

- I am satisfied with the work of the different authorities responsible for REACH in my country as the information I receive from different authorities is consistent
- I have experienced several inconsistencies in the approach of different authorities responsible for the implementation or the enforcement of REACH in my country (if so, could you please provide a concrete example?)
- I have never had any experience with the different authorities responsible for REACH in my country

## **E – Open question**

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**E15 – Please provide any additional comment that you consider relevant for the REFIT evaluation of REACH. Also, please provide any suggestions for reducing any burdens while keeping the main objectives of REACH (i.e. protection of human health and the environment, including promotion of alternative methods to animal testing; free circulation of substances in the internal market while enhancing competitiveness and innovation).**