enterprise europe network

29 Νοεμβρίου 2016

ΝΕΑ ΔΗΜΟΣΙΑ ΔΙΑΒΟΥΛΕΎΣΗ (ΕΡΕΎΝΑ)

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 οποιεσδήποτε 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 (ΕCHA), 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 <u>stalo@ccci.org.cy</u> 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)

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

A - Company profile

* A1 –	Size - Please indicate which of the following best describes the size of your company
	group of companies?
0	microenterprise
0	small enterprise
0	medium-sized enterprise
0	large enterprise
	large enterprise
* A2 -	Geographical location –
a) Ple	ease indicate in which country your company is based:
	BE
0	BG
	CZ
0	DK
0	DE
0	EE
0	IE .
	EL
	ES
	FR
	HR
	IT
0	CY
0	LU
	HU
	MT
	NL
0	AT
0	PL
	PT
	RO
	SI
	SK
	FI
	SE
	UK
	Iceland
	Liechtenstein
	Norway

Other

b) Pl	ease indicate in	whi	ich counti	y/ies	s your company regularly sell products and/or services:				
	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				
A3 - I	Role under REA								
	Manufacturer of	f che	emical sub	stano	ces[1]				
	Importer[2]								
	Formulator[3]								
	Distributor[4]								
	Only representa	ative	s[5]						
	Downstream us	er (i	ndustrial o	r pro	fessional user)[6]				
	Supplier (produ	cer/i	importer/ w	vhole	saler/retailer) of articles[7]				
	I don't know								
[2] N	lanufacturer means a	ny na	tural or legal p	person	established within the EU who manufactures a substance within the EU				
[3] Ir	mporter means any na	atural	or legal perso	n esta	blished within the EU who is responsible for import				
[4] F	ormulators produce m	nixture	es (e.g. paints	, adhe	sives, detergents), which are usually supplied further downstream				
[5] [istributor means any	natura	al or legal per	son es	tablished within the EU, including a retailer, who only stores and places on the				
marl	ket a substance, on its	own	or in a mixtur	e for th	nird parties				
[6] N	lon-EU suppliers may	appo	int an only rep	oresen	tative for the purpose of acting as a registrant established in the EU				
	`				r) means any natural or legal person established within the EU, other than the				
	•				e, either on its own or in a mixture, in the course of their industrial or professional				
					mical products in an industrial site, large or small. Professional users are workers				
	-				tting (e.g. workshop, client site, educational or healthcare establishment) such as				
	struction, mobile clean	_							
	_	_	•	-	surface or design that determines its function to a greater extent than its chemical				
com	composition does (e.g. clothing, furniture, electronics and practically all objects of modern life								

B – Information in the company about REACH

In which of the following sectors are you involved? Please tick all that apply.								
	Basic chemicals		Speciality chemicals		Formulation of chemical products			
	Metals		Adhesives and glues		Fertilisers			
	Polymers		Cosmetics		Personal care products			
	Retail		Textiles		Automotive			
	Plastics		Toys		Synthetic Rubber			
	Veterinary medicines		Lubricants and oils		Dyes and Pigments			
	Crop protection		Paper and pulp		Consumer chemicals			
	Aerosols		Fuels		Electronics			
	Detergents and cleaning products		Paints, inks and coatings		Auxiliaries for industry			
	Aerospace and Defence		Other manufacturing		Agriculture			
	Construction		Motor vehicle repair		Professional painting or decoration			
	Cleaning services		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								
0	Rather not satisfied							
0	Satisfied							
0	Very satisfied							

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

	Never used	Rarely	Occasionally used	Sometimes used	Often used	I am not aware of this source of information
Business partners - Suppliers	0	0	0	0	0	•
Business partners - Customers	0	0	•	0	0	•
Business partners - Consultants	0	0	0	0	0	•
Business partners - Law firms	0	0	0	0	0	•
National, regional or local level- Helpdesks (or other public authorities' sources)	©	©	©	•	©	•

National, regional or local level - Chambers of Commerce	0	•	•	•	0	•
National, regional or local level - Inspectors	0	0	0	•	0	•
Industry associations - Sector- specific	0	0	0	•	0	•
EU level - ECHA	0	0	0	0	0	0
EU level - European Commission	0	0	0	0	0	•
Other (please specify)	0	0	0	©	0	0

Oth	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	0	0	•	•	0	•
Information and guidance published at national, regional or local level	0	•	•	©	0	•
Information and guidance - Sector-specific guidelines by industry associations	©	©	©	©	©	•

National helpdesk supportNational helpdesk support	0	©	•	©	©	•
Lower information requirements for substances registered in low volumes	•	•	•	•	•	•
Reduction of fees payable to ECHA (e.g. registration, application for authorisation)	0	•	•	•	©	•
Exemption for R&D activities (i.e. PPORD – Product and Process Oriented Research and Development)	©	©	•	•	©	•
Regulation on data sharing	0	0	0	0	0	0
Other (please specify)	0	0	0	0	0	0

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
*C7 – a) Has REACH increased your total production costs?
Yes to a significant extent*
Yes but to an insignificant extent*
O No
I don't know
*Please indicate % in case of choosing option A or B.
%

*C7 -	- b) If REACH has increased your cost	s, were you able to	pass this increase	on (fully or
par	tly) to your customers?			

- Yes fully (above 90%)
- ∇es to a significant extent (50 90%)
- Yes to a small extent (below 50%)
- O 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	0	©	0	0	0
Authorisation	0	0	0	0	0

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)	0	0	0	0	0	•
Testing requirements	©	0	0	0	0	0
Information in the supply chain, including dealing with (e)Safety Data Sheets	©	•	©	©	©	•
Fulfilling requirements on substances in articles	0	©	©	©	©	•

Authorisation: preparation of application (s) for authorisation	©	©	©	©	©	0
Authorisation: costs to replace SVHC (s)	•	•	©	©	•	0
Compliance with restrictions	0	0	0	0	0	0
Fees payable to ECHA	0	0	0	0	0	0
Cost for training of staff for familiarisation with the REACH Regulation	©	©	©	©	©	©
Costs for internal technical /legal management	©	©	©	©	©	0

Costs for external technical /legal support	•	•	•	•	•	•
Loss of business to big companies	•	•	•	0	•	•
Loss of business to imports	©	0	©	0	©	0

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)	•	•	•	•	•	•
Access to data	0	0	0	0	0	•
Complexity (legal text, guidance, IT tools,)	•	©	©	0	•	•
Frequency of updates (e.g. candidate list, IT tools,)	•	©	©	•	•	•

Availability of information and relevant tools (e.g. guidance, IT support) in national languages	©	©	•	•	•	•
Preparation of registration dossier(s)	•	0	0	0	0	•
Information in the supply chain, including dealing with (e)Safety Data Sheets	©	©	•	•	•	•
Fulfilling requirements on substances in articles	©	©	©	©	•	•
Preparation of applications for authorisation (s)	•	•	•	•	•	•

Compliance with restrictions	0	©	0	0	0	0
Substitution of substances of very high concern (SVHC(s))	•	©	•	•	•	•
Relationship between REACH and other chemicals legislation (e. g. CLP, environment, consumer protection, worker protection)	•	©	•	•	•	

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	©	•	©	©	©	0
Reduction of chemical risks for products manufactured	©	•	0	©	©	0
Reduction of chemical risks for workers	©	©	©	©	©	0
Reduction of chemical risks for the environment	©	•	©	©	©	0

Access to new markets and customers	©	©	©	0	©	•
New business opportunities linked to better information on chemicals	•	•	•	•	•	•
Substitution of hazardous chemicals (SVHCs)	©	•	©	0	©	•
Focus company activities on emerging markets	©	©	©	©	©	•
Other (please specify)	©	0	0	0	0	0

Othe	r (please specify):
	-b) Open question: If you have quantitative estimates for some of the benefits mentioned ove, please provide them (in EUR). Please indicate also what the type of benefits for which
	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	l don't know
Access to raw materials /availability of chemicals	0	0	0	0	•	0
Access to the EU internal market	0	©	0	©	0	0

Access to external markets (outside EU)	0	0	0	•	•	0
Contractual relations with business partners	©	0	0	0	0	0
Turnover	0	0	0	0	0	0
Changes to the portfolio of chemical substances	©	0	0	0	0	0
Management of the company's legal obligations	©	0	0	0	•	0
Climate for Investment decisions	0	©	0	0	0	0
Other (please specify)	0	0	0	0	0	0

	Substantially negative	Slightly negative	No effect	Slightly	Substantially positive	l don't know
R&D budget	0	0	0	0	0	0
Staff dedicated to R&D	0	0	0	0	0	0
R&D and innovation outcome (new products, processes, services)	•	•	0	•		0
Other (please specify)	0	0	0	0	0	0

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	l don't know
Content (helpfulness and accuracy) of the reply	©	•	•	•	0	•
Time needed to get the reply	0	0	0	0	0	0

[1]	1 National	halndacke	are establis	had in aac	h FIII	Mamhar	State to	aiva	advice	on the	nrovisions	of F	REA	CH
11	i ivalionai	Helpuesks	are establis	illeu III eac		Mellibel	State to	uive	auvice	OH HIE	DIOMONIO	OI I	$\neg \vdash \land \lor$	UII.

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

- 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

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