

2021 Joint Forum- BPRS OPEN SESSION

OS 2.2.2 ASOs Workshops related
to the projects Customs 2, REF-7
and BEF-1

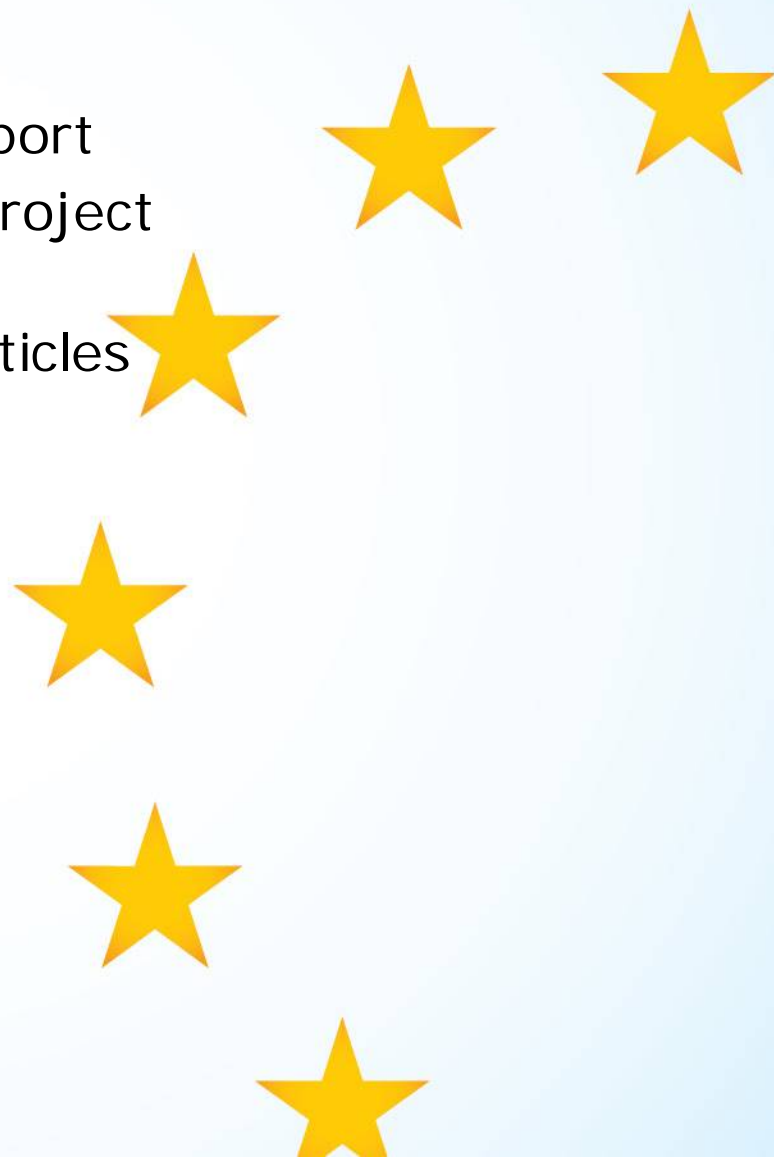
10 November 2021



Content

Workshops with ASOs related to:

- 'REF-7 on registrations' project report
- 'Cooperation with Customs' pilot project report
- BEF-1 project report on treated articles



Workshop with ASOs related to 'REF-7 project on registrations'

- The Workshop with ASOs took place on 27 May 2021
- 10 participants from ASOs
- WG members presented project results and recommendations
- The main issues raised by the ASOs related to REF-7 project:
 - Art. 22 of REACH obligation to update of the registration dossier.
 - NEAs approach to check upstream and/or downstream actors in the supply chain in case of finding non-compliances.

Workshop with ASOs related to 'Cooperation with Custom II' pilot project

- The Workshop with ASOs took place on 27 May 2021
- 11 participants from ASOs
- WG members presented projects results and recommendations.
- COM representative presented current COM actions on integrating REACH checks in Customs controls
- ASOs shared their experience related to customs authorities' inspections:
 - Some of them were asked to provide documents which are not required by REACH or CLP (referred to as REACH certificates) or provide registration numbers even for mixtures their members imported.
 - They also referred to stringent/more detailed customs checks, depended on the importing MS.

Results of the survey with ASOs

Results of survey sent after Workshop to ASOs participants:

- 8 participants answered. 5 ASOs were not familiar with the project reports prior to receiving invitation to the Workshop
- All of participants thought that the length of the workshop was adequate.
- Participants found the discussions during workshop very useful but asked for interactive discussion on the recommendations and ASOs contribution towards their resolution. ASOs also proposed sharing information on practices from some associations that meet Forum expectations to promote them.
- All respondents rated the workshop as good or excellent and assessed that Workshop was very instructive and well organised.

Workshop with ASOs related to BEF-1 Treated articles - BPR

- ✓ Workshop held on 26 April 2021 - **12 ASOs** attending it
- ✓ ASOs shared problems and doubts for companies to comply with TAs obligations

Topics discussed in break-out groups

- ✓ **Consumer information/safety** – TA labelling necessary for consumer safety – special attention for internet sale (important source of TAs in EU). ASOs expressed concerns on the quality of information for TAs' labels
- ✓ **Labelling** - Names of active substances in TAs need to be clearly reported on labels. ASOs raised concerns on incorrect use of biocidal property claims for TAs (e.g. articles claimed as 'antimicrobial' with no biocidal property information on labels = non-compliance). Products without declaration of active substances must be considered TAs and hence comply with labelling obligations
- ✓ **Supply chain** - ASOs highlighted that companies might remove biocidal claims on TAs along the supply chain to circumvent BPR obligations = unmonitored/'hidden' TAs on the market – potentially containing non-approved active substances (illegal TAs)

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