

2019 Report of National Helpdesk Activities: Overview

July 2020



Disclaimer

This publication is solely intended for information purposes and does not necessarily represent the official opinion of the European Chemicals Agency. The European Chemicals Agency is not responsible for the use that may be made of the information contained in this document.

Table of Contents

1 INTRODUCTION	5
2 NATIONAL HELPDESKS IN NUMBERS	5
2.1 TOTAL NUMBER OF ENQUIRIES RECEIVED BY NATIONAL HELPDESKS IN 2019	5
2.2 ENQUIRIES RECEIVED BY NATIONAL HELPDESKS BY REGULATION	6
2.3 BPR, CLP AND REACH ENQUIRIES RECEIVED BY NATIONAL HELPDESKS SINCE 2014	7
2.4 HOT TOPICS	9
2.5 RELATION BETWEEN ARTICLE 33 OF REACH AND THE WASTE FRAMEWORK DIRECTIVE	12
2.6 SUPPORT GIVEN BY NATIONAL HELPDESKS ON OTHER REGULATIONS	12
3. CUSTOMER SUPPORT	13
3.1 COMMUNICATION CHANNELS	13
3.2 SERVICE RESPONSE TIME	13
3.3 HELPDESK RESOURCES	14
4. NATIONAL HELPDESK ACTIVITIES	15
4.1 WAYS TO SUPPORT COMPANIES	15
4.2 EVENTS ORGANISED BY NATIONAL HELPDESKS IN 2019	16
4.3 EVENTS PLANNED BY NATIONAL HELPDESKS IN 2020	16
4.4 VISITING PROGRAMME	17
4.5 COOPERATION WITH ENTERPRISE EUROPE NETWORK (EEN)	17
5. CONCLUSIONS	18

List of Acronyms

BPC	Biocidal Products Committee
BPR	Biocidal Products Regulation (EU) 528/2012
CLP	CLP Regulation (EC) 1272/2008
Forum	Forum for Exchange of Information on Enforcement
HelpEx	Tool to communicate and discuss questions among the members of HelpNet
HelpNet	BPR, CLP and REACH Helpdesk Network, consisting of representatives from the national helpdesks of the 28 EU Member States, as well as Iceland, Liechtenstein and Norway, ECHA and the European Commission
HelpNet Secretariat	Service within the Support and Enforcement Unit of ECHA responsible for the coordination of HelpNet activities
NHD	National helpdesk
Q&A	Question and answer
REACH	REACH Regulation (EC) 1907/2006
SDS	Safety data sheet
SME	Small and medium-sized enterprise
SVHC	Substance of very high concern

Foreword by the Chair of the HelpNet

Dear readers,

As the new Chair of the HelpNet, I am happy to introduce this annual report of national helpdesk activities. I am impressed by the amount of work, as well as the diversity of topics that the national helpdesks are able to cover. Having a network that is able to support companies in their own language and understand their specific situations is one of the strengths of the BPR, CLP and REACH.

After the last registration deadline under REACH, we saw a small reduction of questions, but you as national helpdesks have still answered more than 40 000 questions in 2019. During my recent visit to one of the national helpdesks, I saw not only the enthusiasm you all have to help industry to be compliant with the various pieces of legislation that you are taking care of, but also a hunger to learn. REACH and CLP are both already more than 10 years old, but many people have changed jobs – myself included – and are confronted with areas that are new to them. Your continuous engagement is very much appreciated as you contribute concretely to the well-being of workers, consumers and our environment.

Brexit, poison centre notifications and communicating on substances of very high concern in articles, not only required under REACH Article 33, but also now embedded in the Waste Framework Directive in the SCIP database, will all trigger a lot of new questions. I am sure that you will rise to these new challenges and continue to help industry to stay compliant.

It is clear that the BPR remains the regulation with the highest number of questions replied by national helpdesks. Understandably, this is due to the fact that only national helpdesks can reply to questions on certain BPR topics that touch upon national requirements. I would like to thank you for handling such an impressive number of questions.

On a wider perspective, under the new von der Leyen Commission, chemicals will stay very high on the agenda and we are all looking forward to what the Green Deal, the Circular Economy and the Chemicals Strategy for Sustainability will bring to our daily work.

I hope you enjoy reading this report.

Erwin Annys
Chair of the HelpNet



1 Introduction

The national BPR, CLP and REACH helpdesks report each year on their activities, workload and particular needs. This report summarises the activities of national helpdesks (NHDs) from 1 January to 31 December 2019. The HelpNet Secretariat collected the information from January to February 2020 through a web-based survey.

For 2019, the survey was open to the NHDs of 28 EU Member States and three EEA countries, observers from three EU candidate countries, as well as a third-country observer of HelpNet (for BPR and CLP). Overall, the responses provided through the survey reflect the activities of the BPR, CLP and REACH helpdesks across 32 countries.

The views expressed in this report are an interpretation of the HelpNet Secretariat on the data provided by NHDs, and do not necessarily represent the views of the NHDs that provided the information.

2 National helpdesks in numbers

2.1 Total number of enquiries received by national helpdesks in 2019¹

In 2019, NHDs received around 40 500 enquiries² from their customers on the BPR, CLP and REACH. Out of the total number of enquiries, 42 % were related to the BPR, 30 % to REACH, and 26 % to CLP. The remaining 2 % of enquiries were related to REACH and CLP, but were not allocated to a specific regulation (see Figure 1).

Enquiries received by NHDs in 2019, split by regulation

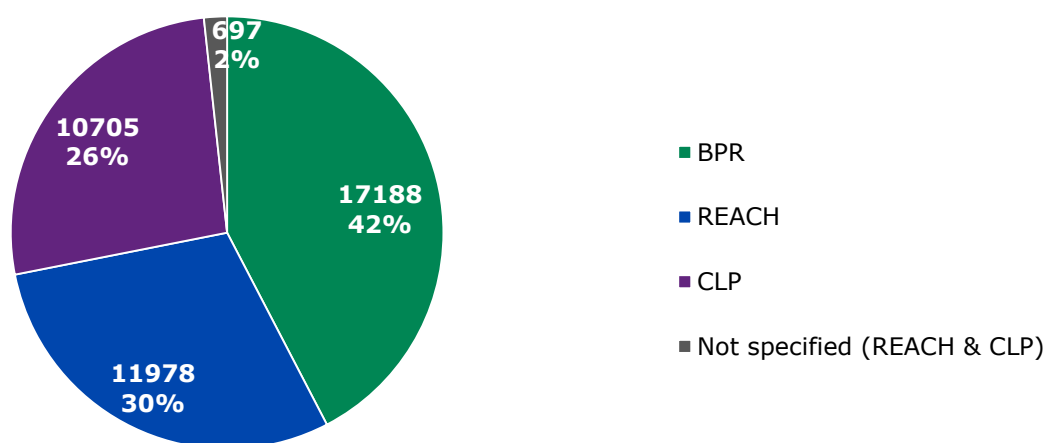


Figure 1: Enquiries received by NHDs in 2019, split by regulation.

¹ Disclaimer: trends presented in this report are indicative as they rely on data provided by the reporting national helpdesks, which may use different methods to keep track of enquiries received from customers and replied during the reporting period.

² Not including the data of four BPR helpdesks (including a BPR helpdesk of a candidate country that is an observer to HelpNet), as the numbers were not provided.

Compared with the previous year, nearly 9 000 fewer BPR, CLP and REACH enquiries³ were received, representing a decrease of 18 %. This continues the downward trend in the number of enquiries recorded by NHDs in the last two years, after a significant peak in 2017.

- ✓ The number of BPR-related enquiries was lower than in 2018, yet consistently remaining the highest amongst all three regulations.
- ✓ For CLP, the number of enquiries reported by the NHDs remained approximately at the same high level as in 2018.
- ✓ REACH-related enquiries decreased considerably in 2019 compared to 2018, the year of the last registration deadline.

2.2 Enquiries received by national helpdesks by regulation

The information below is based on the figures reported by NHDs, with reference to each of the three regulations in their remit:

BPR

The total number of BPR enquiries received by 31 NHDs in 2019, was 17 188, showing a slight decrease compared to 2018 (21 005 enquiries) and representing the highest percentage (42 %) of all received enquiries for the three regulations. Five NHDs, received more than 1 000 questions in 2019. The number of enquiries received by the top five countries, mostly the same ones as in the previous year, varied from 1 000 to almost 2 000 questions.

Following the announcement of the UK's withdrawal from the EU in June 2016, the BPR NHDs witnessed an increase in enquiries of about 20 % in 2017 and 2018. In 2019, the total number of enquiries decreased, reaching the seemingly normal baseline of around 17 000 enquiries per year.

CLP

The total number of CLP enquiries received by NHDs in 2019, based on the data reported by 35 NHDs, was 10 705 questions (26 % of all enquiries). The number of enquiries reported by NHDs remained mostly unchanged compared to the previous year. Importantly, the reporting of NHDs was more granular this year as almost all NHDs were able to report CLP and REACH enquiries separately.

In many countries, the number of CLP enquiries remained approximately at the same level as in the previous year. Some NHDs reported slightly increased incoming questions, with the implementation of Annex VIII considered to be the reason. The highest number of questions are asked from mostly the same NHDs over the years, with three NHDs receiving more than 1 000 questions in 2019 compared to three NHDs in 2018 and two in 2017. The highest number of questions varied from 1 100 to 3 000. At the other end, one NHD recently established in one of the EU candidate countries, received their first CLP questions in 2019.

³ For more information on 2018 statistics see '2018 Report on National Helpdesk Activities: Overview' at: https://echa.europa.eu/documents/10162/21877836/nhd_activities_2018_en.pdf/

One NHD that reported the highest number of CLP enquiries (and received by far the highest number of CLP questions over the past several years) indicated that more than 40 % of the questions were related to Article 45 of CLP and Annex VIII, including its amendment (postponement of the application date for one year). Also other NHDs reported an increased number of enquiries received in 2019 due to the implementation of Annex VIII and the notifications through the Poison Centre Notification portal. To be noted that in 2018, 76 % of the NHDs reported that they are dealing with regulatory (and, in some cases, technical) questions on Article 45 and Annex VIII.

Moreover, eight NHDs have received CLP questions on the UK's withdrawal from the EU, with a variation between one and more than 30 enquiries.

REACH

Based on the input provided by 34 NHDs, the total number of REACH enquiries received in 2019 by NHDs was 11 978 questions (30 % of all questions received by NHDs). This is a noticeable decrease compared to the previous two years, and most prominently compared to 2017 (15 524 questions reported), a year before the last registration deadline of 31 May 2018. We should note also that out of 700 enquiries reported but not allocated to a specific regulation, part are REACH enquiries. Out of all REACH helpdesks, five received more than 1 000 questions in 2019 compared to seven NHDs in 2018 and five NHDs in 2017. The number of questions replied by each of the five NHDs varied between 1 000 and 1 600, and the highest number of questions were asked from the same NHDs over the last two years.

Some NHDs have shared their views on changes in the number of REACH questions they received in 2019, compared to previous years. After the last registration deadline, and in the absence of other important milestones for industry in 2019, some NHDs noticed a decrease between 10 % and 38 % of the incoming REACH-related questions. Less REACH-related questions, arriving at NHDs is also the consequence of dedicated time and effort to develop useful, accessible support material information on national websites, and the experience and knowledge gained by industry after three registration milestones. For a candidate country, the upcoming registration obligations – applying from 31 December 2020 until 31 December 2023 - determined a significant increase of questions arriving at the helpdesk.

In addition, 20 NHDs have received REACH questions on the UK's withdrawal from the EU. The number of questions received by these NHDs varied from two to 400 enquiries. Some NHDs did not receive any specific questions on this topic, while others may have received but did not keep records of questions on the UK's withdrawal from the EU.

2.3 BPR, CLP and REACH enquiries received by NHDs since 2014

On a general level, the BPR remains the regulation with the highest number of questions replied by NHDs, followed by REACH and CLP. The high demand for the BPR NHD support is likely to stem from the split of BPR processes to those managed by ECHA and those implemented at the national level. As a result of this, NHDs are responsible for replying to many questions that ECHA cannot reply to such as scope questions, questions related to the evaluation of approval or authorisation dossiers, questions on national authorisations, and national procedures applicable during the transitional period, etc.

The figure below displays the number of enquiries received by NHDs since 2014.

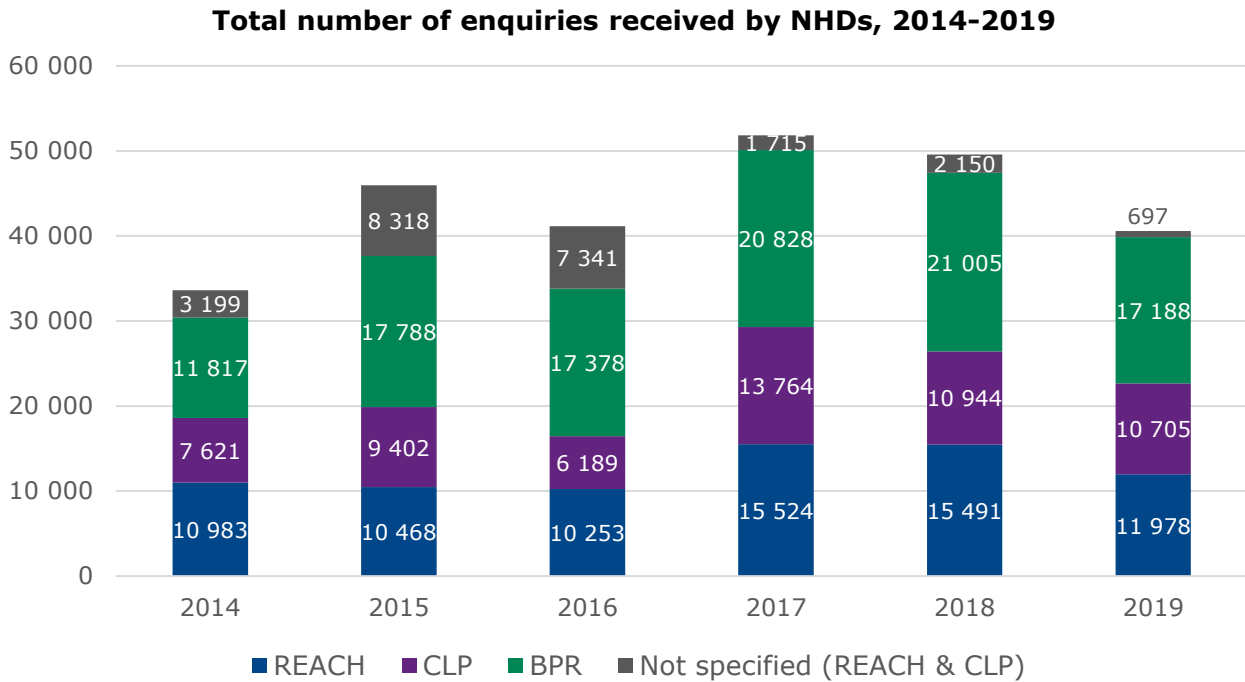


Figure 2: Total number of enquiries received by NHDs from 2014 to 2019.

Consistent with the overall trend, the **median number**⁴ of BPR and REACH enquiries decreased, and the median number of CLP enquires remained practically unchanged in 2019 (see Figure 3).

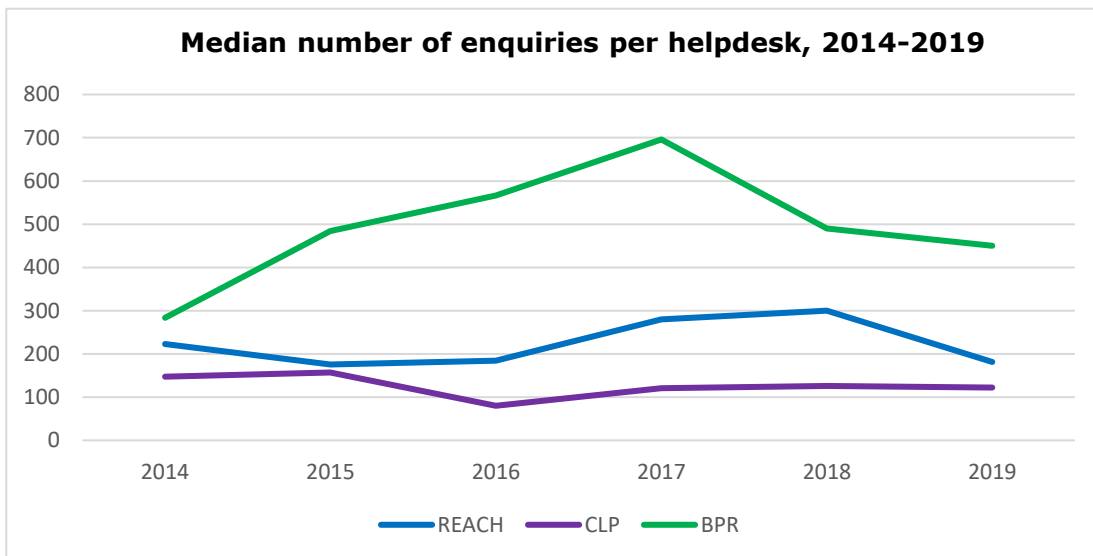


Figure 3: Median number of enquiries per helpdesk in 2014-2019.

⁴ The number of enquiries reported by NHDs has been arranged from lowest to highest. The 'median' is the 'middle' value in the list.

2.4 Hot topics

NHDs reported on the 'hot topics' raised by their customers on the BPR, CLP and REACH in 2019⁵. The five most frequent topics⁶ reported per regulation are shown in Figure 4.

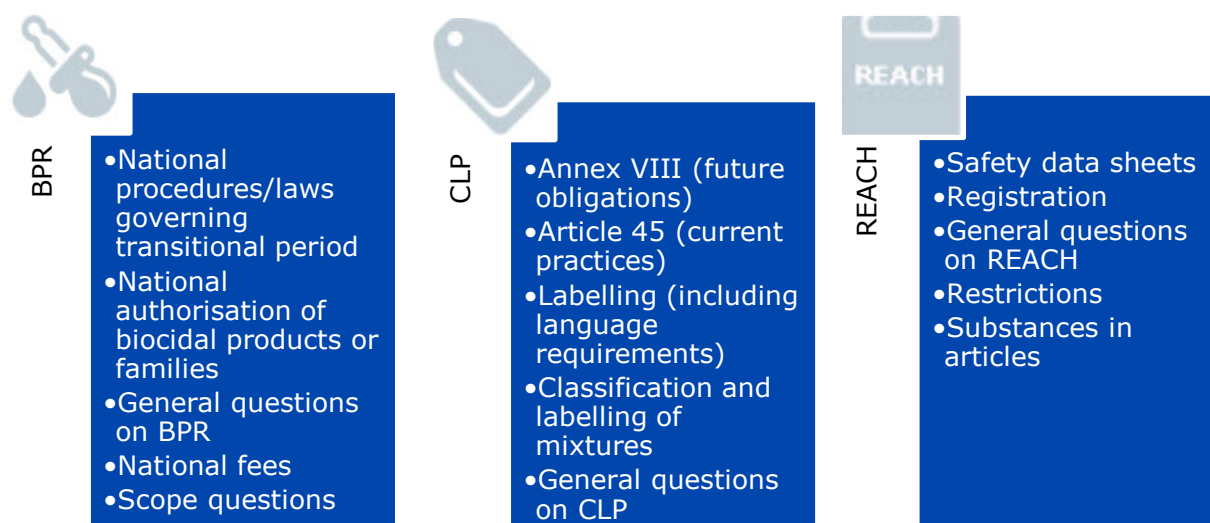


Figure 4: Overview of the hot topics under the BPR, CLP and REACH in 2019.

The top 10 most frequently asked topics in 2019 and 2018 are presented below for the BPR (Table 1), CLP (Table 2), and REACH (Table 3).

Table 1: Hot topics concerning the Biocidal Products Regulation in 2019 and 2018.

2019	2018
1) National procedures governing the transitional period	1) National procedures
2) National authorisation of biocidal products or families	2) Transitional period
3) General questions on the BPR	3) Authorisation
4) National fees	4) Fees
5) Scope questions	5) General obligations under the BPR
6) Active substance approval	6) Mutual recognition
7) In situ generation of active substances	7) Active substances
8) Classification, labelling, packaging of biocidal products	8) Article 95
9) Treated articles	9) <i>In situ</i> generation
10) Article 95	10) Classification and labelling

For the BPR, there are no significant differences in the hot topics. The first and second hot topic in 2018 - '**National procedures**' and '**Transitional period**' - were merged into one topic, '**National procedures governing the transitional period**' which ranked as the first hot topic in 2019.

New entries in 2019 are represented by '**Scope questions**', '**Treated articles**' and '**Classification, labelling, packaging of biocidal products**'.

⁵ Respondents were asked to rank their 'Top 5' topics for the relevant regulations by choosing the five most relevant topics from a list and ranking them from 1 to 5 (1 = most frequently asked, 5 = least frequently asked). If topics other than the ones listed in the survey were among their 'Top 5', respondents were asked to specify them in the open fields marked 'Other'. Topics were given an overall rank by taking into account the 1-to-5 ranking by each respondent and the frequency of each response option.

⁶ The list of REACH, CLP and BPR topics in the 2019 survey were revised for clarity and to avoid overlaps.

As expected, the top positions are mainly represented by topics that fall within the remit of national authorities (e.g. national procedures, national authorisations, national fees and scope questions). Article 95, which falls under ECHA's remit, occupies the last position among the hot topics ranking.

Table 2: Hot topics concerning the CLP Regulation in 2019 and 2018.

2019	2018
1) Annex VIII (future obligations)	1) Labelling
2) Article 45 (current practices)	2) Article 45 (current practices)
3) Labelling (including language requirements)	3) Classification and labelling of mixtures
4) Classification and labelling of mixtures	4) Annex VIII (future obligations)
5) General questions on CLP	5) Scope and exemptions of CLP
6) Classification of substances	6) Classification methods
7) Harmonised classification/Annex VI	7) Language requirements for labels
8) Packaging	8) Harmonised classification
9) Use of alternative chemical name	9) Packaging requirements
10) Related EU chemicals legislation	10) Use of alternative chemical name

For CLP, there are slight differences in the hot topics, once the changes in naming done from 2018 are noted. The biggest one is that in 2019 the categories '**Labelling**' and '**Language requirements for labels**', which were the first and seventh hot topics in 2018, were merged. '**Scope and exemptions of CLP**' has been split into '**General questions on CLP**', which has remained in fifth position, and '**Related EU chemicals legislation**', which covers a variety of specific issues as reported by the NHDs in the '**Others**' open field.

As expected, in 2019, due to the proximity of the date of application of Annex VIII to CLP, the new '**Annex VIII**' on information related to emergency measures and '**Article 45 (current practices)**', triggered more questions at the NHDs – becoming the first and the second most asked questions. Up to 20 NHDs specifically mentioned the increase of questions related to one, the other or both topics together. Three pointed out specific issues related to technical implementation and the Unique Formula Identifier (UFI). Not all NHDs dealt with questions on Article 45 - regarding both current and future practices regarding Annex VIII. In some Member States, they are replied directly by poison centres.

Other frequent topics which remained in the top 10 list, although in a slightly different order than in 2018, included: '**Classification and labelling of mixtures**', '**Harmonised classification/Annex VI**', '**Packaging**' and '**Use of alternative chemical name**'.

Some specific topics that caught the attention of the NHDs are: labelling borderline cases, not clearly covered by CLP; questions related to consumer products (candles, diffusers or nail glue); exemptions (within the topic '**General questions on CLP**'). Some are more technical such as health hazards; chemical and occupational safety; or specific concentration limits (SCLs). Safety data sheets (overlap with REACH) and European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR) could be considered as specificities under the topic '**Related EU chemicals legislation**'.

Finally, three topics which reflect the other responsibility of NHDs are worth mentioning: national legislation on labelling and packaging; national classification and labelling portal, and the transposition (including timing) to national legislation.

Table 3: Hot topics concerning the REACH Regulation in 2019 and 2018.

2019	2018
1) Safety data sheets	1) Safety data sheets
2) Registration	2) Registration
3) General questions on REACH	3) Import
4) Restrictions	4) Roles and obligations under REACH
5) Substances in articles	5) REACH 2018 deadline
6) Downstream user obligations	6) Authorisation obligations
7) Authorisation	7) Substances in articles
8) Data sharing and joint submission	8) Obligations related to substances in the Candidate List
9) Related EU chemicals legislation	9) Scope of REACH
10) Substance identity	10) Complying with restrictions

For REACH, the observed trends of the hot topics in the last two years are very similar. The ranking of the first two topics '**Safety data sheets**' and '**Registration**' remained the same, while, in third position, a new general topic '**General questions on REACH**' replaced the previous topics: '**Import**', '**Roles and obligations under REACH**' and (partly) '**Scope of REACH**' at approximately the same ranking. Even though a few NHDs reported less registration questions in 2019 due to the end of the phase-in period, there were still many general questions on imports and REACH compliance.

Notably, '**Restrictions**' (replacing topics 'Complying with restrictions' and 'New Restrictions') climbed to fourth position, possibly due to the increased activities on the authorities' side (restriction proposals under commenting phase) and the approaching dates of applicability of several major restrictions⁷.

'**Substances in articles**' (merged with the topic 'Obligations related to substances in the Candidate List') remained a hot topic in fifth position, owing to the new developments related to the SCIP database/WFD requirements, as well as the enforcement activities and cooperation with customs in this area.

The revision of the REACH topics in 2019 distinguished '**Downstream user obligations**' as an important new topic of increasing interest to duty holders in the post-phase-in era (previously covered partly under 'Roles and obligations under REACH' or 'Communication of safe use in the supply chain') which appeared in sixth position.

'**Authorisation**' (including questions on the Candidate List) remained a frequent topic in seventh position, possibly due to authorisation obligations related to the use of octylphenol/nonylphenol ethoxylates (endocrine disruptors).

'**Data sharing and joint submission**' appeared in eighth position, which could be due to the increasing number of dossier evaluation decisions, which need to be addressed jointly by the registrants. A NHD also reported an increased number of questions on data sharing, joint submission and inquiry triggered by a national enforcement project on essential oils. To differentiate questions on chemicals legislation outside of ECHA's remit, the topic '**Related**

EU chemicals legislation' was introduced (previously named 'Overlapping legislation' and covered mostly under 'Scope of REACH') which made it to the ninth position. NHDs reported an increasing number of questions on the borderline between WFD/REACH (e.g. 'end-of-waste' criteria, SiA obligations/SCIP), as well as on various other legislation (cosmetics, food & feed, medicinal products, medical devices).

Lastly, '**Substance Identity**' appeared in the 10th position (possibly including questions on 'Polymers and Monomers').

⁷ ECHA's current activities on restrictions: <https://echa.europa.eu/current-activities-on-restrictions>
ECHA's completed activities on restriction: <https://echa.europa.eu/completed-activities-on-restriction>
Submitted restrictions under consideration: <https://echa.europa.eu/restrictions-under-consideration>

2.5 Relation between Article 33 of REACH and the Waste Framework Directive

Almost all REACH NHDs and one BPR NHD provide various forms of support on Article 33 of REACH and related Waste Framework Directive (WFD) notification obligations (Figure 5). At the same time, one REACH NHD has reported not receiving such questions during 2019. Four NHDs highlighted that, while they provide support on REACH obligations, questions related to WFD are directed to a dedicated helpdesk, which is different from the REACH helpdesk and in some cases, the helpdesk providing support on WFD operates under a different competent authority. One REACH NHD expressed interest in receiving further information material on Article 33 and WFD notification obligations so they can provide basic support to customers on these topics.

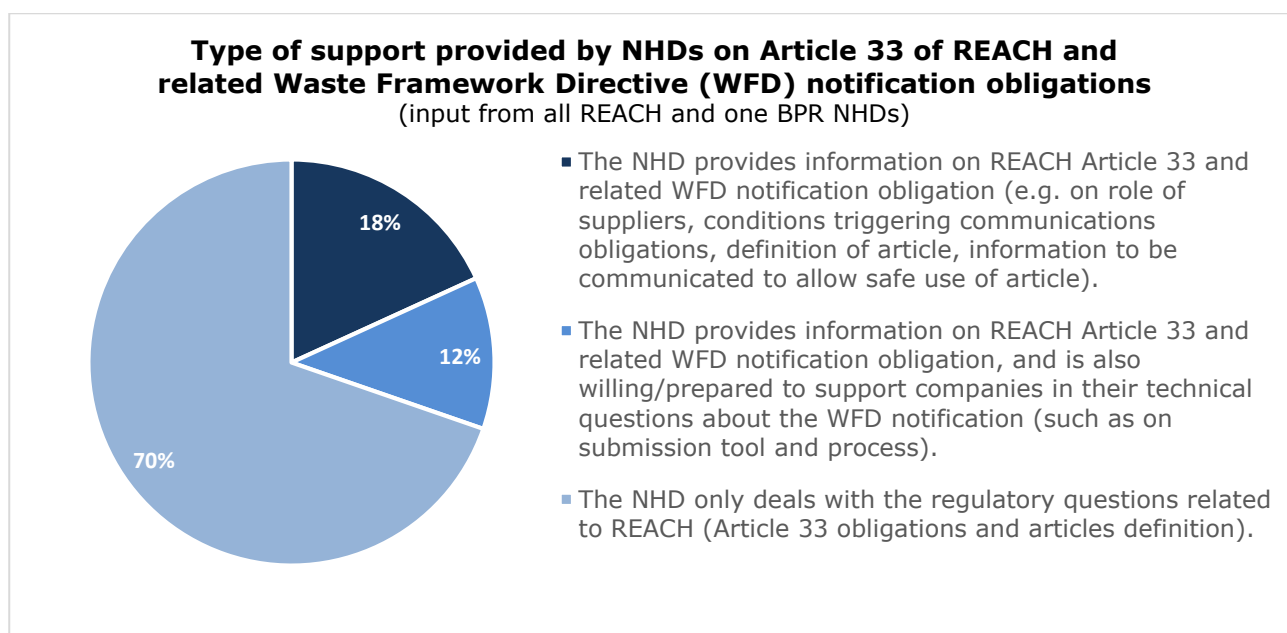


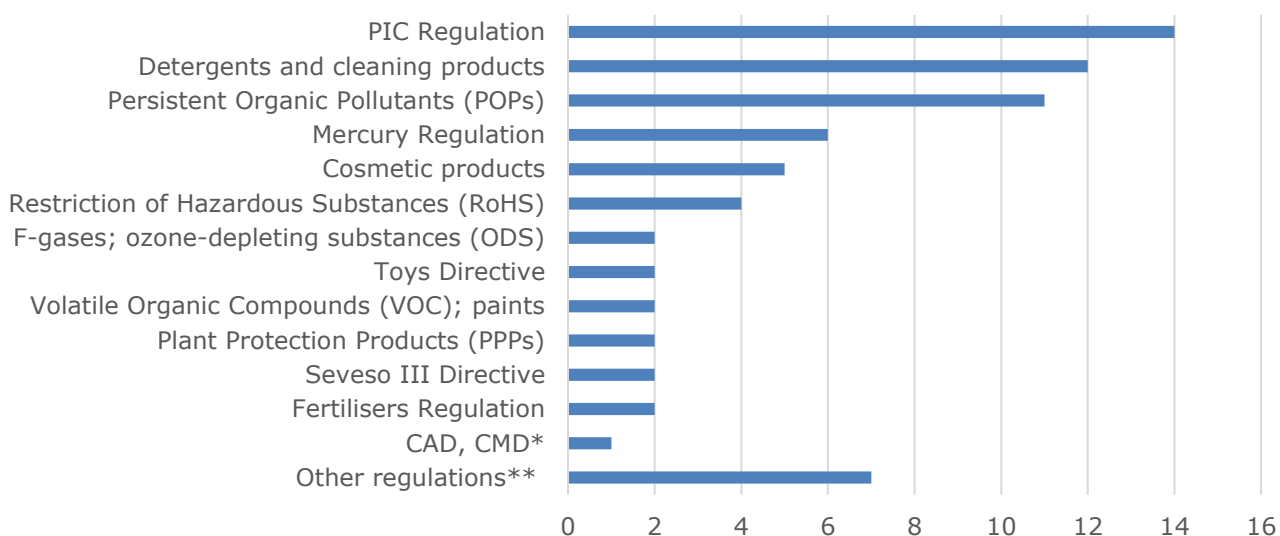
Figure 5: Support on Article 33 of REACH and related WFD obligations.

The revised WFD also foresees new tasks for ECHA regarding substances in articles. In the beginning of 2020, ECHA has launched the prototype version of the database for SCIP and, in October 2020, ECHA will launch the SCIP database for industry to submit data. Member States have to transpose the legal requirements into national law by July 2020. The notification duty for industry to submit information to the database is set to apply as of 5 January 2021.

2.6 Support given by national helpdesks on other regulations

In 2019, NHDs reported that they replied to 7 315 enquiries allocated to other pieces of chemicals legislation than REACH, CLP or the BPR. More than half of the reporting NHDs provide support on the Prior Informed Consent (PIC) Regulation closely followed by the Detergents and cleaning products, Persistent Organic Pollutants (POPs), Cosmetic products, and Mercury regulations. In addition, many NHDs provide support on national chemicals legislation.

Other EU regulations for which NHDs provide support
(number of NHDs, of those that provide support on other EU regulations beyond
BPR, CLP, REACH)



*Chemical Agents Directive (CAD), Carcinogens and Mutagens Directive (CMD)

**Other regulations are presented in detail in the table below

Figure 6: Other EU regulations on which NHDs provide support.

In this context, ECHA's new 'EU Chemicals Legislation Finder'⁸ tool launched by ECHA in March 2020, will hopefully prove beneficial for duty holders in guiding them to find applicable laws and determine the obligations related to their substances.

3. Customer support

3.1 Communication channels

Due to technological advances, the way customers interact with NHDs becomes more and more interesting each year. The communication channels grow over the years from one or two channels to new and rapid means of communication. In 2019, companies used various means to contact their NHDs, the most common channels remaining email, online contact forms, telephone, face-to-face meetings, and events delivered by NHDs to companies.

Some NHDs provided multi-channel customer service including real-time exchange of messages through the internet, e.g. chat and WhatsApp. The use of social media also offers great opportunities for NHDs to proactively keep companies up-to-date on their activities.

3.2 Service response time

The most important attribute of good customer service is a fast response time, representing working days elapsed between receiving a question and sending out the reply. According to the information provided by the 57 reporting NHDs, the average response time is determined by the complexity of the question received, available resources and expert input from colleagues within the same organisation or other competent authorities, when needed.

⁸ EU Chemicals Legislation Finder (EUCLEF): <https://echa.europa.eu/legislation-finder>

Even if not all NHDs are recording incoming enquiries by their complexity, most of them could estimate the response timeframe for different types of questions received in 2019:

Table 4. Response time considering the complexity of enquiries received by NHDs

Complexity of enquiry	Response time	
	Minimum	Maximum
Simple	20 minutes	10 working days
Moderate	2 hours	30 working days
Complex	5 working days	30 days

The official response time required by various national laws ranges between 5 and 30 days in the reporting countries. Some NHDs are keeping records of the response time, while others can only make annual estimates, and others do not keep track of the answering time at all. Some NHDs differentiate between simple and complex enquiries received, while many others do not keep track of the complexity, but aim at answering enquiries as soon as possible, respecting the deadlines required by national laws or the internal quality systems. One NHD mentioned that response time depends on the availability of resources, stressing that for urgent matters a solution could always be found.

3.3 Helpdesk resources

HelpNet members ensure high quality and harmonisation of support and answers to queries on the BPR, CLP and REACH. As presented in Chapter 2, NHDs are responsible for scientific and technical support on other EU chemicals legislation and national laws. More, HelpNet members are involved in various networks and bodies of ECHA and the European Commission⁹. Therefore, the overall effort of an NHD to provide support to customers has to be compared against numerous responsibilities and available resources.

In 2019, a higher number, specifically nine NHDs (five CLP, three REACH and one BPR) reported having more resources allocated for providing helpdesk support compared to 2018. At the same time, four REACH, four CLP and five BPR helpdesks encountered resource cuts. In terms of full time equivalents (FTEs), 54 NHDs reported between 0.2 and 10 FTEs – resources allocated for the three applicable regulations – with an average of 1.2 FTE per national helpdesk. On average, one FTE replies to about 535 enquiries per year.

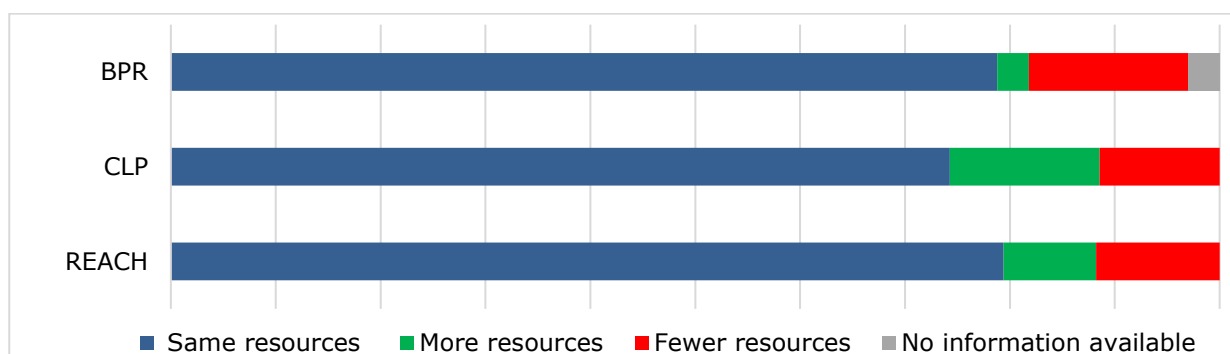


Figure 7. Resources available to provide helpdesk advice in 2019 compared to 2018.

⁹ See full version of 2018 Report of National Helpdesk Activities on S-CIRCABC, at: <https://webgate.ec.europa.eu/s-circabc/w/browse/591dc6fd-2e2a-4d2a-912f-1820c505738d>

4. National helpdesk activities

4.1 Ways to support companies

Over the years, NHDs have constantly reported that information available on ECHA's website – including Q&As, and guidance documents – is a major source that they use when replying to their customers. It is valuable for both NHDs and ECHA to know that the time and effort put into developing useful harmonised Q&As, and support material is well worth doing.

In 2019, the NHDs have been actively supporting companies using various means. These included referring their customers to ECHA's website, organising targeted events for industry; updating the information available on their own website; issuing newsletters, leaflets and questionnaires and drafting good Q&As; organising topical events and having more direct contact with companies, in particular, through phone calls or face-to-face meetings; using the HelpEx knowledgebase; inviting ECHA and the European Commission to support events in their countries. One candidate country mentioned that attending meetings and exchanging experience with various Member States across EU is essential for their capacity building.

NHDs unanimously appreciated the support ECHA provided to companies in relation to hot topics, and suggested areas in which ECHA could continue or increase the support towards duty holders:

Events, publications and ECHA's website:

- Webinars, video tutorials considered as very practical support to companies;
- Hands-on training on Annex VIII submissions for both industry and inspectors;
- New publications, updated guidance documents and practical manuals;
- Leaflets and infographics on hot topics such as: SCIP, new restrictions, poison centre notifications, Article 48 for internet sales obligations;
- Information on submitting registration dossiers – registration and inquiry processes.
- Support material available on ECHA's website available in 23 EU languages was found to be of utmost importance for companies, especially for SMEs;
- Guidance on BPR information available on ECHA's website.
- Improved search functions for information available on ECHA's website.

Contact forms:

- Indicating the response time on enquiries received by ECHA through the contact forms.

Support on hot topics:

- ECHA experts who would answer borderline issues, e.g. REACH and Waste;
- Best practice examples, e.g. nanoforms;
- Supporting NHDs in communicating with the European Commission to clarify legal texts, where relevant.

IT Tools:

- Step-by-step guide for users of ECHA's IT tools (REACH-IT, IUCLID, ECHA Cloud services);
- IUCLID and ECHA Cloud services used to submit registration dossiers to ECHA; clarifying that IUCLID Cloud is not limited to SMEs and their consultants:
<https://echa.europa.eu/support/registration/creating-your-registration-dossier>

4.2 Events organised by national helpdesks in 2019

Informing is about spreading information about chemicals legislation to wide but targeted audiences and through various means, for example: events, websites, newsletters, social media and many others.

In 2019, most of the NHDs organised events targeted to industry or participated in conferences, workshops, seminars organised by industrial, business organisations and the European Enterprise Network (EEN). In some of the events, most of them annual conferences, experts from ECHA and the European Commission participated. The events covered a wide range of topics, including borderline cases between the BPR, CLP and REACH and other pieces of legislation.

For the BPR, requirements for biocidal products, treated articles and borderline products, tips and tricks to improve a BPR dossier – especially for disinfection products, seminars for applicants on specific topics and general information sessions for inexperienced applicants, treated articles, *in situ*, biocidal family product notifications, biocidal product authorisation and environmental and human health measures. One country promoted biocides that are less harmful to human health and the environment and provided support to small businesses through a grant scheme for SMEs.

For CLP, the most common topics were Article 45 and Annex VIII to CLP, classification of substances and mixtures, the scope of CLP and the relation with REACH and the BPR. One country is organising yearly training for chemicals advisors on several pieces of chemicals legislation, including REACH and CLP.

For REACH, the most common topics addressed in 2019 were: registration dossier updates, dossier quality and compliance, substance identity, polymers and nanomaterials, downstream user obligations, communication in the supply chain, high quality safety data sheets, restrictions, obligations related to substances in articles (SiA), data and cost sharing negotiations and the UK's withdrawal from the EU.

More specific topics covered hazardous substances in tattoo inks, substitution of substances of very high concern (SVHCs), communicating with ECHA, hiring a good consultant, circular economy and the LIFE project AskREACH. Basic to advanced seminars were organised in one of the countries for all three regulations.

For inspiration, it would be worth mentioning the participation of helpdesk colleagues in start-up businesses, interior design and gift fairs, an information event for companies in the give-away products area, a seminar on electronic products, a pet store fair, a conference organised by a mining company or seminars for museum shops and recycling industries.

4.3 Events planned by national helpdesks in 2020

The NHDs were also requested to report on events they plan to organise in 2020. Two-thirds of the reporting NHDs informed that they are planning similar events in 2020 as those organised last year.

For the BPR, the topics of seminars and workshops that were highlighted by the NHDs were data requirements in BPR applications, borderline biocidal products, biocides efficacy, treated articles and disinfectants.

As expected, among the CLP events planned in 2020, most NHDs will be focusing on Article 45 of CLP and Annex VIII requirements, classification of mixtures and poison centre notifications.

On the agenda of the REACH events that had been foreseen for 2020 there are topics such as updating registration dossiers, improving the quality of safety data sheets, information campaigns on the SCIP database, Waste Framework Directive, and occupational health issues.

One NHD reported that seminars and a media campaign on the UK's withdrawal from the EU would be continued in 2020. Many of these events have been cancelled, postponed or held virtually due to the COVID-19 pandemic.

Five NHDs invited ECHA to participate in their future events, and REACH and CLP were clearly the regulations of main interest.

4.4 Visiting programme

The HelpNet visiting programme has been running since 2008, with the aim of enhancing cooperation on common objectives and mutual benefits; facilitate interaction on joint projects; share best practice among NHDs; understand the needs of NHDs and in which topical areas they would need to develop their competences, and how ECHA can better support them.

In 2019, staff of the Regulatory Support Team (REST) visited three NHDs, while representatives of other three countries visited ECHA jointly.

Whenever requested, ECHA visitors could provide training on the HelpEx tool or address specific topic of interest for NHDs (e.g. substance identification and brief REACH, CLP and BPR training sessions for capacity building in potential candidate countries to EU).

In the survey on 2019 activities, NHDs could express their interest in inviting ECHA to visit them, visiting ECHA or visiting another helpdesk. 10 countries have expressed their interest in visiting ECHA, five in visiting another helpdesk, four in hosting ECHA and three in hosting another helpdesk. Unfortunately, due to travel restrictions during the global COVID-19 pandemic, the March visit was cancelled and the visiting programme was temporary suspended.

4.5 Cooperation with Enterprise Europe Network (EEN)

In seven countries, NHDs continued cooperating with the Enterprise Europe Network (EEN) through regular meetings, joint workshops, support in disseminating information and awareness-raising activities. In some countries, Chambers of Commerce and Industry facilitate cooperation with EEN. Two NHDs reported their willingness to start such a cooperation, and one got a positive reply from EEN who passed the information about the NHD to their clients. Unfortunately, other NHDs have reported unsuccessful attempts in collaborating with EEN in their countries and 12 NHDs reported no joint activities with EEN.

5. Conclusions

In 2019, NHDs replied to 40 500 enquiries and continued working together, learning from each other, bringing forward the most complex questions from their customers to be discussed and harmonised, and therefore providing consistent support to companies operating in all EU/EEA countries. Helpdesks of three candidate countries reported on their 2019 activities, complementing the picture of chemicals legislation implemented in Europe.

In addition, NHDs enhanced their expertise through collaboration with experts in their organisations, bodies of ECHA and the European Commission, and in some countries with Chambers of Commerce and the Enterprise Europe Network.

The number of enquiries and hot topics dealt with by NHDs in relation to the BPR, CLP and REACH were as follows:

- For the BPR, the number of enquiries submitted last year was comparable to 2015 and 2016 (~17 000). The questions continued to target mainly topics related to national procedures governing the transitional period, national authorisation of biocidal products and data requirements for the approval of active substances.
- For CLP, NHDs have replied to almost the same amount of enquiries as in 2018; supported importers and downstream users of hazardous mixtures, and organised numerous events focusing on Poison Centre notifications (Article 45 and Annex VIII requirements), and classification of mixtures.
- For the REACH helpdesks, the trend of decreasing numbers of enquiries was a reality after the last registration deadline, when NHDs and ECHA could take stock of the lessons learnt during the phase-in period of REACH, and prepare for the post-registration phase, offering companies support on registration dossier updates, improved communication in the supply chain, etc.

Understandably, the UK's withdrawal from the EU continued to be a topical concern for some BPR and REACH helpdesks.

The visiting programme continued in 2019, endorsing collaboration within the network, allowing NHDs to share best practice, learn from each other, and achieve mutual benefits. The visits enabled the visited NHDs to clarify issues of concern, receive training on HelpEx or topical issues, and have ECHA contributing to events organised in the Member States. For ECHA, the visits created great opportunities to understand the challenges of helpdesks, new established organisations, new HelpNet members, and assisting candidate countries in adapting their EU legislation and upgrading the capacity of their helpdesk services in order to meet the EU requirements.

Since the beginning of 2020, countries all over the world have faced an unpredicted global pandemic. ECHA staff and members of HelpNet were challenged working under some form of lockdown and adjusting the work relations to demanding times. How initial plans made by NHDs for 2020 were affected by the pandemic will be reflected in the NHD report on 2020 activities.