

# Report on the survey of successful registrants

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Dear readers,

*During the summer, the European Chemicals Agency conducted a “Survey of successful Registrants”. We were keen to find out about their experience of the process and their feedback on the various tools and information that we made available. We obviously intend to learn from this to improve ahead of the 2013 registration deadline. I would like to thank the almost 1000 companies who gave us their feedback and responded to the survey. It represents a valuable body of information and I am pleased to make publicly available the survey’s findings which make interesting reading on key aspects of the REACH registration process, apart from providing a more tangible acknowledgment of the rich input from participants.*

*Based on these findings, and anecdotal feedback received, ECHA has decided to undertake a number of improvements already:*

*The further development of the Chesar tool. We were pleased to see that 17% of successful registrants who submitted dossiers containing a Chemical Safety Report with an exposure assessment made use of the Chesar tool provided by ECHA. We have learned from these first experiences and will further develop it ahead of the next deadline so that it is used in most cases.*

*Guidance documents. The survey highlights the importance of ECHA’s Guidance documents, of Dossier Submission and Industry User Manuals, Practical Guides, and other ECHA publications addressing registration-related issues. This feedback is being used to prioritise our work on updating and further developing such material.*

*Multilingual publications. The report provides statistics on the use of ECHA’s publications available in 22 official EU languages and highlights the readers’ general appreciation of the Agency’s Translation Practice. The Agency will continue this important service to REACH and CLP duty holders. ECHA’s new website which is to be launched shortly will further facilitate access to translated material. The Agency also used feedback from the survey as input into an “Assessment of the Need for and Feasibility of enhancing multilingual Communication in the Agency’s Operations” which I will submit to the ECHA Management Board for further consideration at their next meeting in December of this year.*

*Helpdesk support. Even though 73 % of successful registrants expressed their satisfaction with their national REACH helpdesks and 78 % were satisfied with the ECHA Helpdesk service, the report reveals also some disappointment expressed by individual participants in the survey. Helpdesks are there to help. ECHA and national administrations providing helpdesk support to companies are continuously looking into ways to improve their service. In order to understand more completely the reasoning behind this feedback, ECHA is conducting a more in-depth survey of ECHA Helpdesk customers, at the end of 2011.*

*Communications. The statistical feedback and comments on ECHA’s communications activities and means has been most valuable in enabling us to refine our external communications activities. For example, the Agency has introduced e-News to distribute a weekly news update. The one-to-one sessions at ECHA’s Stakeholders Days as a response to the requests from the field give more time for companies to talk to ECHA staff.*

*One final comment – what you see here is exactly how companies responded to our questions, with one exception. With 1000 respondents, the “free text” responses were plentiful! To make the report easier to digest, we have therefore grouped the comments into themes and then chosen a few of them to illustrate the predominant feelings. Please note that the quotes are anecdotal and not analysed or reflected according to their weight or importance.*

*Geert Dancet  
Executive Director*

# 1 Executive summary

The European Chemicals Agency (ECHA) carried out the Survey of Successful Registrants as part of the Needs and Feasibility Assessment of enhancing multilingual communication in the Agency's operations<sup>1</sup>. The purpose of the survey was to learn more about the experiences of the companies who had registered substances under REACH by the 2010 deadline, to identify what kind of material and information they found useful and to understand how ECHA could improve its services with a view to the 2013 and 2018 deadlines.

The target group for the survey was all successful registrants of substances with the survey conducted online and a survey link sent to 4 310 companies. By the deadline, 21% of the recipients had completed the questionnaire. Answers were tabulated with the online tool and analysed by processing the data in spreadsheets. A higher share of SMEs responded to the questionnaire than their share was among registrants.

Overall, the results of the survey suggest that communication with ECHA and the use of IT tools in English was not an obstacle to carrying out the preparatory work and registering the substances successfully.

Based on the responses received, the **following conclusions** can be drawn:

- In preparing the dossiers, the companies widely used ECHA's website, guidance documents, fact sheets, practical guides, technical manuals and other supporting material provided by ECHA. Almost all (92%) respondents consulted the material published by ECHA and considered it very useful or useful.
- ECHA's website and the guidance documents were the most commonly used material (94% of the respondents indicated their use of it). The Navigator was only used by 35% of the respondents.
- The supporting material was mostly used in English - 86% of respondents indicated using the sources in English primarily. This also applies to the companies with a corporate language that is not English. The answers to the questions about the use of translated material in other languages showed that consultation of the supporting material in other languages than English was not a common practice. For only a few languages, such as German, French, Spanish and Italian, was the usage rate above 5%.
- English was a dominating language for consulting the webinar slides (96%)<sup>2</sup>. Other language versions were used most when consulting the guidance documents (by 17%), which indicates that out of all the supporting material translated, the translations of guidance material were the most commonly used.
- During the registration process, the vast majority of respondents (98%) communicated with the Lead Registrant or other registrants in their SIEF in English, followed by 12% who did this in German, and a tiny proportion having done this in other languages. Only 8% of the respondents indicated having linguistic problems within their SIEF, mainly due to limited English skills within the company, different skill levels of English within the SIEF or complexity of vocabulary.
- REACH-IT and IUCLID 5 contain a number of useful features, but are overall considered to be rather complex and not easy to use.

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<sup>1</sup> The Agency committed itself in the Work Programme 2011 to carry out the needs and feasibility assessment with regard to enhancing SME accessibility to communication with the Agency, including via REACH-IT, in different languages.

<sup>2</sup> Webinar recordings were available only in English; however some of the webinar slides (for instance, the slides on Chesar, Chemical Safety Assessment, technical completeness checks, substance identity) were translated.

- During the course of the registration, the companies commonly contacted their national helpdesks (67%) but almost as large a percentage (59%) of the respondents contacted the ECHA Helpdesk. Both of the services could be improved: the level of dissatisfaction was relatively high – 27% of the respondents were not satisfied with the national helpdesk service and 22% were not satisfied with ECHA Helpdesk. The respondents felt that more personal communication with ECHA (for instance, the possibility to make contact directly by telephone or by email) would be helpful for them.
- During the registration process, the main sources for up-to-date information were industry associations (60%), ECHA's website (58%) and consultants (40%). These sources were important for the respondents, because they delivered the relevant information on time, with clarity and in an easily understandable and reliable manner.
- According to the companies, in preparing for the 2013 deadline, it is essential to have sufficient knowledge of English (63% indicated this as very important); nominate the Lead Registrant early (61%) and train staff on REACH (59% of respondents). Starting all the preparatory work as early as possible is of course also essential.



## 2 Introduction

### 2.1 Context

To enable companies to comply with the registration requirements, the European Chemicals Agency (ECHA) has assisted companies since 2007, by providing advice, guidance, training and IT tools. From June 2008, REACH-IT became operational and companies could submit their registration(s) via this system. A lot of material was published online in 22 EU languages. In addition, ECHA made an effort to stabilise the guidance and IT tools by not issuing updates in the six months prior to the first deadline. In the future, ECHA will seek further ways to adapt guidance to continue to make it readily accessible, for example, by the re-design of the guidance website and by simplifying guidance where practical.

ECHA has committed itself in the Work Programme 2011 to carry out a needs and feasibility assessment with regard to enhancing SME accessibility to communication with the Agency, including via REACH-IT, in different languages<sup>3</sup>. During Q2 2011, ECHA launched internal consultations on the feasibility of extending the use of multilingual communication. In order to determine the needs, an online survey was identified as the most efficient way to collect the reliable information.

In July 2011, the Communications Unit launched a survey with the companies that had successfully submitted a registration under the REACH Regulation, to find out about their experiences in conducting the registration and any operational need for more multilingual communication.

### 2.2 Objectives of the survey

The purpose of the survey was to learn more about the experiences of the companies who registered their substance(s) under REACH, identify what kind of material and information they found useful and how ECHA could improve its services with a view to improving processes for the 2013 and 2018 deadlines. The aim of the survey was also to find out the extent to which the translated material was used and to what extent additional multilingual communication was needed.

ECHA's survey of successful registrants covered three main aspects, as follows:

1. The companies' registration experience.
2. Use of supporting material provided by ECHA in preparing their dossier(s).
3. Communication needs.

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<sup>3</sup> Doc. MB/63/2010 final of 17 December 2010, page 30

## 3 Survey design

### 3.1 Respondents

The survey was conducted online in July 2011. A link to the questionnaire was sent to 4 310 email contacts of successful registrants on 4 July. 98% of these emails were successfully delivered to the recipients. The respondents had four weeks to reply to the survey, which closed on 29 July. Two reminders were sent (on 20 and 29 July) to the contacts who had not yet responded.

### 3.2 Questionnaire

The survey consisted of 84 questions (in English) divided into three sections: registration experience; dossier preparation; and communication needs. The questions on company information and the use of certain types of material/services were compulsory while the majority of the questions were optional.

The scales used for the different type questions were as follows:

- **Yes/No** (for questions about the use of material/services).
- **Enumeration** (choice of one element/multiple-choice) (for questions about the registration experience and the use of languages).
- **Qualitative scale** (Satisfaction, usefulness, agreement, etc.), usually with 3 or 4 levels. In most of the cases, more than one option could be rated for this type of question (for questions about the usefulness and quality of these services).
- **Open fields** for comments.<sup>4</sup>

The survey was tested with pilot users before it was sent to the respondents. Based on the information gathered during the pilot, it was estimated that it would take 15 minutes to complete the survey.

### 3.3 Analysis of the responses

The responses for the multiple choice questions have been compiled quantitatively. Commonly expressed feedback and examples are provided for the open questions.

The findings of the survey are presented following the structure of the questionnaire. Some of the key results are also presented in figures or tables.

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<sup>4</sup> In analysing the results, the comments were grouped. A few of them were chosen to illustrate the predominant feelings. To improve the readability, the spelling errors were corrected, where applicable.

## 4 Results of the survey

### 4.1 Response rate

The response rate was 21% (899 responses). That is consistent with the typical response rate for online marketing surveys. The majority of the respondents (500) filled in the questionnaire within 10 days of the launch of the survey.

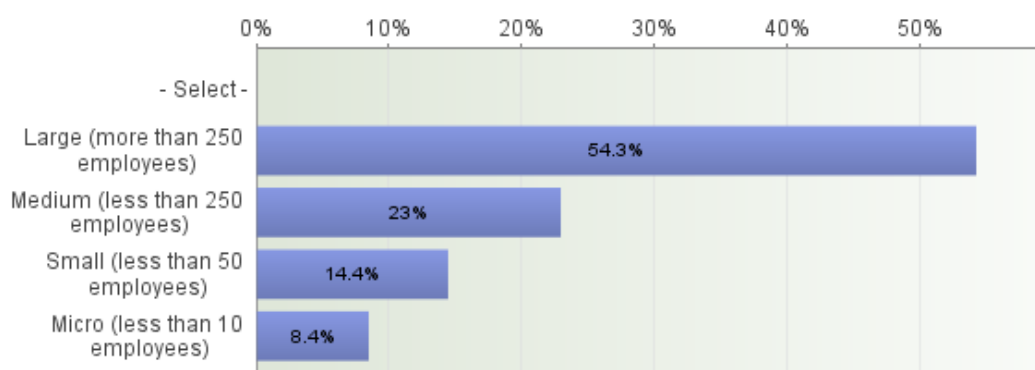
Five recipients (less than 1%) of the survey asked for clarification or provided comments by sending an email to the ECHA Surveys functional mailbox. The comments sent by email were also taken in to account when the findings were compiled.

The number of responses per question varied due to the fact that respondents did not need to answer all questions to complete the survey. The highest response rates were to the questions related to registration experiences and the supporting material/services used (for these questions the rate was commonly close to 90%, i.e. at least 800 responses). The lowest response rates were recorded for the questions about the use of translated material and the quality of translations (17-61%, i.e. 150 - 550 responses). The response rate for open questions (10) was from 1 to 11% (9-84 responses).

### 4.2 Respondent profile

In the first part of the survey, the respondents were asked about their company and their registration experiences.

The majority of the responses (54%) came from large companies (Figure 1). These companies have their legal entities<sup>5</sup> based in Germany, the United Kingdom, Italy, France and Spain (see Attachment 1a). A few companies who responded to the survey were located outside the EU (Argentina, China, Japan, India, Israel, Norway, South Africa and the USA) (3% in total).

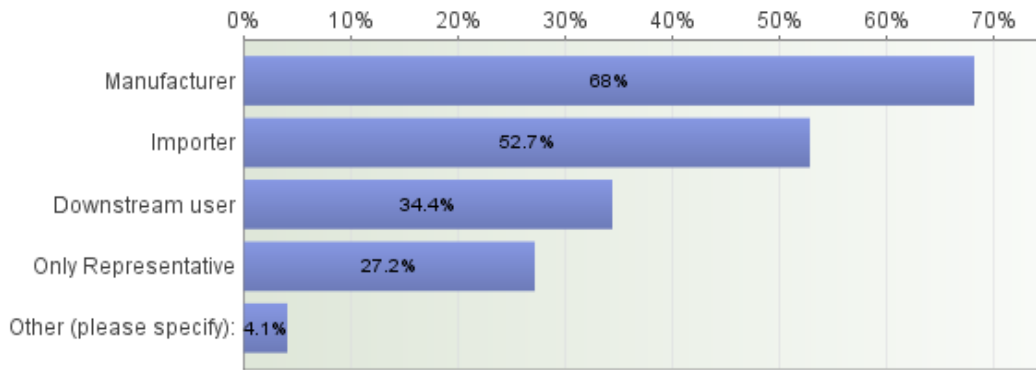


**Figure 1:** Size of the company

English was the corporate language of 38% of the companies who responded to the survey. Other more common corporate languages were German (21%), Italian (8%), French (6%) and Spanish (6%). For the complete list of languages see Attachment 1b.

The respondents were mainly manufacturers (68%), importers (53%) and/or downstream users (34%). 27% were Only Representatives (Figure 2). Others were consultants, distributors, third parties, trade associations acting as a secretariat to a consortium, and Research Institutes.

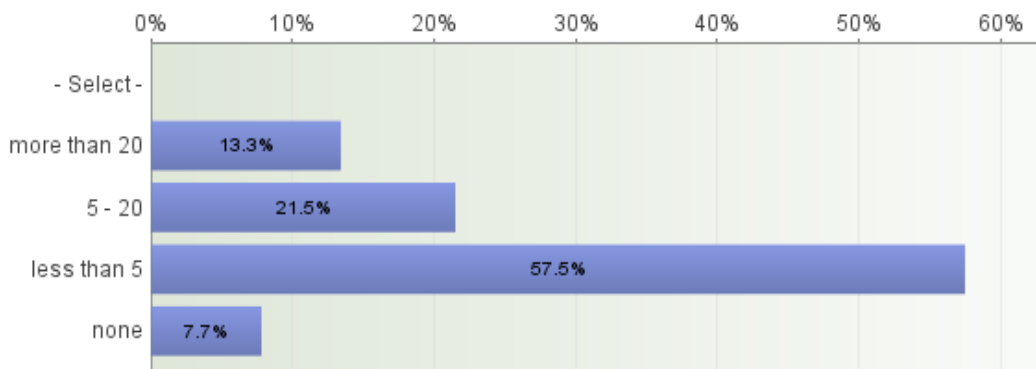
<sup>5</sup> Legal entity refers to an entity responsible for the registration.



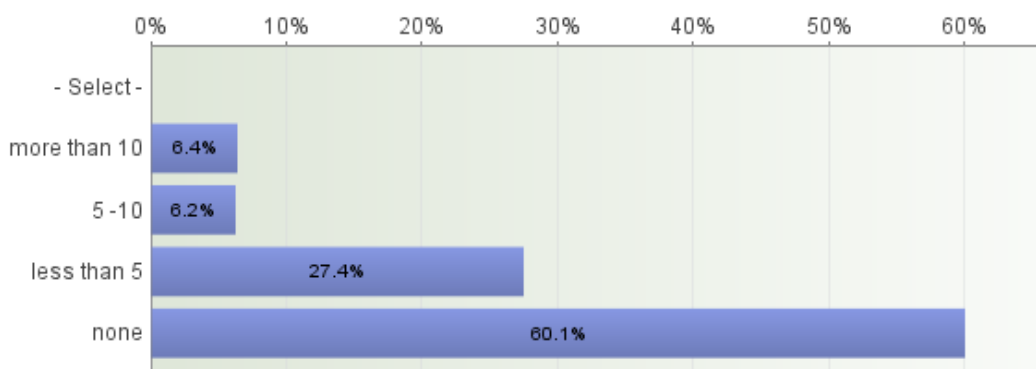
**Figure 2:** What is the role of your company under REACH? (Please tick all that apply)

The majority of the respondents (72%) had a dedicated REACH team of less than five people and 93% carried out the 2010 registration by themselves. 14% of the respondents indicated that no REACH team was available in their company.

More than half (58%) of the respondents submitted less than five dossiers as member registrants and 27% as Lead Registrants (Figures 3 and 4).



**Figure 3:** How many dossiers did your company submit as a Member Registrant?



**Figure 4:** How many dossiers did your company submit as a Lead Registrant?

## 4.3 Survey findings

### 4.3.1 Dossier Preparation

#### 4.3.3.1 Communication

The respondents were asked about the language(s) used for communication with the Lead Registrants or other registrants within the SIEF(s). The responses indicate that the vast majority of them (98%) communicated with the Lead Registrant or other registrants in their SIEF(s) in English, followed by 12% who did so in German, and a small proportion having done this in other languages (Table 1).<sup>6</sup>

**Table 1:** In which language did you communicate with the Lead Registrant or other registrants in your SIEF(s)? Please select all relevant languages

Language	No. of responses	%
Bulgarian	1	< 1
Czech	3	< 1
Danish		
Dutch	5	< 1
English	876	98
Estonian		
Finnish	1	< 1
French	17	2
German	107	12
Greek	1	< 1
Hungarian		
Italian	9	1
Latvian		
Lithuanian		
Maltese		
Polish	10	1
Portuguese		
Romanian		
Slovak	2	< 1
Slovene	1	< 1
Spanish	15	2
Swedish	3	< 1
<b>Total</b>	<b>1051</b>	

<sup>6</sup> More than one language option could be chosen for this question, therefore the total amount of percentages is above 100%.

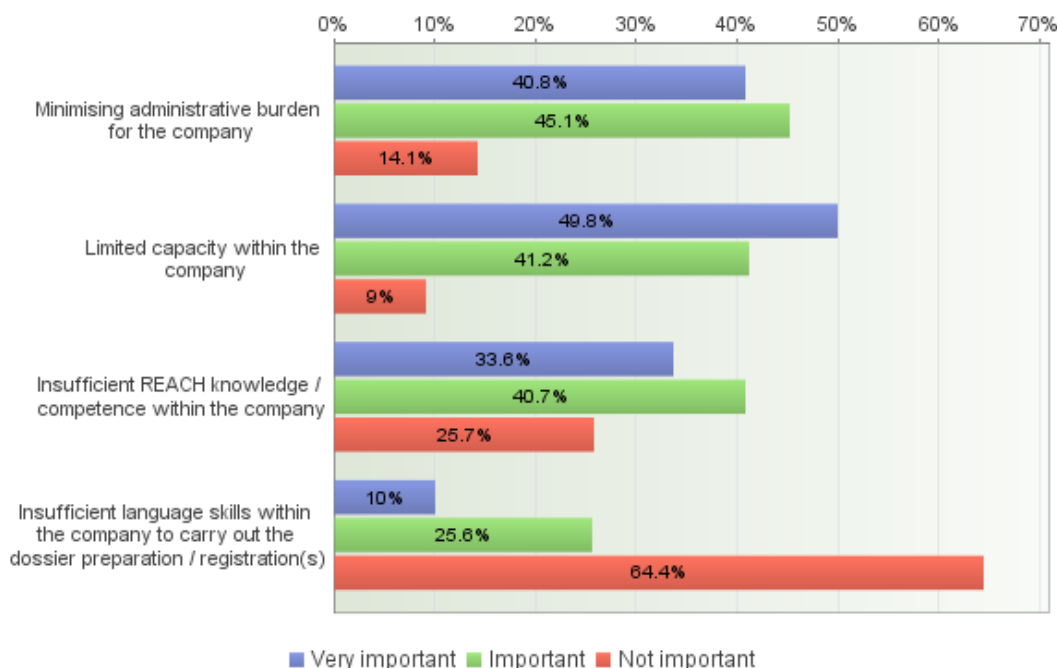
When asked about the potential problems due to the language barrier, only a low number of the respondents (8%) indicated that they had faced linguistic problems, mainly due to:

- limited English skills within the company;
- different English skills levels within SIEF(s), and/or
- complicated technical vocabulary or unknown abbreviations.

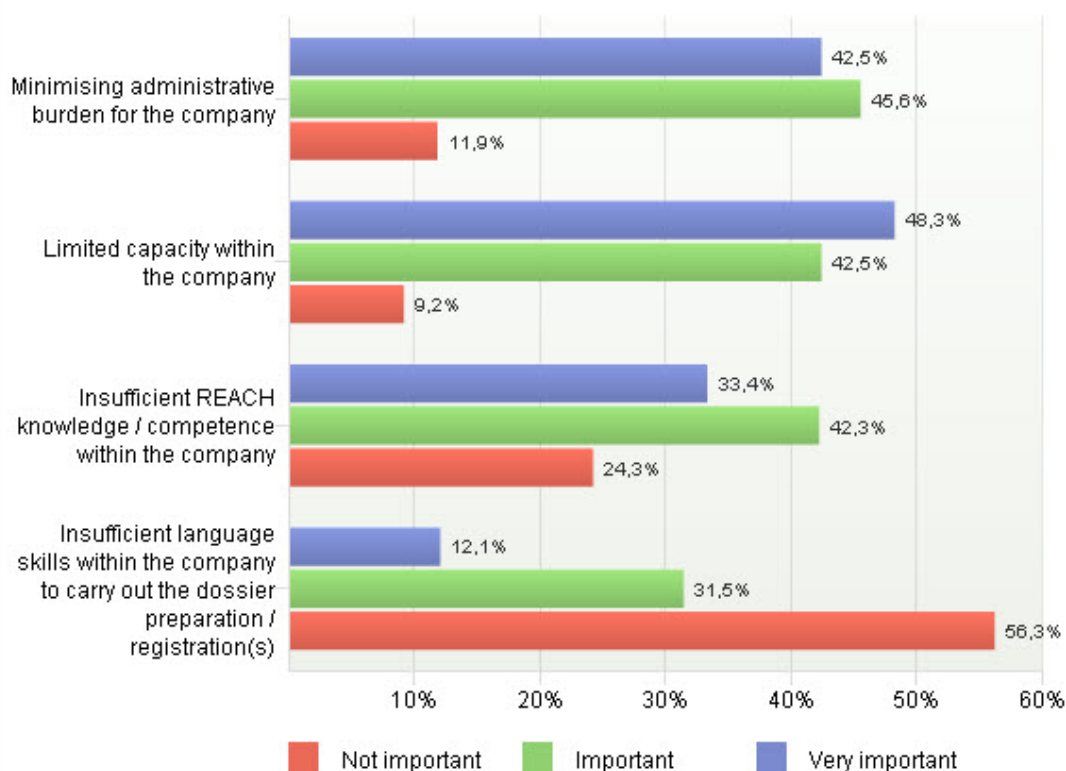
#### 4.3.1.2 Outsourcing

Dossier preparatory work was mainly carried out by the companies with the support of consultants (40%) or by the companies themselves (32%). The most important reasons for outsourcing the dossier preparation work were limited capacity within a company (50%) or the desire to minimise the administrative burden within the company (41%).

According to the responses received, the majority of companies had sufficient English skills to carry out the preparations themselves. Insufficient language skills was not an important reason for relying on external support among the registrants – more than half of the respondents (64%) indicated this aspect as the least important reason for outsourcing (Figure 5). When this was compared with the answers provided by the companies having a corporate language other than English, the outcome was very similar – 56% indicated that insufficient language skills were not an important reason to outsource the dossier preparation (Figure 6).



**Figure 5:** If the preparatory work for your dossier submission(s) was outsourced, please indicate the level of importance for each of the aspects/all responses.



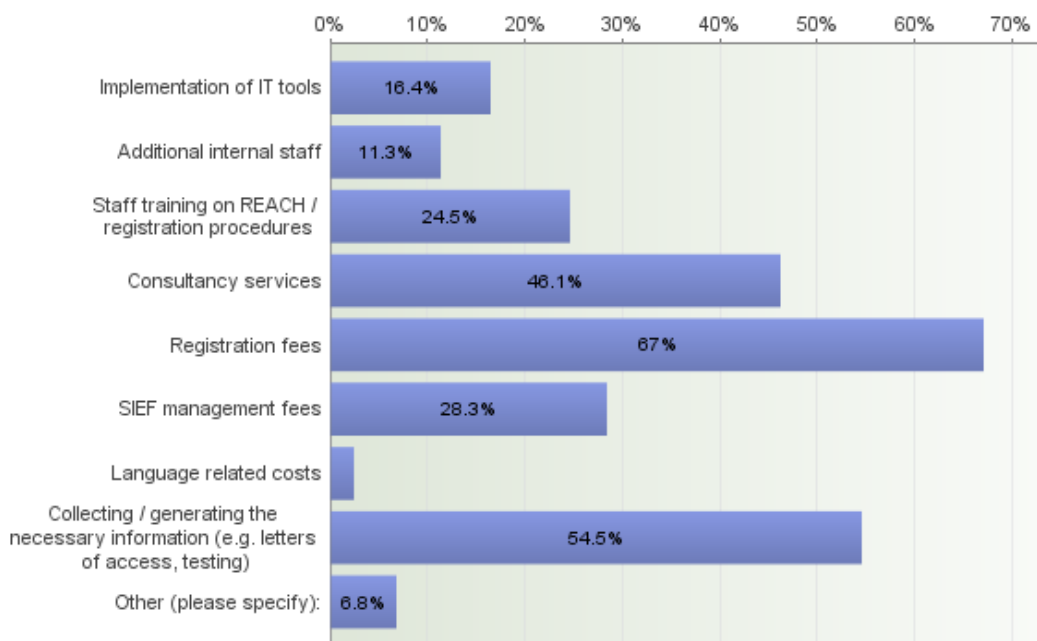
**Figure 6:** If the preparatory work for your dossier submission(s) was outsourced, please indicate the level of importance for each of the aspects/responses from the companies having a corporate language other than English.

In the open field area, the respondents indicated other reasons for external support. The main two reasons were:

1. The lack of expertise in toxicology and IUCLID within the company:
  - *the dossier preparation is mainly outsourced because of the lack of technical expertise in (eco)toxicology, C&L etc.;*
  - *Lack of IUCLID experience and lack of toxicological knowledge;*
  - *Insufficient IUCLID 5 skills within the company;*
  - *Insufficient knowledge / competence regarding toxicology;*
  - *Insufficient IUCLID skills within the company. - Very important;*
  - *Limited experience in taking decisions in toxicology and Ecotox strategy and the building of Exposure Scenarios;*
  - *REACH was studied and understood as a very specialist topic for contents and knowledge background. Within our organization we didn't recognise a proper level of competence to follow the case.*
2. Minimising the costs for the company/getting it right the first time:
  - *A desperate attempt to keep the costs down, by sharing with other companies;*
  - *The reason for outsourcing was to check if the CSR was confirming the requirements. We also used consultants as sparring partners;*
  - *Data security by having an independent third party looking at the data;*
  - *Although our company have more than 250 people in staff. The production department of the eleven substances registered only has 37 people; We do have a lot of knowledge on chemical substances. But due to staffing problems we have*

### 4.3.1.3. Cost of registration

The respondents were asked about the main components of their registration related expenditure. According to the answers received, the largest components of the costs were the registration fees (for 67%), the collection of necessary information (for 55%) and consultancy services (for 46%). Language-induced costs hardly figure in comparison to other registration related expenditure (Figure 7).



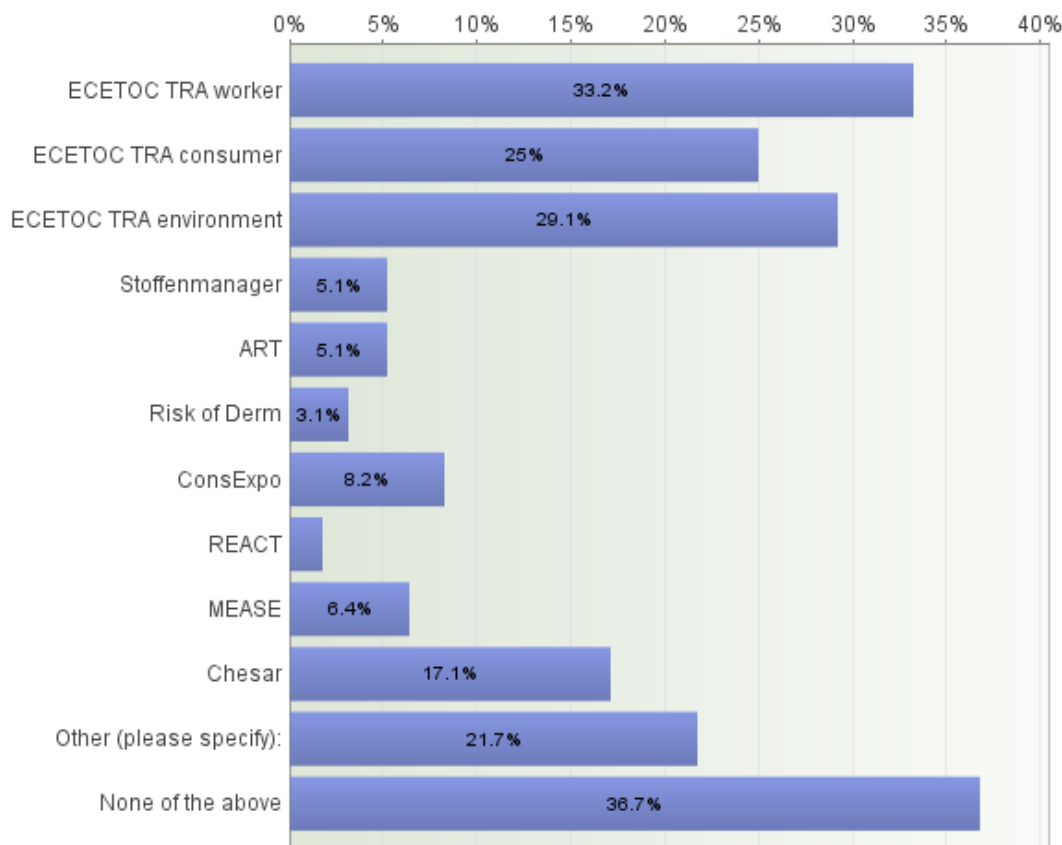
**Figure 7:** What was the most significant proportion of your registration expenditure? (Please select a maximum of three options)

The costs listed in the open field area included consortium fees (e.g. Concawe), study access costs, legal fees, the costs related to translations and data access.

### 4.3.1.4 Chemical Safety Assessment

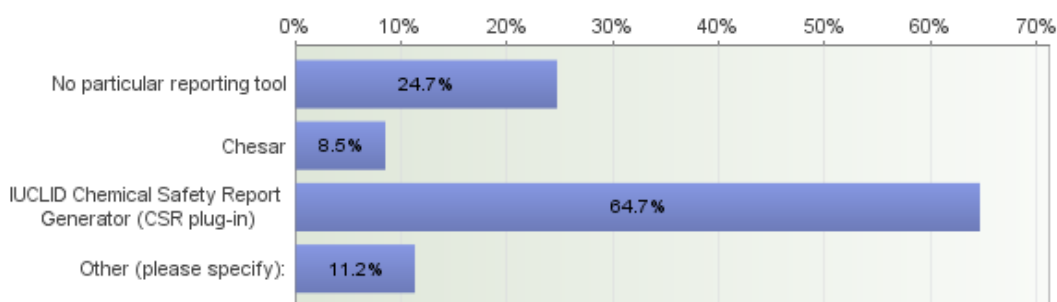
The majority of the respondents (72%) indicated that their dossiers contained a Chemical Safety Report with an exposure assessment. To prepare the Chemical Safety Assessment and the report, the companies had used various tools (Figure 8). Chesar was used by almost a fifth (17%) of registrants for the assessment but by less than 9% for the report (Figure 9).





**Figure 8:** The use of the tools for the Chemical safety assessment

In the open field for the use of the tools for assessment and the Chemical Safety Report, the respondents mentioned additional tools such as EUSES, EasyTra, EPISuite, QSAR, NRK, TGD Excel, GES, Petrорisk, Concawe SIEF Communication tool for petroleum substances and FOCUS/exposit. Some of the respondents indicated that the tools or CSR were provided by the consortium, the Lead Registrant, consultants or simply that they did not know how the report had been compiled.



**Figure 9:** The use of the tools for the Chemical Safety Report attached in the registration dossiers

## 4.3.2. Use of supporting material provided by ECHA in preparing the dossiers

### 4.3.2.1. Use of material

In the second part of the questionnaire, the respondents were asked about the use and usefulness of the variety of material made available by ECHA since 2007 in 22 EU languages.

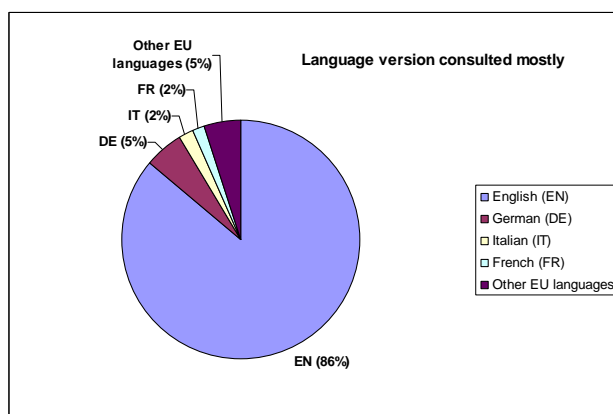
The main structure of eight questions addressed the use of ECHA's website, FAQ and Q&A documents, guidance documents, Navigator, Practical Guides, Dossier Submission and Industry User Manuals, IUCLID End User Manual and webinars was the following:

- *Did you use the material<sup>7</sup>?*
- *In which language did you mostly consult the material?*
- *Other languages consulted.*
- *Quality of translations, if relevant.*
- *Usefulness of material consulted.*
- *Other comments, if relevant.*

According to the responses received, the companies widely used (92% of respondents) ECHA's website, guidance documents, fact sheets, practical guides, technical manuals and other supporting material provided by the Agency. In general, they considered the material as very useful or useful.

Over 90% of respondents had used ECHA's website and the guidance documents while preparing their registration dossiers. The Navigator was used by about one third (35%) of the respondents.

The supporting material was mainly consulted in English. Figure 10 below gives this information in more detail.



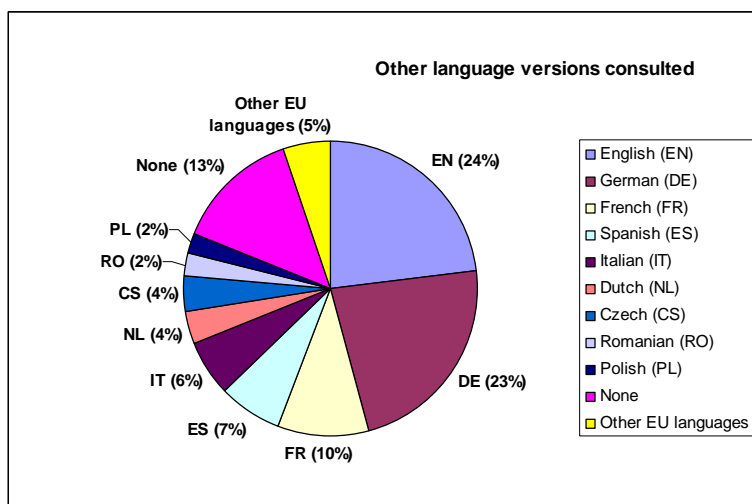
**Figure 10:** Language version consulted mostly \*

The answers to the question about other languages used in consulting different types of material showed that consultation of the supporting material in other languages than English

<sup>7</sup> Material refers to the ECHA website, FAQ and Q&A documents, Guidance documents, Navigator, Practical Guides, Dossier submission and Industry user manuals, the IUCLID End User Manual and webinars/webinar slides.

\* Average use of all supporting material, based on average percentages. To produce these statistics, an excel table was used.

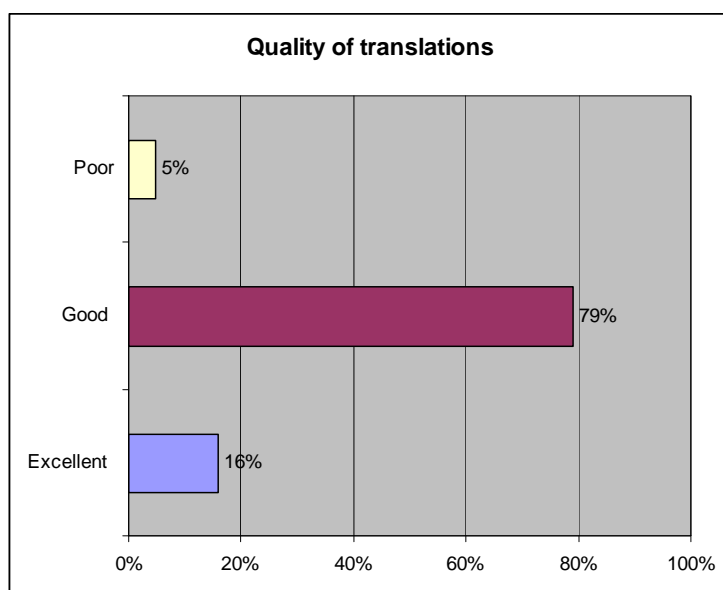
was not a common practice. For only a few languages, such as German, French, Spanish and Italian, was the usage rate above 5% (Figure 11).



**Figure 11:** Other language versions consulted\*

#### 4.3.2.2 Quality of translations

In general, the companies were satisfied with the quality of translations. Only 5% of respondents rated the quality of translations as poor.



**Figure 12:** Quality of translations consulted\*\*

#### 4.3.2.3 ECHA's website

The respondents were asked whether they used ECHA's website and in which language mostly. Responses showed that the majority of respondents (94%) consulted ECHA's website, mostly in English (84%) (Table 2).

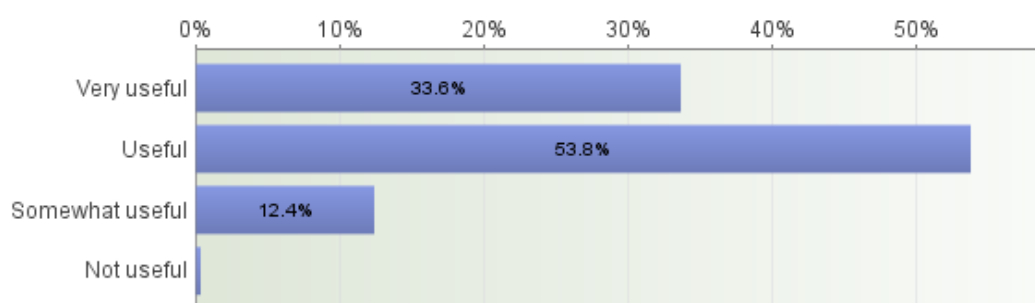
\*\* To produce these statistics, an excel table was used.

**Table 2:** Mostly used language in consulting ECHA’s website

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	4	< 1	1
Czech	7	< 1	3
Danish	1	< 1	< 1
Dutch	5	< 1	2
English	655	84	38
Estonian	2	< 1	< 1
Finnish	1	< 1	< 1
French	15	2	6
German	42	5	21
Greek			2
Hungarian			1
Italian	15	2	8
Latvian			< 1
Lithuanian	1		< 1
Maltese			
Polish	11	1	4
Portuguese	1		1
Romanian	1		2
Slovak	1		< 1
Slovene	1		< 1
Spanish	14	2	6
Swedish	1		1
<b>Total</b>	<b>778</b>	<b>100</b>	<b>100</b>

When asked about the consultation of ECHA’s website in other languages, the respondents indicated the use of German (27%), French (11%), Italian (8%) and Spanish (7%).<sup>8</sup>

The majority of the respondents (87%) indicated that the website was very useful or useful (Figure 13).



**Figure 13:** Rate the usefulness of ECHA website

#### 4.3.2.4 FAQs and Q&A documents

The respondents were asked whether they used FAQs and Q&A documents and in which language they were mostly used. Responses showed that the majority of respondents (85%) consulted FAQs and Q&A documents, mostly in English (87%) (Table 3).

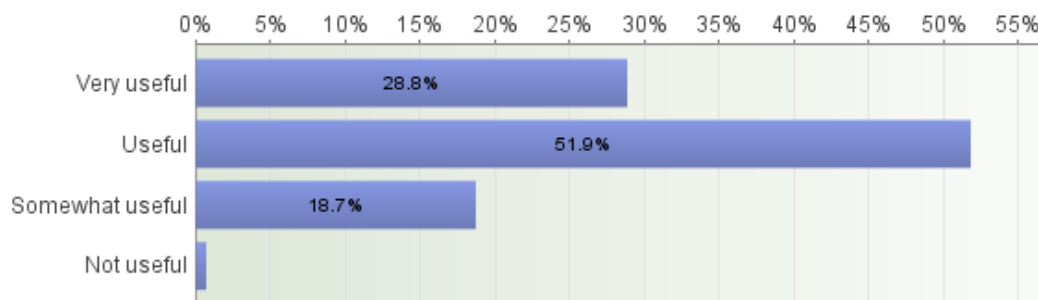
<sup>8</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 24%.

**Table 3:** Mostly used language in consulting FAQs and Q&A documents

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	2		1
Czech	5	1	3
Danish			< 1
Dutch	3		2
English	610	87	38
Estonian	1		< 1
Finnish	1		< 1
French	10	1	6
German	32	5	21
Greek			2
Hungarian			1
Italian	18	3	8
Latvian			< 1
Lithuanian			< 1
Maltese			
Polish	11	2	4
Portuguese			1
Romanian	1		2
Slovak			< 1
Slovene			< 1
Spanish	9	1	6
Swedish			1
<b>Total</b>	<b>703</b>	<b>100</b>	<b>100</b>

When asked about the consultation of FAQs and Q&A documents in other languages, the respondents indicated the use of German (27%), French (10%), Italian (7%), Spanish (7%) and Dutch (5%).<sup>9</sup>

The majority of the respondents (80%) indicated that the documents were very useful or useful (Figure 14).



**Figure 14:** Rate the usefulness of FAQs and Q&A documents

<sup>9</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 21%.

#### 4.3.2.5 Guidance documents

The respondents were asked whether they used guidance documents and in which language they were mostly used. Responses showed that the majority of respondents (94%) consulted the guidance documents, mostly in English (83%) (Table 4).

**Table 4:** Mostly used language in consulting the guidance documents

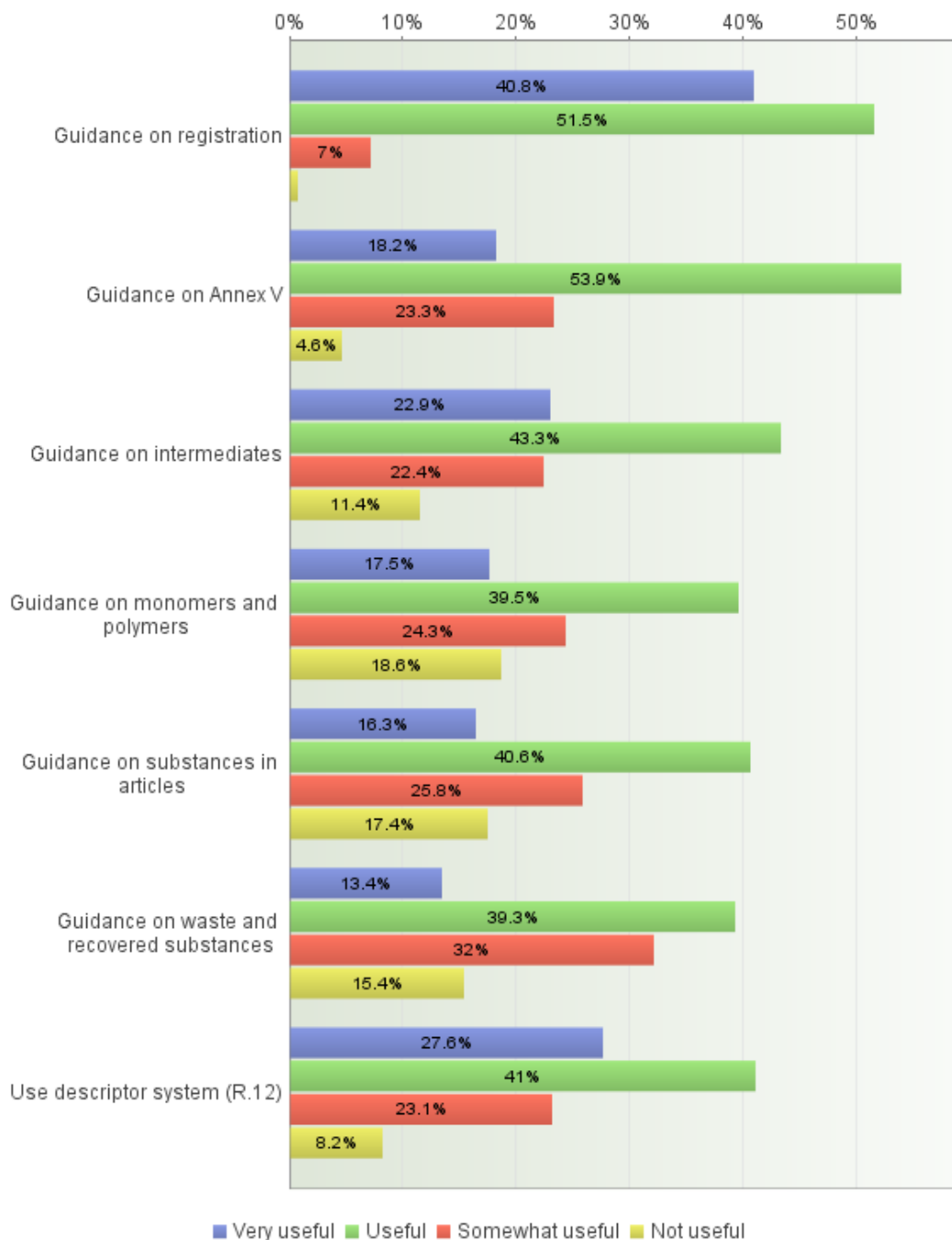
Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	4	1	1
Czech	7	1	3
Danish			< 1
Dutch	7	1	2
English	645	83	38
Estonian	1		< 1
Finnish	2		< 1
French	14	2	6
German	47	6	21
Greek			2
Hungarian			1
Italian	19	2	8
Latvian			< 1
Lithuanian	1		< 1
Maltese			
Polish	14	2	4
Portuguese	1		1
Romanian	1		2
Slovak	1		< 1
Slovene			< 1
Spanish	12	2	6
Swedish	1		1
<b>Total</b>	<b>777</b>	<b>100</b>	<b>100</b>

When asked about the consultation of guidance documents in other languages, the respondents indicated the use of German (25%), French (10%), Spanish (7%) and Italian (6%).<sup>10</sup>

Respondents were asked to rate the usefulness of the guidance documents listed below (Figure 15). It was not mandatory to rate all the documents, therefore the number of responses varies for each of them. The responses showed that the most useful document was Guidance on Registration (41%). Other very useful documents were Use Descriptor System (R.12) (28%), Guidance on intermediates (23%) and Guidance on Annex V (18%) (Figure 15).

According to the feedback, the least useful documents were the Guidance on Monomers and Polymers (19% considered it as not important), Guidance on Substances in Articles and Guidance on Waste and Recovered Substances (not important for 17% and 15% respectively).

<sup>10</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 25%.



**Figure 15:** Rate the usefulness of the guidance documents used

In the open field area the respondents could indicate other guidance material which they found very useful. Other documents useful for registrants were<sup>11</sup>:

- *Guidance on Data Sharing;*
- *Guidance in a Nutshell on Chemical Safety Assessment;*
- *Guidance on CLP;*
- *Guidance on Substance Identity;*
- *DU guidance;*

<sup>11</sup> The use of some material mentioned was addressed in separate questions as it regards the Navigator or REACH-IT manuals, for instance.

- *Guidance on Information Requirements and Chemical Safety Assessment, incl. all sub-documents;*
- *Guidance on Risk Assessment and Chemical Safety Report;*
- *Guidance on Communication in the Supply Chain (including CSR);*
- *Guidance on Pre-registration;*
- *Navigator tool;*
- *REACH-IT manuals (DSM 15 – Dissemination, DSM 4 - How to Pass Business Rule Verification, DSM22 - How to Prepare and Submit an Application for Authorisation using IUCLID 5, IUM 6 : Dossier Submission, IUM 17 - Legal Entity Change, IUM 8 – Invoicing);*
- *IUCLID 5 guidance and support;*
- *CLP Introductory guidance;*
- *Guidance on Identification and Naming;*
- *Guidance on Derivation of DNELs/DMELs from human data;*
- *Guidance on Scientific Research and Development (SR&D) and Product and Process Oriented Research and Development (PPORD);*
- *Practical Guide 7 on how to notify substances to the Classification & Labelling inventory;*
- *Practical guide 9 on how to do a registration as a Member of a joint submission;*
- *Minutes from the Competent Authorities, and*
- *Trade association guidelines.*

Other comments on guidance material:

1. Guidance material was useful, but was published too late and was not easy to find

- *Guidance was very useful but it came too late.*
- *Any information and any guidance are very useful. I hope that ECHA continue supplying useful guidance.*
- *I had a very difficult time trying to find the Guidance documents on the website.*

2. Too much material and too many updates

- *I would like to comment that there were too many documents, which is noticeable also in this survey. You could spend a year reading all the documents and even though you can't find those tiny tips for IUCLID5, know how to manage with more than one legal entity. Having too many documents is not useful.*
- *Guidance is well written but there are a lot of them for each portion of the registration. Often it is too confusing, switching between each guidance document.*
- *Late changes in the Guidance on Intermediates, contrary to legal text were significant, which had a big negative impact.*
- *On the whole, guidance documents were overly complicated and tend to be regulation by the backdoor. Guidance documents produced by ECHA commonly seek to go further than required by Regulation and to require additional materials not specified in Regulation.*
- *The constant revisions, which took place to guidance documents; especially intermediates and use descriptors, created a lot of confusion and conflicting information. Also the advice from the competent authority wasn't always clear due to the lack of clear and concise information from ECHA. It would have been more beneficial to have a step by step guidance as was the case with the CLP guidance which was much clearer.*

#### **4.3.2.6 Navigator**

The respondents were asked whether they used Navigator and in which language they mostly used it. Responses showed that the majority of respondents (65%) did not use



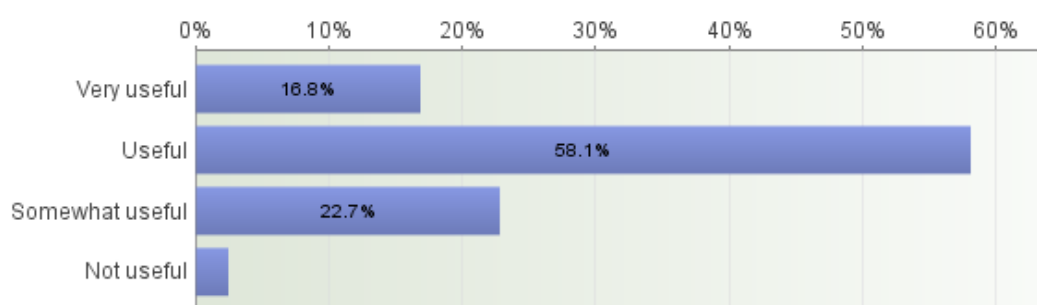
Navigator. The companies who consulted Navigator, did so mostly in English (84%) (Table 5).

**Table 5:** Mostly used language in consulting Navigator

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	2	1	1
Czech	2	1	3
Danish			< 1
Dutch			2
English	244	84	38
Estonian			< 1
Finnish			< 1
French	6	2	6
German	21	7	21
Greek			2
Hungarian			1
Italian	6	2	8
Latvian			< 1
Lithuanian			< 1
Maltese			
Polish	2	1	4
Portuguese	1		1
Romanian	1		2
Slovak	1		< 1
Slovene			< 1
Spanish	6	2	6
Swedish			1
<b>Total</b>	<b>292</b>	<b>100</b>	<b>100</b>

When asked about the consultation of the Navigator tool in other languages, the respondents indicated using German (24%), French (9%), Spanish (7%) and Italian (6%).<sup>12</sup>

The companies who used the Navigator tool rated it as very useful or useful (75% in total) (Figure 16).



**Figure 16:** Rate the usefulness of the Navigator

<sup>12</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 23%. The Competent Authorities of France and Poland have volunteered to implement their own navigators, therefore the Navigator tool is not available on ECHA's website in French and Polish.

### 4.3.2.7 Practical guides

The respondents were asked whether they used the practical guides and in which language they mostly used them. Responses showed that the majority of respondents (77%) consulted the practical guides, mostly in English (85%) (Table 6).

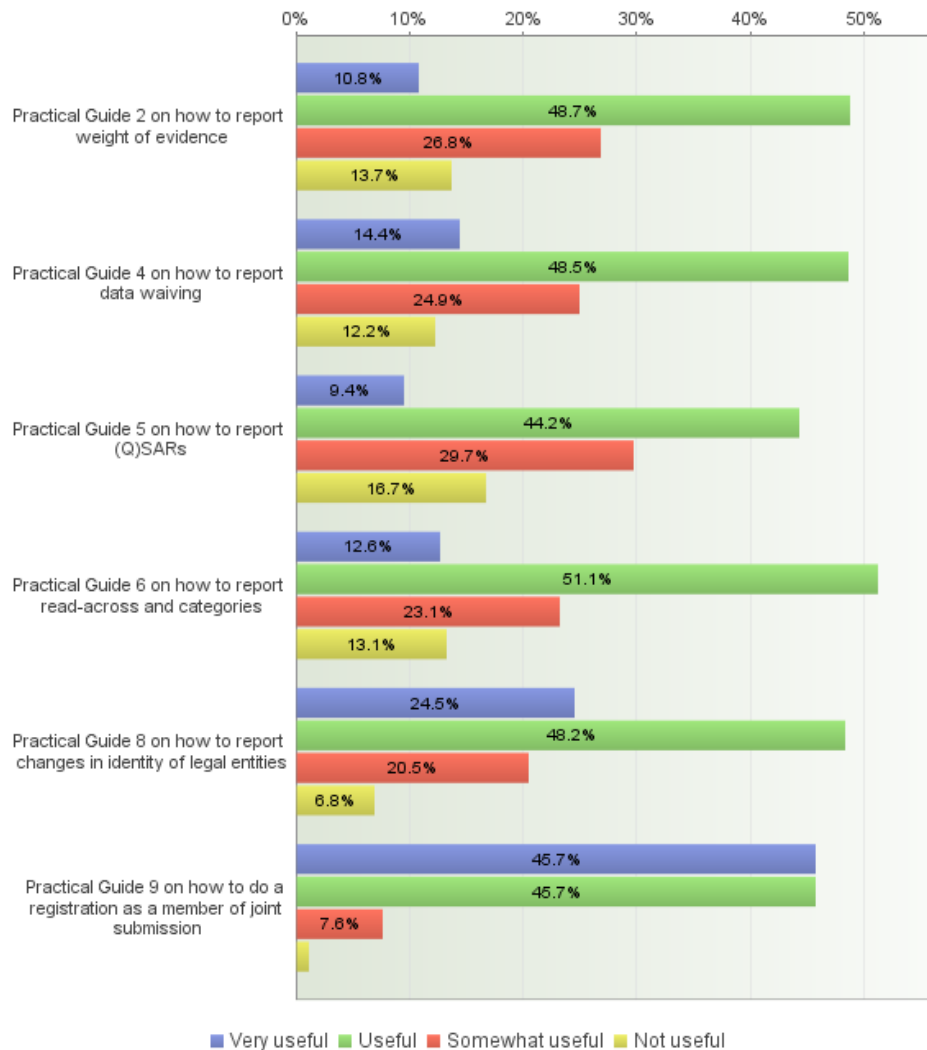
**Table 6:** Mostly used language in consulting the practical guides

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	3	1	1
Czech	3	1	3
Danish			< 1
Dutch	3	1	2
English	538	85	38
Estonian			< 1
Finnish	1		< 1
French	12	2	6
German	38	6	21
Greek			2
Hungarian			1
Italian	13	2	8
Latvian			< 1
Lithuanian			< 1
Maltese			
Polish	10	1	4
Portuguese	1		1
Romanian	2		2
Slovak	1		< 1
Slovene			< 1
Spanish	10	1	6
Swedish	1		1
<b>Total</b>	<b>636</b>	<b>100</b>	<b>100</b>

When asked about the consultation of the practical guides in other languages, the respondents indicated that they used German (23.7%), French (9%), Spanish (7%) and Italian (6%).<sup>13</sup>

Respondents were asked to rate the usefulness of the practical guides listed below (Figure 17). It was not mandatory to rate all the documents, therefore the number of responses varies for each of them. The responses showed that the most useful practical guide was Practical Guide 9 on 'How to do a Registration as a Member of Joint Submission' (46% considered this as very useful). Other useful documents were Practical Guide 8 on 'How to Report Changes in Identity of Legal Entities' and Practical Guide 4 on 'How to Report Data Waiving' (25% and 14% considered these documents as very useful) (Figure 17).

<sup>13</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 23%.



**Figure 17:** Rate the usefulness of practical guides used

In the open field the respondents could indicate other practical guides which they found very useful. The documents mentioned were<sup>14</sup>:

- *Practical Guide 7 on How to Notify Substances to the Classification and Labelling Inventory;*
- *Practical Guide 3 on How to Report Robust Study Summaries;*
- *Guidance on Pre –registration;*
- *Guidance on Data Sharing, and*
- *Guidance on IUCLID.*

#### 4.3.2.8 Dossier Submission and Industry User Manuals

The respondents were asked whether they used the Dossier Submission and Industry User Manuals and in which language they mostly used them. Responses showed that the majority of respondents (80%) consulted the manuals, mostly in English (85%) (Table 7).

<sup>14</sup> The use of some material mentioned was addressed in the separate questions, for instance with regard to the guidance documents.

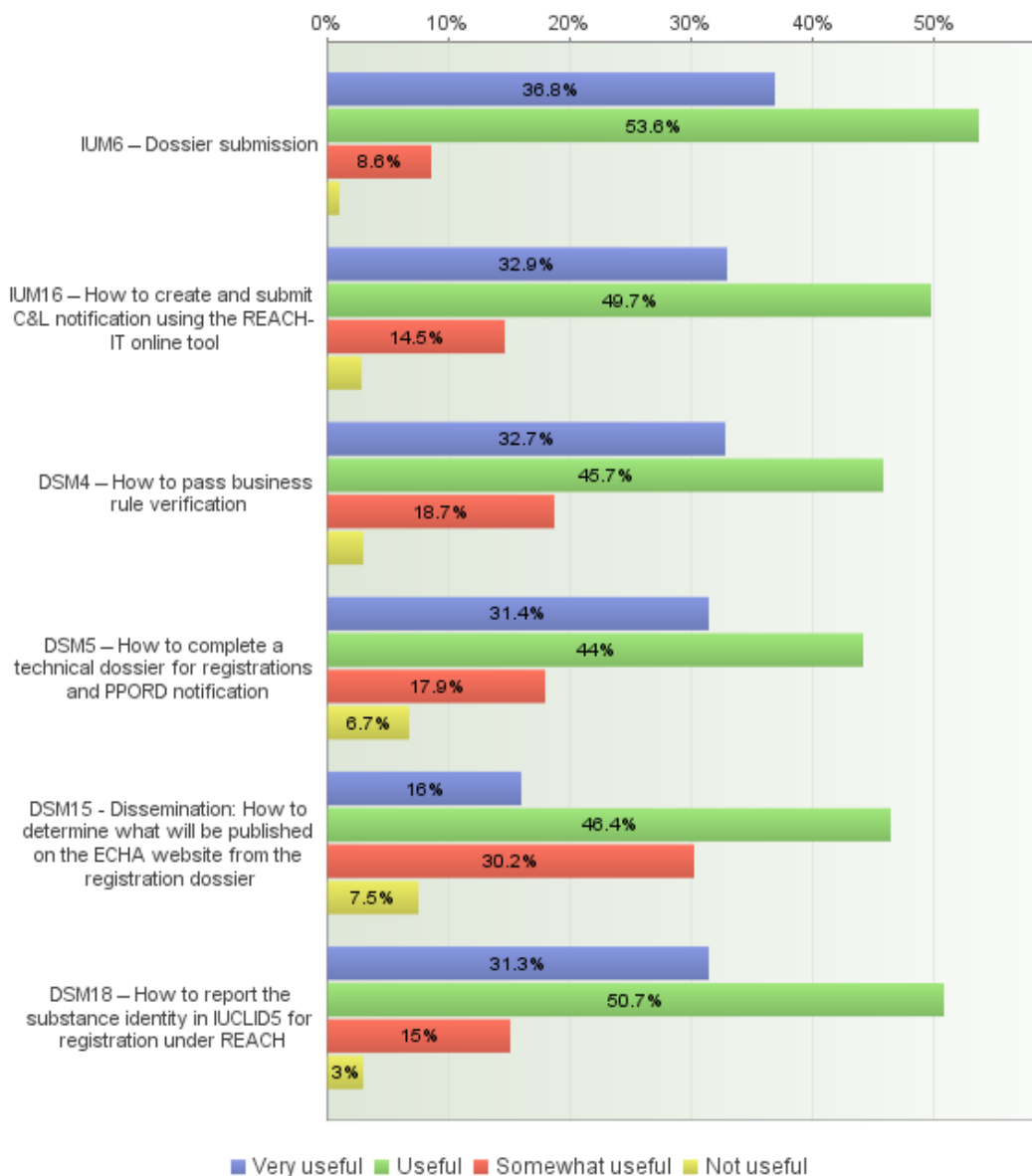
**Table 7:** Mostly used language in consulting the Dossier Submission and Industry User Manuals

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	2		1
Czech	4	1	3
Danish			< 1
Dutch	2		2
English	558	85	38
Estonian	1		< 1
Finnish	1		< 1
French	9	2	6
German	37	6	21
Greek			2
Hungarian	1		1
Italian	17	3	8
Latvian			< 1
Lithuanian			< 1
Maltese			
Polish	11	2	4
Portuguese	1		1
Romanian	1		2
Slovak			< 1
Slovene	1		< 1
Spanish	9	1	6
Swedish	1		1
<b>Total</b>	<b>656</b>	<b>100</b>	<b>100</b>

When asked about the consultation of the Dossier Submission and Industry User Manuals in other languages, the respondents indicated using German (23%), French (8%), Italian (8%) and Spanish (8%).<sup>15</sup>

Respondents were asked to rate the usefulness of the Dossier Submission and industry user manuals listed below (Figure 18). 70% of the companies responded to this question. It was not mandatory to rate all the documents, therefore the number of responses varies for each of them. The responses showed that the most useful manual was IUM6 – Dossier Submission (37% considered it as very useful). Other useful manuals were IUM16 – ‘How to Create and Submit C&L Notification using the REACH-IT online tool’ and DSM4 – ‘How to Pass Business Rule Verification’ (very useful for 33%) (Figure 18).

<sup>15</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 24%.



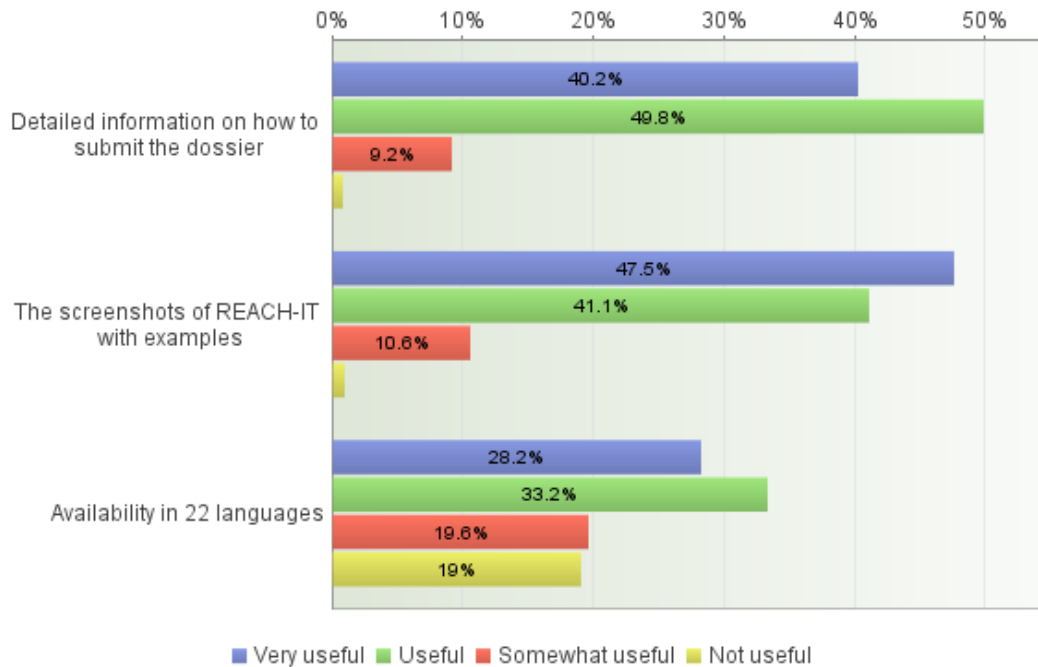
**Figure 18:** Rate the usefulness of Dossier Submission and Industry User Manuals used

In the open field the respondents could indicate other manuals which they found very useful. The documents mentioned were:

- *DSM17 - Legal Entity Change;*
- *DSM8 - Invoicing;*
- *DSM 21 - How to Prepare and Submit a Downstream User Report using IUCLID 5;*
- *DSM 1 - How to Prepare and Submit PPORD notification;*
- *DSM16 - Data Submission Manual 16: Confidentiality Claims: How to make Confidentiality Claims, and how to write Art 119(2) confidentiality claims justifications;*
- *DSM19 - How to submit the CSR as part of a joint submission;*
- *There are so many, cannot remember which ones and in which order. Most complicated was the CLP update of NONS;*
- *DSM2 - How to Prepare and Submit an Inquiry Dossier;*
- *DSM 20 - How to Prepare and Submit a Substance in Articles Notification Using IUCLID;*
- *IUM7 - Joint Submission, and*

- *IUM2 - Sign-up and Account Management.*

The respondents were also asked to rate the usefulness of different features of the manuals. As can be seen below (Figure 19), the most important features for the industry were the availability of screenshots and detailed information; while the availability of translations was considered as least important (19% of the respondents rated it as not useful) (Figure 19).



**Figure 19:** Rate the usefulness of different features of Dossier Submission and Industry User Manuals

In the open field, the respondents could indicate other features that they found very useful or add other comments. From the feedback received, two types of contrasting comments emerged:

- The manuals were well written and helpful.
  - *easy to read and to follow the processes described.*
- The manuals were not helpful.
  - *The manuals were not always written from the view of a registrant. Many things in registration had to be considered at the same time (which is the pre-registration number, what number is needed for an update of a dossier etc.).*
  - *I only had the English versions of the documents. It would be easier to have them in my language because all terms and the reach-specific terms are not easy to understand.*
  - *Well written manuals but so many cross references to other documents and guidance it was confusing.*
  - *There were conflicts between different guidance on the same issue.*

#### 4.3.2.9 IUCLID End User Manual

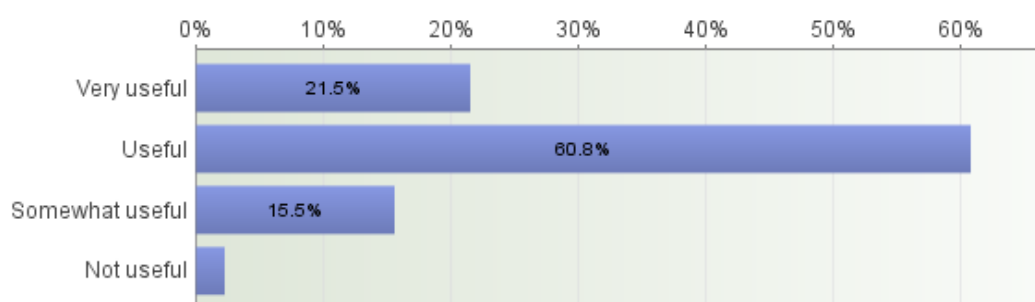
The respondents were asked whether they used the IUCLID End User Manual and in which language they used it mostly. Responses showed that approximately two thirds of the respondents (66%) consulted the IUCLID End User manual, mostly in English (87%) (Table 8).

**Table 8:** Mostly used language in consulting the IUCLID End User manual

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	1		1
Czech	4	1	3
Danish			< 1
Dutch	3	1	2
English	475	87	38
Estonian	1		< 1
Finnish			< 1
French	9	2	6
German	29	5	21
Greek			2
Hungarian			1
Italian	11	2	8
Latvian			< 1
Lithuanian	1		< 1
Maltese			
Polish	6	1	4
Portuguese	1		1
Romanian	2		2
Slovak			< 1
Slovene			< 1
Spanish	6	1	6
Swedish			1
<b>Total</b>	<b>549</b>	<b>100</b>	<b>100</b>

When asked about the consultation of the IUCLID End User Manual in other languages, the respondents indicated using German (23%), French (10%), Spanish (7%) and Italian (6%).<sup>16</sup>

The companies who used the manual rated it as very useful or useful (82% in total) (Figure 20).



**Figure 20:** Rate the usefulness of the IUCLID En User manual

#### 4.3.2.10 Webinars / webinar slides

The respondents were asked whether they consulted webinars/webinar slides and in which language they mostly did so. Responses showed that a little more than half of the respondents (51%) consulted this material, mostly in English (96%) (Table 9).

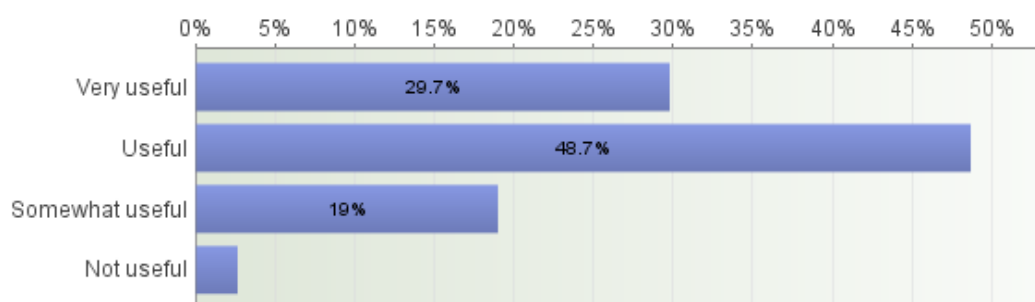
<sup>16</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 23%.

**Table 9:** Mostly used language in consulting the webinars/webinar slides.<sup>17</sup>

Language	No. of responses	% of respondents	% of companies using the language as corporate language
Bulgarian	1		1
Czech			3
Danish			< 1
Dutch	1		2
English	404	96	38
Estonian			< 1
Finnish			< 1
French	4	1	6
German	4	1	21
Greek			2
Hungarian			1
Italian	3	1	8
Latvian			< 1
Lithuanian			< 1
Maltese	1		
Polish	1		4
Portuguese			1
Romanian			2
Slovak			< 1
Slovene			< 1
Spanish	3	1	6
Swedish			1
<b>Total</b>	<b>422</b>	<b>100</b>	<b>100</b>

When asked about the consultation of the webinars/webinar slides in other languages, the respondents indicated using German (18%), French (8%) and Spanish (5%).<sup>18</sup>

The companies who consulted the webinars/webinar slides rated them as very useful or useful (78% in total) (Figure 21).



**Figure 21:** Rate the usefulness of webinars / webinar slides

#### 4.3.2.11 Use of IT-tools

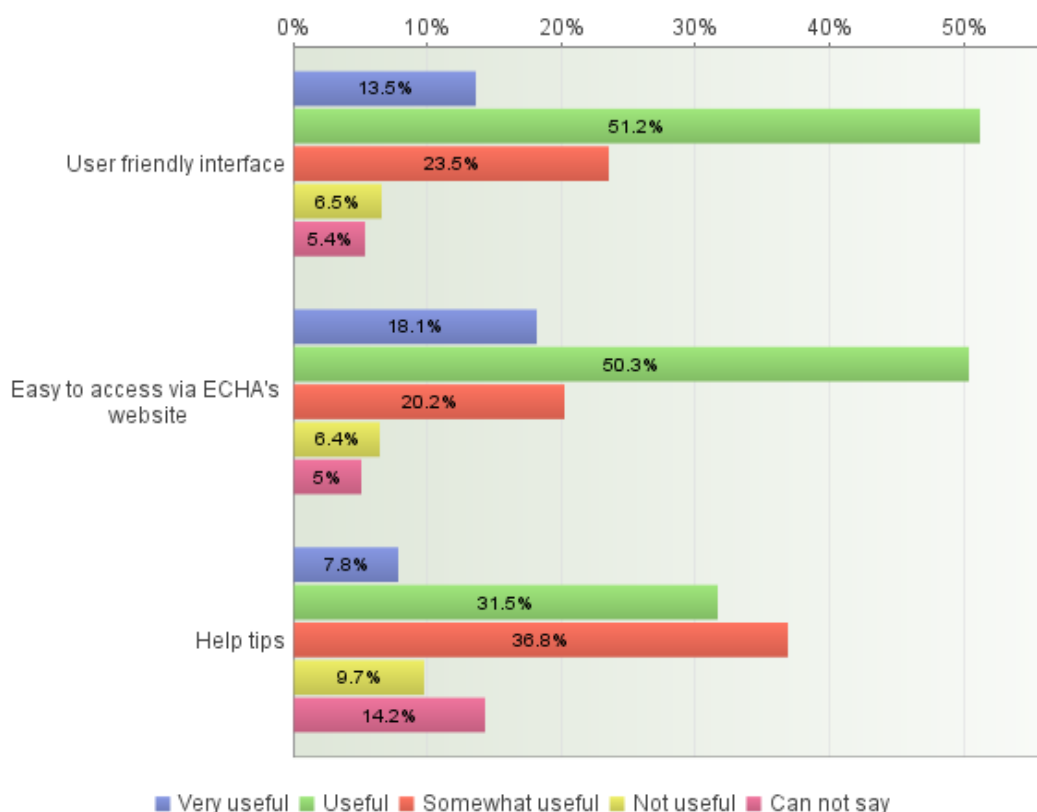
##### a) REACH-IT

The respondents were asked about the usefulness of some features of REACH-IT. The responses show that the availability of the Help tips is a less useful feature (only 8% indicated it as very useful) compared to easy access via ECHA's website or user a friendly interface (considered as very useful by 18% and 14% respectively) (Figure 22).

<sup>17</sup> Webinar recordings were available only in English; however some of the webinar slides (for instance, the slides on Chesar, Chemical Safety Assessment, TCC, substance identity) were translated.

<sup>18</sup> This indicates the use of other languages used by more than 5% of the respondents. English was mentioned by respondents here as another language. The rate for English was 19%.





**Figure 22:** Rate the usefulness of the REACH-IT features

In the open field, the respondents could indicate other features that they found very useful or add other comments. The main comments are grouped below:

1. Other useful features.

- *possibility to communicate with the SIEF member when we are the SIEF Facilitator.*
- *Very well structured.*
- *Password reset.*
- *Easy access to SVHC candidate list but somewhat confusing that it is separated from the corresponding consultation.*
- *Notification when email is received in the REACH-IT mailbox.*
- *Dissemination plug-in.*
- *Fee calculator.*
- *Language.*
- *Search functionality.*

2. REACH-IT is a complex software.

- **VERY BAD THINGS:**
- *It is not possible to manage in one account several legal entities.*
- *It is not possible to export (CVS, xml, text...) all pre-registration and registration numbers for one legal entity.*
- *Password change is required much to often (should be disabled).*
- *Verification code is not always easy to read.*
- *Instead of an email alert, it should be possible that the complete email could be forwarded to the individual email addresses.*

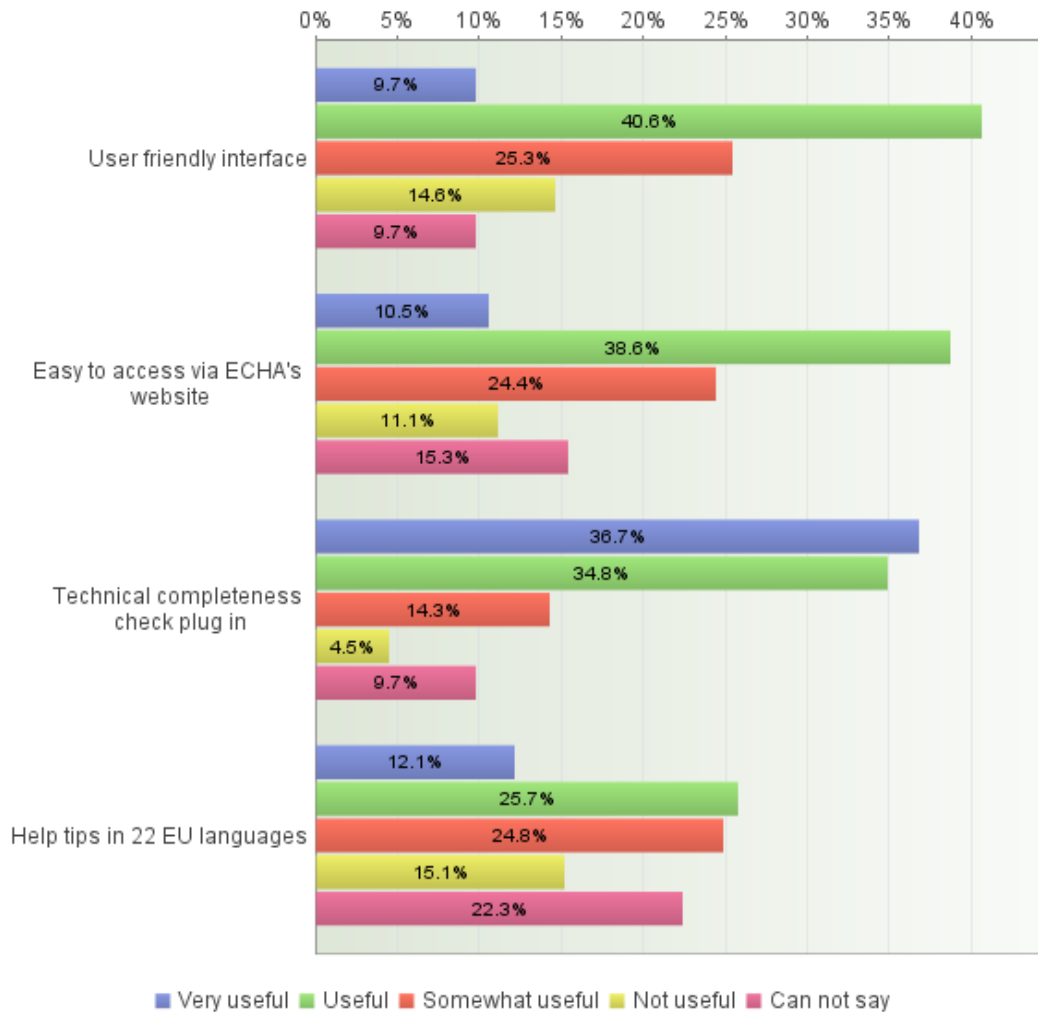
- *Too complex to find right information and process flow.*
- *It might be wise for safety reasons to change the password every second month, but if you have more legal entities in same group and you are administering all the accounts, it is quite laborious.*
- *When you start, you don't know which data will be required, after each page on REACH-IT, if some data is missed, we need to restart operation.*
- *REACH-IT/IUCLID was virtually impossible to use even after going on a training course, had to outsource in the end.*

### 3. Other comments.

- *The interface is not user friendly and it is not easy to access from ECHA's website.*
- *Difficult to find the target selection.*
- *REACH-IT should be open 24/7 not during Finnish working hours.*
- *The automatic password reset is exceptionally annoying and unnecessary.*
- *Not useful: Inbox system - too much junk that cannot be easily deleted or filtered.*
- *Side menu access is good for most things but searching each of the specific area for sub-level data and information is time consuming*

### b) IUCLID 5

The respondents were asked about the usefulness of some features of IUCLID 5. The responses show that out of the features mentioned, the technical completeness check plug was considered as the most useful (37%), while the availability of the help tips in 22 EU languages was not so useful (13% rated it as very useful) (Figure 23).



**Figure 23:** Rate the usefulness of the IUCLID 5 features

In the open field, the respondents could indicate other features found as very useful or add any other comments. The main comments are grouped below:

1. Other useful features:

- *Fee calculator plug-in.*
- *Bulk export / import.*
- *Copy / paste.*
- *Search within raw data.*
- *History track.*
- *Copy functionality.*
- *Print functionality.*
- *CSR plug-in.*
- *Chesar is unwieldy and unhelpful.*

2. IUCLID 5 is a complex software.

- *IUCLID 5 can only be handled by software experts - therefore we had to order an external consultant.*
- *IUCLID5 interface is a complete mess, very heavy and not a user friendly software!*
- *I had big problems with IUCLD 5 implementation. It is too difficult to use when you do not have*

- *Installation of IUCLID on our new Pac's was a real nightmare, days of work lost. This software seems to come from another age.*
- *IUCLID is a nightmare for people who have to use it just once to get through this registration process; God knows how people will manage for 2013 and onwards. Big companies have systems and computer departments, which can integrate IUCLID into their systems, but small companies stand little chance and this is a blatant technical barrier to trade and will result in industry being compromised.*
- *IUCLID IS ONLY SUPPORTED BY WINDOWS AS WE WORK ON MAC WE HAD TO PURCHASE A WINDOWS LICENSE TO USE IUCLID.*
- *We use APPLE OS entirely so to have this platform not supported was a major headache for us requiring stand alone PC's to complete IUCLID and involving migration of large datasets between individual computers on a regular basis. We are a small company with no internal IT dept and in a remote location so this was our major problem.*
- *The tie-in between the two software programs is useful, but it requires the user to learn and become familiar with both products and their weaknesses. IUCLID5 is favoured for its layout and user interface but disliked for its complexity in knowing what information is required to be submitted at each level of inquiry. Time to learn each system is limited for small businesses, which is why consultants are so expensive.*

### 3. IUCLID training was helpful

- *Having already completed a 2 day course on IUCLID the support documents etc. were very useful. If I had not done the course I do not think they would be as easy to use.*
- *IUCLID5 was easy to use after you got some tips from a consultant, e.g. how to handle with different legal entities etc. These you couldn't find in any instructions.*

#### **4.3.3. Helpdesk assistance**

In the third part of the survey, the respondents were asked questions about their communication with the national REACH helpdesks, ECHA's Helpdesk and communication needs in general.

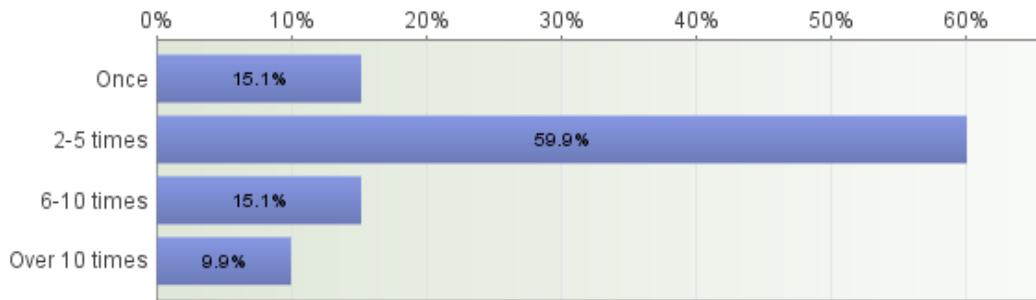
The main structure of the questions addressing the communication needs was as follows:

- *Did you seek help from your national REACH helpdesk/ECHA?*
- *How often did you seek help?*
- *Rate the importance of various service related aspects.*
- *Rate your overall satisfaction with the service.*

According to the responses received, in making the registration, companies commonly contacted the National helpdesks (67%), but almost as large a proportion (59%) of the respondents contacted ECHA's Helpdesk. The respondents indicated that, on average, they had contacted these services between two and five times.

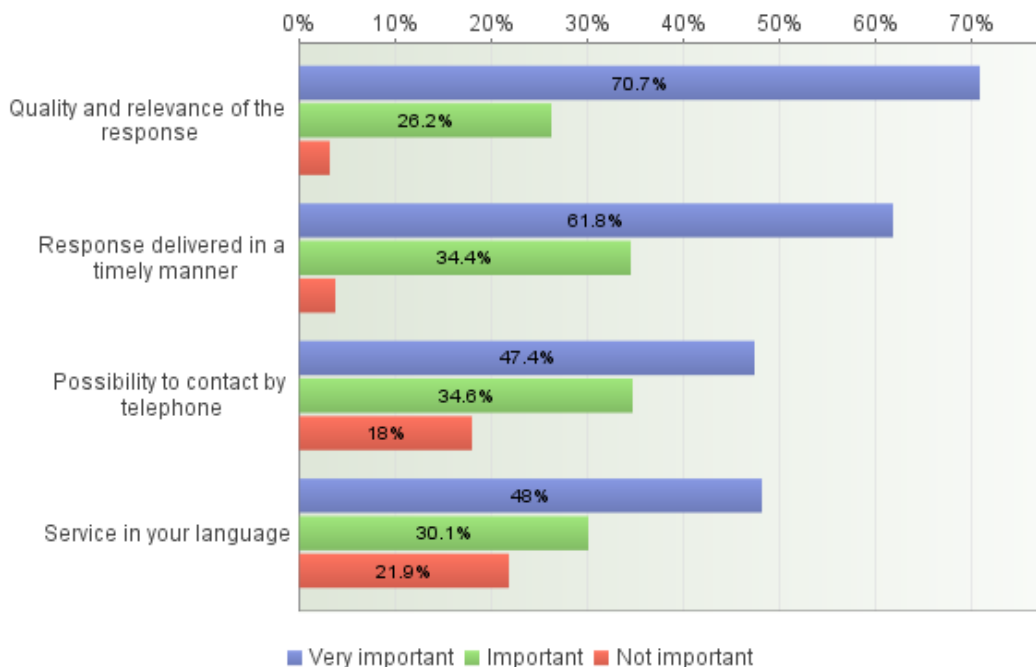
##### **4.3.3.1. Communication with the national REACH helpdesk**

During the registration, the majority of respondents (67%) contacted their national REACH helpdesks two to five times on average (60%).



**Figure 24:** How often did you seek help from your national REACH helpdesk in the course of your registration(s)?

The respondents were asked about the importance of various service related aspects. The responses show that out of the aspects mentioned below, quality and relevance of the response were considered as the most important elements (by 71% of the respondents), while the possibility to get a service in their own language was considered as the least important aspect (by 22%) (Figure 25).



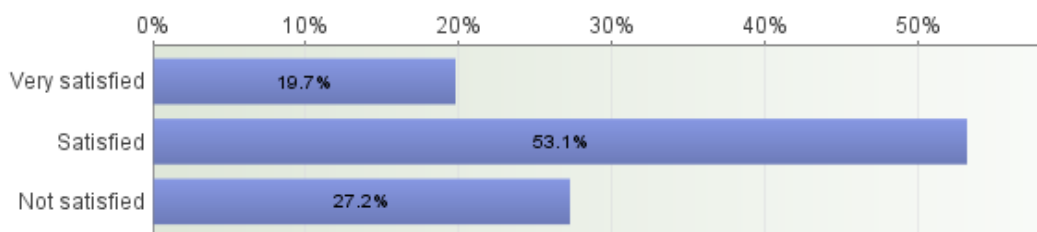
**Figure 25:** What services of your national helpdesk were the most important for you? Please indicate the level of importance for each of the aspects

In the open field, the respondents could indicate any other services that they found to be very useful or add comments. The main comments are grouped below:

- National helpdesk services were very useful.
  - *Very helpful and pragmatic.*
  - *UK Helpdesk is an excellent service and will always get back to you.*
  - *Responses were useful, but in several occasions came far too late.*
  - *I was not always impressed by the level of detailed knowledge of the Dutch helpdesk. However, I also occasionally spoke to the UK helpdesk and they were exceptionally good.*
  - *The national web pages of helpdesk authorities were very useful.*

- *The UK helpdesk was excellent, giving rapid and informed assistance.*
  - *The HSE eventually stopped the telephone helpdesk, but did respond to email enquiries.*
2. National helpdesk services need improvement.
- *Quite often, the national helpdesk is not competent to answer questions. It is not practical that we first have to go through the national helpdesk before we can contact ECHA's helpdesk.*
  - *National helpdesk could not provide any useful help, just reference to international helpdesk (ECHA)*
  - *ECHA could not be contacted only via email. There has been no reply. So to sum up: No help at all was provided by national or international service desks. Without the help of a major company the reach dossiers could never have been submitted.*
  - *The possibility to contact by phone is very important but our national helpdesk didn't offer this service. You should include your question in a web questionnaire. The response was never delivered in a timely manner and the quality of the response wasn't good (they only refer to guidance).*
  - *Responses were ambiguous.*
  - *National helpdesk answers are sometimes contrary to ECHA-guidelines which causes still more confusion about REACH implementation (e.g. intermediates).*
  - *UK and Austrian seem most helpful.*
  - *Response within 48 hours. Currently, it takes too long time to get an answer from the national helpdesk.*

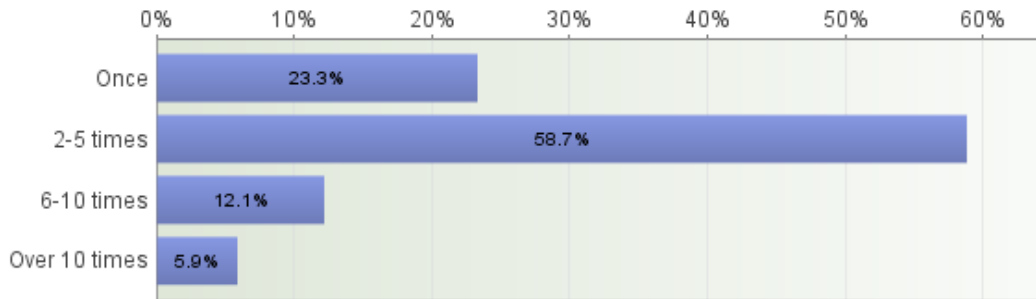
The respondents were asked whether they were satisfied with the national REACH helpdesk services. The answers show that the majority of respondents were satisfied with the service received (73%); however some improvement is needed, since the level of dissatisfaction was relatively high (Figure 26).



**Figure 26:** Rate your overall satisfaction with national REACH helpdesks

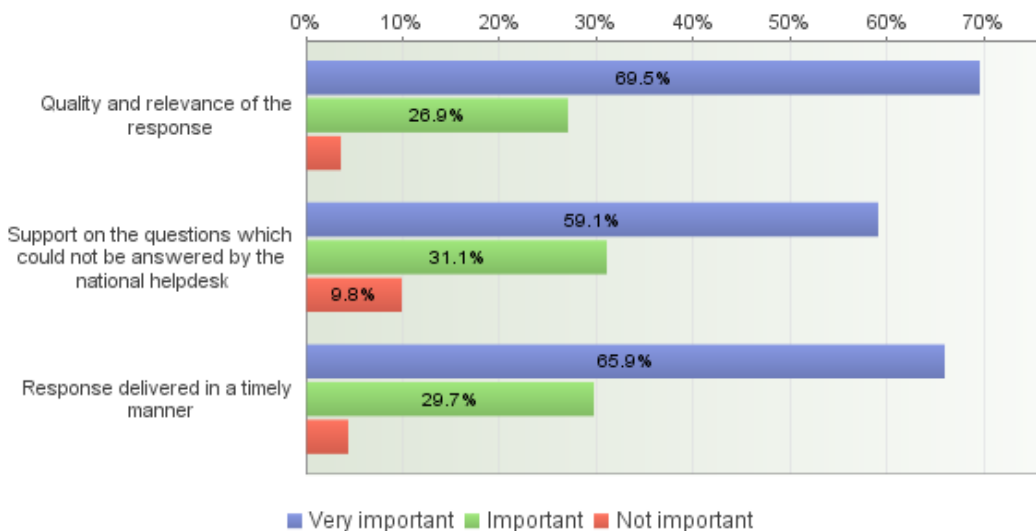
### 4.3.3.2. Communication with ECHA Helpdesk and ECHA staff

During the registration, the majority of respondents (59%) contacted ECHA Helpdesk, on average, two to five times (59%) (Figure 27).



**Figure 27:** How often did you seek help from the ECHA Helpdesk in the course of your registration(s)?

The respondents were asked about the importance of various service related aspects. The responses show that out of the aspects mentioned below, the same trends apply as in evaluating the national helpdesk services - quality and relevance of the response was considered as the most important element (by 70% of the respondents) (Figure 28).

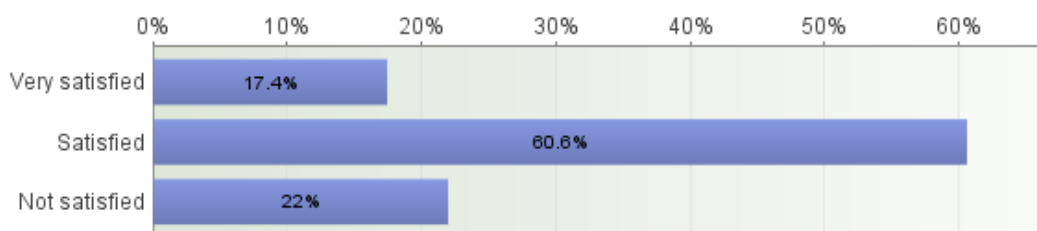


**Figure 28:** What services of the ECHA Helpdesk were the most important for you? Please indicate the level of importance for each of the aspects

In the open field, the respondents could indicate any other services found as very useful or add other comments. The comments given in the open field were mainly negative, as shown below:

1. ECHA Helpdesk does not address business specific questions and delivers too late.
  - *Helpdesk tended only to regurgitate either the regulations or guidance - my experience was that the ECHA Helpdesk was of little or no help.*
  - *The response from ECHA was very poor and untimely for getting any results.*
  - *I'm not satisfied because they do not reply to specific questions, only mention legislation.*
  - *Comments: - the overall process is far too long when the local helpdesk does not answer quickly and we need to go to ECHA. Complicated and time consuming forms to fill in and answers were very formal, and just pointed to the legal text which was not enough. Also slow response.*
  - *In complete contrast to the National Helpdesk, ECHA are unavailable, unhelpful and overly bureaucratic.*
  - *One response took over 6 months and then only quoted an irrelevant section of the guidance.*
  - *Solutions of ECHA Helpdesk have often been contrary to the REACH Regulation and contrary to proposals of national associations which causes a lot of confusion and often a loss of time.*
2. More personal communication with ECHA is needed.
  - *I was once called by ECHA staff to finish the registration report together. I found this very nice!*
  - *It would have been useful to be able to discuss matters on the phone with ECHA staff, but that was unfortunately not possible.*
  - *Difficult to get advice by telephone, however once contact was established (initiated by ECHA) this proved to be very useful. It improved mutual understanding about the problem and solution.*
  - *After submitting, there was a problem. ECHA contacted us and gave brilliant support!*
  - *Impossible to contact by telephone only by email and response took days, due to lack of staff I assume and the number of companies asking questions.*
  - *Support needs to be by human contact over the telephone to allow problems to be discussed, not by delayed email responses.*
  - *There is still no real opportunity for personal communication between industry and ECHA.*

The respondents were asked whether they were satisfied with ECHA's Helpdesk services. The answers show that the majority of respondents were satisfied with the service (78%), however some improvement is needed, since the level of dissatisfaction was relatively high (Figure 29).

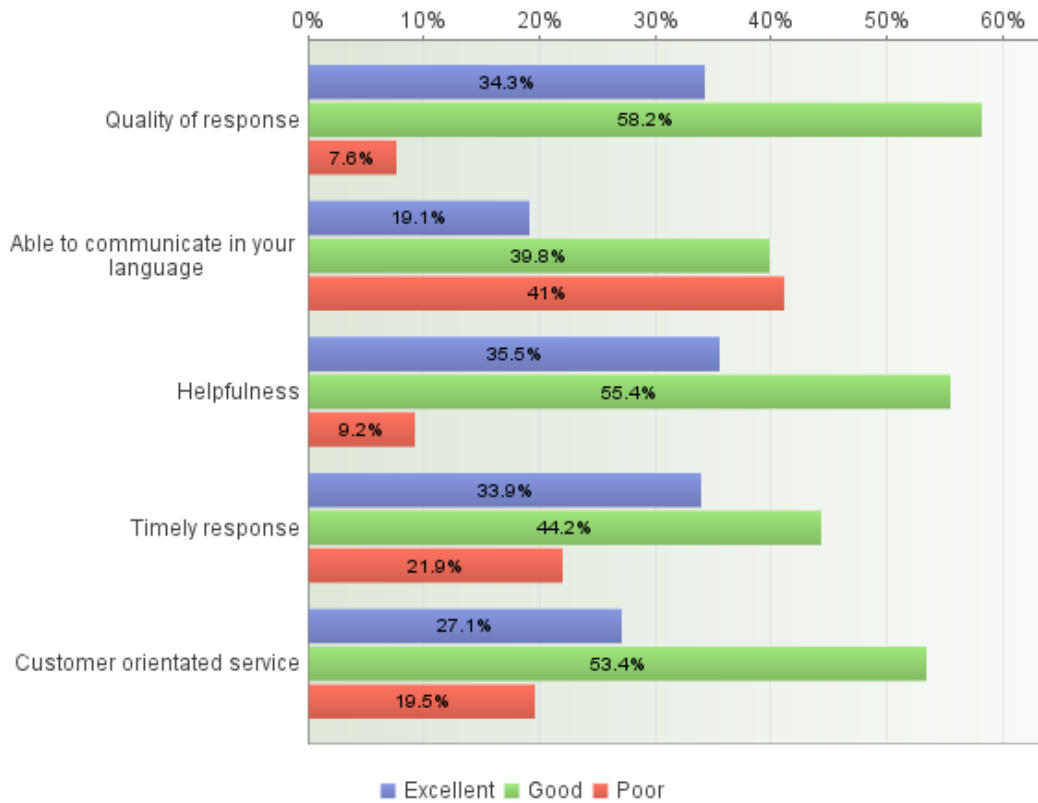


**Figure 29:** Rate your overall satisfaction with ECHA Helpdesk service

To finalise the registration, almost one third of the respondents (28%) were contacted by ECHA staff, i.e. the staff of the ECHA Helpdesk and other ECHA experts, by telephone. The respondents were asked to rate their satisfaction with the service. Figure 30 shows that out



of the aspects mentioned below the respondents were best satisfied with the quality of response and its timely delivery (34%).

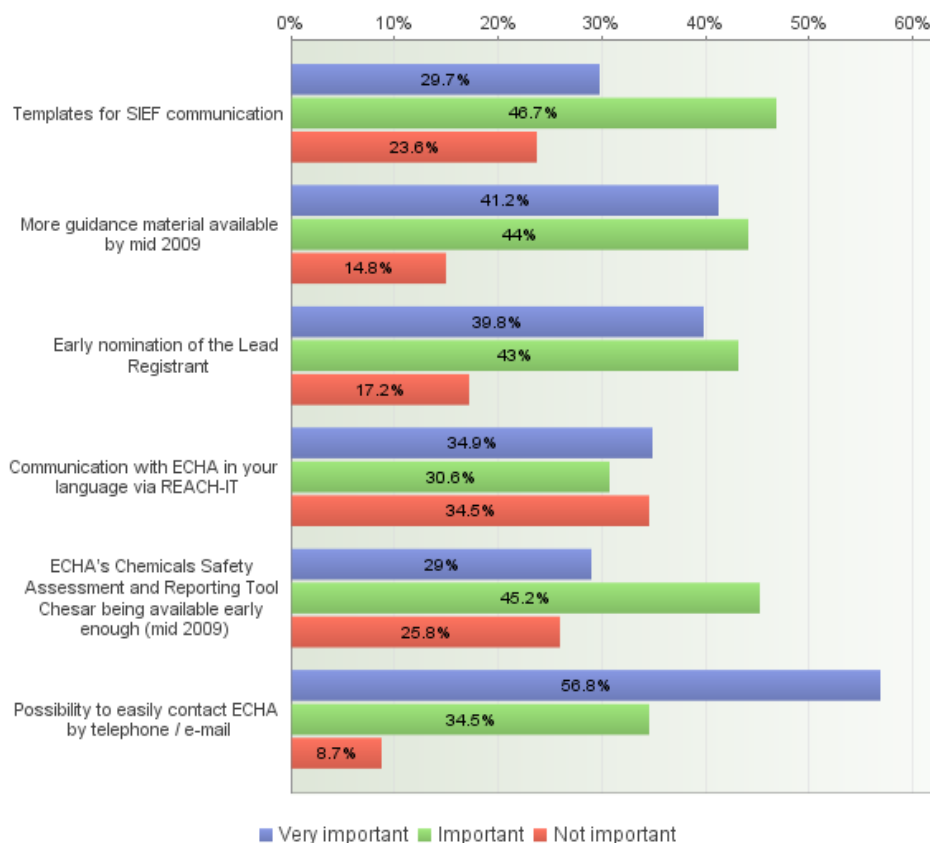


**Figure 30:** Satisfaction with various service related aspects provided by ECHA staff (If you answered "Yes" in the previous question, indicate your level of satisfaction for each of the suggestions)

## 5 Preparing for 2013 deadline

The respondents were asked what would have made their registration(s) easier. The answers show that the most important for them would have been the possibility to contact ECHA by telephone/email (57%)<sup>19</sup>, the earlier availability of guidance material (41%) and the early nomination of the Lead Registrant (40%) (Figure 31).

### Importance of various aspects to facilitate the registration process

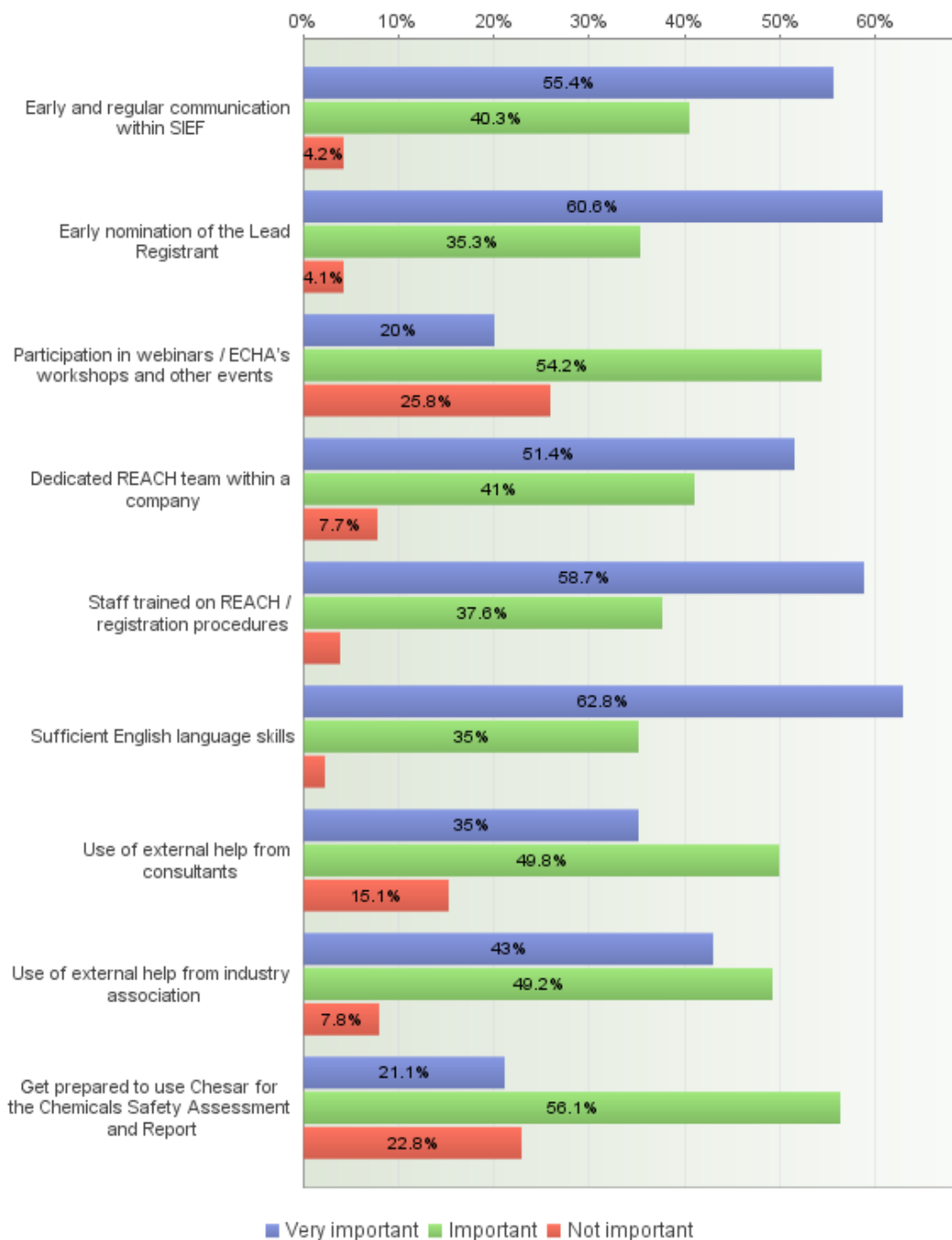


**Figure 31:** What would have made your registration(s) easier? Please indicate the level of importance for each of the aspects

The respondents were asked about the importance of various aspects in preparing for 2013 deadline. The answers show (Figure 32) that in preparing for the for 2013 deadline, it is essential:

- to have a sufficient knowledge of English (63%);
- to nominate early the Lead Registrant (61%), and
- to train the staff on REACH / registration procedures (59%).

<sup>19</sup> Interesting to note that in evaluating national REACH helpdesk services, possibility to contact national helpdesk by telephone was considered as very important by 47%. 18% indicated that it was not important.



**Figure 32:** If you were advising other companies for the 2013 REACH registration deadline, what useful tips would you like to give? Please indicate the level of importance for each of the aspects.

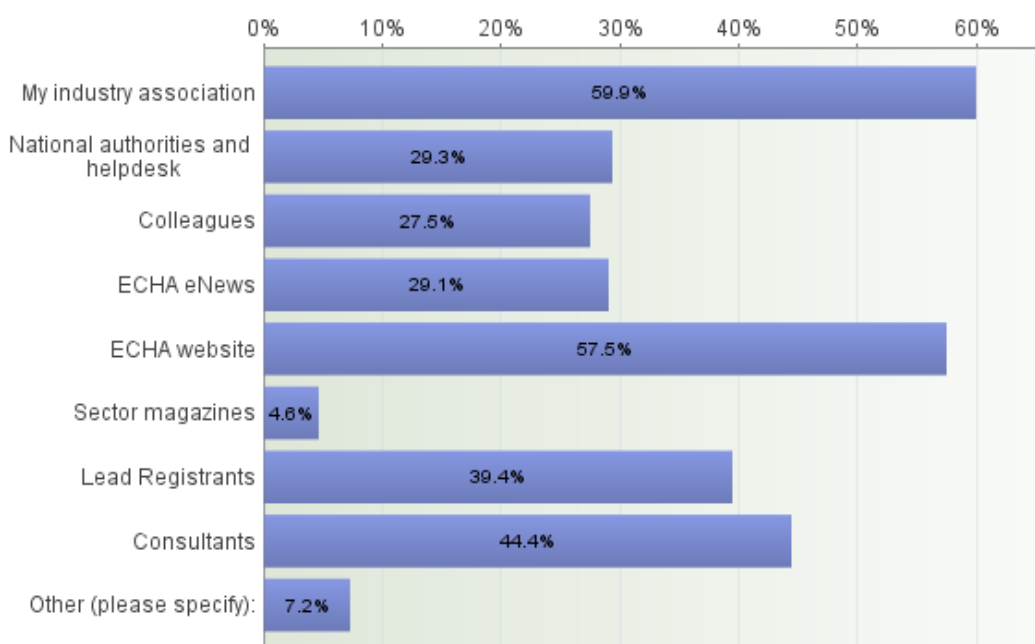
In the open field, the respondents could indicate any other useful tips. The main comments are grouped below:

1. Early identification of the substance and communication with other registrants of the same substance is essential,
  - Clarify your substance identity early enough, including analytics! This is extremely important.
  - If possible get member in the consortia's of your most important substances. There is the best support.
  - Try to keep the groups/consortia small, with engaged competent participants, otherwise much time will be spent in organisation instead in characterising the substances.

- *Each company should list available data for the substance(s) early enough so that it can be used in SIEF for data gap analysis.*
  - *Dealing with an association was vital for a single substance registrant.*
  - *Networking and meeting other SIEF-Members face-to-face. After you know the other people, teleconferences and emails are much more effective.*
2. Get the training on IUCLID and other related tools.
- *Ensure that you are totally proficient in using IUCLID 5 and understanding how it connects to REACH IT.*
  - *Get familiar with IUCLID and REACH-IT.*
  - *Submit at least one registration dossier early to get familiar with the system and the possible pitfalls.*
  - *Create awareness in advance in your company at management level that REACH registrations are extremely time consuming and can be very expensive.*
  - *IUCLID-5 dossier building is a time consuming job that requires expertise generally not available and too expensive to obtain in-house for companies.*
  - *Get trained on the use of IUCLID and dossier preparation in IUCLID. I was trained by one of the Lead Registrants and it was very useful to go through the dossier preparation step by step.*
3. Plan, budget and start preparations on time.
- *Start the preparation early.*
  - *Early setup of consortia if needed.*
  - *Plan the registration process with plenty of time and contingency for when deadline is approaching fast.*
  - *Have plenty of money available. REACH registration is expensive.*
  - *Clear guidance given on the candidate list and authorisation process to have been published earlier as this has only just been released. And, also there is very limited concise guidance on the costs of authorisation.*
  - *Toxicology study gap analysis done as early as possible. Start negotiations with data holders as soon as possible.*
- Other comments:
- *Please check the algorithm, if the clarification process in SIEF leads to a new substance name which isn't covered by the proposed lead registrant but given as 'similar substance'. The existing procedure excludes to be the LR in this case.*
  - *Start the enquiry process (if applicable) long before the relevant registration deadline. The enquiry processing time may take up to six months, which is absolutely unacceptable for the industry time wise, as well as from the point of view of money paid for the registration. Taking this into account we recommend ECHA to find better ways to control the enquiry process and decrease the processing time down to one week.*
  - *Big companies control the data price and SIEF management cost, which is a huge barrier for many companies outside Europe. After the deadline, the companies who do not register the substance have to import the substance through the registered companies. It means that a small amount of registered companies will control the importation channel, and even the market. So a reasonable decision/tip for many companies is to go to other markets outside Europe.*
  - *CHESAR has a lot of potential. Clear and flexible CHESAR with a good manual.*
  - *CHESAR is still not good enough, since the spERCs are not fully integrated and since the RCR calculations are more time-consuming than with EasyTRA.*
  - *Avoid Chesar. Very heavy component in stand alone version.*

The respondents were asked about the main sources of up-to-date information on the registration purposes. The responses showed (Figure 33) that the main sources for the information were:

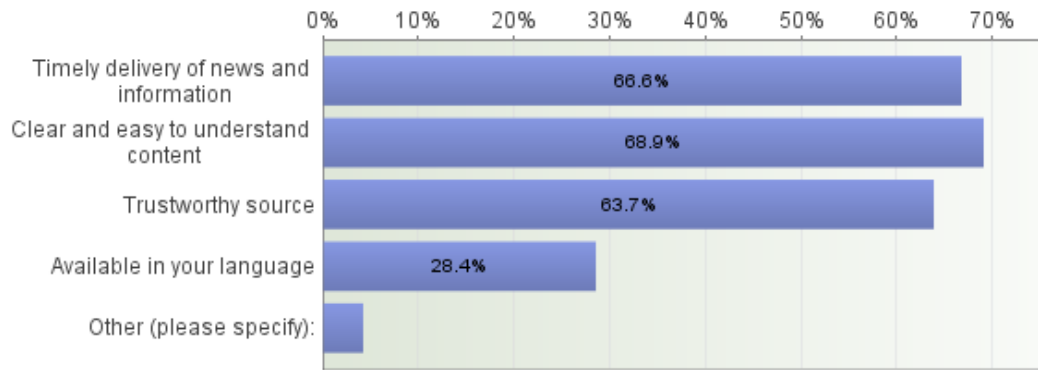
- industry associations (60%);
- ECHA’s website (58%), and
- consultants (44%)



**Figure 33:** What were your sources for up-to-date information on the registration process? (Please select a maximum of three options).

Other information sources mentioned in the open field area were SIEF(s), CONCAWE, VLARIP, Consortia, linkedin groups, staff trained on REACH, only representatives, suppliers, the internet, seminars and publications.

The respondents were asked about the reasons for using certain types of information sources. The responses show that the most appreciated information is the information that is delivered on time, with clarity and in an understandable and reliable manner (marked by more than 60% of the respondents), while the availability of information in their own language was not so highly important – only 28% indicated choosing the source, because it was available in their own language (Figure 34).



**Figure 34:** Please indicate why you used these sources of information (Please select a maximum of three options).

In the open field, the respondents could indicate any other reasons for preferring one information source to another. The feedback shows that the respondents appreciated certain types of information because it:

- *was relevant/related to their substances;*
- *simplified the complex legislative language, and*
- *provided reliable advice.*

## Attachment 1a. Location of the respondent's company

In which country are your legal entities responsible for the registration located? (Please tick all that apply)

Country	No. of responses	%
Austria	33	4
Belgium	54	7
Bulgaria	11	4
Cyprus	10	2
Czech Republic	38	2
Denmark	18	12
Estonia	5	< 2
Finland	21	< 2
France	106	2
Germany	279	2
Greece	16	14
Hungary	20	< 2
Ireland	18	< 2
Italy	121	< 2
Latvia	6	< 2
Lithuania	4	< 2
Luxembourg	7	< 2
Malta	2	< 2
Netherlands	85	10
Poland	57	6
Portugal	18	2
Romania	27	3
Slovakia	12	< 2
Slovenia	10	< 2
Spain	92	10
Sweden	24	3
United Kingdom	127	14
Other	25	3
<b>Total</b>	<b>1244</b>	<b>100</b>

## Attachment 1b. Corporate language

What is your corporate language?

Language	No. of responses	%
Bulgarian	8	1
Czech	27	3
Danish	3	< 1
Dutch	21	2
English	343	38
Estonian	3	< 1
Finnish	5	< 1
French	57	6
German	190	21
Greek	14	2
Hungarian	11	1
Italian	72	8
Latvian	3	< 1
Lithuanian	4	< 1
Maltese		
Polish	37	4
Portuguese	13	1
Romanian	14	2
Slovak	5	< 1
Slovene	7	< 1
Spanish	51	6
Swedish	11	1
<b>Total</b>	<b>899</b>	<b>100</b>



**European Chemicals Agency**  
P.O. Box 400, FI-00121 Helsinki  
<http://echa.europa.eu>