

15TH PLENARY MEETING OF THE BPR SUBGROUP OF THE
FORUM FOR EXCHANGE OF INFORMATION ON ENFORCEMENT

BPRS-15 MINUTES

22-23 MARCH 2022

REMOTE MEETING

CONTENTS

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Glossary of acronyms and abbreviations

AOB	Any Other Business
ASO	Accredited Stakeholder Organisation
BEF-1	First Biocides Enforcement Project
BPRS	BPR Subgroup of the Forum which coordinates the BPR enforcement
BPC	ECHA Biocidal Product Committee
CLP	Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures
COM	European Commission
DG	Directorate General at the Commission
DG SANTE	Directorate General on Health and Food Safety/European Commission
DG GROW	Directorate General for Internal Market, Industry, Entrepreneurship and SMEs
EU	European Union
FORUM	The Forum for Exchange of Information on Enforcement: Network of authorities responsible for the enforcement of the REACH, CLP, PIC and BPR regulations in the EU, Norway, Iceland and Liechtenstein
HET	ECHA Harmonised Enforcement Team (former ECHA Forum Secretariat)
ICSMS	Internet-supported information and communication system for the pan-European market surveillance
MAWP	Multiannual Work Programme
MFF	ECHA Multi annual financial framework
MOC	Manual of Conclusions
MS	Member State
MSR	Market surveillance Regulation
NC	National Coordinator of the Enforcement Project
NEA	National Enforcement Authority
RAPEX	Rapid Alert System
REACH	Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals
REF	REACH-EN-FORCE, Harmonised Enforcement Project of the Forum
ROPs	Rules of Procedure
SPC	Summary of Product Characteristics
TA	Treated Articles
TF	Task Force of the Forum/BPRS
TfT	WG of the Forum/BPRS on Training for Trainers for national inspectors
WG	Working Group of the Forum/BPRS
WIN PPIE	ECHA Work Instruction - Processing Practical Issues for Enforcement

I. Summary record of the proceedings

Item 1 - Welcome and introduction

The Chair of the BPRS opened the plenary meeting which, for the sixth time, was held remotely.

The Chair informed the plenary that the meeting was recorded for the purpose of writing the minutes, and that the recordings are going to be destroyed after the minutes are adopted. The final agenda was adopted (see Annex I), and no AOB was included.

No conflicts of interest (according to Article 9(2) of the Forum Rules of Procedure - ROPs) were declared at the meeting.

The ECHA Harmonised Enforcement Team (HET) informed the members that two room documents were submitted after the documents deadline, namely on: i) the EuOTA list of in situ devices and related BPRS inputs; ii) update from ADCO Chairs meeting and the EUPCN.

All action points from the BPRS-14 were discharged.

Item 2 – Cooperation with ECHA bodies / Secretariat Update on Forum Work Programme 2021

2.1 Debriefing from ECHA Director and Forum/BPRS Chairs

The Chair informed the BPRS members on the discussions that took place during the remote meeting with the ECHA Director held on 3 March 2022. Among the topics tackled during the meeting, the Chair shared with the BPRS members the update on the ECHA planning in view of the activities related to the Chemical Strategy for Sustainability (CSS) and the potential involvement of Forum and BPRS. Specifically, the Chair outlined the key points discussed on the European Audit Capacity and related high-level round table. The same point was also discussed under item 2.bis of the BPRS-15 (i.e. update from the Fourm-40). The minutes of the ECHA Director and Forum/BPRS Chairs meeting are reported in Annex 2.

2.3 Implications of UK withdrawal

A member of the HET followed up the discussion that took place at the BPRS-14 on the potential implication of UK withdrawal for BPR inspectors. No further feedbacks from the BPRS members were collected from the last plenary, which reflects the fact of limited numbers of untransformed UK biocidal product authorisation assets. In case further investigation is needed at national level and BPRS member requests it, ECHA will provide an updated table of un-transferred assets.

2.4 Follow-up ASOs open session - EuOTA list of “non-compliant in situ devices” and experience in national enforcement

The Chair debriefed the plenary on the list submitted by the European Ozone trade Association (EuOTA) containing the allegedly non-compliant devices currently marketed in EU and the related inputs submitted by the BPRS members. Some Member States have investigated these and others will do so in the future. Depending on the outcomes of these investigations in some MSs a follow-up discussion will be tabled at the BPRS-16.

Item 3 - Updates on developments by the European Commission

3.1 Update from DG SANTE

The DG SANTE representative delivered an update of the Commission's activities that were relevant for the work of the BPRS.

The presentation started with an update on the actions related to the COVID-19 pandemic and its impact on the marketing of biocides in EU. Specifically, in the last months of activities the MSs granted only a limited number of Article 55(1) derogations for disinfectants (product type 1, 2, and 4), with a total of 16 notifications received by the Commission. The speaker reported to the plenary the outcome of the discussion that took place at CA level on the use of hand disinfectants in dispensers and refilled containers. In particular, hand disinfectants provided in large packaging volumes should be used with a dispensing pump/system, and the information should be available to the user also on dispensers and/or refilled containers.

The Commission representative updated the BPRS members on the Article 3(3) decision on products containing Alkyl (C12-16) dimethylbenzyl ammonium chloride (ADBAC/BKC) in a concentration of 2.4%. The concerned products are intended to prevent and control the growth of unwanted algae, and therefore considered to be biocidal products falling under product type 2.

The speaker mentioned to the plenary the state-of-play concerning the CA discussion on application for authorisation for specific in situ generated systems. Specifically, two cases are being analysed, i.e. biocidal products as precursors (if marketed for biocidal purposes); and biocidal products as active substance generated in situ (with precursors not placed on the market for biocidal purposes). It was highlighted that there is the need for a harmonisation approach on how to convey to users the correct information on the in situ devices via SPCs. Commission created an *ad hoc* CA Working Group to discuss the matter, which will potentially involve also industry. Follow-up information will be shared with the BPRS members in view of the next plenary meeting.

Other updates from the DG SANTE were related to the use of active substance trivial/common name; and on how biocides are linked to the activities of the forthcoming Chemical Strategy for Sustainability (CSS). In particular the speaker updated the BPRS members on the revision of the CLP Regulation that will most probably introduce criteria for endocrine disruptors (EDs) (distinguished in categories) and PBT substances (criteria established under the BPR). It was also mentioned the plan to add to the CLP additional hazard categories to become exclusion criteria (e.g. immunotoxicity, neurotoxicity); and the concept of essential use (examination ongoing on how to develop the concept in the context of REACH and CLP based also on the experience gathered under the BPR so far). Other topics related to the CSS that might be possibly linked to the BPR are: 'one substance one assessment' data platform for different legal frameworks; cumulative risk assessment; and the export ban for substances no longer allowed in the EU.

The Commission representative was invited to regularly update the BPRS in the forthcoming future when there will be more clarity on the different Working Group established under the CSS.

3.2 Follow-up: Collaboration with OLAF - European Anti-Fraud Office's activities

A member of the HET followed up the discussion that took place at the BPRS-15 and informed the plenary that no NEA is currently cooperating with OLAF at national level.

The speaker informed the BPRS members that the forthcoming Chemicals Strategy for Sustainability will most probably foresee the revision of the role of OLAF and its tasks. Potential collaborations among the BPRS, Forum and OLAF was therefore put hold until more clarity is available at Commission level.

The BPRS agreed to inform the HET on any *ad hoc* cooperation with OLAF related to BPR enforcement.

Item 4 – BPRS enforcement activities

BEF-2

The WG Chair updated the plenary on the BEF-2 on-going activities. The operational phase of BEF-2 was kicked off in January 2022 and national inspectors are currently performing enforcement activities in 26 Member States plus Norway, Iceland, Liechtenstein and Switzerland. The scope of the BEF-2 focuses on biocidal products containing non-approved/approved active substance (under BPR and under national legislation). The project includes horizontal obligations such as Article 95, advertisement, labelling and packaging. Ad hoc sections on disinfectant products and chemical analysis are also expected.

The BEF-2 project manual and questionnaires were adopted on 18 November 2021, and duly translated based on the needs indicated by the National Coordinators (NCs) of the BEF-2 (by December 2021). The HET transferred the BEF-2 questionnaires on the online tool EU Survey. The tool was tested among the NCs in December 2021. The HET delivered to the BPRS members and NCs the 'handbook for National Coordinators' which contains a chapter on the functionalities and working method on EU Survey. An *ad hoc* training focused on the different options for data collection/reporting offered by EU Survey was also delivered to the NCs on 30 November 2021.

In December 2021, the HET together with the ECHA Communication Unit elaborated different communication products on the BEF-2.

The WG members also discussed and analyse the need for an *ad hoc* workshop on the BEF-2 (for BPRS members and NCs) to be potentially held in June 2022 (similar workshop was organised during the operational phase of the BEF-1).

The 'BPRS training 2021 for national inspectors and national coordinators' focused on the BEF-2 took place remotely on 26 November 2021. More than 370 participants remotely attended the event. Several case studies were analysed throughout the training, and an *ad hoc* session covered the role and responsibilities for the NCs of the BEF-2. The BEF-2 manual and questionnaires for inspections were presented to the audience, and a representative of the ECHA Biocides Assessment Unit presented the features of the ECHA dissemination website for biocides. During the event the participants submitted via chat over 80 content-related questions, the majority of which were tackled live. Several WebEx polls were used to interact in real time on specific case studies.

As follow-up of the training event, the WG members shared with the participants the case studies with the correct reasoning. National Enforcement Authorities are currently using this material for organising national trainings in their countries.

Set-up of the WG on Training for national inspectors 2022

The BPRS members agreed with the need to deliver a training event also for the year 2022. The plenary indicated that the 2022 training should focus on in situ generated substances; CLP in BPR enforcement practices; and borderline cases of biocidal products. The BPRS established a WG to prepare and deliver the training. The BPRS members were invited to appoint further experts and to suggest any additional topic proposals.

REF-8

A BPRS member participating to the REF-8 WG informed the plenary that the Forum adopted the project report during the Forum-39. The report was published on ECHA's webpage in December 2021, together with a press release, which included a podcast with interview with the WG chair and HET team leader and posts in social media.

The WG is currently elaborating the "Enforcement Guide for inspectors" which was already consulted with Forum members in March 2022. The WG will also deliver an *ad hoc*

workshop with the ECHA stakeholders (ASO) on 17 May 2022 focusing on the results of the REF-8. The HET will share the final agenda of the ASO workshop on online sales with the BPRS once ready.

Item 5 – Practical issues for enforcement

New practical issue submitted to the plenary concerned the enforcement of the indication “vegetal” or indication “vegetal origin ingredient” on biocides labels. A preliminary discussion on the related legal obligations took place at the plenary, and the BPRS members were invited to send to the HET their written comments. The HET was requested to elaborate a draft conclusion based on the BPRS/COM inputs.

Item 2.bis Update from the Forum-40

The Forum Chair debriefed the BPRS members on the key issues tackled during the last plenary of the Forum (i.e. Forum-40). The update mainly covered the current REF and pilot projects. Namely, the REF-11 on SDS is currently preparing the manual for enforcement; the REF-10 on integrated controls is having its operational phase; the REF-9 and the pilot project on recovered substances are collecting the enforcement results and will prepare the related reports during Q2 and Q3 2022. The pilot project on classification of mixtures is currently discussing with the ECHA experts on the exact interpretation of the CLP concerning enforcement of mixture classification principles that go beyond standard summation or additivity approaches. The WG on member state reporting will seek to verify the possibility to implement the convention of country controls under REACH and CLP. Other updates were related to the ongoing discussions on the harmonisation of the enforceability of restrictions on tattoo inks and diisocyanates; the adoption of the Forum practical issue on creosote; and the presentation from Commission on the potential European Audit Capacity under the CSS.

Item 6 - Activities in Member States and cooperation with other networks

6.1 Update from ADCO Chairs meeting and European Product Compliance network

The Chair informed the plenary that three relevant meetings were held since the BPRS-14, namely: the EU Product Compliance Network (EU PCN) meeting n. 8 and n.9; and the joint meeting EU PCN / Consumer Safety Network (CSN). The topics tackled at those meetings touched upon: i) the CASP Projects of the CSN; ii) new technologies supporting market surveillance (i.e. web crawler, digitalisation of documents and unique product identifiers); iii) linking and mutual sharing of data from customs and market surveillance authorities.

6.2 Dutch case analysis - incidents with the use of phosphine in plant protection products and biocides

The item was postponed at the BPRS-16.

Item X. Introduction of new the future ECHA Director of Submission and Interaction

The BPRS was informed that ECHA Director of the Support and Enforcement unit, Jukka Malm was retiring at the end of April 2022. He appreciated all the good collaboration between ECHA and the BPRS. The new appointed Director taking over in May 2022 will be Mercedes Viñas and she was looking forward to be more involved in the work of the BPRS.

6.3 Follow-up: Germany case analysis on changes in national legislation for biocidal products under transitional measures

The DE BPRS adviser followed up the discussion that took place at the BPRS-14 on the German case study on changes in national legislation for biocidal products, informing the plenary that 19 NEAs responded to their survey on national transitional measures for biocides. The comprehensive table submitted to the BPRS members could result useful when considering enforcement activities at national level linked to mutual recognitions or parallel trades.

6.4 Italian experience with national transitional measures stemmed by the BPR

The IT BPRS member presents to the BPRS members the Italian measures to control biocides marked under national measures. The speaker touched upon the structure of the NEA in Italy; the current transitional measures for biocides; the coordination with regional offices of controls; and the support to EU activities.

Item 7 – AOBs

7.1 Future BPRS plenaries dates

The tentative dates for the next remote BPRS meetings in 2022 are the following: i) BPRS-16: 13-17 June 2022 if physical (if remote 21-22 June 2022); iii) BPRS-17: 14-18 November 2022 (TBC)

II. Conclusions & action points adopted at the BPRS-15 (public)

MAIN CONCLUSIONS & ACTION POINTS – BPRS-15 23 March 2022

(Adopted at the BPRS-15 meeting)

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
Item 1- Welcome and introduction		
1.3 Adoption of the Agenda	Agenda was adopted.	
1.4 Action points and written procedures from BPRS-14		
Item 2 - Cooperation with ECHA bodies / Secretariat		
2.1 Debriefing from ECHA Directors and Forum/BPRS Chairs		
2.2 Follow-up: Implications of UK withdrawal		
2.3 Update from Forum-40		
2.4 Follow-up: ASOs open session - EuOTA list of "non-compliant in situ devices" and experience in national enforcement		<p>BPRS members from countries willing to investigate in situ devices are invited to send their findings to HET by 31 May.</p> <p>HET will then collect the inputs and table them at the BPRS-16 for discussion.</p> <p>The HET to draft and consult with the Chairs the reply to EuOTA by 7 April.</p>
Item 3 – Updates on developments by Commission		
3.1 Update from DG SANTE on BPR provisions		<p>BPRS members are invited to provide written feedback on the experience with control of disinfectants in a dispenser container to HET by 29 April.</p> <p>HET will compile the feedback received and transfer to COM.</p>
3.2 Follow-up: Collaboration with OLAF - European Anti-Fraud Office's activities	BPRS agreed to inform HET on any ad hoc cooperation with OLAF related to BPR enforcement.	
Item 4 – BPRS enforcement activities		

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
4.1 BEF-2		
4.1.1 Progress Report		BPRS members and National Coordinators are invited to liaise with the WG members and HET in case of questions related to the BEF-2 manual and questionnaires to be considered for the potential workshop.
4.1.2 Mandate amendment	The BPRS revised the mandate of the WG.	
4.2 Set-up of the WG on Training for national inspectors 2022	The BPRS established a WG to prepare and deliver the training.	BPRS members are invited to appoint further experts or specify names of appointed experts for the WG Tft 2022 by 15 April
4.3 REF-8 Follow-up – <i>ad hoc</i> ASOs workshop		REF-8 WG will share the final agenda of the ASO workshop on online sales with the BPRS once it is ready.
	The BPRS revised the mandate of the WG.	
Item 5 – Practical issues for enforcement		
5.1 Items raised by the BPRS/ECHA/COM (list of practical issues is prepared independently from the agenda)		<p>COM is invited to share information on the BPR CA feedback related to information that can be included on the label of biocidal products.</p> <p>BPRS members are invited to comment on practical issue 15.1 and share their experience with control of biocidal products indicating “plant based ingredients” on the label by 15 April</p> <p>HET will draft the conclusion of issue 15.1 considering the information collected.</p> <p>BPRS members are invited to submit new Practical Issues to the HET by beginning of May</p>
Item 6 - Activities in Member States and cooperation with other networks		
6.1 Update from ADCO Chairs meeting and the EU Product		

Agenda point	Conclusions / decisions / minority opinions	Action requested after the meeting
Compliance network (EUPCN)		
6.2 Dutch case analysis - incidents with the use of phosphine in plant protection products and biocides		NL BPRS member is invited to present the case study at the BPRS-16.
6.3 Follow-up: Germany case analysis on changes in national legislation for biocidal products under transitional measures		
6.4 Italian experience with national transitional measures stemmed by the BPR		
Item 7 AOBs		
7.1 Dates of next BPRS plenary meetings	BPRS-16: <ul style="list-style-type: none"> - 13-17 June 2022, if physical - 21-23 June 2022, if remote BPRS-17: <ul style="list-style-type: none"> - 14-18 November 2022 (remote meeting) 	
7.2. Placeholder		
Item 8 – Adoption of conclusions and action points		

III. List of attendees of the BPRS-15

BPRS members

	Country	Name
1	AT	ANWANDER Eugen
2	BE	DE VOS Helmut
3	BG	HRISTOVA Viktoriya
4	CH	BUERGY Heribert
5	CY	ELIA Nikos
6	CZ	JAROLIM Oldrich
7	DE	FRENZEL Stefan
8	DK	HANSEN Lise Bach
9	EE	HONGA Aljona
10	EL	GKILPATHI Dimitra
11	ES	TEBAR LUJAN Jorge
12	FI	OLLIKKA Jussi
13	FR	VERDIER Elodie
14	HR	PILETIC Kaca
15	HU	NEMET Balazs
16	IE	CANTY Mary
17	IS	INGVARSDOTTIR Hafdis Inga
18	IT	LONGO Antonina
19	LI	RELLA-QUADERER Maria-Rosaria
20	LT	HAKAITE Palmira
21	LU	HERMES Joe
22	LV	DAUGELE Santa
23	MT	FARRUGIA Bernice
24	NO	HAGEN Gro
25	PL	WASIK Romualda
26	PT	DIAS Marina
27	RO	CIRLAN Cristiana
28	SE	KARLSSON Jenny
29	SI	HAJRLAHOVIC-MEHIC Semira
30	SK	POCAROVSKA Miriam

Advisers

	Country	Name
1	CH	GRISEL Nadine
2	DE	WURSTHORN Sibylle
3	DK	MADSEN Betina
4	EL	PAPATHANASIS Thanasis
5	ES	ESCALADA Jesus

	Country	Name
6	FI	TAURIALA-RAJALA Terhi
7	FR	TCHNAKIAN Fiona
8	IT	PERRONE Rafaella
9	LU	LENTZEN Esther
10	PL	STULCZEWSKI Dawid
11	SE	LJUNGGREN Robert

European Commission representatives

	Country	Name
1	DG SANTE	NEGULICI Ligia

ECHA staff

	ECHA	Unit
1	ANNYS Erwin	Head of Unit Support and Enforcement
2	BARANSKI Maciej	Support and Enforcement
4	LEHTO Anastasia	Support and Enforcement
5	MATEUS Tania	Support and Enforcement
6	NIKULA Terhi	Support and Enforcement
7	TECCE Nicola	Support and Enforcement

IV. List of Annexes

Annex 1. Adopted agenda of BPRS-15

Annex 2. Minutes of the ECHA Director-Forum/BPRS Chairs meeting

Annex 3. List of Forum / BPRS WG mandates

3 a. Forum/BPRS REF-8

3 b. BPRS WG BEF-2

3 c. BPRS WF Tft 2022

Annex 1. BPRS-15 adopted agenda

Date: 22 March 10:30-13:00 - 23 March 10:30-12:15 (Helsinki time)

Item 1 – Welcome and introduction	10:30-10:40
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- 1.1 Opening by the BPRS Chair
- 1.2 Adoption of the agenda and declarations of conflict of interest
- 1.3 Action points and written procedures from BPRS-14
For information/adoption

Item 2 – Cooperation with ECHA bodies / Secretariat	10:40-11:15
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- 2.1 Debriefing from ECHA Directors and Forum/BPRS Chairs (10')
- 2.2 Follow-up: Implications of UK withdrawal (5')
- 2.4 Follow-up: ASOs open session - EuOTA list of "non-compliant in situ devices" and experience in national enforcement (20')

Item 3 – Updates on developments by Commission	11:25-11:55
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- 3.1 Update from DG SANTE on BPR provisions (25')
- 3.2 Follow-up: Collaboration with OLAF - European Anti-Fraud Office's activities (5')

Item 4 – BPRS enforcement activities	11:55-12:25
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- 4.1 BEF-2 (10')
 - 4.1.1 Progress Report
 - 4.1.2 Mandate amendment
- 4.2 Set-up of the WG on Training for national inspectors 2022 (15')
- 4.3 REF-8 Follow-up – *ad hoc* ASOs workshop (5')

Item 5 – Practical issues for enforcement	12:25-13:00
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- 5.1 Items raised by the BPRS/ECHA/COM (list of practical issues is prepared independently from the agenda)

End of DAY 1 at 13:00
Start of DAY 2 at 10:30

Item 2 bis – Cooperation with ECHA bodies / Secretariat	10:30-10:40
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- 2. bis Update from Forum-40 (10') – *Forum Chair*

Item 6 – Activities in Member States and cooperation with other networks	10:40-11:10
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- 6.1 Update from ADCO Chairs meeting and the EU Product Compliance network (EUPCN) – *BPRS Chair* (10')
- 6.2 Dutch case analysis - incidents with the use of phosphine in plant protection products and biocides – *NL BPRS member* (20')

Item X - Introduction of the future ECHA Director of Submission and Interaction *11:10-11:20*

Item 6 – Activities in Member States and cooperation with other networks *11:20-12:00*

6.3 Follow-up: Germany case analysis on changes in national legislation for biocidal products under transitional measures – DE BPRS member (20')

6.4 Italian experience with national transitional measures stemmed by the BPR – IT BPRS member (20')

Item 7 – AOBs *12:00-12:10*

7.1 Dates of next BPRS plenary meetings

7.2 Placeholder

Item 8 – Conclusions and action points *12:15*

End of BPRS-15

Annex 2. Minutes of the ECHA Director-Forum/BPRS Chairs meeting

The topics addressed during the meeting held on 3 March were the 1) European Audit Capacity and 2) reflections from the High level round table.

Annex 3. List of Forum/BPRS WG mandates

Annex 3a. REF-8 (mandate adopted at Forum-40/BPRS-15)

“Coordinated enforcement project REACH-EN-FORCE-8”

Chair: Karin RUMAR (SE)

Forum Members and Alternates

- Eugen ANWANDER (AT)
- Martin MARKO (CZ)
- Maria PALEOMILITOU (CY)

Invited Experts

- Kevin BUCKLEY (IE)
- Timea TARNOCZAI (HU)
- Jurgita BALCIUNIENE (LT)
- Ingrida STULGIENE (LT)

BPRS Members and Experts

- Cathrine SKJÆRGÅRD (NO) (BPRS member)
- Jenny KARLSSON (SE) (BPRS alternate)
- Brian MURPHY (IE) (BPRS alternate)
- Jabik DE BOER (NL) (BPRS alternate)
- Anne HORN (DE) (BPRS expert)

ECHA

- Tania MATEUS; Nicola TECCE

Objective:

- Conceive and manage the eighth major Forum enforcement project REF-8 'Enforcement of CLP, REACH and BPR duties related to substances, mixtures and articles sold on-line'.

Mandate:

1. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project, taking into account the learnings from previous Forum projects “control of internet sales” and “REF-4” and others at EU level;
2. Define the specific duties to be covered in the project;
3. Prepare and deliver the training for project national coordinators
4. Management of the Operational phase
5. Management the Reporting phase: Follow-up operational phase, collect the results and draft project evaluation
6. Elaborate tips and hints for inspectors based on the relevant outcomes from the project
7. Prepare and organize a short WebEx workshop for ECHA ASOs to present the results and recommendations from this project

Timeline

- Project manual: Q4 2019
- Prepare and deliver the training for project national coordinators: Q4 2019
- Operational phase: 2020
- Reporting phase (National Coordinators): Q1 2021
- Evaluation phase: Q3 2021
- Draft report: Q4 2021
- Adoption of the report: Q4 2021
- Tips and hints for inspectors: Q2 2022
- Workshop with ASOs: Q2 2022

Annex 3b. BEF-2 (mandate adopted at BPRS-15)

“BPR Enforcement project on biocidal products containing non-approved/approved active substances”

Chair: Jenny KARLSSON (SE)

BPRS Members/Alternates

Heribert BUERGY (CH)
Cathrine SKJAERGARD (NO)
Eugen ANWANDER (AT)
Helmut DE VOS (BE)
Antonina LONGO (IT)

Invited Experts

Nadine GRISEL (CH)
Catherine BERTSCHY (CH)
Tobias SCHLEICHER (DE)
Mariana DE VRIES (NL)
Robert LJUNGGREN (SE)
Raffaella PERRONE (IT)

ECHA: Nicola TECCE; Anastasia LEHTO

Objective: Conceive and manage the second BPRS enforcement project on biocidal products containing non-approved/approved active substances

Mandate:

1. Defining the detailed scope of the BEF-2 in agreement with the BPRS members
2. Develop the project manual (guidance document, checklist, planning, recommendations) for the execution of the project
3. Prepare and deliver the BPRS Training 2021 for national inspectors and national coordinators focused on the BEF-2
4. Management of the operational phase
5. Management the reporting phase: follow-up operational phase, collect the results and draft project evaluation
6. Elaborate a Practical guide for inspectors based on the relevant outcomes from the project
7. Design and deliver an *ad hoc* workshop focused on the best practises and problems

- encountered by inspectors during the operational phase, if appropriate
8. Prepare and organize a workshop for ECHA ASOs to present the results and recommendations from the project

Timeline:

- Approval of BEF-2 scope: Q1 2021
- Project manual: Q4 2021
- BPRS training 2021: Q4 2021
- Operational phase: 2022
- BEF-2 workshop: Q2 2022
- Reporting phase: 2023
- Workshop with ASOs: Q2 2024

Annex 3c. BPRS Tft 2022 (mandate adopted at BPRS-15)**“Training for national inspectors 2022”**

Chair: De Vos Helmut (BE)

BPRS Members/Alternates :

- Anwander Eugen (AT)
- Hermes Joe (LU)

Invited Experts:

- BE (one or two members)
- FR

ECHA: Nicola TECCE

Objective:

- Prepare and deliver the training for national inspectors for the enforcement of the BPR

Mandate

1. Examine the training subjects relevant for enforcement and prepare the draft agenda for agreement by Q2 2022
2. Specify the envisaged level of the content of the training
3. Prepare materials necessary for the training (presentations and case studies)
4. Actively conduct the training event with support from other BPRS members, ECHA and COM and other experts in specific topics as necessary
5. Collect, summarise and evaluate the recommendations and reactions of participants

Timeline

- Draft agenda for agreement by Q2 2022
- Delivery of the training: Q3 2022
- Final report adopted: Q4 2022