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General Secretariat

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**Interinstitutional files:
2023/0455 (COD)**

WK 3886/2025 INIT

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Ad hoc Working Party on One Substance One Assessment
N° prev. doc.:	WK 3157/2025
N° Cion doc.:	ST 16973/23
Subject:	OSOA Package: Regulation as regards the re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals - comments from delegations

Following the call for comments on the above set out with WK 3157/2025, delegations will find attached comments from DK, DE, IE, ES, FR, IT, HU, AT, PT, RO, SI, SK and SE.

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		DENMARK	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	Neutral	Denmark is flexible, however, we prefer the Council Mandate
22	Recital 9	Neutral	
27a	Recital 14a	Neutral	
41	Article 1, first paragraph, point (2), first subparagraph	Neutral	Denmark is flexible, however, we prefer the Council Mandate
42	Article 1, first paragraph, point (2), second subparagraph	Neutral	Denmark is flexible, however, we prefer the Council Mandate
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Neutral	
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	Neutral	
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	Neutral	
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	In favor	The EP and Council proposals are identical
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	In favor	The EP and Council proposals are identical
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	In favor	The EP and Council proposals are identical
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	Neutral	However, we prefer the Council Mandate
82a	Article 4, first paragraph, point (4a)	Neutral	
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	Neutral	
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	In favor	Denmark is flexible, however, we prefer the Council Mandate
89a	Article 4, first paragraph, point (5)(ca) - (ce)	Neutral	
89e	Article 4, first paragraph, point (7)	Neutral	
89f	Article 4, first paragraph, point (8)	Neutral	
89g	Article 4, first paragraph, point (9)	Neutral	
89h	Article 4, first paragraph, point (10)	Neutral	
89i	Article 4, first paragraph, point (11)	Neutral	

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		GERMANY	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	Scrutiny	We generally agree with the addition of a justification when dealing with divergent opinions. However, it seems unclear how most protective opinion to safeguard vulnerable groups could be identified, particularly when balancing different protection goals such as e.g. environmental protection and the access to essential medical devices. This seems to be not a scientific decision.
22	Recital 9		
27a	Recital 14a		
41	Article 1, first paragraph, point (2), first subparagraph	Object	Please see comment on recital 8 Added sentence is not needed. Vulnerable groups are already taken into account in the respective legal areas. If there are specific divergences in the assessment methodology, this is already covered by the first sentence.
42	Article 1, first paragraph, point (2), second subparagraph	Object	Please see comment on recital 8 We support the Council Mandate
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)		
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)		
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	-	corresponds to the Council's position
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	-	corresponds to the Council's position
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	-	corresponds to the Council's position
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	Object	The Council's position should continue to be supported, as it also takes into account further developments in the treatment of waste.
82a	Article 4, first paragraph, point (4a)		
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)		
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	Object	The wording of paragraph 6 in the Council's position corresponds to the current text of the POP Regulation and should therefore continue to be supported
89a	Article 4, first paragraph, point (5)(ca) - (ce)	Object	For justification see in the following rows
89e	Article 4, first paragraph, point (7)	Object	The EP's proposal to lower the limit value should be rejected. The limit values in Annexes IV and V are set on the basis of scientific criteria (e.g. availability of methods for analysing POPs, disposal capacities, quantity of waste affected). A blanket lowering of the limit values could lead to the waste containing POPs no longer being able to be disposed of in an environmentally sound manner.
89f	Article 4, first paragraph, point (8)	Object	The EP's proposal to lower the limit value should be rejected. The limit values in Annexes IV and V are set on the basis of scientific criteria (e.g. availability of methods for analysing POPs, disposal capacities, quantity of waste affected). A blanket lowering of the limit values could lead to the waste containing POPs no longer being able to be disposed of in an environmentally sound manner.

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		Select delegation	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8		IE support the wording in the Council Mandate. IE are of the view that the legislative proposal is not intended to align assessment methodologies across legislation and therefore IE consider that such divergences in assessment approaches do not need to be justified, since assessments should be performed according to the requirements of specific legislation
22	Recital 9		
27a	Recital 14a		
41	Article 1, first paragraph, point (2), first subparagraph		
42	Article 1, first paragraph, point (2), second subparagraph		IE support the wording in the Council Mandate. IE are of the opinion that automatically assigning priority to the opinion with the highest level of protection does not provide clarification for the reasons for the divergences. In addition, this approach may lead to ambiguity regarding the role of EFSA ("Authority") or another EU Agency mandated under the specific legislation to perform an assessment.
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)		
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)		
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)		
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph		
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph		
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)		
82a	Article 4, first paragraph, point (4a)		
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)		
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)		
89a	Article 4, first paragraph, point (5)(ca) - (ce)		
89e	Article 4, first paragraph, point (7)		
89f	Article 4, first paragraph, point (8)		
89g	Article 4, first paragraph, point (9)		
89h	Article 4, first paragraph, point (10)		
89i	Article 4, first paragraph, point (11)		

MS**Position**

Austria
Belgium
Bulgaria
Croatia
Republic of Cyprus
Czech Republic
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Poland
Portugal
Romania
Slovakia
Slovenia
Spain
Sweden
Select delegation

-
In favor
Object
Neutral
Scrutiny

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
SPAIN		SPAIN	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	In favor	
22	Recital 9	In favor	
25a	Recital 12a	Object	According to the text, in the case of Articles 3(2) and 3(3), we insist that if substances need to be reviewed, consultation with medical device experts should be taken into account. It is in the Council's proposal and we insist that it goes in the final proposal that has not been taken up by Parliament.
27a	Recital 14a	In favor	
41	Article 1, first paragraph, point (2), first subparagraph	In favor	
42	Article 1, first paragraph, point (2), second subparagraph	In favor	
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Object	With regard to the amendment of Regulation 178/2002 on food safety and the establishment of the EFSA Agency, we have doubts regarding Parliament's amendments 6 and 7 relating to Article 30 – paragraph 2 – sub-paragraph 2 and Article 30 – new paragraph 3, on the resolution of scientific divergences, we consider that the provisions of Article 30(2) of the Council's proposal are sufficient
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	Object	With regard to the amendment of Regulation 178/2002 on food safety and the establishment of the EFSA Agency, we have doubts regarding Parliament's amendments 6 and 7 relating to Article 30 – paragraph 2 – sub-paragraph 2 and Article 30 – new paragraph 3, on the resolution of scientific divergences, we consider that the provisions of Article 30(2) of the Council's proposal are sufficient
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)		
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph		
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph		
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)		
82a	Article 4, first paragraph, point (4a)		
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)		
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)		
89a	Article 4, first paragraph, point (5)(ca) - (ce)		
89e	Article 4, first paragraph, point (7)		
89f	Article 4, first paragraph, point (8)		
89g	Article 4, first paragraph, point (9)		
89h	Article 4, first paragraph, point (10)		

Member State	
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Row in table Annex I	Reference in the text	MS position
GENERAL	GENERAL	Scrutiny
GENERAL	GENERAL	Scrutiny
GENERAL	GENERAL	Scrutiny
GENERAL	GENERAL	Scrutiny

Select delegation

MS comment

Uncertainty about the adaptation of ECHA to the new tasks proposed by Parliament in the absence of the proposal for the new founding regulation for ECHA:

The reallocation of scientific and technical tasks will have a significant impact on ECHA, and not only in terms of budgetary implications and necessary human/administrative resources. A reorganisation of the Agency's work will be necessary to ensure that its Committees can cope with the increased workload without compromising the quality and timeliness of its work.

New structures - committees or working groups - and certainly the reinforcement of existing ones are likely to be needed (the Committee for Risk Assessment is already facing a considerable workload; the Committee for Socio-Economic Analysis will also be affected by additional tasks). In addition to the additional budget and staffing, the establishment and organisation of work must be taken into account. In the absence of clarity, it is impossible to conclude whether the resources proposed will be sufficient.

Without a proposal for a founding regulation from ECHA, it is not clear whether and how the Agency (including its committees and working groups) will be able to adapt to allow for a smooth and effective integration of new tasks.

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		FRANCE	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8		
22	Recital 9		
27a	Recital 14a		
41	Article 1, first paragraph, point (2), first subparagraph	-	FR considers the Parliament's proposal interesting considering the importance of ensuring the readability of scientific expertise. The process and procedures in case of divergence should be clarified and the proposal to mention the cause of divergence increases clarity. Inclusion of variations in vulnerability among populations in risk evaluation could be encouraged but would need further
42	Article 1, first paragraph, point (2), second subparagraph	-	FR considers the Parliament's proposal interesting considering the importance of ensuring the readability of scientific expertise. The process and procedures in case of divergence should be clarified and the proposal to mention the cause of divergence increases clarity. Inclusion of variations in vulnerability among populations in risk evaluation could be encouraged but would need further
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	-	FR considers the Parliament's proposal interesting considering the importance of ensuring the readability of scientific expertise. The process and procedures in case of divergence should be clarified and the proposal to mention the cause of divergence increases clarity. Inclusion of variations in vulnerability among populations in risk evaluation could be encouraged but would need further
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	-	FR considers the Parliament's proposal interesting considering the importance of ensuring the readability of scientific expertise. The process and procedures in case of divergence should be clarified and the proposal to mention the cause of divergence increases clarity. Inclusion of variations in vulnerability among populations in risk evaluation could be encouraged but would need further
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)		
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph		
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph		
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	-	FR fully supports the Council's proposal which goes further than the Parliament's proposal and allows the entries in Annexes IV and V to be adapted to scientific and technical progress in particular to developments in waste treatment and decontamination technologies and to new scientific information indicating that the hazards and risks associated to a substance in waste have been
82a	Article 4, first paragraph, point (4a)		
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	-	FR prefers the provisions introduced by the Council on the issue of resources and tasks assigned to ECHA.
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)		
89a	Article 4, first paragraph, point (5)(ca) - (ce)		
89e	Article 4, first paragraph, point (7)		
89f	Article 4, first paragraph, point (8)		
89g	Article 4, first paragraph, point (9)		
89h	Article 4, first paragraph, point (10)		
89i	Article 4, first paragraph, point (11)		

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		ITALY	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	In favor	
22	Recital 9	Neutral	
27a	Recital 14a	In favor	
41	Article 1, first paragraph, point (2), first subparagraph	Scrutiny	
42	Article 1, first paragraph, point (2), second subparagraph	Scrutiny	
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Scrutiny	
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	Scrutiny	
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	In favor	
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	In favor	
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	In favor	
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	In favor	
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	Object	We prefer general approach which refers only to the POP Regulation and that specifies in detail the scientific and technological progress
82a	Article 4, first paragraph, point (4a)	In favor	
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	In favor	
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	Object	Preference for general approach
89a	Article 4, first paragraph, point (5)(ca) - (ce)	In favor	
89e	Article 4, first paragraph, point (7)	In favor	
89f	Article 4, first paragraph, point (8)	In favor	
89g	Article 4, first paragraph, point (9)	In favor	
89h	Article 4, first paragraph, point (10)	In favor	
89i	Article 4, first paragraph, point (11)	In favor	

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		HUNGARY	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	Object	We do not support the settling of disputes by favouring the stricter option, as we believe that this should be done on a scientific basis.
22	Recital 9	Neutral	-
27a	Recital 14a	In favor	We support the proposal to monitor the Agency's workload and resources, as it is key to ensure that it can effectively fulfil its increasing number of tasks.
41	Article 1, first paragraph, point (2), first subparagraph	Neutral	With regard to the resolution of the divergence of views, we can accept the EP's proposal for clarification on the need for more justification
42	Article 1, first paragraph, point (2), second subparagraph	Object	We do not support the settling of disputes by favouring the stricter option, as we believe that this should be done on a scientific basis.
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Object	We consider that the EP proposal (No 44a; 44b) goes beyond the purposes of the draft (improve cooperation among Union agencies), as it would pose obligations on national authorities.
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	Object	We consider that the EP proposal (No 44a; 44b) goes beyond the purposes of the draft (improve cooperation among Union agencies), as it would pose obligations on national authorities.
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	Neutral	-
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	Neutral	-
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	Neutral	-
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	Neutral	-
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	Neutral	-
82a	Article 4, first paragraph, point (4a)	In favor	We support the proposal to monitor the Agency's workload and resources, as it is key to ensure that it can effectively fulfil its increasing number of tasks.
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	In favor	We support the proposal to monitor the Agency's workload and resources, as it is key to ensure that it can effectively fulfil its increasing number of tasks.
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	Neutral	-
89a	Article 4, first paragraph, point (5)(ca) - (ce)	Neutral	-
89e	Article 4, first paragraph, point (7)	Neutral	-
89f	Article 4, first paragraph, point (8)	Neutral	-
89g	Article 4, first paragraph, point (9)	Neutral	-
89h	Article 4, first paragraph, point (10)	Neutral	-
89i	Article 4, first paragraph, point (11)	Neutral	-

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		PORTUGAL	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8		
22	Recital 9		
27a	Recital 14a	In favor	We are flexible.
41	Article 1, first paragraph, point (2), first subparagraph		
42	Article 1, first paragraph, point (2), second subparagraph		
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)		
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)		
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	In favor	We agree with this amendment.
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	In favor	We agree with this amendment.
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	In favor	We agree with this amendment.
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)		We prefer to maintain the Council's mandate version.
82a	Article 4, first paragraph, point (4a)	In favor	We can agree with this amendment.
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	In favor	We can agree with this amendment.
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	In favor	We agree with this amendment.
89a	Article 4, first paragraph, point (5)(ca) - (ce)		
89e	Article 4, first paragraph, point (7)	In favor	We prefer the Council's mandate, however we can be flexible.
89f	Article 4, first paragraph, point (8)	In favor	We prefer the Council's mandate, however we can be flexible.
89g	Article 4, first paragraph, point (9)	In favor	We prefer the Council's mandate, however we can be flexible.
89h	Article 4, first paragraph, point (10)	In favor	We prefer the Council's mandate, however we can be flexible.
89i	Article 4, first paragraph, point (11)	In favor	We prefer the Council's mandate, however we can be flexible.

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION establishing a common data platform on chemicals, laying down rules to ensure that the data contained in it are findable, accessible, interoperable and reusable and establishing a monitoring and outlook framework for chemicals (Text with EEA)	
Member State		Select delegation	
Row in table Annex III	Reference in the text	MS position	MS comment
13	Recital 1	in favor	
14	Recital 2	in favor	
16	Recital 4	neutral	
18	Recital 6	neutral	
19	Recital 7	scrutiny	More clarity is needed on the way this recital extends the rol/objective of the CDPC and the possible impact on MS administrative capacity including enforcement
20	Recital 8	neutral	
21	Recital 9	neutral	
21a	Recital 9a	neutral	
24	Recital 12	neutral	
26	Recital 14	neutral	
29	Recital 17	neutral	
30	Recital 18	neutral	
31	Recital 19	neutral	
33	Recital 21	neutral	
34	Recital 22	neutral	
35	Recital 23	neutral	
36	Recital 24	neutral	
36a	Recital 24a	neutral	
36b	Recital 24b	neutral	
39	Recital 27	neutral	
40	Recital 28	neutral	
42	Recital 30	neutral	
43	Recital 31	neutral	
45	Recital 33	neutral	
48	Recital 36	neutral	
48a	Recital 36a	neutral	
50	Recital 38	neutral	
53a	Recital 41a	neutral	
54	Recital 42	neutral	
55	Recital 43	neutral	
56	Recital 44	scrutiny	This recital contradicts line 241 which refer to the implementation and enforcement not policy action by authorities
58	Recital 46	neutral	
60	Recital 48	neutral	
60a	Recital 48a	neutral	

60b	Recital 48b	neutral	
60c	Recital 48c	neutral	
67	Article 1(1)	neutral	
70a	Article 1(2), point (ba)	neutral	
77	Article 2, first paragraph, point (2)	neutral	
85	Article 2, first paragraph, point (10)	neutral	
89a	Article 2, first paragraph, point (11a)	neutral	
92a	Article 2, first paragraph, point (14a)	neutral	
99a	Article 3(2), point (ba)	neutral	
99b	Article 3(2), point (bb)	neutral	
104a	Article 3(4a)	neutral	
109a	Article 3(5), point (da)	object	Preference to maintain CONS position, because this extends the workflow on SM,
109b	Article 3(5), point (db)	object	Similar to Line 109a.
113	Article 3(6)	in favor	
116	Article 3(9)	neutral	
118	Article 3(11)	neutral	
120	Article 4(1)	neutral	
121	Article 4(2)	neutral	
123	Article 4(4)	neutral	
128a	Article 4(5), point (da)	neutral	
130	Article 4(5), point (f)	neutral	
132	Article 5(1)	neutral	
133	Article 5(2)	neutral	
134	Article 5(3)	neutral	
136	Article 5(5)	neutral	
137	Article 5(6)	neutral	
138	Article 5(7)	neutral	
139	Article 5(8)	neutral	
140	Article 5(9)	neutral	
140a	Article 5(9a)	neutral	
140b	Article 5(9b)	neutral	
142	Article 6(1)	neutral	
145	Article 6, 3.	neutral	
150	Article 6, 3., point €	neutral	
150a	Article 6(3a), first subparagraph, point (ea)	neutral	
150b	Article 6(3a), first subparagraph, point (eb)	neutral	
150c	Article 6(3a), first subparagraph, point (ec)	neutral	
150g	Article 6(4a)	neutral	
150h	Article 6(4b)	neutral	
150i	Article 6(4c)	neutral	
150j	Article 6(4d)	neutral	
150k	Article 6(4e)	neutral	
151	Article 6(5)	neutral	
151a	Article 6(5a)	neutral	
152	Article 6(6)	neutral	
152a	Article 6(6a)	neutral	
152b	Article 6(6b)	neutral	
164a	Article 8(4a)	neutral	
167a	Article 9(1a)	in favor	
168	Article 9(2)	neutral	
169	Article 9(3)	neutral	
170a	Article 9(4a)	neutral	
170b	Article 9(4b)	neutral	
170c	Article 9(4c)	neutral	
173	Article 10(1)	object	Risk assessment is done by identification at the substance level not at chemicals level. The CONS proposal has a stronger legal basis as it uses terminology established in existing legislation. The terminological change proposed by the PE might require additional adjustments in other parts of legal text or in related acts to ensure coherence.
174	Article 10(1a), first subparagraph	neutral	
174h	Article 10(2), point (a)	neutral	
174i	Article 10(2), point (b)	neutral	
174j	Article 10(2), point (c)	neutral	
174k	Article 10(2), point (d)	neutral	
174l	Article 10(2), point €	neutral	

174m	Article 10(2), point (f)	neutral	
174n	Article 10(2), point (g)	neutral	
176	Article 10(3), point (a)	neutral	
181a	Article 10(3), point (fa)	neutral	
182	Article 10(4)	neutral	
182a	Article 10a	neutral	
182b	Article 10a(1)	object	In line with line 109 a
182c	Article 10a(2)	neutral	
182s	Article 10a(3)	neutral	
182e	Article 10b	object	In line with line 109 a
182f	Article 10b(1)	neutral	
182g	Article 10b(2)	neutral	
182h	Article 10b(3)	neutral	
182i	Article 10b(4)	neutral	
185	Article 11(2)	neutral	
191	Article 13(1)	neutral	
192	Article 13(2)	neutral	
193	Article 13(3)	neutral	
194	Article 13(4)	neutral	
205	Article 14(4)	neutral	
215a	Article 14(5), point (ia)	neutral	
215b	Article 14(5), point (ib)	neutral	
218	Article 14(8)	neutral	
229	Article 15(5), point (a)	neutral	
234	Article 15(8)	neutral	
234a	Article 15a	neutral	
234b	Article 15a(1)	neutral	
234c	Article 15a(2)	neutral	
234d	Article 15a(3)	neutral	
234e	Article 15a(4)	neutral	
234f	Article 15a(5)	neutral	
237	Article 16(1)	neutral	
238	Article 16(2)	neutral	
239	Article 16(3)	neutral	
241	Article 17(1)	neutral	
242	Article 17(2)	neutral	
243a	Article 17(3a)	neutral	
246	Article 18(1)	neutral	
246a	Article 18(1a)	neutral	
247	Article 18(2)	neutral	
252	Article 19(2), first subparagraph, point (b)	neutral	
253	Article 19(2), first subparagraph, point (c)	neutral	
255a	Article 19(2), first subparagraph, point (ea)	neutral	
255b	Article 19(2), first subparagraph, point (eb)	neutral	
255c	Article 19(2), first subparagraph, point (ec)	neutral	
257	Article 19(3)	neutral	
258	Article 19(4)	scrutiny	Similar to Line 56.
258a	Article 19(4a)	in favor	
259	Article 19(5)	neutral	
259a	Article 19(5a)	neutral	
261	Article 20(1)	neutral	
262	Article 20(2)	neutral	
267	Article 20(4), point (c)	neutral	
270	Article 21(1)	neutral	
270a	Article 21(1), point (a)	neutral	
270b	Article 21(1), point (b)	neutral	
270c	Article 21(1), point (c)	neutral	
271	Article 21(2)	neutral	
272	Article 21(3)	neutral	
272a	Article 21(3a)	neutral	
274	Article 21(5)	neutral	
275a	Article 21(6a)	neutral	
275b	Article 21(6b)	neutral	
275c	Article 21(6c)	neutral	
279	Article 22(1)	neutral	
279a	Article 22(-1), second subparagraph	neutral	
279b	Article 22(-1), second subparagraph, point (a)	neutral	
279c	Article 22(-1), second subparagraph, point (b)	neutral	
279d	Article 22(-1), third subparagraph	neutral	
280	Article 22(2)	neutral	
281	Article 22(3)	neutral	
282	Article 22(4)	neutral	
284	Article 22(6)	neutral	
285	Article 22(7)	neutral	
286	Chapter VIII	neutral	
289	Article 23(2)	neutral	
297a	Article 24a	neutral	
297b	Article 24a(1)	neutral	
297c	Article 24a(2)	neutral	

299	Article 25	neutral	
303a	Article 26a	neutral	
303b	Article 26a, first paragraph	neutral	
303c	Article 26a, second paragraph	neutral	
303d	Article 26a, third paragraph	neutral	
303e	Article 26a, fourth paragraph	neutral	
303f	Article 26a, fifth paragraph	neutral	
303g	Article 26a, sixth paragraph	neutral	
384a	Annex I, point 70a.	neutral	
391	Annex II, second paragraph	neutral	
393	Annex II, point 4.	neutral	
394	Annex II, third paragraph	neutral	
431a	Annex III, point 34a.	neutral	
431b	Annex IIIa	neutral	
431c	Annex IIIa, paragraph 1	neutral	

File		DIRECTIVE as regards the re-attribution of scientific and technical tasks to the European Chemicals (RoHS) Agency (Text with EEA relevance) - 2023/0454(COD)	
ROMANIA		Select delegation	
Row in table Annex 1	Reference in the text	MS position	MS comment
14	Recital 1	neutral	Flexible, can accept EP amendment
15	Recital 2	neutral	Flexible, can accept EP amendment
19a	Recital 6a	object	RO supports CONS position 5-year timeline due to legal certainty for industry
21	Recital 8	object	Preference to maintain CONS position.
36	Article 1, first paragraph, point (1)(a), amending provision, numbered paragraph (4), second subparagraph	object	Preference for the CONS position (may provision)
48	Article 1, first paragraph, point (1)(b), amending provision, numbered paragraph (4a), fifth subparagraph	neutral	
49a	Article 1, first paragraph, point (1)(ba)	neutral	It would be important to have a feasible deadline (maybe 6 months is too short).
49b	Article 1, first paragraph, point (1)(ba), amending provision, numbered paragraph (5)	neutral	Similar to Line 49a.
56	Article 1, first paragraph, point (3)(a), amending provision, first paragraph	object	Similar to Line 19a.
59	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), first subparagraph	object	Preference for the CONS position (or a group of similar substances)
60	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), second subparagraph	in favor	
61a	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (- a)	neutral	
61b	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (- b)	neutral	
61c	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (- c)	neutral	
63a	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (ba)	neutral	We can be flexible towards the EP-preferred option to use annex XV of REACH (to ensure coherence since REACH is a horizontal legal act)
63b	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (bb)	neutral	
63c	Article 1, first paragraph, point (3)(c), amending provision, numbered paragraph (2), third subparagraph, point (bc)	neutral	
89a	Article 1, first paragraph, point (4a)	neutral	
89b	Article 1, first paragraph, point (4a), amending provision, numbered paragraph (1a)	neutral	
89c	Article 1, first paragraph, point (4b)	neutral	
89d	Article 1, first paragraph, point (4b), amending provision, numbered paragraph (2a) paragraph	neutral	
91	Article 2, first paragraph	neutral	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation	
Member State		ROMANIA	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	neutral	
22	Recital 9	neutral	
27a	Recital 14a	neutral	
41	Article 1, first paragraph, point (2), first subparagraph	neutral	
42	Article 1, first paragraph, point (2), second subparagraph	in favor	
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	scrutiny	It should be clarify how are defined the substantive divergences
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	scrutiny	Is not clear how will be applied in practice
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	scrutiny	Classification is a step forward in the identification process. A substance can be identified as ED even before a harmonized classification is finalized, which may take several years
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	neutral	
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	neutral	
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	neutral	
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	object	Preference for the CONS position
82a	Article 4, first paragraph, point (4a)	neutral	
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	neutral	
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	in favor	
89a	Article 4, first paragraph, point (5)(ca) - (ce)	neutral	
89e	Article 4, first paragraph, point (7)	neutral	
89f	Article 4, first paragraph, point (8)	neutral	
89g	Article 4, first paragraph, point (9)	neutral	
89h	Article 4, first paragraph, point (10)	neutral	
89i	Article 4, first paragraph, point (11)	neutral	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		SLOVENIA	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	In favor	
22	Recital 9	In favor	
27a	Recital 14a	In favor	
41	Article 1, first paragraph, point (2), first subparagraph	In favor	
42	Article 1, first paragraph, point (2), second subparagraph	In favor	
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	In favor	
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	In favor	
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	In favor	
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	In favor	
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	In favor	
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	In favor	
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	In favor	
82a	Article 4, first paragraph, point (4a)	In favor	
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	In favor	
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	In favor	
89a	Article 4, first paragraph, point (5)(ca) - (ce)	In favor	
89e	Article 4, first paragraph, point (7)	In favor	
89f	Article 4, first paragraph, point (8)	In favor	
89g	Article 4, first paragraph, point (9)	In favor	
89h	Article 4, first paragraph, point (10)	In favor	
89i	Article 4, first paragraph, point (11)	In favor	

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		SLOVAKIA	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	Neutral	We consider the Council wording appropriate
22	Recital 9		
27a	Recital 14a	In favor	
41	Article 1, first paragraph, point (2), first subparagraph	Object	We do not consider it appropriate to impose an obligation on Member States to justify differences in methodologies
42	Article 1, first paragraph, point (2), second subparagraph		
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Object	We do not consider it appropriate to impose an obligation on Member State Authorities to clarify the contentious scientific issues
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)		
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)		
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)		
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph		
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph		
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)		
82a	Article 4, first paragraph, point (4a)		
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)		
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)		
89a	Article 4, first paragraph, point (5)(ca) - (ce)		
89e	Article 4, first paragraph, point (7)		
89f	Article 4, first paragraph, point (8)		
89g	Article 4, first paragraph, point (9)		
89h	Article 4, first paragraph, point (10)		
89i	Article 4, first paragraph, point (11)		

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	

File		REGULATION as regards re-attribution of scientific and technical tasks and improving cooperation among Union agencies in the area of chemicals (Text with EEA relevance) - 2023/0455(COD)	
Member State		SWEDEN	
Row in table Annex II	Reference in the text	MS position	MS comment
21	Recital 8	In favor	
22	Recital 9	Neutral	
27a	Recital 14a	In favor	
41	Article 1, first paragraph, point (2), first subparagraph	In favor	
42	Article 1, first paragraph, point (2), second subparagraph	Object	Stick to Council mandate
44a	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3a)	Object	Hesitant to extend the requirements for consistency to also include national authorities that come to conflicting conclusions.
44b	Article 1, first paragraph, point (2), amending provision, numbered paragraph (3b)	In favor	
54	Article 3, first paragraph, point (1), amending provision, numbered paragraph (b)	In favor	
71	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), first subparagraph, point (a)	-	EP same position as the Council?
75	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), second subparagraph	Neutral	
76	Article 4, first paragraph, point (2), amending provision, numbered paragraph (1a), third subparagraph	Neutral	
82	Article 4, first paragraph, point (4), amending provision, numbered paragraph (2)	Object	Stick to Council mandate. We see problems that amendments to Annexes IV and V are not included in the text, as well as other text on decontamination technologies, etc.
82a	Article 4, first paragraph, point (4a)	In favor	
82b	Article 4, first paragraph, point (4a), amending provision, numbered paragraph (2a)	In favor	
89	Article 4, first paragraph, point (5)(c), amending provision, numbered paragraph (6)	Neutral	
89a	Article 4, first paragraph, point (5)(ca) - (ce)	Neutral	
89e	Article 4, first paragraph, point (7)	Neutral	
89f	Article 4, first paragraph, point (8)	Neutral	
89g	Article 4, first paragraph, point (9)	Neutral	
89h	Article 4, first paragraph, point (10)	Neutral	
89i	Article 4, first paragraph, point (11)	Neutral	

MS	Position
Austria	-
Belgium	In favor
Bulgaria	Object
Croatia	Neutral
Republic of Cyprus	Scrutiny
Czech Republic	
Denmark	
Estonia	
Finland	
France	
Germany	
Greece	
Hungary	
Ireland	
Italy	
Latvia	
Lithuania	
Luxembourg	
Malta	
Netherlands	
Poland	
Portugal	
Romania	
Slovakia	
Slovenia	
Spain	
Sweden	
Select delegation	