



Council of the European Union
General Secretariat

Brussels, 24 March 2025

**Interinstitutional files:
2023/0453 (COD)**

WK 3890/2025 INIT

LIMITE

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CONTRIBUTION

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| 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 16961/23 + ADD 1 |
| Subject: | OSOA Package: Regulation on Data Platform - 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, CY, HU, AT, PT, RO, SI, SK and SE.

| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | DENMARK | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 14 | Recital 2 | Neutral | Denmark can be flexible in relation to EP's proposal. However, we prefer to delete "By collecting and making available all data on chemicals that exist in the Union, the database will also foster innovation and support the development of advanced biologically-relevant tools, methods and models, and data analysis capacities." |
| 16 | Recital 4 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 18 | Recital 6 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 19 | Recital 7 | Neutral | Denmark can be flexible in relation to EP's proposal. However, we prefer to delete "and enforcement activities", if this information's is not already included in the obligations under the EU legislation mentioned in the Annexes. |
| 20 | Recital 8 | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 21 | Recital 9 | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 21a | Recital 9a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 24 | Recital 12 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 26 | Recital 14 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 29 | Recital 17 | Object | Denmark does not support inclusion of information on chemicals in articles or information on safer alternatives to substances of concern at the time of the Data Platform establishment. |
| 30 | Recital 18 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 31 | Recital 19 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 33 | Recital 21 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 34 | Recital 22 | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 35 | Recital 23 | Object | Denmark cannot accept the word "national" in the EP proposal. Supports Council mandate |
| 36 | Recital 24 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 36a | Recital 24a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 36b | Recital 24b | Neutral | Denmark can be flexible in relation to EP's proposal, but prefers the text in recital 24c in the Council mandate |
| 39 | Recital 27 | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 40 | Recital 28 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 42 | Recital 30 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 43 | Recital 31 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 45 | Recital 33 | Neutral | Denmark can be flexible in relation to EP's proposal. Denmark prefers to delete "Information on enforcement should be made public to enhance public trust in the effective implementation of Union law." |
| 48 | Recital 36 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 48a | Recital 36a | Neutral | Denmark can be flexible in relation to EP's proposal. However, Denmark preferer to delete: "(36a)There are data gaps on the occurrence of hazardous and other harmful chemicals in articles on the Union market. In order to enhance visibility on the availability of data, and to promote research and development activities as regards safer alternatives, as well as the uptake of such alternatives, ECHA should establish and manage a repository of information on chemicals in articles generated or submitted under Union acts listed in Annex I. This database should integrate the information required under Article 9(1)(i) of Directive 2008/98/EC and the web portal under Article 14 of Regulation (EU) 2024/178. In addition, ECHA should also establish and manage a database collecting available information from Agencies, Member States and business operators on safer alternatives to substances of concern, as defined in Article 2(27) of Regulation (EU) 2024/1781 as well as substances that meet the criteria for classification in hazard classes referred to in Article 2(27)(b) of Regulation (EU) 2024/1781." |
| 50 | Recital 38 | Neutral | Denmark can be flexible in relation to EP's proposal. Denmark can see the point in having identifiers. Denmark notes there is already a system, the CAS Registry System, for unique chemical identifier. Denmark suggests to use this system instead of developing a new. |
| 53a | Recital 41a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 54 | Recital 42 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 55 | Recital 43 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 56 | Recital 44 | Object | Can only support EP's suggests if the following is deleted: "For any risk and warning signal identified by the report, the Authorities should consider undertaking regulatory, policy or enforcement actions and provide justification when they decide not to proceed with any action." |
| 58 | Recital 46 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 60 | Recital 48 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 60a | Recital 48a | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. ECHA should not initiate regular biomonitoring studies. Regulation of harmful chemicals must be done before these chemicals can be measured in humans. In addition, it can be difficult to identify the specific source of the chemicals in humans. |
| 60b | Recital 48b | Neutral | Denmark can be flexible in relation to EP's proposal |
| 60c | Recital 48c | Neutral | Denmark can be flexible in relation to EP's proposal |
| 67 | Article 1(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 70a | Article 1(2), point (ba) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 77 | Article 2, first paragraph, point (2) | Neutral | Denmark prefers the Council Mandate. The reference to annex II is not relevant. |
| 85 | Article 2, first paragraph, point (10) | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 89a | Article 2, first paragraph, point (11a) | Neutral | Denmark can be flexible in relation to EP's proposal, but suggest the following amendment: 'research data' means any hazard, occurrence, exposure and fate relevant data derived from scientific studies published in peer-reviewed literature that are not carried out specifically to inform regulatory assessments; |
| 92a | Article 2, first paragraph, point (14a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 99a | Article 3(2), point (ba) | Neutral | Denmark can be flexible in relation to EP's proposal. Data voluntarily submitted data should fall within the scope of this Regulation and be reliable. Denmark proposes data quality is ensured according to the ECHA guidelines |
| 99b | Article 3(2), point (bb) | Neutral | Denmark can be flexible in relation to EP's proposal. Data voluntarily submitted data should fall within the scope of this Regulation and be reliable. Denmark proposes data quality is ensured according to the ECHA guidelines |
| 104a | Article 3(4a) | Neutral | Denmark can see the point in having identifiers. Denmark notes there is already a system, the CAS Registry System, for unique chemical identifier. Denmark suggests to use this system instead of developing a new. |
| 109a | Article 3(5), point (da) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 109b | Article 3(5), point (db) | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment |
| 113 | Article 3(6) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 116 | Article 3(9) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 118 | Article 3(11) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 120 | Article 4(1) | Neutral | Prefers the text from the Council mandate and keep the deletion of "by means of an implementing decision". These decisions are rather technical and does not benefit from an implementing act. |
| 121 | Article 4(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 123 | Article 4(4) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 128a | Article 4(5), point (da) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 130 | Article 4(5), point (f) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 132 | Article 5(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 133 | Article 5(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 134 | Article 5(3) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 136 | Article 5(5) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot accept the word "national" in the EP proposal. Supports Council mandate. |
| 137 | Article 5(6) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot accept the word "national" in the EP proposal. Supports Council mandate. |
| 138 | Article 5(7) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. Can only support EP's suggests if the following amendments are made: 7. The Commission and the Authorities and national agencies The Commission and the Agencies shall provide the necessary technical cooperation to the ECHA to enable the integration of the chemicals data provided in accordance with paragraph 2 in the common data platform as well as its publication through that platform. The ECHA shall provide support to the Authorities and national agencies to facilitate the integration of the chemicals data provided in accordance with paragraph 2. |
| 139 | Article 5(8) | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 140 | Article 5(9) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. Support the Council mandate. |
| 140a | Article 5(9a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 140b | Article 5(9b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 142 | Article 6(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 145 | Article 6, 3. | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150 | Article 6, 3., point 3e | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150a | Article 6(3a), first subparagraph, point (ea) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150b | Article 6(3a), first subparagraph, point (eb) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150c | Article 6(3a), first subparagraph, point (ec) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150g | Article 6(4a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150h | Article 6(4b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150i | Article 6(4c) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150j | Article 6(4d) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 150k | Article 6(4e) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 151 | Article 6(5) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 151a | Article 6(5a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 152 | Article 6(6) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 152a | Article 6(6a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 152b | Article 6(6b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 164a | Article 8(4a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 167a | Article 9(1a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 168 | Article 9(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 169 | Article 9(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 170a | Article 9(4a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 170b | Article 9(4b) | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 170c | Article 9(4c) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 173 | Article 10(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174 | Article 10(1a), first subparagraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174h | Article 10(2), point (a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174i | Article 10(2), point (b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174j | Article 10(2), point (c) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174k | Article 10(2), point (d) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174l | Article 10(2), point € | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174m | Article 10(2), point (f) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 174n | Article 10(2), point (g) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 176 | Article 10(3), point (a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 181a | Article 10(3), point (fa) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 182 | Article 10(4) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 182a | Article 10a | Object | Denmark does not support inclusion of information on chemicals in articles at the time of the Data Platform establishment. There is a need to clarify how this information is handled today. For example, chemical composition in articles can change quite quickly. |
| 182b | Article 10a(1) | Object | Denmark does not support inclusion of information on chemicals in articles at the time of the Data Platform establishment. There is a need to clarify how this information is handled today. For example, chemical composition in articles can change quite quickly. |
| 182c | Article 10a(2) | Object | Denmark does not support inclusion of information on chemicals in articles at the time of the Data Platform establishment. There is a need to clarify how this information is handled today. For example, chemical composition in articles can change quite quickly. Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. |
| 182s | Article 10a(3) | Object | Denmark does not support inclusion of information on chemicals in articles at the time of the Data Platform establishment. There is a need to clarify how this information is handled today. For example, chemical composition in articles can change quite quickly. |
| 182e | Article 10b | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment. It is difficult to see how this EP proposal is feasible. Chemicals of concern are a very broad range of substances and safer alternatives can change depending on specific use. It is not assessed as technical feasible to introduce this information in the data base at this point in time. |
| 182f | Article 10b(1) | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment. Chemicals of concern are a very broad range of substances and safer alternatives can change depending on specific use. It is not assessed as technical feasible to introduce this information in the data base at this point in time. |
| 182g | Article 10b(2) | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment. Chemicals of concern are a very broad range of substances and safer alternatives can change depending on specific use. It is not assessed as technical feasible to introduce this information in the data base at this point in time. Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. |

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| 182h | Article 10b(3) | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment. Chemicals of concern are a very broad range of substances and safer alternatives can change depending on specific use. It is not assessed as technical feasible to introduce this information in the data base at this point in time. |
| 182i | Article 10b(4) | Object | Denmark does not support inclusion of information on safer alternatives to substances of concern at the time of the Data Platform establishment. |
| 185 | Article 11(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 191 | Article 13(1) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 192 | Article 13(2) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. Support the Council mandate/COM proposal. |
| 193 | Article 13(3) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. Support the Council mandate/COM proposal. However, if researchers or research consortia funded by national programmes (art 5, para 6), are already obligated to sent ECHA data, Denmark can be flexible to the EP proposal. |
| 194 | Article 13(4) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 205 | Article 14(4) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. Support the Council mandate/COM proposal. |
| 215a | Article 14(5), point (ia) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 215b | Article 14(5), point (ib) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 218 | Article 14(8) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 229 | Article 15(5), point (a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234 | Article 15(8) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234a | Article 15a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234b | Article 15a(1) | Neutral | Denmark can be flexible in relation to EP's proposal, but suggest the following amendment: "1. Researchers shall be able to voluntarily submit publicly available research data on chemicals related to an entry in the common data platform. Research data shall be submitted in a format prescribed by the ECHA." |
| 234c | Article 15a(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234d | Article 15a(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234e | Article 15a(4) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 234f | Article 15a(5) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 237 | Article 16(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 238 | Article 16(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 239 | Article 16(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 241 | Article 17(1) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |

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| 242 | Article 17(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 243a | Article 17(3a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 246 | Article 18(1) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 246a | Article 18(1a) | Neutral | Denmark can be flexible in relation to EP's proposal but there is a need to clarify the scope of this proposal |
| 247 | Article 18(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 252 | Article 19(2), first subparagraph, point (b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 253 | Article 19(2), first subparagraph, point (c) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 255a | Article 19(2), first subparagraph, point (ea) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 255b | Article 19(2), first subparagraph, point (eb) | Object | Denmark prefers the Council Mandate. However, Denmark can be flexible, if data is already submitted (in accordance to EU obligations in the Annexes) to the Commission's databases. |
| 255c | Article 19(2), first subparagraph, point (ec) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 257 | Article 19(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 258 | Article 19(4) | Object | Cannot accept the wording proposed by EP. Support Council mandate |
| 258a | Article 19(4a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 259 | Article 19(5) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 259a | Article 19(5a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 261 | Article 20(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 262 | Article 20(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 267 | Article 20(4), point (c) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 270 | Article 21(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 270a | Article 21(1), point (a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 270b | Article 21(1), point (b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 270c | Article 21(1), point (c) | Object | Denmark notes that EP introduces a new involvement of Member States. Denmark cannot support any new involvement of Member States. |
| 271 | Article 21(2) | In favor | Support EP suggestions |
| 272 | Article 21(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 272a | Article 21(3a) | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 274 | Article 21(5) | Neutral | Denmark can be flexible in relation to EP's proposal. Denmark suggests to merge Council text and EP amendment. |
| 275a | Article 21(6a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 275b | Article 21(6b) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. ECHA should not initiate regular biomonitoring studies. Regulation of harmful chemicals must be done before these chemicals can be measured in humans. In addition, it can be difficult to identify the specific source of the chemicals in humans. |
| 275c | Article 21(6c) | Object | Denmark notes that EP introduces new obligations on Member States. Denmark cannot support any new obligations on Member States. ECHA should not initiate regular biomonitoring studies. Regulation of harmful chemicals must be done before these chemicals can be measured in humans. In addition, it can be difficult to identify the specific source of the chemicals in humans. |
| 279 | Article 22(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 279a | Article 22(-1), second subparagraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 279b | Article 22(-1), second subparagraph, point (a) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 279c | Article 22(-1), second subparagraph, point (b) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 279d | Article 22(-1), third subparagraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 280 | Article 22(2) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 281 | Article 22(3) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 282 | Article 22(4) | Neutral | Denmark can be flexible in relation to EP's proposal, however, we prefer the Council Mandate. |
| 284 | Article 22(6) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 285 | Article 22(7) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 286 | Chapter VIII | Neutral | Denmark can be flexible in relation to EP's proposal |
| 289 | Article 23(2) | Neutral | Denmark can be flexible in relation to EP's proposal, but prefers the text from the Council mandate. |
| 297a | Article 24a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 297b | Article 24a(1) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 297c | Article 24a(2) | Neutral | Denmark can be flexible in relation to EP's proposal |
| 299 | Article 25 | Neutral | Denmark can be flexible in relation to EP's proposal |
| 303a | Article 26a | Neutral | Denmark can be flexible in relation to EP's proposal |
| 303b | Article 26a, first paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 303c | Article 26a, second paragraph | Object | Denmark support the Council Mandate's article 26a on medicinal products. |
| 303d | Article 26a, third paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |

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| 303e | Article 26a, fourth paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 303f | Article 26a, fifth paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 303g | Article 26a, sixth paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 384a | Annex I, point 70a. | Neutral | Denmark can be flexible in relation to EP's proposal |
| 391 | Annex II, second paragraph | Object | Denmark support the Council Mandate |
| 393 | Annex II, point 4. | Neutral | Denmark can be flexible in relation to EP's proposal |
| 394 | Annex II, third paragraph | Neutral | Denmark can be flexible in relation to EP's proposal |
| 431a | Annex III, point 34a. | Neutral | Denmark can be flexible in relation to EP's proposal |
| 431b | Annex IIIa | Neutral | Denmark can be flexible in relation to EP's proposal |
| 431c | Annex IIIa, paragraph 1 | Neutral | Denmark can be flexible in relation to EP's proposal |

| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | GERMANY | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | Scrutiny | Specify "different sources". The MS and resp. authorities? Data to be integrated must be reliable and trustworthy. Making available "all data": data protection must be ensured in particular for personal data. |
| 16 | Recital 4 | | |
| 18 | Recital 6 | Scrutiny | Replace "should" with "must". The data platform must required to ensure compliance with data protection regulations. The same applies to authorities under both EU and German law. |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | In favor | support |
| 26 | Recital 14 | Scrutiny | "should" or "must"? |
| 29 | Recital 17 | Object | see comment on Article 10a / Row 182a and on Article 10b / Row 182e |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | - | |
| 34 | Recital 22 | | We understand this amendment as not touching on the ownership rights / data ownership. |
| 35 | Recital 23 | In favor | Generally in agreement |
| 36 | Recital 24 | | It is unclear what exactly is covered by the term "collecting" in this context. |
| 36a | Recital 24a | In favor | Generally in agreement |
| 36b | Recital 24b | Scrutiny | 1.) Conformity with data protection regulations must be ensured before data are made available (in the respective national projects and programs) - of course, the data platform cannot offer less protection than the (new) applicable data protection regulations. The relevant regulations should be carefully reviewed from a legal and data protection perspective. 2.) Numbers 36 and 37 are inconsistent particularly with regard to the use of "personal" and "anonymised" data. Needs review. 3.) The costs and benefits of transmitting "old" data must be reviewed and weighed against each other, especially if the data are not available in digital form. 4.) see our comments to article 21(6b) and 21(6c), Row 275b and 275 c |

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| 39 | Recital 27 | Scrutiny | It is unclear how the quality of such information could be ensured (see our comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d) We support the addition made in the Council Mandate. |
| 40 | Recital 28 | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | Object | No duplicate structures should be created. It is not understandable why ECHA should set up a database if the COM is already supposed to create and maintain a web portal in accordance with Article 14 ESPR or if ECHA has already set up the SCIP database according WFD. |
| 50 | Recital 38 | | |
| 53a | Recital 41a | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | Scrutiny | see our comments to article 21(6b) and 21(6c), Row 275b and 275 c |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | Object | see comment on Article 10a / Row 182a and on Article 10b / Row 182e Comment on row 80/ definition of human biomonitoring data: The definition is generally agreeable, however, it is important to differentiate between HBM data for the general population and occupational HBM. The resp. generated data is hosted by different EU institutions (EEA or ECHA). This differentiation should be made in the definition and at all other places where it is necessary. |
| 89a | Article 2, first paragraph, point (11a) | Scrutiny | Is HBM data interpreted as research data (exposure)? HBM data are critical to inform policy-making and regulation. |
| 92a | Article 2, first paragraph, point (14a) | | |

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| 99a | Article 3(2), point (ba) | | |
| 99b | Article 3(2), point (bb) | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 104a | Article 3(4a) | | |
| 109a | Article 3(5), point (da) | Object | see comment on Article 10a / Row 182a and on Article 10b / Row 182e |
| 109b | Article 3(5), point (db) | Object | see comment on Article 10a / Row 182a and on Article 10b / Row 182e |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | We understand that all HBM data constitute personal data. |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | Scrutiny | What is a "data controller", what is included in this term? For Art. 5 (9a+b): Terminologies such as "data controller" or "data processor" must be explained or defined to distinguish them from one another and to determine which EU agency or (national) authority/ies holds the respective function. |
| 140b | Article 5(9b) | Scrutiny | We understand Art. 5 (9b) to refer only to data from occupational HBM specifically. The second part of the sentence may need to be revised, as it appears contradictory to row 140a/Art. 5 (9a). |
| 142 | Article 6(1) | | |

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| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | In favor | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |
| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | Word missing. Para should end with "parties". |
| 152 | Article 6(6) | | See above. Terminology and tasks/ responsibilities need to be clear. Who will be the data owner? / what are the rights/ possibilities of data use for the resp. MS? |
| 152a | Article 6(6a) | - | We understand the addition to apply exclusively to the data platform. However, the regulation does not imply that EU agencies can, for example, determine retention periods at national authorities. In general, we are of the opinion that aspects of data storage and sovereignty require legal review. |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | Neutral | DE questions inhowfar 'reference values from research' relate to reference values from European agencies. Would it be necessary to include in the repository a clear indication/distinction? |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |

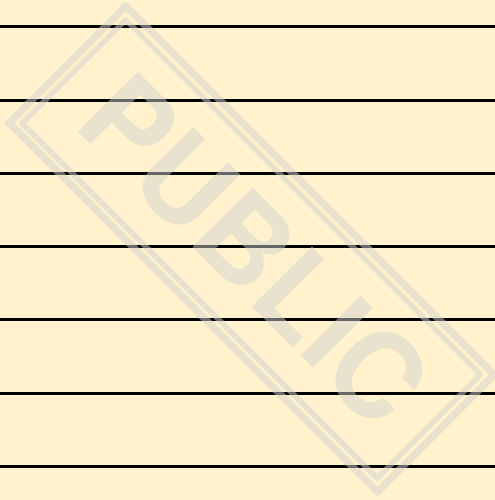
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| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |
| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | Object | Concerning the addition of information on Chemicals in articles DE has concerns regarding data availability, practicality and added value. This question is not an inherent property of the substance, but depends in particular on the specific use of the substance. A validation by ECHA seems not to be possible and it could create (enormous) additional burden and resource investment, both on authority side as on industry or stakeholder side. Whether the information could later be used for the purpose to improve chemical safety also seems questionable. No duplicate structures should be created. It is not understandable why ECHA should set up a database if the COM is already supposed to create and maintain a web portal in accordance with Article 14 ESPR or if ECHA has already set up the SCIP database according WFD. |
| 182b | Article 10a(1) | Object | see comment on Article 10a / Row 182a |
| 182c | Article 10a(2) | Object | see comment on Article 10a / Row 182a |
| 182s | Article 10a(3) | Object | see comment on Article 10a / Row 182a |
| 182e | Article 10b | Object | Concerning the addition of information on alternatives DE has concerns regarding data availability, practicality and added value. This question is not an inherent property of the substance, but depends in particular on the specific use of the substance. A validation by ECHA seems not to be possible and it could create (enormous) additional burden and resource investment, both on authority side as on industry or stakeholder side. Whether the information could later be used for the purpose to improve chemical safety also seems questionable. No duplicate structures should be created. It is not understandable why ECHA should set up a database if the COM is already supposed to create and maintain a web portal in accordance with Article 14 ESPR. |
| 182f | Article 10b(1) | Object | see comment on Article 10b / Row 182e |
| 182g | Article 10b(2) | Object | see comment on Article 10b / Row 182e |
| 182h | Article 10b(3) | Object | see comment on Article 10b / Row 182e |
| 182i | Article 10b(4) | Object | see comment on Article 10b / Row 182e |
| 185 | Article 11(2) | | |

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| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |
| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | Object | DE doubts the practicality and the added value of the uptake of research data (see comments on article 15a(a) and 15a(3)) |
| 234b | Article 15a(1) | Object | Without a validation DE doubts the added value of such a collection of data. A validation by ECHA seems not to be possible (see 234d). |
| 234c | Article 15a(2) | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 234d | Article 15a(3) | Object | ECHA is not - and should not become - a research agency. Therefore, validating research data should not be a task for ECHA, this task should remain a process for science and its institutions. In addition, fulfilling that task would first require ECHA to build up the necessary additional staff. DE questions whether these resources could be provided and would be well invested. |
| 234e | Article 15a(4) | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 234f | Article 15a(5) | Object | see comments on Article 15a, 15a(1) and 15a(3) / Row 234a, 234b and 234d |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |

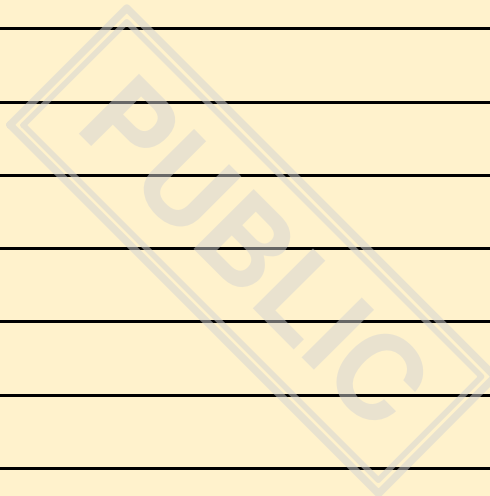
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| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |
| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | Scrutiny | General agreement. see our comments to article 21(6b) and 21(6c), Row 275b and 275 c |
| 271 | Article 21(2) | Scrutiny | General agreement, whereby it should generally be clarified what the triggers and frequency of studies should be to ensure the proper planning of complex HBM studies for all parties involved. see our comments to article 21(6b) and 21(6c), Row 275b and 275 c |
| 272 | Article 21(3) | Scrutiny | Explain, how unnessecary duplication of studies can be avoided. |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |

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| 275b | Article 21(6b) | Scrutiny | An assessment of possible further involvement of ECHA on conduction of Union-wide HBM studies is not possible because, aside from the frequency, a number of other questions need to be answered, including the provision of financial and personnel capacities and coordination with the MS. Would the participation of all MS be mandatory? In addition, ECHA is not - and should not become - a research agency. Fulfilling that task would create (enormous) additional burden for ECHA and first require ECHA to build up the necessary additional staff. DE questions – while also considering the respective explanations of Commission - whether these resources could be provided. |
| 275c | Article 21(6c) | Scrutiny | What is meant by "any" HBM study? Does this result in an obligation for all MS to participate in the regular EU-wide HBM studies (Art. 21 (6b))? Or does this proposal extend beyond that? Who provides the funds to support "any" HBM study, especially if they are to go beyond the cycles mentioned in Art. 21 (6b)? Efforts should be made to seek synergies with national studies, not only for cost reasons. In addition, ECHA is not - and should not become - a research agency. Fulfilling that task would create (enormous) additional burden for ECHA and first require ECHA to build up the necessary additional staff. DE questions – while also considering the respective explanations of Commission - whether these resources could be provided. |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |

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| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |
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| MS | Position |
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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | IRELAND | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | | IE support the wording in the Council Mandate. In particular, IE consider that rules on the transparency of data should be covered by the legislation which triggered the submission of the data to the CDP. |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | IE support the wording in the Council Mandate. IE note the EP proposal “...chemicals data on occurrence of chemicals submitted by Member States to Union agencies or the Commission in compliance with their reporting obligations and enforcement activities “. Member States have reporting obligations under various legislation and IE can support the inclusion of such data in the CDP, the expansion of this to cover enforcement activities is not supported. |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | | IE support the wording in the Council Mandate. As discussed at the Ad Hoc Working Party on One Substance One Assessment on 7 March, IE consider that the requirement for a database on chemicals in articles is already addressed by the requirements of the SCIP Database under the Waste Framework Directive. With respect to the EP proposal for a database on safer alternatives to substances of concern, IE consider that while in principle such a database would be useful in practice but would be difficult to implement and thus IE believe it is premature to specify it in this legislation. In addition, it should not be forgotten that an assessment of the suitability of alternatives has to be undertaken on a use specific basis and therefore it is also unclear how such a database would work in practice. |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | IE note the EP proposal that ECHA should host and be the data provider for workplace monitoring data, including “occupational human biomonitoring data”. Under Irish national OSH legislation, there is no requirement for companies to submit occupational human biomonitoring data to an Authority or Competent Authority.. While IE have no objection to ECHA hosting occupational human biomonitoring data provided they are given the necessary resources. It isn’t clear if such a measure would also necessitate a change to national legislation to require the national competent authority to collate the data or whether the intention is that such data, where available, would be submitted directly by companies to ECHA? Such a provision would place an administrative burden on companies (and member states if the |

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| | | | are expected to collate the data). In the context of this proposal has an impact analysis being undertaken? |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | | <p>IE support the wording in the Council Mandate.</p> <p>IE consider that the EP proposal that scientific studies which are not commissioned to support an application, notification or regulatory dossier do not need to be notified will be difficult to implement in practice. Studies may be done for research purposes but then ultimately can be used to support a regulatory dossier. Therefore, IE consider that this issue would be better addressed in guidance.</p> <p>In addition, IE consider that the EP proposal placing a legal requirement on ECHA to set up a mechanism to exchange information with authorities in third countries about studies that are notified or submitted for regulatory purposes outside the EU is outside the remit of an EU Agency.</p> |
| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | <p>IE support the wording in the Council Mandate.</p> <p>IE note the EP proposal "<i>Information on enforcement should be made public to enhance public trust in the effective implementation of Union law</i>". IE do not consider it appropriate to include data on enforcement actions within the CDP. In addition, it is not clear whether the EP proposal refers to enforcement of the provision of Article 22 of this draft regulation or enforcement of chemicals legislation more generally.</p> <p>In addition such a measure places an additional administrative burden on member states and does not align with a principle for simplification of EU legislation.</p> |
| 48 | Recital 36 | | |
| 48a | Recital 36a | | <p>IE support the Council Mandate to not include the EP proposal.</p> <p>As discussed at the Ad Hoc Working Party on One Substance One Assessment on 7 March, IE consider that the requirement for a database on chemicals in articles is already addressed by the requirements of the SCIP Database under the Waste Framework Directive.</p> <p>With respect to the EP proposal for a database on safer alternatives to substances of concern, IE consider that while in principle such a database would be useful in practice but would be difficult to implement and thus IE believe it is premature to specify it in this legislation. In addition, it should not be forgotten that an assessment of the suitability of alternatives has to be undertaken on a <u>use specific basis</u> and therefore it is also unclear how such a database would work in practice.</p> |
| 50 | Recital 38 | | <p>In principle, IE see merit in the EP proposal to apply a unique chemical identifier to each chemical in the CDP, which would facilitate the searchability of data. Such an approach is already applied by ECHA in the context of REACH registration data, but IE note that ECHA performs a substance identification check to ensure that chemicals within the ECHA database are identified correctly. Therefore, it is not clear whether the intention here is to automatically apply chemical identifiers (for example CAS number) or a process where chemical identifiers are verified. IE note the latter would significantly add to the workload of ECHA.</p> <p>With respect to the EP proposal for a chemical notation specifying the molecular structure, IE are of the view that this may be difficult to implement for all chemicals, in particular those with a complex composition, e.g. UVCBs (unknown or variable composition, complex reaction products) under REACH.</p> |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |

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| 55 | Recital 43 | | |
| 56 | Recital 44 | | IE support the wording in the Council Mandate. IE note the EP proposal with respect to any risk and warning signal identified in the EEA report that Authorities should "...provide justification when they decide not to proceed with any action.", IE consider that this requirement in particular would create an additional administrative burden on authorities. |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | IE support the wording in the Council Mandate. IE note the EP proposal with respect to samples of test material that "...ECHA should be given the necessary sample by the business operator, upon request." IE consider that the legal basis for a business operator to provide a sample to ECHA would need to be clarified. In addition, it may not always be clear who should provide the sample, for example where there are multiple business operators or where the chemical under consideration is a breakdown product. |
| 60a | Recital 48a | | IE support the Council Mandate to not include the EP proposal. While IE understand the important information that is harnessed by human biomonitoring, IE have strong reservations regarding the inclusion of a specific requirement in this legislation and consider that it would be overly burdensome on both the Agencies and Member States. IE are of the view that any proposal for an EU wide human biomonitoring programme would be better addressed in a standalone legislative proposal which could address the specificities associated with setting up biomonitoring programmes. In addition, IE consider that the data generation mechanism foreseen in Article 21 in principle already covers the possibility to commission a human biomonitoring study where deemed necessary. |
| 60b | Recital 48b | | IE support the Council Mandate to not include the EP proposal. IE do not consider that this regulation which deals specifically with the CDP is the place to review tasks associated with the use of the data by the EU Agencies. |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | IE support the Council Mandate to not include the EP proposal. IE consider that the EP proposal placing a legal requirement on ECHA to set up a mechanism to exchange information with authorities in third countries about studies that are notified or submitted for regulatory purposes outside the EU is outside the remit of an EU Agency. |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | IE support the wording in the Council Mandate. IE note in particular the EP proposal to include information related to the enforcement of chemicals. IE do not consider it appropriate to include data on enforcement actions within the CDP. In addition, it is not clear whether the EP proposal relates to enforcement of all chemical legislation listed in Annex I to the draft regulation. In addition such a measure places an additional administrative burden on member states and does not align with a principle for simplification of EU legislation. |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | | |
| 99b | Article 3(2), point (bb) | | IE support the Council Mandate to not include the EP proposal. While in principle IE see merit in the EP proposal to include academic research data in the CDP, IE have concerns that without implementation of a quality control mechanism this could lead to the CDP becoming unmanageable. The implementation of a quality control mechanism would put an additional significant burden on ECHA which IE do not consider appropriate, especially given the broad definition of "research data" proposed by the EP in line 89a. |
| 104a | Article 3(4a) | | IE support the Council Mandate to not include the EP proposal. In principle, IE see merit in the EP proposal to apply a unique chemical identifier to each chemical in the CDP, which would facilitate the searchability of data. Such an approach is already applied by ECHA in the context of REACH registration data, but IE note that ECHA |

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| | | | <p>performs a substance identification check to ensure that chemicals within the ECHA database are identified correctly. Therefore, it is not clear whether the intention here is to automatically apply chemical identifiers (for example CAS number) or a process where chemical identifiers are verified. IE note the latter would significantly add to the workload of ECHA.</p> <p>With respect to the EP proposal for a chemical notation specifying the molecular structure, IE are of the view that this may be difficult to implement for all chemicals, in particular those with a complex composition, e.g. UVCBs (unknown or variable composition, complex reaction products) under REACH.</p> |
| 109a | Article 3(5), point (da) | | <p>IE support the Council Mandate to not include the EP proposal.</p> <p>As discussed at the Ad Hoc Working Party on One Substance One Assessment on 7 March, IE consider that the requirement for a database on chemicals in articles is already addressed by the requirements of the SCIP Database under the Waste Framework Directive.</p> |
| 109b | Article 3(5), point (db) | | <p>IE support the Council Mandate to not include the EP proposal.</p> <p>In principle, IE agree that information on safer alternatives to substances of concern would be useful, in practice this may be difficult to implement and thus it may be premature to specify it in this legislation. In addition, it should not be forgotten that an assessment of the suitability of alternatives has to be undertaken on a <u>use specific basis</u> and therefore it is also unclear how such a database would work in practice.</p> |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | <p>IE support the wording in the Council Mandate.</p> <p>IE note the EP proposal that ECHA should host and be the data provider for workplace monitoring data, including “occupational human biomonitoring data Under Irish national OSH legislation, there is no requirement for companies to submit occupational human biomonitoring data to an Authority or Competent Authority..</p> <p>While IE have no objection to ECHA hosting occupational human biomonitoring data provided they are given the necessary resources. It isn’t clear if such a measure would also necessitate a change to national legislation to require the national competent authority to collate the data or whether the intention is that such data, where available, would be submitted directly by companies to ECHA?</p> <p>Such a provision would place an administrative burden on companies (and member states if the are expected to collate the data). In the context of this proposal has an impact analysis being undertaken?</p> |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |

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| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | IE support the Council Mandate to not include the EP proposal. |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | | IE support the Council Mandate to not include the EP proposal. IE consider that the EP proposal placing a legal requirement on ECHA to set up a mechanism to exchange information with authorities in third countries about studies that are notified or submitted for regulatory purposes outside the EU is outside the remit of an EU Agency. |

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| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |
| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | IE support the wording in the Council Mandate. The term “substance identity” is already used in chemicals legislation, for example REACH. |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | | |
| 182b | Article 10a(1) | | IE support the Council Mandate to not include the EP proposal. As discussed at the Ad Hoc Working Party on One Substance One Assessment on 7 March, IE consider that the requirement for a database on chemicals in articles is already addressed by the requirements of the SCIP Database under the Waste Framework Directive. |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | | IE support the Council Mandate to not include the EP proposal. In principle, IE agree that information on safer alternatives to substances of concern would be useful, in practice this may be difficult to implement and thus it may be premature to specify it in this legislation. In addition, any assessment of alternatives needs to be done on a use specific basis and therefore it is unclear how such a database would work in practice. |

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| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | | IE support the Council Mandate to not include the EP proposal. While in principle IE see merit in the EP proposal to include research data in the CDP, that the quality control mechanism proposed would put an additional burden on ECHA which IE do not consider appropriate, especially given the broad definition of “research data” proposed by the EP in line 89a. |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |

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| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | | IE support the wording in the Council Mandate. |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | | IE support the Council Mandate to not include the EP proposal. While IE understand the important information that is harnessed by human biomonitoring, IE have strong reservations regarding the inclusion of a specific requirement in this legislation and |

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| | | | consider that it would be overly burdensome on both the Agencies and Member States. IE are of the view that any proposal for an EU wide human biomonitoring programme would be better addressed in a standalone legislative proposal which could address the specificities associated with setting up biomonitoring programmes. In addition, IE consider that the data generation mechanism foreseen in this article in principle already covers the possibility to commission a human biomonitoring study where deemed necessary and therefore IE would prefer not to specify the types of studies in this article. |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | IE support the Council Mandate to not include the EP proposal. IE consider that the legal basis for a business operator to provide a sample to ECHA would need to be clarified. In addition, it may not always be clear who should provide the sample, for example where there are multiple business operators or where the chemical under consideration is a breakdown product. |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | IE support the Council Mandate to not include the EP proposal. While IE understand the important information that is harnessed by human biomonitoring, IE have strong reservations regarding the inclusion of a specific requirement in this legislation and consider that it would be overly burdensome on both the Agencies and Member States. IE are of the view that any proposal for an EU wide human biomonitoring programme would be better addressed in a standalone legislative proposal which could address the specificities associated with setting up biomonitoring programmes. |
| 275c | Article 21(6c) | | IE support the Council Mandate to not include the EP proposal. While IE understand the important information that is harnessed by human biomonitoring, IE have strong reservations regarding the inclusion of a specific requirement in this legislation and consider that it would be overly burdensome on both the Agencies and Member States. IE are of the view that any proposal for an EU wide human biomonitoring programme would be better addressed in a standalone legislative proposal which could address the specificities associated with setting up biomonitoring programmes. |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | IE support the Council Mandate to not include the EP proposal. IE consider that the EP proposal that scientific studies which are not commissioned to support an application, notification or regulatory dossier do not need to be notified will be difficult to implement in practice. Studies may be done for research purposes but then ultimately can be used to support a regulatory dossier. Therefore, IE consider that this issue would be better addressed in guidance. |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |

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| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

| 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 | |
| SIEden | |
| Select delegation | |



PUBLIC

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| File | DIRECTIVE a |
| Member State | |

| Row in table Annex I | Reference in the text | MS position |
|-----------------------------|------------------------------|--------------------|
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | Scrutiny |
| GENERAL | GENERAL | |

PUBLIC

as regards the re-attribution of scientific and technical tasks to the European Chemicals

Select delegation

MS comment

Unnecessary administrative burdens on businesses and ECHA need to be avoided

Appropriate safeguarding of confidential information submitted in the context of this obligation is also necessary to promote innovation.

We must seek to avoid duplication of processes for obtaining information on substances, the proposed Data Generation Mechanism should not overlap with existing mechanisms or duplicate existing processes already established in legislation, such as substance evaluation under REACH. This mechanism should only be used when there is a clear need for data that cannot be generated with

It is important that these new infrastructures that are created comply with all the safety and interoperability requirements that are demanded at European level so that they are not limited in

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.

Significant financial resources are required to conduct these studies, and there is a noticeable deficit in that regard. However, from our perspective, there is no deficit at the national level in terms of the scientific and technical capacity and expertise necessary to carry them out.

| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| | | SPAIN | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | In favor | Spain supports the inclusion " <i>and thereby contribute to ensuring that testing on animals only takes place as a last resort</i> ". |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | Object | Spain does not support the addition of " <i>and enforcement activities</i> ". |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | Scrutiny | We have doubts about the added value and the validity of a database on chemicals in articles and we need more clarity about the database on safer alternatives to substances of concern although we could concur with the initial purpose |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | Scrutiny | <p>This platform will hold all the information generated about chemicals, from properties, uses, exposure, to their regulatory status. However, it is considered that, of all the data generated, those data evaluated by authorities or agencies should prevail or be more visible.</p> <p>The platform should be prevented from becoming a data conglomerate that complicates finding reliable data for regulatory decision-making</p> <p>We are concerned about references to data provided by "other parties," "third parties," etc</p> <p>We are concerned about the responsibility for validating the data before its inclusion in the common Data Platform, and we would like to highlight that quality and robust information on the platform are essential.</p> |
| 34 | Recital 22 | Object | We question the addition of Amendment No 15. At the end of the paragraph, reference is made to '... as well as data on concentrations of chemicals in human matrices such as blood or urine ('human biomonitoring data') |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |

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| 36a | Recital 24a | | |
| 36b | Recital 24b | Scrutiny | We are worried about who will be responsible for the validation and the curation of the data prior to their inclusion in the common Data Platform and would like to stress that quality and robust information in the platform is critical. |
| 39 | Recital 27 | | |
| 40 | Recital 28 | Scrutiny | <p>On the amendments proposing modification of deadlines, we generally support maintaining the deadlines that had been agreed in the Council. In particular, to establish the database on the notification of studies of 24 to 18 months we do not support it because 24 months is the minimum to be able to launch it</p> <p>We are concerned about the reduction of deadlines (in particular, for establishing the database on the notification of studies from 24 to 18 months). We note that 24 months (as proposed by the Commission) would be the minimum period necessary for the implementation of this obligation, even for the industry, which will not even be able to begin preparations before ECHA does its part by establishing the practical provisions..</p> <p>We do not oppose to a mechanism of cooperation with third countries, but always maintaining the same criteria of confidentiality, relevance and robustness that are being demanded within the EU for such studies to be valid, for such studies to be carried out under norms or standards recognized in Europe and to be admitted in the legislative tools mentioned in Annex I. If a mechanism is to be created for the exchange of studies with third countries, we want to emphasize that it is essential to ensure the protection of intellectual property rights and confidential business information in the exchange.</p> |
| 42 | Recital 30 | Scrutiny | |
| 43 | Recital 31 | Scrutiny | |
| 45 | Recital 33 | Object | <p>we do not agree in principle with the addition of the end. What information on compliance should be made public should be qualified because it could compromise the commercial interests of companies. This has already caused some problems related to requesting information from ECHA on data derived from REACH-EN-FORCE inspection projects.</p> <p>Not in accordance with this inclusion. This database should facilitate compliance, but no information should be given about compliance.</p> |
| 48 | Recital 36 | In favor | We support. Transparency on animal testing is essential. |
| 48a | Recital 36a | Scrutiny | <p>This amendment is acceptable if it is limited to substances of higher concern. It is considered that integrating the information from the SCIP database, derived from Directive 2008/98/EC and the digital product passport in accordance with Regulation 2024/1781 is appropriate in order to give more visibility to the substances that raise the most concern in the articles that contain them.</p> <p>However, extending it to the rest of chemical substances is more complex, taking into account the difficulties that have been encountered when implementing the SCIP database. On the other hand, there is little legal basis for requiring the notification of chemicals in articles, which will result in little information available.</p> |
| 50 | Recital 38 | In favor | All right. The easier the identification of substances, the better |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | | |

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| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | In favor | In favor of avoiding animal testing |
| 70a | Article 1(2), point (ba) | Scrutiny | We do not oppose to a mechanism of cooperation with third countries, but always maintaining the same criteria of confidentiality, relevance and robustness that are being demanded within the EU for such studies to be valid, for such studies to be carried out under norms or standards recognized in Europe and to be admitted in the legislative tools mentioned in Annex I. If a mechanism is to be created for the exchange of studies with third countries, we want to emphasize that it is essential to ensure the protection of intellectual property rights and confidential business information in the exchange. |
| 77 | Article 2, first paragraph, point (2) | Object | Annex II should not be included as it is only for reference values in the Council document. |
| 85 | Article 2, first paragraph, point (10) | Object | Regarding and the enforcement thereof : We do not agree. Rationale: We have legal concerns that it may be interpreted that "enforcement" referring to ensuring compliance through monitoring, investigations, and the application of sanctions, could be subject to data or evaluations that are not specific to the legislation that determines and regulates such monitoring, investigation, and sanction application |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | Scrutiny | This platform will hold all the information generated about chemicals, from properties, uses, exposure, to their regulatory status. However, it is considered that, of all the data generated, those data evaluated by authorities or agencies should prevail or be more visible. The platform should be prevented from becoming a data conglomerate that complicates finding reliable data for regulatory decision-making |
| 99b | Article 3(2), point (bb) | Scrutiny | This platform will hold all the information generated about chemicals, from properties, uses, exposure, to their regulatory status. However, it is considered that, of all the data generated, those data evaluated by authorities or agencies should prevail or be more visible. The platform should be prevented from becoming a data conglomerate that complicates finding reliable data for regulatory decision-making |
| 104a | Article 3(4a) | In favor | All right. The easier the identification of substances, the better |
| 109a | Article 3(5), point (da) | Scrutiny | This amendment is acceptable if it is limited to the substances of higher concern. Integrating the information from the SCIP database, derived from Directive 2008/98/EC and the Digital Product Passport in accordance with Regulation 2024/1781, is considered to be appropriate in order to give more visibility to substances of greatest concern in articles containing them. However, extending it to other chemicals is more complex, taking into account the difficulties that have been experienced when implementing the SCIP database. On the other hand, there is little legal basis for requiring the notification of chemicals in articles, which will result in little information being available. |
| 109b | Article 3(5), point (db) | In favor | |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |

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| 118 | Article 3(11) | Object | We prefer to keep 'without undue delay' to set the 30-day period |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | Scrutiny | If a mechanism is to be created for the exchange of studies with third countries, we want to emphasize that it is essential to ensure the protection of intellectual property rights and confidential business information in the exchange. |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | Object | We question the need for "national". It would already be covered by "Union". |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | Object | We prefer the wording of the text agreed in the Council "EEA shall cooperate with the ECHA". |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |
| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |

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| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | Scrutiny | <p>We do not oppose to a mechanism of cooperation with third countries, but always maintaining the same criteria of confidentiality, relevance and robustness that are being demanded within the EU for such studies to be valid, for such studies to be carried out under norms or standards recognized in Europe and to be admitted in the legislative tools mentioned in Annex I.</p> <p>If a mechanism is to be created for the exchange of studies with third countries, we want to emphasize that it is essential to ensure the protection of intellectual property rights and confidential business information in the exchange.</p> <p>However. We have to take into account the regulatory frameworks in which we are working, and not all third countries have the same legislation</p> |
| 168 | Article 9(2) | Scrutiny | <p>We do not oppose to a mechanism of cooperation with third countries, but always maintaining the same criteria of confidentiality, relevance and robustness that are being demanded within the EU for such studies to be valid, for such studies to be carried out under norms or standards recognized in Europe and to be admitted in the legislative tools mentioned in Annex I.</p> |
| 169 | Article 9(3) | Object | we disagree. There are some decisions that are public, so not all study notifications shall not be made public. |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

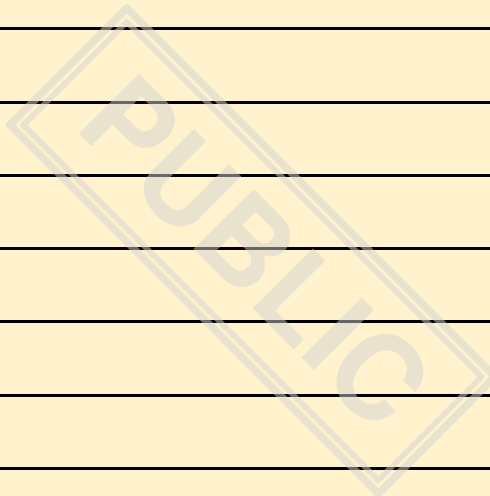
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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | In favor | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | Scrutiny | <p>This amendment is acceptable if it is limited to substances of higher concern. It is considered that integrating the information from the SCIP database, derived from Directive 2008/98/EC and the digital product passport in accordance with Regulation 2024/1781 is appropriate in order to give more visibility to the substances that raise the most concern in the articles that contain them.</p> <p>However, extending it to the rest of chemical substances is more complex, taking into account the difficulties that have been encountered when implementing the SCIP database. On the other hand, there is little legal basis for requiring the notification of chemicals in articles, which will result in little information available.</p> |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182d | Article 10a(3) | | |
| 182e | Article 10b | Scrutiny | |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | Object | We prefer to keep the wording "Commission or Agencies". |
| 193 | Article 13(3) | Object | We prefer to keep the "Union framework" drafting |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | Object | We prefer to keep the drafting "Commission and the Agencies". |

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| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |
| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | Neutral | Keep in mind that the data must be validated. |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | Object | We do not agree to include "enforcement" |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |

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| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |
| 258 | Article 19(4) | Object | <p><i>Regarding, within six months of the presentation of the report, the Authorities shall undertake regulatory, policy or enforcement actions accordingly or provide justification if they decide not to proceed with any action related to any of the early warning signals identified by the report, including an assessment of the possible consequences of non-action.:</i></p> <p>we disagree. The authorities should consider taking measures, but they should not be obliged to it</p> |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | - | |
| 270b | Article 21(1), point (b) | - | |
| 270c | Article 21(1), point (c) | Scrutiny | <p>A programme on Human Biomonitoring proposed in the legal framework in Article 21 is good news at European level. The situation would be even better if the legislation included recurrent cycles in the biomonitoring programme, such as with this amendment.</p> <p>ECHA may conduct an EU-wide human biomonitoring data sampling survey every 5 years in cooperation with Member States. The Member States should cooperate with the Agencies to organise the human bio-monitoring in their respective territories, in terms of planning, coordination, collection and transmission of samples</p> <p>There is scientific and technic experience in the EU to carry out this programme although it should be considered whether this is the right legal instrument to impose this obligation and the economic resources.</p> |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | In favor | We agree with the European Parliament that the scientific studies referred to in the Article carried out by ECHA should give priority to the use of non-animal methods of experimentation. |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | Scrutiny | <p>A programme on Human Biomonitoring proposed in the legal framework in Article 21 is good news at European level. The situation would be even better if the legislation included recurrent cycles in the biomonitoring programme, such as with this amendment.</p> <p>ECHA may conduct an EU-wide human biomonitoring data sampling survey every 5 years in cooperation with Member States. The Member States should cooperate with the Agencies to organise the human bio-monitoring in their respective territories, in terms of planning, coordination, collection and transmission of samples</p> <p>. There is scientific and technic experience in the EU to carry out this programme although it should be considered whether this is the right legal instrument to impose this obligation and the economic resources.</p> |

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| 275c | Article 21(6c) | Scrutiny | A programme on Human Biomonitoring proposed in the legal framework in Article 21 is good news at European level. The situation would be even better if the legislation included recurrent cycles in the biomonitoring programme, such as with this amendment. ECHA may conduct an EU-wide human biomonitoring data sampling survey every 5 years in cooperation with Member States. The Member States should cooperate with the Agencies to organise the human bio-monitoring in their respective territories, in terms of planning, coordination, collection and transmission of samples . There is scientific and technic experience in the EU to carry out this programme although it should be cosidered whether this is the right legal instrument to impose this obligation and the economic resources. |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | Scrutiny | We are worried about who will be responsible for the validation and the curation of the data prior to their inclusion in the common Data Platform and would like to stress that quality and robust information in the platform is critical. |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |

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| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |
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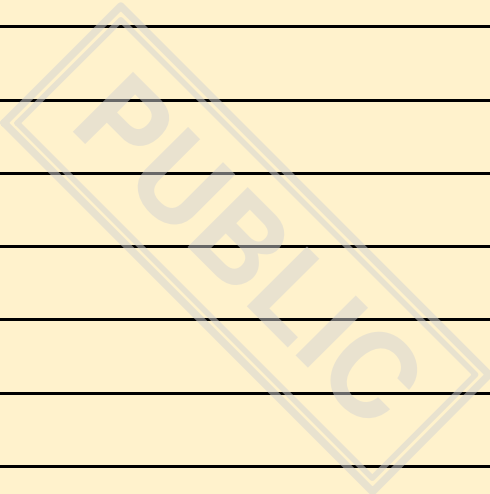
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| MS | Position |
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| Austria | - |
| Belgium | In favor |
| Bulgaria | Object |
| Croatia | Neutral |
| Republic of Cyprus | Scrutiny |
| Czech Republic | |
| Denmark | |
| Estonia | |
| Finland | |
| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|------------|
| Member State | | FRANCE | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | | |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | | |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | | |

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| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | | |
| 50 | Recital 38 | | |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | | |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | Object | FR is not in favor the Parliament's proposal to add to the platform any additional data provided on a voluntary basis by Member States, national agencies, research institutes or other parties. FR considers that Agencies should assess whether or not the data provided should be included in the platform to ensure the quality of data. This preferred option is already in article 5 of the Council mandate. |
| 99b | Article 3(2), point (bb) | Object | FR is not in favor the Parliament's proposal to add to the platform any additional data provided on a voluntary basis by Member States, national agencies, research institutes or other parties. FR considers that Agencies should assess whether or not the data provided should be included in the platform to ensure the quality of data. This preferred option is already in article 5 of the Council mandate. |
| 104a | Article 3(4a) | Object | FR is not in favor the Parliament's proposal to introduce a unique chemical identifier. FR considers that the existing identifiers should be used. |

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| 109a | Article 3(5), point (da) | In favor | FR is in favor the Parliament's proposal to add a dedicated service for information on chemicals in articles to the platform. FR reiterates the importance to ensure the readability of the information in particular for consumers and to link this service with the other tools that provide similar information (SCID database and Digital Product Passport). |
| 109b | Article 3(5), point (db) | Scrutiny | FR considers the Parliament's proposal interesting, but the notion of "sarer" alternatives seems difficult to characterise in a general context and raises questions about the very broad scope proposed, which includes all substances of concern as defined in the ecodesign regulation. FR questions the availability of such data in the current regulations. Also, the question of alternatives is |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | - | FR considers the Parliament's proposal that researchers or research consortia should provide human biomonitoring data from national programmes interesting. |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | Object | FR is not in favor the Parliament's proposal to include Member States authorities and national agencies in the management of the platform's data flows. |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | Object | FR is not in favor the Parliament's proposal to include Member States authorities and national agencies in the management of the platform's data flows. |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | In favor | FR is in favor the Parliament's proposal to allow EU-OSHA to process human biomonitoring data constituting personal data for the purposes mentioned. |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | In favor | FR is in favor the Parliament's proposal to include in the repository of reference values any reference value generated as part of Union, national or international programmes or research activities and made available to ECHA in the standard formats. |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | In favor | FR is in favour the Parliament's proposal to add a dedicated service for information on chemicals in articles to the platform. FR reiterates the importance to ensure the readability of the information in particular for consumers and to link this service with the other tools that provide similar information (ECIP database and Digital Product Passport). |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | Scrutiny | FR considers the Parliament's proposal interesting, but the notion of "safer" alternatives seems difficult to characterise in a general context and raises questions about the very broad scope proposed, which includes all substances of concern as defined in the ecodesign regulation. FR questions the availability of such data in the current regulations. Also, the question of alternatives is |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | Object | FR is not in favor the Parliament's proposal to include Member States authorities and national agencies in the management and the sourcing of the platform's data flows on environmental sustainability data. |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | Object | FR is not in favor the Parliament's proposal to include Member States authorities and national agencies in the management of the platform's data flows. |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 234b | Article 15a(1) | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 234c | Article 15a(2) | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 234d | Article 15a(3) | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 234e | Article 15a(4) | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 234f | Article 15a(5) | - | FR questions the benefit of such a mechanism notably compared to the resources needed to implement it and considering the ongoing work at JRC. |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | | |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | Scrutiny | FR supports the principle of conducting biomonitoring studies at European level and considers it important to perpetuate existing biomonitoring programmes. Consideration was given to the feasibility of a European biomonitoring programme and to the estimate of the associated costs compared to the allocated budget of Agencies within the framework of the data generation |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |

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| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | - | FR is flexible on the deadline for applying the new provisions on notifications of study. |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | In favor | FR is in favor the Parliament's proposal to include the data held by the EMA resulting from procedures concluded before the entry into force of this Regulation into the platform. |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | In favor | FR is in favor the Parliament's proposal to include the data held by the EMA resulting from procedures concluded before the entry into force of this Regulation into the platform. |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|---|
| Member State | | ITALY | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | Neutral | |
| 14 | Recital 2 | | |
| 16 | Recital 4 | | |
| 18 | Recital 6 | In favor | |
| 19 | Recital 7 | | EP proposal is partially acceptable (the enforcement data like on Reach and CLP seem out the scope of the Platform) |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | In favor | |
| 29 | Recital 17 | | |
| 30 | Recital 18 | | |
| 31 | Recital 19 | In favor | |
| 33 | Recital 21 | in favor | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | Scrutiny | |

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| 42 | Recital 30 | Scrutiny | |
| 43 | Recital 31 | Scrutiny | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | - | <p>if ECHA receives opportune resources to be involved in database that integrates SCIP and the data of digital passport we could agree with EP proposal.</p> <p>Concerning the database of safer alternatives, it could be too challenging (doubts on quality and quantity of available information, different data sources etc.)</p> <p>We believe it is not necessary because chemical substances already have their numerical identifiers (CAS, CE, n. index for substances with harmonized classification), other numbers can generate confusion.</p> <p>As regards the molecular structure, this is possible for the "main" substance but sometimes in the concept/definition of substance in the REACH regulation there are also impurities, additives, or</p> |
| 50 | Recital 38 | Object | |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | In favor | |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | In favor | |
| 70a | Article 1(2), point (ba) | Scrutiny | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | EP proposal is partially acceptable (the enforcement data like on Reach and CLP seem out the scope of the Platform) |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | In favor | |
| 99b | Article 3(2), point (bb) | In favor | |
| 104a | Article 3(4a) | Object | |

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|------|--------------------------|----------|---|
| 109a | Article 3(5), point (da) | Neutral | We could support an integrated database (SCIP+EPSR) if ECHA receives adequate resources. |
| 109b | Article 3(5), point (db) | Scrutiny | Interesting but difficult to implement since the information on alternatives is the know-how of research centers, competitors. Information is declared in the the authorization /restriction process under reach regulation but it is related to some substances so the database would risk to be incomplete. |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |

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|------|---|----------|--|
| 150a | Article 6(3a), first subparagraph, point (ea) | | |
| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | Scrutiny | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |

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| 174j | Article 10(2), point (c) | | |
| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | Neutral | |
| 182b | Article 10a(1) | Neutral | |
| 182c | Article 10a(2) | Neutral | |
| 182d | Article 10a(3) | Neutral | |
| 182e | Article 10b | Scrutiny | EP proposal appears difficult to be supported because the information on alternatives known to the MS/Agencies could be not sufficient to create a database. The know-how in alternatives belongs to companies, research centres, competitors... |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |

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| 215b | Article 14(5), point (ib) | | |
| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | | |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | Scrutiny | It would be necessary to understand what types of enforcement data are being referred to and whether it is possible to specify them in more detail. |
| 255c | Article 19(2), first subparagraph, point (ec) | | |

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|------|--|----------|--|
| 257 | Article 19(3) | | |
| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | In favor | |
| 270a | Article 21(1), point (a) | In favor | |
| 270b | Article 21(1), point (b) | In favor | |
| 270c | Article 21(1), point (c) | In favor | |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |

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| 280 | Article 22(2) | | |
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |

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| 431c | Annex IIIa, paragraph 1 | | |
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| MS | Position |
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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|------------|
| Member State | | REPUBLIC OF CYPRUS | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | | |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | | |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | | |

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| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | | |
| 50 | Recital 38 | | |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | | |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | | |
| 99b | Article 3(2), point (bb) | | |
| 104a | Article 3(4a) | | |

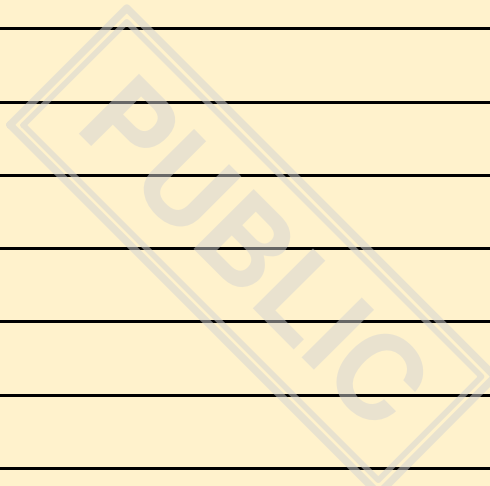
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| 109a | Article 3(5), point (da) | | |
| 109b | Article 3(5), point (db) | | |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | | |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | | |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | Cyprus disagrees with the suggestion of the EP to involve National Authorities in holding a database on environmental sustainability related data. As a general comment, we disagree with any extra involvement of the National Authorities that will increase the administrative burden especially to small MS like Cyprus. |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | | |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |



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| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | | |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |

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|------|-------------------------------|--|--|
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | HUNGARY | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | Neutral | |
| 14 | Recital 2 | Neutral | |
| 16 | Recital 4 | Neutral | |
| 18 | Recital 6 | Neutral | |
| 19 | Recital 7 | Neutral | |
| 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 | Object | In our opinion, cooperation with third countries would impose an unjustified administrative burden on ECHA. Regarding the studies that shall not be notified see our comment for 279c. |

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| 42 | Recital 30 | Neutral | |
| 43 | Recital 31 | Neutral | |
| 45 | Recital 33 | Neutral | |
| 48 | Recital 36 | Neutral | |
| 48a | Recital 36a | Neutral | |
| 50 | Recital 38 | Neutral | Hungary is of the opinion that the use of a CAS or EC number is sufficient to identify a substance accurately. Therefore the introduction of the proposed unique chemical identifier and chemical notation is unnecessary and may impose an unjustified administrative burden. |
| 53a | Recital 41a | Neutral | |
| 54 | Recital 42 | Neutral | |
| 55 | Recital 43 | Neutral | |
| 56 | Recital 44 | Scrutiny | The proposal needs more clarity on the technicalities. It can be assumed that such an event will affect multiple Member States. Which Member States need to take action? A coordinated response would be more effective and would not impose additional administrative burdens on the Member States. |
| 58 | Recital 46 | Neutral | |
| 60 | Recital 48 | Neutral | |
| 60a | Recital 48a | In favor | Hungary recognises the importance of human biomonitoring data collection to improve chemical safety at EU level. However, the question arises as to how the research would be funded. We believe that the clarification of this issue is very important for the feasibility of the proposal. Furthermore, we do not consider it appropriate to burden ECHA with additional tasks, so it should be examined where this task can be carried out efficiently. Relying on existing initiatives e.g. PARC would be more efficient. |
| 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) | Object | Hungary considers that the proposed addition goes beyond the original purpose of the data platform and has reservations. Furthermore, the question of credibility arises, i.e. Where or from whom would the information on safer alternatives come from? What would be considered safer? What would be the ranking of the hazards? Furthermore, without a clear identification of sources, the feasibility of the proposal is questionable. In addition, alternatives are usually use-specific, i.e. they are designed to achieve a desired function in a different way, which can therefore vary from application to application. For this reason, alternatives should not necessarily be linked to the substances but to the functions served. |
| 89a | Article 2, first paragraph, point (11a) | Neutral | |

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| 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) | - | Hungary is of the opinion that the use of a CAS or EC number is sufficient to identify a substance accurately. The introduction of the proposed unique chemical identifier and chemical notation may impose an unjustified administrative burden. |
| 109a | Article 3(5), point (da) | Neutral | |
| 109b | Article 3(5), point (db) | Object | Hungary considers that the proposed addition goes beyond the original purpose of the data platform and has reservations. Furthermore, the question of credibility arises, i.e. Where or from whom would the information on safer alternatives come from? What would be considered safer? What would be the ranking of the hazards? Furthermore, without a clear identification of sources, the feasibility of the proposal is questionable. In addition, alternatives are usually use-specific, i.e. they are designed to achieve a desired function in a different way, which can therefore vary from application to application. For this reason, alternatives should not necessarily be linked to the substances but to the functions served. |
| 113 | Article 3(6) | Neutral | |
| 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 | |

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| 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) | Object | In our opinion, this would impose an unjustified administrative burden on ECHA. Furthermore, the feasibility would be questionable, and it would not be effective if an agreement had to be reached with every relevant third country. |
| 168 | Article 9(2) | Neutral | |
| 169 | Article 9(3) | Neutral | |
| 170a | Article 9(4a) | Neutral | |
| 170b | Article 9(4b) | Neutral | |

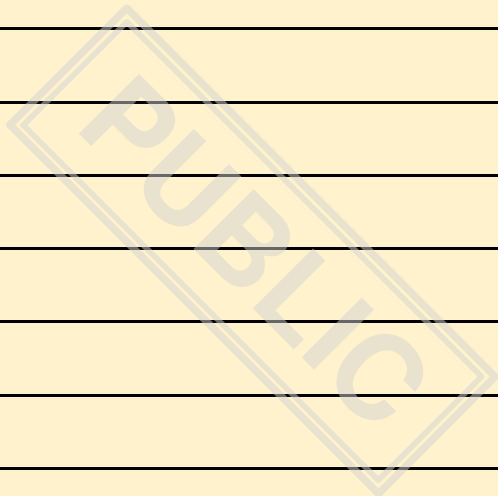
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| 170c | Article 9(4c) | Neutral | |
| 173 | Article 10(1) | Neutral | |
| 174 | Article 10(1a), first subparagraph | Neutral | |
| 174h | Article 10(2), point (a) | Neutral | |
| 174i | Article 10(2), point (b) | Neutral | |
| 174j | Article 10(2), 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) | Neutral | |
| 182c | Article 10a(2) | Neutral | |
| 182s | Article 10a(3) | Neutral | |
| 182e | Article 10b | Neutral | |
| 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 | |

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| 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 | |

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|------|---|----------|---|
| 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 | It can be assumed that such an event will affect multiple Member States. Which Member States need to take action? A coordinated response would be more effective and would not impose additional administrative burdens on the Member States. |
| 258a | Article 19(4a) | Neutral | |
| 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) | In favor | Hungary recognises the importance of human biomonitoring data collection to improve chemical safety at EU level. However, the question arises as to how the research would be funded. We believe that the clarification of this issue is very important for the feasibility of the proposal. Furthermore, we do not consider it appropriate to burden ECHA with additional tasks, so it should be examined where this task can be carried out efficiently. Relying on existing initiatives e.g. PARC would be more efficient. |
| 271 | Article 21(2) | Neutral | |
| 272 | Article 21(3) | Neutral | |
| 272a | Article 21(3a) | Object | The proposal goes beyond the original purpose of the common data platform and also raises practical concerns, e.g. storage of the samples. |
| 274 | Article 21(5) | Neutral | |
| 275a | Article 21(6a) | Neutral | |
| 275b | Article 21(6b) | Neutral | |

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| 275c | Article 21(6c) | Neutral | |
| 279 | Article 22(1) | Object | In our view, the Council's proposal is more precise and covers well the exceptions as well. |
| 279a | Article 22(-1), second subparagraph | Object | |
| 279b | Article 22(-1), second subparagraph, point (a) | Object | |
| 279c | Article 22(-1), second subparagraph, point (b) | Object | |
| 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 | |

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|------|----------------------------|---------|--|
| 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 | |
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| MS | Position |
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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|---|
| Member State | | AUSTRIA | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | | |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | | |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | AT prefers to keep the text from the council mandate and therefore keep the sentence: "For a reference value for the carcinogenic effect of a chemical for which no maximum exposure level can be specified below which no harmful effects on human health are to be expected, the statistical cancer risk associated with that reference value should also be specified, if available." It explicitly mentions |
| 40 | Recital 28 | | |

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| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | | |
| 50 | Recital 38 | | |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | | |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | | |
| 99b | Article 3(2), point (bb) | | |
| 104a | Article 3(4a) | | |

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| 109a | Article 3(5), point (da) | | |
| 109b | Article 3(5), point (db) | | |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | AT prefers to keep the text as stated in the council mandate. The tasks in connection with the Common Data Platform are generally seen as lying more with the EC and the EU agencies and less with national authorities and agencies. |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | AT prefers to keep the text as stated in the council mandate. The tasks in connection with the Common Data Platform are generally seen as lying more with the EC and the EU agencies and less with national authorities and agencies. |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

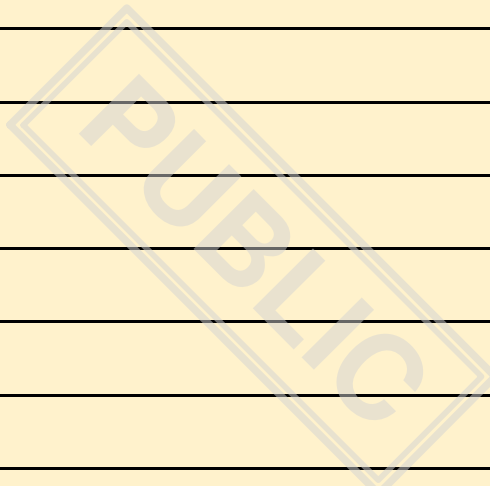
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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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|-------------|---------------------------|--|---|
| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | | |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | | |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | AT prefers to keep the text as stated in the council mandate. The tasks in connection with the Common Data Platform are generally seen as lying more with the EC and the EU agencies and less with national authorities and agencies. |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | AT prefers to keep the text as stated in the council mandate. The tasks in connection with the Common Data Platform are generally seen as lying more with the EC and the EU agencies and less with national authorities and agencies. |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | | |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | | |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |

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| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |



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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|------------|
| Member State | | PORTUGAL | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | | |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | | |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | | |

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| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | In favor | We are flexible. |
| 50 | Recital 38 | In favor | We consider that the proposal concerning the identification of the chemist by means of the UCI and the "chemical notation specifying its molecular structure" is acceptable, although for certain more complex substances, such as MOCS, further details on the identifier are needed. |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. |
| 56 | Recital 44 | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | In favor | We are flexible. |
| 60b | Recital 48b | In favor | We are flexible. |
| 60c | Recital 48c | In favor | We are flexible. |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | Scrutiny | Regarding the inclusion of the "enforcement" in the definition of "chemical data", we would like to have more information on the data flow associated. |
| 89a | Article 2, first paragraph, point (11a) | | |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | Neutral | |
| 99b | Article 3(2), point (bb) | Neutral | |
| 104a | Article 3(4a) | In favor | We consider that the proposal concerning the identification of the chemist by means of the UCI and the "chemical notation specifying its molecular structure" is acceptable, although for certain more complex substances, such as MOCS, further details on the identifier are needed. |

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| 109a | Article 3(5), point (da) | In favor | We are flexible. |
| 109b | Article 3(5), point (db) | In favor | We are flexible. |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | | |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | Scrutiny | We have some concerns whether the additional workload associated with these new provisions will have the correspondent added value. |
| 168 | Article 9(2) | Scrutiny | We have some concerns whether the additional workload associated with these new provisions will have the correspondent added value. |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | In favor | In our opinion the confidentiality level shall be in accordance with the provisions regarding confidentiality under the originating Union act. |
| 170b | Article 9(4b) | In favor | In our opinion the confidentiality level shall be in accordance with the provisions regarding confidentiality under the originating Union act. |
| 170c | Article 9(4c) | In favor | We agree with the reference that Authorities and national enforcement authorities shall have access to the data contained in the Database of Study Notifications before those data are integrated in the common data platform. We believe, however, that the wording can be improved: we propose to substitute the segment "authorities and national enforcement authorities" to "...national authorities, including enforcement authorities...". |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | In favor | We are flexible. |
| 182b | Article 10a(1) | In favor | We are flexible. |
| 182c | Article 10a(2) | In favor | We are flexible. |
| 182s | Article 10a(3) | In favor | We are flexible. |
| 182e | Article 10b | In favor | We are flexible. |
| 182f | Article 10b(1) | In favor | We are flexible. |
| 182g | Article 10b(2) | In favor | We are flexible. |
| 182h | Article 10b(3) | In favor | We are flexible. |
| 182i | Article 10b(4) | In favor | We are flexible. |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234a | Article 15a | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234b | Article 15a(1) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234c | Article 15a(2) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234d | Article 15a(3) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234e | Article 15a(4) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 234f | Article 15a(5) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. We agree with the COM that some assertiveness that was assured by the initial proposal can be lost when these new tasks are delegated to ECHA and the other agencies. |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | Scrutiny | We have concerns about the clarity and the administrative burden related with these proposals. |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | In favor | We agree with this amendment. |
| 270b | Article 21(1), point (b) | In favor | We agree with this amendment. |
| 270c | Article 21(1), point (c) | In favor | This amendment seems to be an added value in view of the importance of the results/conclusions human biomonitoring studies carried out in the EU have, for instance when pointing out different hazardous chemicals, combined exposure and risks in humans. |
| 271 | Article 21(2) | In favor | We are in favour, although we believe that the wording could be more clear. In this sense, we propose the following amendment: "Member States may request the Commission to request the ECHA to commission such scientific studies". |
| 272 | Article 21(3) | In favor | We agree with this amendment. |
| 272a | Article 21(3a) | Neutral | |
| 274 | Article 21(5) | Object | We prefer the Council Mandate version since establishes that the Member States consultation shall be prior to commissioning those scientific studies. |
| 275a | Article 21(6a) | In favor | We agree with this amendment. |
| 275b | Article 21(6b) | Neutral | Due to the significative impact of this proposal time frequency could be increased to 7 years. |
| 275c | Article 21(6c) | Neutral | |
| 279 | Article 22(1) | In favor | |
| 279a | Article 22(-1), second subparagraph | In favor | We agree with the amendement. |
| 279b | Article 22(-1), second subparagraph, point (a) | In favor | We agree with the amendement. |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | Scrutiny | "Without delay" is a vague term and therefore it is difficult to understand exactly from which point on business operators must provide a valid justification. It might also create distortions between MS on the implementation of this provision if some authorities are more "permissive" on the interpretation of the term "without delay" than the others. |
| 280 | Article 22(2) | In favor | |

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|------|-------------------------------|----------|------------------------------|
| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | In favor | |
| 303b | Article 26a, first paragraph | In favor | |
| 303c | Article 26a, second paragraph | In favor | |
| 303d | Article 26a, third paragraph | In favor | |
| 303e | Article 26a, fourth paragraph | In favor | |
| 303f | Article 26a, fifth paragraph | In favor | |
| 303g | Article 26a, sixth paragraph | In favor | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | In favor | We agree with the amendment. |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

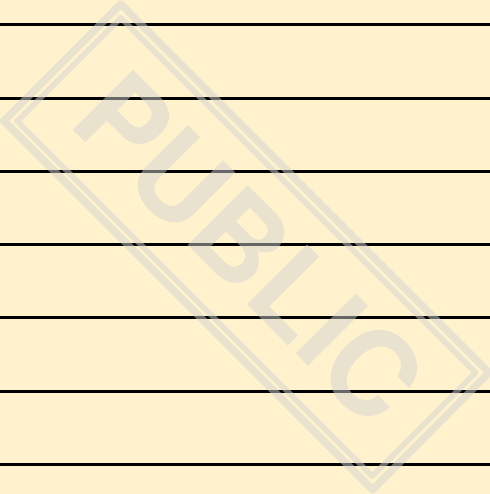
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| MS | Position |
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| Austria | - |
| Belgium | In favor |
| Bulgaria | Object |
| Croatia | Neutral |
| Republic of Cyprus | Scrutiny |
| Czech Republic | |
| Denmark | |
| Estonia | |
| Finland | |
| 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 | | ROMANIA | |
| 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 | |

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| 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 | |

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| 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 | |

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| 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 | |

PUBLIC

| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|------------|
| Member State | | SLOVENIA | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | - | |
| 14 | Recital 2 | - | |
| 16 | Recital 4 | - | |
| 18 | Recital 6 | - | |
| 19 | Recital 7 | - | |
| 20 | Recital 8 | - | |
| 21 | Recital 9 | - | |
| 21a | Recital 9a | - | |
| 24 | Recital 12 | - | |
| 26 | Recital 14 | - | |
| 29 | Recital 17 | - | |
| 30 | Recital 18 | - | |
| 31 | Recital 19 | - | |
| 33 | Recital 21 | - | |
| 34 | Recital 22 | - | |
| 35 | Recital 23 | - | |
| 36 | Recital 24 | Neutral | |
| 36a | Recital 24a | Neutral | |
| 36b | Recital 24b | Neutral | |
| 39 | Recital 27 | Neutral | |
| 40 | Recital 28 | Neutral | |

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|------|---|----------|--|
| 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 | - | |
| 54 | Recital 42 | - | |
| 55 | Recital 43 | - | |
| 56 | Recital 44 | - | |
| 58 | Recital 46 | - | |
| 60 | Recital 48 | - | |
| 60a | Recital 48a | - | |
| 60b | Recital 48b | - | |
| 60c | Recital 48c | - | |
| 67 | Article 1(1) | - | |
| 70a | Article 1(2), point (ba) | - | |
| 77 | Article 2, first paragraph, point (2) | - | |
| 85 | Article 2, first paragraph, point (10) | - | |
| 89a | Article 2, first paragraph, point (11a) | - | |
| 92a | Article 2, first paragraph, point (14a) | - | |
| 99a | Article 3(2), point (ba) | - | |
| 99b | Article 3(2), point (bb) | - | |
| 104a | Article 3(4a) | Scrutiny | We can support if it is possible to implement. Can be very positive. |

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| 109a | Article 3(5), point (da) | Object | |
| 109b | Article 3(5), point (db) | In favor | |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | Neutral | SI prefers Council General approach. |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | - | EP amendment and Council General approach - there is no difference. |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | Object | Realisation is not possible. There are a lot of data on occupational human biomonitoring data available in Slovenia but they are payed by employers and kept by employers. A periodical is different. The methodology is not defined. It is not defined when sample needs to be taken. How you can force the employers to send that data to ECHA? Employees would be trusting national |
| 136 | Article 5(5) | In favor | |
| 137 | Article 5(6) | Scrutiny | |
| 138 | Article 5(7) | In favor | It is reasonable and possible to implement. |
| 139 | Article 5(8) | - | |
| 140 | Article 5(9) | Neutral | |
| 140a | Article 5(9a) | In favor | |
| 140b | Article 5(9b) | In favor | |
| 142 | Article 6(1) | In favor | |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | In favor | |
| 150h | Article 6(4b) | Neutral | |
| 150i | Article 6(4c) | - | We do not see the difference Council General Approach vs EP amendment |
| 150j | Article 6(4d) | - | |
| 150k | Article 6(4e) | In favor | |
| 151 | Article 6(5) | In favor | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | Neutral | |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | | |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | | |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | In favor | |
| 234b | Article 15a(1) | In favor | |
| 234c | Article 15a(2) | In favor | |
| 234d | Article 15a(3) | In favor | |
| 234e | Article 15a(4) | In favor | |
| 234f | Article 15a(5) | In favor | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | In favor | |
| 246a | Article 18(1a) | In favor | |
| 247 | Article 18(2) | In favor | |
| 252 | Article 19(2), first subparagraph, point (b) | In favor | |
| 253 | Article 19(2), first subparagraph, point (c) | In favor | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | | |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |

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| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | Neutral | 18 months is a short period. We would still prefer 24 months and not 18 as proposed by 24. |
| 285 | Article 22(7) | In favor | Reasonable proposal. |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | In favor | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

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| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | SLOVAKIA | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | | |
| 14 | Recital 2 | Object | We consider the Council proposal appropriate |
| 16 | Recital 4 | | |
| 18 | Recital 6 | | |
| 19 | Recital 7 | | |
| 20 | Recital 8 | | |
| 21 | Recital 9 | | |
| 21a | Recital 9a | | |
| 24 | Recital 12 | | |
| 26 | Recital 14 | | |
| 29 | Recital 17 | Object | we support Council mandate. we do not support inclusion of a database on chemicals in articles as well as a database on safer alternatives to substances of concern. In the context of ambitious proposals for expanding the platform we should find balance approach between the significant resource spent on its establishment and the value gained in terms of data usability. |
| 30 | Recital 18 | | |
| 31 | Recital 19 | | |
| 33 | Recital 21 | | |
| 34 | Recital 22 | | |
| 35 | Recital 23 | | |
| 36 | Recital 24 | | |
| 36a | Recital 24a | | |
| 36b | Recital 24b | | |
| 39 | Recital 27 | | |
| 40 | Recital 28 | | |

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| 42 | Recital 30 | | |
| 43 | Recital 31 | | |
| 45 | Recital 33 | | |
| 48 | Recital 36 | | |
| 48a | Recital 36a | | |
| 50 | Recital 38 | Object | We support Council mandate. Current chemical identifier by CAS, EC...we consider sufficient |
| 53a | Recital 41a | | |
| 54 | Recital 42 | | |
| 55 | Recital 43 | | |
| 56 | Recital 44 | | |
| 58 | Recital 46 | | |
| 60 | Recital 48 | | |
| 60a | Recital 48a | | |
| 60b | Recital 48b | | |
| 60c | Recital 48c | | |
| 67 | Article 1(1) | | |
| 70a | Article 1(2), point (ba) | | |
| 77 | Article 2, first paragraph, point (2) | | |
| 85 | Article 2, first paragraph, point (10) | | |
| 89a | Article 2, first paragraph, point (11a) | Object | We support Council mandate that we consider appropriate as definition of chemical data |
| 92a | Article 2, first paragraph, point (14a) | | |
| 99a | Article 3(2), point (ba) | | |
| 99b | Article 3(2), point (bb) | | |
| 104a | Article 3(4a) | | |

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| 109a | Article 3(5), point (da) | Object | we support Council mandate. we do not support inclusion of a database on chemicals in articles as well as a database on safer alternatives to substances of concern. In the context of ambitious proposals for expanding the platform we should find balance approach between the significant resources spent on its establishment and the value gained in terms of data usability. |
| 109b | Article 3(5), point (db) | Object | See comment above. |
| 113 | Article 3(6) | | |
| 116 | Article 3(9) | | |
| 118 | Article 3(11) | | |
| 120 | Article 4(1) | | |
| 121 | Article 4(2) | | |
| 123 | Article 4(4) | | |
| 128a | Article 4(5), point (da) | | |
| 130 | Article 4(5), point (f) | | |
| 132 | Article 5(1) | | |
| 133 | Article 5(2) | | |
| 134 | Article 5(3) | Object | We support Council mandate; we should stay realistic and consider financial aspects of any new ambitious proposals. Current provisions on biomonitoring data collected by EEA we consider sufficient. |
| 136 | Article 5(5) | | |
| 137 | Article 5(6) | | |
| 138 | Article 5(7) | | |
| 139 | Article 5(8) | | |
| 140 | Article 5(9) | | |
| 140a | Article 5(9a) | | |
| 140b | Article 5(9b) | | |
| 142 | Article 6(1) | Object | We support Council mandate; we should stay realistic and consider financial aspects of any new ambitious proposals. Current provisions on biomonitoring data collected by EEA we consider sufficient. |
| 145 | Article 6, 3. | | |
| 150 | Article 6, 3., point € | | |
| 150a | Article 6(3a), first subparagraph, point (ea) | | |

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| 150b | Article 6(3a), first subparagraph, point (eb) | | |
| 150c | Article 6(3a), first subparagraph, point (ec) | | |
| 150g | Article 6(4a) | | |
| 150h | Article 6(4b) | | |
| 150i | Article 6(4c) | | |
| 150j | Article 6(4d) | | |
| 150k | Article 6(4e) | | |
| 151 | Article 6(5) | | |
| 151a | Article 6(5a) | | |
| 152 | Article 6(6) | | |
| 152a | Article 6(6a) | | |
| 152b | Article 6(6b) | | |
| 164a | Article 8(4a) | | |
| 167a | Article 9(1a) | | |
| 168 | Article 9(2) | | |
| 169 | Article 9(3) | | |
| 170a | Article 9(4a) | | |
| 170b | Article 9(4b) | | |
| 170c | Article 9(4c) | | |
| 173 | Article 10(1) | | |
| 174 | Article 10(1a), first subparagraph | | |
| 174h | Article 10(2), point (a) | | |
| 174i | Article 10(2), point (b) | | |
| 174j | Article 10(2), point (c) | | |

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| 174k | Article 10(2), point (d) | | |
| 174l | Article 10(2), point € | | |
| 174m | Article 10(2), point (f) | | |
| 174n | Article 10(2), point (g) | | |
| 176 | Article 10(3), point (a) | | |
| 181a | Article 10(3), point (fa) | | |
| 182 | Article 10(4) | | |
| 182a | Article 10a | | |
| 182b | Article 10a(1) | | |
| 182c | Article 10a(2) | | |
| 182s | Article 10a(3) | | |
| 182e | Article 10b | | |
| 182f | Article 10b(1) | | |
| 182g | Article 10b(2) | | |
| 182h | Article 10b(3) | | |
| 182i | Article 10b(4) | | |
| 185 | Article 11(2) | | |
| 191 | Article 13(1) | | |
| 192 | Article 13(2) | | |
| 193 | Article 13(3) | | |
| 194 | Article 13(4) | | |
| 205 | Article 14(4) | | |
| 215a | Article 14(5), point (ia) | | |
| 215b | Article 14(5), point (ib) | | |

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| 218 | Article 14(8) | | |
| 229 | Article 15(5), point (a) | | |
| 234 | Article 15(8) | | |
| 234a | Article 15a | | |
| 234b | Article 15a(1) | | |
| 234c | Article 15a(2) | | |
| 234d | Article 15a(3) | | |
| 234e | Article 15a(4) | | |
| 234f | Article 15a(5) | | |
| 237 | Article 16(1) | | |
| 238 | Article 16(2) | | |
| 239 | Article 16(3) | | |
| 241 | Article 17(1) | | |
| 242 | Article 17(2) | | |
| 243a | Article 17(3a) | | |
| 246 | Article 18(1) | | |
| 246a | Article 18(1a) | | |
| 247 | Article 18(2) | | |
| 252 | Article 19(2), first subparagraph, point (b) | | |
| 253 | Article 19(2), first subparagraph, point (c) | | |
| 255a | Article 19(2), first subparagraph, point (ea) | | |
| 255b | Article 19(2), first subparagraph, point (eb) | | |
| 255c | Article 19(2), first subparagraph, point (ec) | | |
| 257 | Article 19(3) | | |

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| 258 | Article 19(4) | | |
| 258a | Article 19(4a) | | |
| 259 | Article 19(5) | | |
| 259a | Article 19(5a) | | |
| 261 | Article 20(1) | | |
| 262 | Article 20(2) | | |
| 267 | Article 20(4), point (c) | | |
| 270 | Article 21(1) | | |
| 270a | Article 21(1), point (a) | | |
| 270b | Article 21(1), point (b) | | |
| 270c | Article 21(1), point (c) | Object | We support Council mandate; we should stay realistic and consider financial aspects of any new provisions on biomonitoring data collected by ECHA in cooperation with MS CAs; we consider them to be very ambitious and too demanding and burdening especially for MS CAs as well as for ECHA. |
| 271 | Article 21(2) | | |
| 272 | Article 21(3) | | |
| 272a | Article 21(3a) | | |
| 274 | Article 21(5) | | |
| 275a | Article 21(6a) | | |
| 275b | Article 21(6b) | | |
| 275c | Article 21(6c) | | |
| 279 | Article 22(1) | | |
| 279a | Article 22(-1), second subparagraph | | |
| 279b | Article 22(-1), second subparagraph, point (a) | | |
| 279c | Article 22(-1), second subparagraph, point (b) | | |
| 279d | Article 22(-1), third subparagraph | | |
| 280 | Article 22(2) | | |

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| 281 | Article 22(3) | | |
| 282 | Article 22(4) | | |
| 284 | Article 22(6) | | |
| 285 | Article 22(7) | | |
| 286 | Chapter VIII | | |
| 289 | Article 23(2) | | |
| 297a | Article 24a | | |
| 297b | Article 24a(1) | | |
| 297c | Article 24a(2) | | |
| 299 | Article 25 | | |
| 303a | Article 26a | | |
| 303b | Article 26a, first paragraph | | |
| 303c | Article 26a, second paragraph | | |
| 303d | Article 26a, third paragraph | | |
| 303e | Article 26a, fourth paragraph | | |
| 303f | Article 26a, fifth paragraph | | |
| 303g | Article 26a, sixth paragraph | | |
| 384a | Annex I, point 70a. | | |
| 391 | Annex II, second paragraph | | |
| 393 | Annex II, point 4. | | |
| 394 | Annex II, third paragraph | | |
| 431a | Annex III, point 34a. | | |
| 431b | Annex IIIa | | |
| 431c | Annex IIIa, paragraph 1 | | |

| 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 relevance) - 2023/0453(COD) | |
|------------------------|-----------------------|--|--|
| Member State | | SWEDEN | |
| Row in table Annex III | Reference in the text | MS position | MS comment |
| 13 | Recital 1 | In favor | |
| 14 | Recital 2 | Neutral | Flexible, hesitation about "cost-effective" and "result in a reduction of the administrative burden" - how measure this? Council mandate: "with a view to reducing..." Flexible on text about "transparency", testing on animals and development of bio-tools etc. |
| 16 | Recital 4 | In favor | |
| 18 | Recital 6 | Neutral | |
| 19 | Recital 7 | In favor | The addition "but not be limited to," is relevant considering that certain research data should also be submitted. |
| 20 | Recital 8 | Object | Stick to the Council mandate. |
| 21 | Recital 9 | Object | Stick to the Council mandate. |
| 21a | Recital 9a | Object | Stick to the Council mandate. |
| 24 | Recital 12 | Neutral | |
| 26 | Recital 14 | Object | Clarification on the exact meaning and purpose of this amendment. |
| 29 | Recital 17 | In favor | In principle in favor. Needs further evaluation of how best to include information on chemicals in articles and alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 30 | Recital 18 | Neutral | |
| 31 | Recital 19 | Neutral | |
| 33 | Recital 21 | Neutral | |
| 34 | Recital 22 | In favor | |
| 35 | Recital 23 | In favor | |
| 36 | Recital 24 | Neutral | |
| 36a | Recital 24a | - | Same as the Council mandate? |
| 36b | Recital 24b | - | Same as the Council mandate? |
| 39 | Recital 27 | Object | Stick to the Council mandate. |
| 40 | Recital 28 | Neutral | |

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|------|---|----------|---|
| 42 | Recital 30 | Object | Stick to the Council mandate. |
| 43 | Recital 31 | Neutral | |
| 45 | Recital 33 | Neutral | |
| 48 | Recital 36 | In favor | |
| 48a | Recital 36a | In favor | In principle in favour. Needs further evaluation of how best to include information on chemicals in articles and alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 50 | Recital 38 | Neutral | |
| 53a | Recital 41a | Neutral | |
| 54 | Recital 42 | Neutral | |
| 55 | Recital 43 | Neutral | |
| 56 | Recital 44 | Neutral | |
| 58 | Recital 46 | In favor | |
| 60 | Recital 48 | In favor | Can support adding "groups of chemicals" and whenever possible use non-animal testing. Neutral on obtaining "sample of a substance". |
| 60a | Recital 48a | In favor | |
| 60b | Recital 48b | Neutral | |
| 60c | Recital 48c | Object | |
| 67 | Article 1(1) | In favor | |
| 70a | Article 1(2), point (ba) | Neutral | |
| 77 | Article 2, first paragraph, point (2) | Neutral | |
| 85 | Article 2, first paragraph, point (10) | In favor | In principle in favour. Needs further evaluation of how best to include information on alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 89a | Article 2, first paragraph, point (11a) | In favor | |
| 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 | |

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| 109a | Article 3(5), point (da) | In favor | In principle in favour. Needs further evaluation of how best to include information on chemicals in articles and alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 109b | Article 3(5), point (db) | In favor | In principle in favour. Needs further evaluation of how best to include information on alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 113 | Article 3(6) | Neutral | |
| 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) | In favor | |
| 136 | Article 5(5) | In favor | |
| 137 | Article 5(6) | In favor | |
| 138 | Article 5(7) | In favor | |
| 139 | Article 5(8) | Neutral | |
| 140 | Article 5(9) | Neutral | |
| 140a | Article 5(9a) | Neutral | |
| 140b | Article 5(9b) | Neutral | |
| 142 | Article 6(1) | In favor | |
| 145 | Article 6, 3. | Neutral | |
| 150 | Article 6, 3., point € | In favor | |
| 150a | Article 6(3a), first subparagraph, point (ea) | In favor | |

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|-------------|---|----------------|--------------------------|
| 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) | Neutral | |
| 168 | Article 9(2) | Neutral | |
| 169 | Article 9(3) | Object | Stick to Council mandate |
| 170a | Article 9(4a) | Object | Stick to Council mandate |
| 170b | Article 9(4b) | Object | Stick to Council mandate |
| 170c | Article 9(4c) | Neutral | |
| 173 | Article 10(1) | Neutral | |
| 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 | |

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| 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) | In favor | |
| 182 | Article 10(4) | In favor | |
| 182a | Article 10a | In favor | In principle in favour. Needs further evaluation of how best to include information on chemicals in articles and alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 182b | Article 10a(1) | In favor | In principle in favour. However, we are concerned about implementation and would suggest that it might be better for this to be initiated after the review mentioned in row 303b in order to establish an appropriate plan and with realistic timeframes. |
| 182c | Article 10a(2) | Object | Reservation on this section that addresses the transfer of information and that might relate to confidentiality and the protection of data. |
| 182s | Article 10a(3) | In favor | In principle in favour. |
| 182e | Article 10b | In favor | However, we are concerned about implementation and would suggest that it might be better for this to be initiated after the review mentioned in row 303b in order to establish an appropriate plan and with realistic timeframes. |
| 182f | Article 10b(1) | In favor | Reservation on this section that addresses the transfer of information and that might relate to confidentiality and the protection of data. |
| 182g | Article 10b(2) | Object | Reservation on this section that addresses the transfer of information and that might relate to confidentiality and the protection of data. |
| 182h | Article 10b(3) | In favor | In principle in favour. |
| 182i | Article 10b(4) | In favor | In principle in favour. Needs further evaluation of how best to include information on alternatives to substances of concern. Therefore proposes a review clause on this issue. |
| 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 | |

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|------|---|---------|---|
| 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) | Object | Stick to Council mandate |
| 241 | Article 17(1) | Neutral | |
| 242 | Article 17(2) | Neutral | |
| 243a | Article 17(3a) | Object | Clarification on the exact meaning and purpose of this amendment. |
| 246 | Article 18(1) | - | EP supports Council mandate |
| 246a | Article 18(1a) | Neutral | |
| 247 | Article 18(2) | Neutral | |
| 252 | Article 19(2), first subparagraph, point (b) | - | EP supports Council mandate |
| 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 | |

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| 258 | Article 19(4) | Object | Stick to Council mandate |
| 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) | Object | Stick to Council mandate |
| 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) | In favor | |
| 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 | |

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|------|-------------------------------|----------|--|
| 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 | In favor | In principle in favour. |
| 303b | Article 26a, first paragraph | In favor | In principle in favour. However, we are strongly of the opinion that the assessments on the development on a database of chemicals in articles and the establishment of a database on suitable alternatives should be the subject of a feasibility study before the work is begun. |
| 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. | In favor | |
| 391 | Annex II, second paragraph | Object | Stick to Council mandate |
| 393 | Annex II, point 4. | Neutral | |
| 394 | Annex II, third paragraph | Object | Stick to Council mandate |
| 431a | Annex III, point 34a. | In favor | |
| 431b | Annex IIIa | Neutral | |
| 431c | Annex IIIa, paragraph 1 | In favor | In principle in favour. Regarding point on chemicals in articles it needs further evaluation of how best be included. Therefore proposes a review clause on this issue. |

| 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 | |

