

**ANNEX 1**

**LIST OF CONSULTEES**

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## **ANNEX 1: LIST OF CONSULTEES**

### **A1.1 ORGANISATIONS CONSULTED**

The organisations contacted as potential sources of information to support either indicators and/or baselines are listed below. However, a small number were unable to provide information within the timescale for this study.

#### *Government Departments, Agencies and Supported Bodies*

- Centre for Environment, Fisheries & Aquaculture Science (Cefas)
- Competent Authority
- Competent Authority Enforcement Group
- Department for Business Innovation and Skills (BIS, formerly BERR)
- Department for Business Innovation and Skills, Chemicals Regulatory Forum (BIS CRF)
- Department for Environment Food and Rural Affairs (Defra)
- Department for Environment Food and Rural Affairs, Chemicals Stakeholder Forum (Defra CSF)
- Department of Environment Northern Ireland (DOE)
- Department of Health (DH)
- Environment Agency (EA)
- Government Chemist at LGC
- Health Protection Agency (HPA)
- Health and Safety Executive (HSE), Enforcement Group
- Health and Safety Executive (HSE), Epidemiology Group
- Health and Safety Executive (HSE), International Chemicals Unit (ICU)
- Home Office Animals In Scientific Procedure Division (Policy)
- National Centre for the Replacement, Refinement and Reduction of Animals in Research (NC3Rs)
- National Centre for Social Research (NATCEN)
- National Health Service, UK Ambulance Services (National Education Network for Ambulance Services (NENAS) and UK Ambulance Trusts: East Midlands, Great Western, Isle of Wight, London, North East, North West, Northern Ireland, Scottish, South East Coast, South Central, South West, Staffordshire, Welsh, West Midlands and Yorkshire)
- Northern Ireland Environment Agency (NIEA)
- Office of National Statistics
- Scottish Environmental Protection Agency (SEPA)
- Scottish Executive
- Welsh Assembly Government
- WRAP
- WRAP Northern Ireland
- WRAP Scotland
- WRAP Cymru.

### ***Non-Governmental Organisations***

- British Union for the Abolition of Vivisection (BUAV)
- Chem Trust
- Fund for the Replacement of Animals in Medical Experiments (FRAME)
- Greenpeace UK
- Royal Society for the Prevention of Cruelty to Animals (RSPCA).

### ***Academic and Professional Organisations***

- Green Chemistry Centre of Excellence, University of York
- Institute of Chemical Engineers (IChemE)
- Royal Society of Chemistry (RSC)
- Royal Society of Chemistry, Green Chemistry Network (RSC, GCN)
- University of Birmingham, Division of Environmental Health and Risk Management, School of Geography, Earth and Environmental Sciences.

### ***Trade Unions***

- UK Trade Union Congress
- UNITE.

### ***Industry Associations***

- Aluminium Federation (ALFED)
- British Association for Chemicals Specialities (BACS)
- British Aerosol Manufacturers Association (BAMA)
- British Adhesives and Sealants Association (BASA)
- British Chambers of Commerce (BCC)
- British Coating Federation (BCF)
- British Fragrance Association (BFA)
- British Metal Recycling Association (BMRA)
- British Plastics Federation (BPF)
- British Retail Consortium (BRC)
- British Stainless Steel Association (BASSA)
- Confederation of British Industry (CBI)
- Chemical Industry Association (CIA)
- Chemical Industry Association, REACHReady
- Chemical Business Association (CBA)
- Federation of Small Businesses (FSB)
- Chemical Hazard Communication Society (CHCS)
- Cosmetic Toiletry and Perfumery Association (CTPA)
- Mineral Products Association (BPA)
- National Federation of Demolition Contractors (NFDC)
- Non-ferrous Alliance (NFA)
- UK Engineering Employers Federation (EEF)
- Environmental Services Association

- UK Cleaning Products Industry Association (UKCPI)
- UK Steel.

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**ANNEX 2**

**OBJECTIVES, SUB-OBJECTIVES AND INDICATORS**

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## A2.1. REDUCE THE NEGATIVE HEALTH IMPACTS ARISING FROM OCCUPATIONAL EXPOSURE TO CHEMICALS

Table A2.1 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards the REACH and CLP regulations.

<b>Table A2.1: Objective: Reduce the Negative Health Impacts Arising from Occupational Exposure to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Reduce the Incidence of Chemical-related Occupational Dermatitis and other Skin Diseases</b>				
Change in incidence of chemically-related occupational skin disease (short- to medium-term indicator)	HSE Statistics: Labour Force Survey - Self-reported Work-related Illness survey (SWI), the Health and Occupation Reporting network (THOR), Voluntary reporting of occupational diseases by General Practitioners (THOR-gP), Occupational skin surveillance (EPI-DERM), Occupational Physicians Reporting Activity (OPRA)	Same as for indicator data set	57	43
Change in number of prescriptions for chemically-related occupational dermatitis (short-term indicator)	Survey of appropriate health professionals to gather data on prescribing practice for cases of occupational dermatitis. (Drawing on prescription records of occupational physicians and dermatologists relating to cases of occupational dermatitis)	No existing collated information. Retrospective survey for period pre-REACH implementation to establish baseline	57	43
Change in incidence of work-related chemically-induced skin disease (short- to medium-term indicator)	Survey of Trade Union members in targeted industry sectors (where workers are considered at risk of developing work-related skin disease that might be attributable to chemical exposure)	No existing baseline but repeated survey to establish trends might be informative	57	43
<b>Sub-objective: Reduce the Incidence of Chemical-related Occupational Respiratory Disease</b>				
Change in incidence of chemically-related occupational asthma (short- to medium-term indicator)	HSE Statistics: Labour Force Survey - Self-reported Work-related Illness survey (SWI), Surveillance of work-related and occupational respiratory disease (SWORD), Thor-GP, OPRA, HSE Risk Control Indicators, HSE Workplace health and safety survey (WHASS) programme	Same as for indicator	57	43
Change in incidence of chemically-related occupational chronic obstructive	HSE Statistics: THOR, Industrial Injuries Disablement Benefit (IIDB) Scheme, HSEs Risk Control Indicators, HSEs Workplace health and safety survey (WHASS) programme	Same as for indicator	57	43

<b>Table A2.1: Objective: Reduce the Negative Health Impacts Arising from Occupational Exposure to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
pulmonary disease (COPD) (long-term indicator)				
Change in number of prescriptions for occupational asthma (short-term indicator)	Survey of health professionals to gather data on prescribing practice for cases of occupational asthma. (Would draw on prescription records of occupational and respiratory physicians for cases of occupational asthma)	No existing collated information.  Retrospective survey could be undertaken for period pre-REACH implementation to establish baseline	57	43
Change in incidence of work-related chemically-induced respiratory disease (time course of indicator dependent on conditions under consideration)	Survey of Trade Union members in targeted industry sectors (where workers are considered at risk of developing work-related respiratory disease that might be attributable to chemical exposure)	No existing baseline but repeated survey to establish trends might be informative	57	43
<b>Sub-objective: Reduce the Incidence of Chemical-related Occupational Cancers</b>				
Change in incidence of chemically-related occupational respiratory cancers (long-term indicator)	HSE Statistics: SWORD and OPRA	Same as for indicator	57	43
Change in incidence of chemically-related occupational skin cancers (long-term indicator)	HSE Statistics: EPIDERM	Same as for indicator	57	43
<b>Sub-objective: Reduce the Incidence of Chemical-related Industrial Injuries</b>				
Change in the number of chemical incidents involving exposure of workers (short- to	Health Protection Agency: Chemicals and Poisons Division (CHaPD) chemical incident surveillance systems. Local and Regional Services (LaRS) National Poisons Information Service (NPIS), National Chemical	Same as for indicator	57	43

<b>Table A2.1: Objective: Reduce the Negative Health Impacts Arising from Occupational Exposure to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
medium-term indicator)	Emergency Centre (NCEC)			
Change in the number of the workers affected by chemical incidents (short-to medium-term indicator)	Health Protection Agency: Chemicals and Poisons Division (CHaPD) chemical incident surveillance systems, Local and Regional Services (LaRS), National Poisons Information Service (NPIS), National Chemical Emergency Centre (NCEC)	Same as for indicator	57	43
Change in rates of serious worker injury or death attributable to chemicals (short-term indicator)	HSE Statistics: RIDDOR reports of chemical-related deaths & serious injuries, HSEs Risk Control Indicators, HSEs Workplace health and safety survey (WHASS) programme	Same as for indicator	57	43
Change in numbers claiming compensation because of industrial injuries attributable to chemicals (long-term indicator)	HSE Statistics: IIDB data	Same as for indicator	50	50
<b>Sub-objective: Reduce or Eliminate Exposure to Chemicals of Concern in the Workplace</b>				
Change in industry expenditure on protective gloves (short-term indicator of improvement in worker exposure)	Survey of either glove manufacturers or purchasers in relevant industry sectors of numbers/types of glove purchased	No existing collated information ;  retrospective survey could be undertaken for period pre-REACH implementation to establish baseline	50	50
Change in industry expenditure on local and general ventilation equipment (short-term indicator of improvement in worker exposure)	Survey of either equipment manufacturers or purchasers in relevant industry sectors of numbers/types of equipment purchased	No existing collated information; retrospective survey could be undertaken for period pre-REACH implementation to establish baseline	50	50
Number of substances/ mixtures reclassified with a 'higher' classification	C&L Database statistic, supplemented by survey data from industry	No existing collated information	0	100
Number of substances/ mixtures reclassified with a 'lower'	C&L Database statistic, supplemented by survey data from industry	No existing collated information	0	100

**Table A2.1: Objective: Reduce the Negative Health Impacts Arising from Occupational Exposure to Chemicals**

<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
classification				

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## A2.2. REDUCE THE NEGATIVE IMPACTS ON PUBLIC HEALTH OF EXPOSURE TO CHEMICALS

Table A2.2 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards the REACH and CLP regulations.

<b>Table A2.2. Objective: Reduce the Negative Impacts on Public Health of Exposure to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Reduce the Incidence of Chemical-related Conditions in the General Public</b>				
Change in the numbers of the public affected by chemical incidents (short- to medium-term indicator)	Health Protection Agency: Chemicals and Poisons Division (CHaPD) chemical incident surveillance systems, Local and Regional Services (LaRS), National Poisons Information Service (NPIS), National Chemical Emergency Centre (NCEC), environment agencies	Same as for indicator	57	43
Change in the level of congenital abnormalities in the UK public that can't be attributed to causes other than chemicals (medium- to long-term indicator)	Office of National Statistics data derived from British Isles Network of Congenital Anomaly Registers (BINOCAR)	Same as for indicator	100	0
<b>Sub-objective: Reduce the Level of Public Exposure to Chemicals of Concern</b>				
Change in usage of chemicals of concern in consumer products (short- to medium-term indicator)	Nordic product registers SPIN database	Same as for indicator	50	50
Change in the number of chemical incidents involving exposure of the public (short- to medium-term indicator)	Health Protection Agency: Chemicals and Poisons Division (CHaPD) chemical incident surveillance systems, Local and Regional Services (LaRS) National Poisons Information Service (NPIS), National Chemical Emergency Centre (NCEC), environment agencies	Same as for indicator	57	43
Change in tissue levels of chemicals of concern in the UK population (anticipated EU core reporting requirement)	Archive of human breast milk and other tissues (Some depositories exists, e.g. MRC Biobank, and others might require establishment) with analysis of retained tissue samples for chemicals of concern	Some tissue archives already exist	100	0
<b>Sub-objective: Promote Withdrawal of Substances of Concern from the Market</b>				
Numbers of substances withdrawn from	HSE –CA (drawing on ECHA information) (Supplemented by survey of reasons	Same as for indicator	50	50

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<b>Table A2.2. Objective: Reduce the Negative Impacts on Public Health of Exposure to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
the UK market because of concerns about human health. imposition of restrictions or other reasons relating to REACH	for withdrawal; see below)			
Change in quantities of chemicals of concern produced or marketed in the UK	Office of National Statistics : UK manufacture of hazardous substances (tpa), Proportion of EU manufacture of hazardous substances by UK companies (domestic share), UK imports of hazardous substances (imports), UK exports of hazardous substances (exports)	Same as for indicators	100	0
Change in number of substances of very high concern (SVHC) in articles on UK market	HSE –CA (drawing on ECHA information): UK-based notifications of SVHC in articles, UK-based registrations of SVHC, UK-based authorisations for use of SVHC, UK registrations of restricted substances	No existing baseline data.	100	0
<b>Sub-objective: Increase Substitution of Substances by Less Hazardous Alternatives</b>				
Introduction of alternative substances to replace chemicals of concern under REACH	New survey or Case Studies	UK industry associations, e.g. Federation of Small Businesses (for SMEs), Environmental Services Association & British Plastics Federation (for waste)	100	0
<b>Sub-objective: Implement Emergency Action under Article 129 to Ensure Rapid Safeguarding of Human Health in UK</b>				
Number of national emergency actions taken relating to human health (under Article 129) (anticipated EU core reporting requirement)	HSE Records	Not applicable	100	0

## A2.3. REDUCE THE NEGATIVE IMPACTS ON THE ENVIRONMENT ARISING FROM CHEMICALS

Table A2.3 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.3: Objective: Reduce the Negative Impacts on the Environment Arising from Chemicals</b>				
<b>Indicator</b>	<b>Data Source (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Increase Populations Levels of Species susceptible to Chemical Pollution</b>				
Change in population numbers of species with established susceptibility to chemical pollution	Biodiversity indicator databases: Joint Nature Conservation committee - biodiversity indicators, Cefas, Chem Trust, Environment agencies, the Charting Progress initiative (Defra & Devolved Administrations)	Same as for indicator	100	0
<b>Sub-objective: Reduce the Extent of Chemical-induced Effects in Wildlife Species</b>				
Change in population levels of chemical induced non-lethal effect in wildlife species	Cefas, Environment Agency Endocrine disrupting chemicals (EDC) demonstration programme: Population monitoring data relating to defined chemical effects (e.g. prevalence of endocrine disruptor changes in marker species)	Same as for indicator	100	0
<b>Sub-objective: Reduce the Level of Chemicals of Concern Present in Abiotic Environmental Media</b>				
Change in levels of selected chemicals in ambient air samples (anticipated EU core reporting requirement)	Modification of existing monitoring systems (by Defra, Environment Agencies, UK Air Quality Archive, National Atmospheric Emissions Inventory, UK Pollutant Transfer Register (UKPTR) or, new monitoring programmes of various types to establish sample archive. Analysis of retained samples for specific chemicals of concern	Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation (e.g. Water Framework, IPPC, POPs). Some sample archives already exist	100	0
Change in levels of selected chemicals in water and sediment samples (anticipated EU core reporting requirement)	Modification of existing monitoring systems (by Environment Agencies and water companies) and/or modification of influent water analysis or new monitoring programmes of various types to establish sample archive. Analysis of retained samples for specific chemicals of concern	Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation (e.g. Water Framework, IPPC, POPs). Some sample archives already exist	100	0
Change in levels of selected chemicals in soil samples (anticipated EU core reporting requirement)	Modification of existing monitoring systems (by Environment Agencies or new monitoring programmes of various types to establish sample archive. Analysis of retained samples for specific chemicals of concern.	Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation (e.g. IPPC, POPs). Some sample archives already exist	100	0

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<b>Table A2.3: Objective: Reduce the Negative Impacts on the Environment Arising from Chemicals</b>				
<b>Indicator</b>	<b>Data Source (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
Change in levels of selected chemicals in waste sludge samples	Modification of existing monitoring systems (by Environment Agencies and water companies) or new monitoring programmes of various types to establish sample archive. Analysis of retained samples for specific chemicals of concern. Evaluation of Environment Agencies pollution monitoring and permit data (Pollution Prevention and Control)	Environment Agencies Pollution Prevention and Control data Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation (e.g. IPPC, POPs).	100	0
<b>Sub-objective: Reduce the Level of Chemicals of Concern Present in Wildlife</b>				
Change in levels of selected chemicals in tissue samples of terrestrial species (anticipated EU core reporting requirement)	Centre for Ecology and Hydrology (CEH): Predatory Bird Monitoring Scheme (PBMS) tissue archive (predatory terrestrial birds)	Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation. Some sample archives already exist	100	0
Change in levels of selected chemicals in tissue samples of aquatic species (anticipated EU core reporting requirement)	Predatory Bird Monitoring Scheme tissue archive (fish-eating birds). Centre for Environment, Fisheries and Aquaculture Sciences (CEFAS): Cetacean Distribution & Relative Abundance Survey	Considerable data exists on environmental pollutant levels though much will relate to chemicals addressed by other legislation. Some sample archives already exist	100	0
Change in soil biodiversity	Defra monitoring data on bio-indicators for soil		100	0
<b>Sub-objective: Implement Emergency Action by UK under Article 129 to Ensure Rapid Safeguarding of the Environment in UK</b>				
Number of national emergency actions taken relating to environment protection under article 129 (anticipated EU core reporting requirement)	HSE-CA & other enforcement agencies (possibly involving detailed case studies)	No natural baseline	100	0

## A2.4.MAINTAIN THE COMPETITIVE POSITION OF THE UK CHEMICALS SECTOR

Table A2.4 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.4: Objective: Maintain the Competitive Position of the UK Chemicals Sector</b>				
<b>Indicator</b>	<b>Data Set (indicator)</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Maintain the Competitive Position of UK Substance Producers and Downstream Users</b>				
Overall output of UK chemical industry	ONS production statistics – chemicals sector	Same as indicator	80	20
Profitability	BIS/ Chemical Industries Association data	Same as indicator	67	33
Percentage contribution to GDP	ONS PRODCOM data	Same as indicator	100	0
<b>Sub-objective: Maximise the Ease of Export of Chemicals from the UK</b>				
Volume of exports	ONS trade statistics - chemicals	Same as indicator	50	50
Value of exports	As above	Same as indicator	50	50
<b>Sub-objective: Maximise the Ease of Import of Chemicals into the UK</b>				
Volume of imports	ONS trade statistics - chemicals	Same as indicator	50	50
Value of imports	As above	Same as indicator	50	50

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## A2.5. MINIMISE ADVERSE STRUCTURAL CHANGES TO UK INDUSTRY

Table A2.5 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.5: Objective: Minimise Adverse Structural Changes to UK Industry</b>				
<b>Indicator</b>	<b>Data Set</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Minimise Adverse Structural Changes to UK Industry (Chemicals Sector C20, Downstream Users, Distributors and Waste Recycling Sectors)</b>				
Number of companies	ONS industry production statistics – chemicals sectors	Same as indicator	67	33
Size distribution of companies	As above	Same as indicator	67	33
Employment	ONS employment statistics	Same as indicator	67	33
Volume of materials recycled/recovered	ONS Prodcom statistics available for many industry sectors. ONS industry statistics (recycling non-metal and metal only) supplemented by WRAP data	Same as indicator	100	0
Use of recycled/recovered materials in new products	Consultation with WRAP /industry associations	Same as indicator	100	0

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## A2.6. MINIMISE ADVERSE EFFECTS ON THE PATTERNS OF INDUSTRIAL ACTIVITY IN THE UK

Table A2.6 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.6: Objective: Minimise Adverse Effects on Patterns of Industrial Activity</b>				
<b>Indicator</b>	<b>Data Set</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Avoid Damaging Increases in Input Prices</b>				
Percentage change in price of chemical inputs (compared to overall industry inputs)	Survey/data collected by industry associations	Same as indicator	100	0
<b>Sub-objective: Maintain Competition in the Supply of Chemicals</b>				
Total number substances available on UK market and comparison with EU	No. substances registered (from REACH-IT via HSE - CA) No. substances registered (from ECHA via HSE - CA)	ONS ABI/2 and PRODCOM data; IUCLID IV No. substances registered (from ECHA via HSE - CA)	67	33
Total no. preparations available on UK market	ONS ABI/2 and PRODCOM data	ONS ABI/2 and PRODCOM data; IUCLID IV	67	33
Percentage change in number of suppliers per DU company	Case-studies of selected DU companies from fragrances, coatings and waste recovery sectors	Case-studies prepared for UK IA	100	0
<b>Sub-objective: Minimise Costs Associated with Loss of Substances</b>				
Percentage change in DU product portfolios	Case-studies of selected DU companies including from coatings, fragrances and metal finishing sectors	Case-studies prepared for UK IA	67	33
Number of product reformulations carried out	As above	As above	67	33
Number of products removed from market due to unsupported uses	As above	As above	100	0
Number of process changes carried out	As above	As above	67	33
<b>Sub-objective: Minimise Withdrawal of Substances for Non Risk-related Reasons</b>				
Risk characteristics of withdrawn substances	Eurostat REACH project	Same as indicator	100	0
Reasons for withdrawal of substances	Case-studies of selected substance manufacturers	Not applicable	50	50

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## A2.7. MAXIMISE THE POTENTIAL FOR INNOVATION

Table A2.7 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2-2.7: Objective: Maximise the Potential for Innovation</b>				
<b>Indicator</b>	<b>Data Set</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Maximise Innovation by UK Substance Suppliers and Downstream Users</b>				
REACH/CLP related R&D expenditure as percentage turnover for selected sectors (manufacturers and DUs)	Case-studies of selected substance manufacturers	Case-studies prepared for UK IA. Case-studies of selected manufacturing companies – anecdotal data	50	50
REACH/CLP related R&D expenditure as percentage of total R&D for selected sectors (manufacturers and DUs)	As above	As above	50	50
Number of new substances registered (UK sites) (manufacturers and importers)	CA from REACH-IT	NONS data	100	0
Number of PPOD exemptions sought with reasons (UK sites) (manufacturers and importers)	As above	As above	56	44
Value of REACH/CLP-related services provided to customers (manufacturers, importers and downstream users)	Case-studies of selected substance manufacturers	n/a	50	50
Number of high-risk substances substituted (and cost) by downstream users	Case-studies of selected DU companies	Case-studies prepared for UK IA	71	29
Reasons for substitution by downstream users	As above	As above	50	50
Number of new products developed by downstream users using lower risk substances	As above	As above	71	29
Value of new products developed by downstream users using lower risk substances	As above	As above	71	29

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## A2.8. ENCOURAGING THE DISSEMINATION AND UTILISATION BY STAKEHOLDERS OF INFORMATION SOURCES AND ADVICE RELATING TO CHEMICALS

Table A2.8 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.8: Objective: Encourage the Dissemination and Utilisation of Information Sources and Advice Relating to Chemicals</b>				
<b>Indicator</b>	<b>Data Set (indicator)</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Encourage the Dissemination of Information by the UK CA</b>				
Number of visits to UK CA website	CA (not currently recorded)	No pre-REACH baseline	71	29
Number of guidance items downloaded from CA website	As above	As above	71	29
Number of subscriptions to CA e-Bulletin	CA	No pre-REACH baseline	71	29
Number of CA helpdesk enquiries	As above	No specific baseline, but data from period before implementation of REACH could provide a quasi-baseline	71	29
Number of information events (CA and other government bodies)	As above	As above	71	29
<b>Sub-objective: Encourage the Dissemination of Information by Industry</b>				
Number of consumer requests for information regarding SVHC in articles	Survey of retailers via British Retail Federation. Cooperation promised	A partial baseline may be provided by information from cosmetics companies on no. requests for information made under the Cosmetics Directive	100	0

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## A2.9. ENCOURAGING THE PROVISION OF HIGH QUALITY INFORMATION AND ADVICE ABOUT CHEMICALS

Table A2.9 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.9: Objective: Ensure the Provision of High Quality Information and Advice about Chemicals</b>				
<b>Indicator</b>	<b>Data Set (indicator)</b>	<b>Data source (baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Ensure the Availability of High Quality Information from the UK CA</b>				
Quality of CA website information	Survey of UK industry associations and/or survey of companies accessing the web site	Recollection of NONs information provided by HSE	71	29
Completeness of CA website information	As above	As above	71	29
Relevance of CA website information	As above	As above	71	29
Quality of CA helpdesk responses	Survey of UK industry associations and/or survey of companies using the help desk	No readily-available baseline	71	29
Completeness of CA helpdesk responses	As above	As above	71	29
Relevance of CA helpdesk responses	As above	As above	71	29
<b>Sub-objective: Encourage the Availability of High Quality Information from Industry</b>				
Number of (e)SDS failing legal requirements	HSE – enforcement records	HSE – enforcement records	100	0
Number of SDS meeting DU requirements	HSE – inspection records	HSE – inspection records.	71	29
Number of substance and mixture labels meeting CLP requirements	As above supplemented by future CHCS surveys	CHCS survey	0	100
Percentage of retailers with knowledge of their customers' right to request information	Survey of companies via British Retail Federation	No direct baseline, but survey could ask about right to request information about cosmetics directive	100	0
<b>Sub-objective: Encourage the Availability of High Quality Information to Consumers</b>				
Percentage of consumers with knowledge of right to request information on SVHCs in articles	Survey of consumers	No natural baseline. Survey could ask about right to request information about cosmetics in order to construct a baseline	100	0

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## A2.10. PROMOTE THE DEVELOPMENT OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS

Table A2.10 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards the REACH and CLP regulations.

<b>Table A2.10: Objective: Promote the development of alternative (especially non-vertebrate) test methods</b>				
<b>Indicator</b>	<b>Data source (Indicator)</b>	<b>Data source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Promote the development, evaluation and validation of alternative methods for chemical testing</b>				
UK Government contribution to EU and OECD work on alternative testing methods and guidance (anticipated EU core reporting)	Relevant departmental and agency resource utilisation records relating to support for relevant ECHA, ECVAM and OECD committees [as € or man hours/y]	Same as indicator	100	0
UK Government contribution to the development of alternative test methods (UK focus only) (anticipated EU core reporting)	Relevant agencies and departmental records on funding of research into alternative test method development [as €/y]	Same as indicator	100	0
UK Government's alternative testing awareness raising activities (anticipated EU core reporting)	Relevant agencies and departmental records of expenditure on public &/or scientists awareness raising activities [as € or man hours/y]	Same as indicator	100	0
Number of alternative (non-vertebrate) test methods subject to validation at European level	European Centre for Validation of Alternative Methods (ECVAM) tracking system for test methods review, validation and approval in EU regulation on chemicals (TSAR)	Same as Indicator	100	0
Number of ECVAM validated alternative (non-vertebrate) test methods	As above	As above	100	0
Number of alternative tests adopted by EU	Home Office (based on information from European Commission)	Same as indicator	100	0
Number of alternative (non-vertebrate) test methods subject to validation at OECD level	Home Office (based on information from OECD)	Same as indicator	100	0
Number of OECD validated alternative (non-vertebrate) test methods	OECD published information	Same as indicator	100	0

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## A2.11. PROMOTE THE USE OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS

Table A2.11 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards the REACH and CLP regulations.

<b>Table A2.11: Objective Promote the use of alternative test methods</b>				
<b>Indicator</b>	<b>Data source (Indicator)</b>	<b>Data source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Promote the Replacement of Existing Vertebrate Test Methods</b>				
Number of withdrawn EU test methods that involved use of vertebrate animals	Home Office (based on information from European Commission)	Same as indicator	100	0
Number of withdrawn OECD test methods involving use of vertebrate animals	OECD published information	Same as indicator	100	0
Number of project licenses withdrawn in UK because of availability of alternative test methods	Home Office departmental records	Same as indicator	100	0
<b>Sub-objective: Encourage the Use of Non-Animal Approaches in REACH Risk Assessments</b>				
Number of REACH dossiers involving UK companies that include use of read-across as alternative to proposing vertebrate testing	CA from REACH-IT	Not applicable	100	0
Number of REACH dossiers involving UK companies including use of computational test methods as alternative to proposing vertebrate testing	As above	Not applicable	100	0
Number of REACH dossiers involving UK companies including use of non-vertebrate test methods as alternative to proposing vertebrate testing	As above	Not applicable	100	0
Number of REACH dossiers involving UK companies for which (exposure-based) waiving is allowed as opposed to vertebrate testing	As above	Not applicable	100	0

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## A2.12. MINIMISE THE USE OF VERTEBRATES IN THE TESTING OF CHEMICALS THAT FALL WITHIN THE SCOPE OF REACH

Table A2.12 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards the REACH and CLP regulations.

<b>Table A2.12: Objective: Minimise the use of vertebrates in the testing of chemicals that fall within the scope of REACH</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Promote Minimisation Of Use Of Vertebrates In The Testing Of Chemicals For REACH</b>				
Number (by species) of vertebrate used for testing of chemicals in UK	Home Office Animal usage records relating to 'Protection of man, animals or environment' (as surrogate for REACH-related usage). Possible targeted survey of licensees to provide additional information	Same as indicator	100	0
Change in proportion of total EU usage of animals conducted by UK	European Commission Animal usage records for Member States collected under Directive 86/609/EEC. (Latest available published data relates to 2005)	Same as indicator	100	0
Relative proportion of traditional to more refined test methods using vertebrate animals in the UK	Home Office departmental database	Same as indicator	100	0
Numbers of REACH dossiers including vertebrate test proposals involving one or more UK companies	CA from REACH-IT	No real baseline	100	0
Proportion of vertebrate test proposals agreed to by ECHA involving one or more UK companies	As above	As above	100	0
Estimated savings of animal numbers for ECHA approved tests due to operation of SIEFs /Joint registrations involving one or more UK	CA from REACH-IT Case studies of UK manufacturers	As above	100	0

**Table A2.12: Objective: Minimise the use of vertebrates in the testing of chemicals that fall within the scope of REACH**

<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
companies				
Number of UK stakeholder submissions in favour and against acceptance of vertebrate testing involving UK companies	CA from REACH-IT Case studies of UK manufacturers	As above	100	0

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## A2.13. SUPPORT THE EFFICIENT OPERATION OF THE REACH AND CLP PROCESS BY UK GOVERNMENT AND GOVERNMENT ORGANISATIONS

Table A2.13 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.13: Objective: Supporting the Efficient Operation of the REACH and CLP Process by UK Government and Governmental Organisations</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Efficient Participation in REACH and CLP Implementation Process by UK Government</b>				
Person days of REACH and CLP activity at EU level by type (CA and other government bodies) (e.g. ECHA committees, Enforcement Forum, negotiation with COM etc.)	Relevant departmental and agency resource utilisation records relating to different activities [as € or man hours/y]	Person days of activity in relation to NONS/ESR	50	50
Person days of REACH and CLP activity at UK level by type (CA and other government bodies) (e.g. coordination negotiation and enforcement)	As above	As above	50	50
Numbers and nature of REACH and CLP enforcement actions	CA and enforcement bodies records	A baseline may be constructed relating to NONs	50	50
Person days of CA helpdesk activity	CA resource utilisation records	No real baseline	50	50
Person days of REACH and CLP website development (CA and other government bodies)	Relevant departmental and agency resource utilisation records	No real baseline	50	50
Person days for REACH and CLP awareness/ promotion events (CA and other government bodies)	As above	No real baseline	50	50
Number of proposals for harmonised classification (from UK government with reason)	CA and enforcement bodies records	No real baseline	50	50
Number of emergency health responses by emergency response bodies regarding mixtures (CLP Article 45)	NPIS records (or similar records from other body if not NPIS)	As indicator	0	100
Cost saving from having a common CA and enforcement for REACH and CLP	CA resource utilisation records	No real baseline	50	50
Cost of training of enforcement officers	CA and enforcement bodies records	As indicator	50	50
Cost of training of emergency service staff	Emergency services records	As indicator	0	100
Cost to emergency response	HPA resource utilisation	No real baseline	0	100

<b>Table A2.13: Objective: Supporting the Efficient Operation of the REACH and CLP Process by UK Government and Governmental Organisations</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
bodies from adapting emergency response guidance in the light of CLP (CLP Article 45)	records (or similar records from other body if not HPA)			
Format of data held by emergency response bodies (CLP Article 45)	As above	As indicator	0	100
Nature of data held by emergency response bodies (CLP Article 45)	As above	As indicator	0	100
Number of requests for statistical analysis submitted to emergency response bodies (CLP Article 45)	As above	As indicator	0	100
Number of preventative or corrective measures prepared by emergency response bodies (CLP Article 45)	As above	As indicator	0	100
Nature of preventative or corrective measures prepared by emergency response bodies (CLP Article 45)	As above	As indicator	0	100

## A2.14. ENSURE THE ADEQUACY OF THE UK GOVERNMENT RESOURCE BASE TO MEET REACH AND CLP OBLIGATIONS

Table A2.14 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.14: Objective: Ensuring the Adequacy of the UK Government Resource Base to Meet REACH and CLP Obligations</b>				
<b>Indicator</b>	<b>Data Set (indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Ensure Adequate Resourcing by UK government</b>				
Cost of REACH and CLP activity at EU level by type (CA and other government bodies) (e.g.. ECHA committees, Enforcement Forum, negotiation with COM)	Relevant departmental, local authority and agency records	No real baseline	50	50
Cost of REACH and CLP activity at UK level by type (CA and other government bodies) (Eg. coordination, enforcement and enforcement)	As above	No real baseline	50	50
Cost of CA helpdesk	CA budgets	No real baseline	50	50
Cost of CA website	CA - costs as person days and budget	No real baseline	50	50
Cost of REACH and CLP awareness/ promotion events supported by CA	CA - costs as person days and budget	No real baseline	50	50
Budget for REACH and CLP work (CA and other government bodies)	Relevant departmental, local authority and agency records	No real baseline	50	50
Numbers of staff assigned to REACH and CLP activities (CA and other government bodies)	As above	No real baseline	50	50
Adequacy of skill sets of staff assigned to REACH and CLP activities (CA and other government bodies)	Interviews with departmental managers	No real baseline	50	50

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## A2.15. ENCOURAGE THE EFFICIENT OPERATION OF THE REACH PROCESS BY UK INDUSTRY

Table A2.15 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.15: Objective: Encourage the Efficient Operation of the REACH and CLP Processes by UK Industry</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Encourage Participation of UK industry in REACH and CLP processes</b>				
Number of manufacturers and importers (UK based)	REACH-IT (via CA)	No real baseline	63	38
Number of authorisation applications (UK based)	As above	No real baseline	100	0
Number of phase-in registrations by each deadline (UK based) by manufacturers and importers	As above	No real baseline	100	0
Number of notifications of SVHCs in articles by UK based companies	As above	No real baseline	100	0
Number of notifications of classification and labelling under CLP by UK based companies	As above	No real baseline	0	100
Number of proposals for harmonised classification (from industry with reason)	As above	No real baseline	50	50
<b>Sub-objective: Minimise the Regulatory Burden and Maximise Benefits</b>				
Actual expenditure on REACH registration	Survey of UK companies registering (via industry associations including waste recovery)	Predicted costs from impact assessments	100	0
Actual expenditure on authorisation	Survey of UK companies registering (via industry associations)	Predicted costs from impact assessments; actual costs incurred under ESR	100	0
Actual expenditure by industry on updating and/or replacement of IT systems	As above	Predicted costs from impact assessments	50	50
Actual expenditure by industry on relabelling (set-up and ongoing)	As above	As above	0	100
Actual expenditure by industry on repackaging (set-up and ongoing)	As above	As above	0	100
Actual expenditure by industry informing customers of changes due to REACH and CLP	As above	As above	50	50
Actual expenditure on by industry on staff training due to REACH and CLP	As above	As above	50	50
Actual cost of stock disposal	As above	As above	0	100

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<b>Table A2.15: Objective: Encourage the Efficient Operation of the REACH and CLP Processes by UK Industry</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
due to CLP changes				
Actual expenditure on reclassification of substances due to introduction of CLP	As above	As above	0	100
Actual expenditure on reclassification of mixtures due to introduction of CLP	As above	As above	0	100
Number of joint registrations versus individual registrations	Data from REACH IT via HSE	Predicted proportion of joint registrations from impact assessments	100	0
Number of substances (and mixtures) reclassified using Annex VII alone	As above. May need to be supplemented by industry survey data	Predicted proportions from impact assessments	0	100
Problems encountered with SIEFs	Survey of UK companies registering (with industry associations)	Predicted problems of SIEFs from impact assessments	100	0
Number of SMEs taking advantage of reduced registration fees	Data from REACH IT via CA	Calculated savings compared to full fees	100	0
Number of SMEs reducing manufacture/import to below 1t/y to avoid registration costs	Survey of SME manufacturers/importers (with small business associations)	Questions on baseline will need to be included in survey	100	0
Savings in data costs due to SIEFs	As above	Predicted savings of SIEFs from impact assessments	63	38
Number of dossiers updated for classification changes (with reason for change)	Data from REACH IT via CA	Impact assessment predictions and data trends	50	50
Cost savings from using REACH registration data for reclassification of substances and mixtures	Case studies of UK companies registering (with industry associations)	No real baseline	0	100
Cost of changes to obligations under downstream legislation triggered by CLP (particularly REACH, BPD, PPPD, and Seveso II)	Case studies of UK companies (with industry associations)	No real baseline	0	100
Cost of reclassification of substances and mixtures due to introduction of CLP	Case studies of UK companies (with industry associations)	No real baseline	0	100
Costs of updating SDS due to REACH and CLP	Survey of SME manufacturers /importers and DUs (with small business associations)	Questions on baseline will need to be included in survey	50	50
Time taken by consumers to familiarise themselves with CLP	Survey of consumers via National Centre for Social Research	No real baseline but UK RIA estimations	0	100
Level of consumer understanding of hazard labels under CLP as compared to hazard labels under CHIP	Survey of consumers via National Centre for Social Research	No real baseline but UK RIA estimations	0	100

<b>Table A2.15: Objective: Encourage the Efficient Operation of the REACH and CLP Processes by UK Industry</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
Consumer confidence in chemicals industry	Consumer surveys (carried out consumer survey company)	Previous surveys	50	50
Number of separate lists of prohibited substances prepared by retailers	Survey of retailers	Impact assessment information on existing prohibited lists	83	17
Number of campaigns by NGOs and trade unions on chemicals use	Contact NGO and trade unions	As for indicator	50	50
<b>Sub-objective: Establish Economic Benefits from Improvements to Human and Environmental Health</b>				
Savings in occupational health costs due to better information on chemicals used	Survey of DU companies (with industry associations)	Impact assessment estimates of costs of poor information	50	50
Savings in environmental management costs due to better information on chemicals used	Survey of DU companies (with industry associations)	Impact assessment estimates of costs of poor information	50	50

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## A2.16. ENCOURAGE THE PROVISION OF AN ADEQUATE RESOURCE BASE BY UK INDUSTRY WITH WHICH TO MEET REACH AND CLP OBLIGATIONS

Table A2.16 shows the data sources for each indicator and baseline and the relative specificity of that indicator towards REACH and CLP.

<b>Table A2.16: Objective: Encouraging the Provision of an Adequate Resource Base by UK Industry with which to meet REACH and CLP Obligations</b>				
<b>Indicator</b>	<b>Data Set (Indicator)</b>	<b>Data Source (Baseline)</b>	<b>% REACH</b>	<b>% CLP</b>
<b>Sub-objective: Encourage Provision of Adequate Scientific and Technical Resource Base for UK Industry with which to meet REACH Obligations</b>				
Numbers of toxicologists/ecotoxicologist and risk assessors based in the UK	Defra (Toxicology/Ecotoxicology capacity survey) Survey of companies	Same as indicator	83	17
Adequacy of scientific and technical resource base available to industry (FTEs, skill set and reasons)	Discussion with CA; Case studies of manufacturers and DUs	Same as indicator	83	17
Capacity of UK contract laboratories and extent of involvement in REACH support activities (FTEs, skill set and reasons)	Defra (Toxicology/Ecotoxicology capacity survey) Survey of UK contract laboratories	Same as indicator	83	17

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**ANNEX 3**

**RESULTS OF INDICATOR SCORING FOR REACH EVALUATION**

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### **A3.1. REDUCE THE NEGATIVE HEALTH IMPACTS ARISING FROM OCCUPATIONAL EXPOSURE TO CHEMICALS**

Table A3.1 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	REACH Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Number of substances/mixtures reclassified with a 'higher' classification	0	4	5	3	0	0	0	0
Number of substances/mixtures reclassified with a 'lower' classification	0	4	5	3	0	0	0	0
Change in incidence of chemically-related occupational asthma	4	5	1	5	67	75	86	79
Change in incidence of chemically-related occupational chronic obstructive pulmonary disease (COPD)	4	5	1	5	67	75	86	79
Change in incidence of chemically-related occupational respiratory cancers	4	5	1	5	67	75	86	79
Change in incidence of chemically-related occupational skin cancers	4	5	1	5	67	75	86	79
Change in incidence of chemically-related occupational skin disease	4	5	1	5	67	75	86	79
Change in rates of serious worker injury or death attributable to chemicals	4	5	1	2	67	60	81	41
Change in the number of chemical incidents involving exposure of workers	4	5	1	3	67	65	83	54
Change in the number of the workers affected by chemical incidents	4	5	1	3	67	65	83	54
Change in number of prescriptions for chemically-related occupational dermatitis	4	3	2	3	60	60	67	56
Change in number of prescriptions for occupational asthma	4	3	2	3	60	60	67	56
Change in industry expenditure on local and general ventilation equipment	4	2	2	3	53	55	59	55
Change in industry expenditure on protective gloves	4	2	2	3	53	55	59	55
Change in incidence of work-related chemically-induced respiratory disease	4	2	1	3	47	50	57	50
Change in incidence of work-related chemically-induced skin disease	4	2	1	3	47	50	57	50
Change in numbers claiming compensation because of industrial injuries attributable to chemicals	1	5	1	5	47	60	60	75
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.2. REDUCE THE NEGATIVE HEALTH IMPACTS ON PUBLIC HEALTH OF EXPOSURE TO CHEMICALS**

Table A3.2 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.2: Indicators for Objective 'Reduce the Negative Health Impacts on Public Health of Exposure to Chemicals'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of emergency actions taken relating to human health under article 129 of REACH	5	5	5	5	100	100	100	100
Change in number of substances of very high concern (SVHC) in articles on UK market	5	5	3	4	87	85	96	78
Change in quantities of chemicals of concern produced or marketed in the UK	4	5	3	5	80	85	89	89
Change in the numbers of the public affected by chemical incidents	4	5	1	4	67	70	84	66
Change in the number of chemical incidents involving exposure of the public	4	5	1	3	67	65	83	54
Change in the level of congenital abnormalities in the UK public that can't be attributed to causes other than chemicals	3	4	1	4	53	60	67	64
Change in usage of chemicals of concern in consumer products	5	5	3	3	73	70	77	63
Numbers of substances withdrawn from the UK market because of concerns regarding human health	5	3	3	3	73	70	77	63
Change in tissue levels of chemicals of concern in the UK population	5	4	2	1	73	60	81	34
Introduction of alternative substances to replace chemicals of concern under REACH	4	2	3	2	60	55	59	48
Change in public opinion of adequacy of controls on chemicals	2	3	1	2	40	40	47	36
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.3. REDUCE THE NEGATIVE IMPACTS ON THE ENVIRONMENT FROM CHEMICALS**

Table A3.3 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	REACH Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Number of emergency actions taken relating to environment protection under article 129 of REACH	5	5	5	5	100	100	100	100
Change in soil biodiversity	3	5	1	5	87	70	77	48
Change in levels of selected chemicals in ambient air samples	5	5	3	1	73	70	91	55
Change in levels of selected chemicals in soil samples	5	5	3	1	73	70	91	55
Change in levels of selected chemicals in tissue samples of aquatic species	5	5	3	1	73	70	91	55
Change in levels of selected chemicals in tissue samples of terrestrial species	5	5	3	1	73	70	91	55
Change in levels of selected chemicals in waste sludge samples	5	5	3	1	73	70	91	55
Change in levels of selected chemicals in water and sediment samples	5	5	3	1	73	70	91	55
Change in population levels of chemical induced non-lethal effect in wildlife species	5	3	1	3	73	60	74	38
Change in population numbers of species with established susceptibility to chemical pollution	5	3	1	3	73	60	74	38
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.4.MAINTAIN THE COMPETITIVE POSITION OF THE UK CHEMICALS SECTOR**

Table A3.4 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.4: Indicators for 'Maintain the Competitive Position of the UK Chemicals Sector'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Overall output of UK chemical industry	4	5	2	5	73	80	87	84
Percentage contribution to GDP	4	5	2	5	73	80	87	84
Profitability	4	3	2	4	60	65	69	69
Value of exports	4	5	2	5	73	80	87	84
Value of imports	4	5	2	5	73	80	87	84
Volume of exports	4	5	2	5	73	80	87	84
Volume of imports	4	5	2	5	73	80	87	84
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.5. MINIMISE ADVERSE STRUCTURAL CHANGES TO UK INDUSTRY**

Table A3.5 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.5: Indicators for Objective 'Minimise Adverse Structural Changes to UK Industry'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Employment (various sectors)	4	5	2	5	73	80	87	84
Number of companies (various sectors)	4	5	2	5	73	80	87	84
Size distribution of companies (various sectors)	4	5	2	5	73	80	87	84
Use of recycled /recovered materials in new products	4	5	2	5	73	80	87	84
Volume of materials recycled /recovered	4	5	2	5	73	80	87	84
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.6. MINIMISE ADVERSE EFFECTS ON THE PATTERNS OF INDUSTRIAL ACTIVITY IN THE UK**

Table A3.6 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.6: Indicators for Objective 'Minimise Adverse Effects on the Patterns of Industrial Activity in the UK'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of process changes carried out	4	3	3	3	67	65	69	61
Number product reformulations carried out	4	3	3	3	67	65	69	61
Number products removed from market due to unsupported uses	5	3	3	3	73	70	77	63
Percentage change in DU product portfolios	4	3	3	3	67	65	69	61
Percentage change in number of suppliers per DU company	4	3	3	3	67	65	69	61
Percentage change in price of chemical inputs (compared to overall industry inputs)	4	2	2	3	53	55	59	55
Reasons for withdrawal of substances	5	3	4	3	80	75	79	68
Risk characteristics of withdrawn substances	2	5	3	5	67	75	71	86
Total number of substances available on UK market	4	5	2	4	73	75	86	71
Total number preparations/mixtures available on UK market	4	5	2	3	73	70	84	59
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.7. MAXIMISE THE POTENTIAL FOR INNOVATION**

Table A3.7 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.7: Indicators for ‘Maximise the Potential for Innovation’</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of high-risk substances substituted (and cost) by downstream users	5	3	2	3	67	65	76	58
Number of new products developed using lower risk substances by downstream users	5	3	2	3	67	65	76	58
Number of new substances registered (UK sites) (manufacturers and importers)	5	5	2	4	80	80	94	73
Number of PPORD exemptions sought with reasons (UK sites) (manufacturers and importers)	5	5	2	4	80	80	94	73
REACH/CLP related R&D expenditure as a percentage of total R&D for selected sectors (manufacturers and DUs)	5	3	2	3	67	65	76	58
REACH/CLP related R&D expenditure as percentage turnover for selected sectors (manufacturers and DUs)	5	3	2	3	67	65	76	58
Reasons for substitution by downstream users	5	3	2	3	67	65	76	58
Value of new products developed by downstream users using lower risk substances	5	3	2	3	67	65	76	58
Value of REACH/CLP-related services provided to customers (manufacturers, importers and downstream users)	5	3	3	3	73	70	77	63
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

**A3.8. ENCOURAGE THE DISSEMINATION AND UTILISATION BY STAKEHOLDERS OF INFORMATION SOURCES AND ADVICE RELATING TO CHEMICALS**

Table A3.8 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	REACH Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Number of consumer requests for information regarding SVHCs in articles	5	2	4	3	73	70	70	66
Number of CA helpdesk enquiries	5	5	5	5	100	100	100	100
Number of guidance items downloaded from CA website	5	5	5	5	100	100	100	100
Number of information events (CA and other government bodies)	5	5	5	5	100	100	100	100
Number of subscriptions to CA e-Bulletin	5	5	5	5	100	100	100	100
Number of visits to CA website	5	5	5	5	100	100	100	100
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.9. ENCOURAGE THE PROVISION OF HIGH QUALITY INFORMATION AND ADVICE ABOUT CHEMICALS**

Table A3.9 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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**Table A3.9: Indicators for Objective 'Encourage the Provision of High Quality Information and Advice about Chemicals'**

Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	REACH Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Completeness of CA website information	5	3	5	3	87	80	80	73
Quality of CA website information	5	3	5	3	87	80	80	73
Relevance of CA website information	5	3	5	3	87	80	80	73
Completeness of CA helpdesk responses	5	3	5	3	87	80	80	73
Quality of CA helpdesk responses	5	3	5	3	87	80	80	73
Relevance of CA helpdesk responses	5	3	5	3	87	80	80	73
Percentage of retailers with knowledge of their customers' right to request information	5	2	2	2	60	55	66	44
Number of SDS meeting DU requirements	5	3	4	3	80	75	79	68
Number of (e)SDS failing legal requirements	5	5	4	5	93	95	99	95
Percentage of consumers with knowledge of right to request information on SVHCs in articles	5	3	5	3	87	80	80	73
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.10. PROMOTE THE DEVELOPMENT OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS**

Table A3.10 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.10: Indicators for Objective 'Promote the Development of Alternative (especially Non-vertebrate) Test Methods '</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
UK Government contribution to the development of alternative test methods	5	5	4	5	93	95	99	95
UK Government's alternative testing awareness raising activities	5	5	4	5	93	95	99	95
Number of alternative (non-vertebrate) test methods subject to validation at European level	3	5	5	5	87	90	83	98
Number of ECVAM validated alternative (non-vertebrate) test methods	3	5	5	5	87	90	83	98
UK Government contribution to EU and OECD work on alternative testing methods and guidance	4	5	4	5	87	90	90	94
Number of alternative (non-vertebrate) test methods subject to validation at OECD level	3	5	4	5	80	85	81	93
Number of alternative tests adopted by EU	3	5	4	5	80	85	81	93
Number of OECD validated alternative (non-vertebrate) test methods	3	5	4	5	80	85	81	93
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.11. PROMOTE THE USE OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS**

Table A3.11 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.11: Indicators for Objective 'Promote the Use of Alternative (especially Non-vertebrate) Test Methods'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of project licenses withdrawn in UK because of availability of alternative test methods	5	5	4	5	93	95	99	95
Numbers of REACH dossiers for which (exposure-based) waiving is allowed as opposed to vertebrate testing involving one or more UK companies	5	5	4	4	93	90	97	83
Numbers of REACH dossiers including use of computational test methods as alternative to proposing vertebrate testing involving one or more UK companies	5	5	4	4	93	90	97	83
Numbers of REACH dossiers including use of non-vertebrate test methods as alternative to proposing vertebrate testing involving one or more UK companies	5	5	4	4	93	90	97	83
Numbers of REACH dossiers that include use of read-across as alternative to proposing vertebrate testing involving one or more UK companies	5	5	4	4	93	90	97	83
Numbers of REACH dossiers including vertebrate test proposals involving one or more UK companies	5	5	3	4	87	85	96	78
Proportion of vertebrate test proposals agreed to by ECHA involving one or more UK companies	5	5	3	4	87	85	96	78
Number of withdrawn EU test methods that involved use of vertebrate animals	3	5	4	5	80	85	81	93
Number of withdrawn OECD test methods involving use of vertebrate animals	3	5	4	5	80	85	81	93
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.12. MINIMISE THE USE OF VERTEBRATES IN THE TESTING OF CHEMICALS THAT FALL WITHIN THE SCOPE OF REACH OR CLP**

Table A3.12 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.12: Indicators for Objective 'Minimise the Use of Vertebrates in the Testing of Chemicals that Fall within the Scope of REACH or CLP'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of UK stakeholder submissions in favour and against acceptance of vertebrate testing involving UK companies	5	5	5	4	100	95	99	88
Number (by species) of vertebrate used for testing of chemicals in UK	5	5	4	5	93	95	99	95
Relative proportion of traditional to more refined test methods using vertebrate animals in the UK	5	5	4	5	93	95	99	95
Change in proportion of total EU usage of animals conducted by UK	5	5	3	5	87	90	97	90
Estimated savings of animal numbers for ECHA approved tests due to operation of SIEFs/Joint registrations involving one or more UK companies	5	3	2	3	67	65	76	58
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.13. SUPPORT THE EFFICIENT OPERATION OF THE REACH AND CLP PROCESS BY UK GOVERNMENT AND GOVERNMENT ORGANISATIONS**

Table A3.13 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.4: Indicators for Objective 'Support the Efficient Operation of the REACH and CLP Process by UK Government and Government Organisations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Cost of training of enforcement officers	5	5	4	4	93	90	97	83
Cost saving from having a common CA and enforcement for REACH and CLP	5	5	5	4	100	95	99	88
Number of proposals for harmonised classification (from UK government with reason)	5	5	5	5	100	100	100	100
Numbers and nature of REACH and CLP enforcement actions	5	5	5	4	100	95	99	88
Person days for REACH and CLP awareness/ promotion events (CA and other government bodies)	5	5	5	5	100	100	100	100
Person days of CA helpdesk activity	5	5	5	5	100	100	100	100
Person days of REACH and CLP website development (CA and other government bodies)	5	5	4	4	93	90	97	83
Person days of REACH and CLP activity at EU level by type (CA and other government bodies)	5	5	5	4	100	95	99	88
Person days of REACH and CLP activity at UK level by type (CA and other government bodies)	5	5	5	4	100	95	99	88
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

**A3.14. ENSURE THE ADEQUACY OF THE UK GOVERNMENT RESOURCE  
BASE TO MEET REACH AND CLP OBLIGATIONS**

Table A3.14 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.14: Indicators for Objective 'Maintain the Competitive Position of the UK Chemicals Sector'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Adequacy of skill sets of staff assigned to REACH and CLP activities (CA and other government bodies)	5	5	5	5	100	100	100	100
Budget for REACH and CLP work (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of CA helpdesk	5	5	5	5	100	100	100	100
Cost of CA website	5	5	5	5	100	100	100	100
Cost of REACH and CLP activity at EU level by type (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of REACH and CLP activity at UK level by type (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of REACH and CLP awareness/ promotion events supported by CA	5	5	5	5	100	100	100	100
Numbers of staff assigned to REACH and CLP activities (CA and other government bodies)	5	5	5	5	100	100	100	100
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

### **A3.15. ENCOURAGE THE EFFICIENT OPERATION OF THE REACH AND CLP PROCESS BY UK INDUSTRY**

Table A3.15 shows, for this objective, the results of the scoring exercise for each indicator in relation to REACH and CLP evaluations.

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<b>Table A3.15: Indicators for Objective 'Encourage The Efficient Operation of the REACH Process by UK Industry'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of authorisation applications (UK based)	5	5	4	4	93	90	97	83
Number of phase-in registrations by each deadline (UK based) by manufacturers and importers	5	5	4	4	93	90	97	83
Number of manufacturers and importers (UK based)	5	5	4	4	93	90	97	83
Number of notifications of SVHCs in articles by UK based companies	5	5	4	4	93	90	97	83
Number of proposals for harmonised classification (from industry with reason)	5	3	5	5	87	90	83	98
Actual expenditure by industry informing customers of changes due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure by industry on updating and/or replacement of IT systems due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure on by industry on staff training due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure on REACH authorisation	5	3	5	3	87	80	80	73
Actual expenditure on REACH registration	5	3	5	3	87	80	80	73
Consumer confidence in chemicals industry	4	3	2	2	60	55	66	44
Costs of updating SDS due to REACH and CLP	5	3	5	3	87	80	80	73
Number of campaigns by NGOs and trade unions on chemicals use	5	5	4	3	93	85	96	70
Number of joint registrations versus individual registrations	5	3	5	3	87	80	80	73
Number of REACH dossiers updated for classification changes (with reason for change)	5	3	5	3	87	80	80	73
Number of separate lists of prohibited substances prepared by retailers	5	3	2	2	67	60	74	45
Number of SMEs reducing manufacture/import to below 1t/y to avoid	5	3	3	3	73	70	77	63

**Table A3.15: Indicators for Objective 'Encourage The Efficient Operation of the REACH Process by UK Industry'**

Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	REACH Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
registration costs								
Number of SMEs taking advantage of reduced registration fees	5	3	5	3	87	80	80	73
Problems encountered with SIEFs	5	3	5	3	87	80	80	73
Savings in data costs due to SIEFs	5	3	5	3	87	80	80	73
Savings in environmental management costs due to better information on chemicals used	2	3	3	3	53	55	51	59
Savings in occupational health costs due to better information on chemicals used	2	3	3	3	53	55	51	59
Cost of environmental damage attributable to chemicals	4	2	1	3	47	50	57	50
Costs associated with burden to UK of ill-health of population attributable to chemicals	4	4	1	3	60	60	74	53
Costs associated with burden to UK of work-related ill-health attributable to chemicals	4	4	1	4	60	65	76	65
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

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**A3.16. ENCOURAGE THE PROVISION OF AN ADEQUATE RESOURCE  
BASE BY UK INDUSTRY WITH WHICH TO MEET REACH  
OBLIGATIONS**

Table A3.16 shows, for this objective, the results of the scoring exercise for each indicator in relation to the REACH regulation.

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<b>Table A3.16: Indicators for Objective 'Encourage The Provision of an Adequate Resource Base by UK Industry with which to meet REACH Obligations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>REACH Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Adequacy of scientific and technical resource base available to industry for demands of REACH and CLP	5	3	2	3	67	65	76	58
Capacity of UK contract laboratories and extent of involvement in REACH support activities	5	4	2	3	73	70	84	59
Numbers of toxicologists/ ecotoxicologist and risk assessors based in the UK	5	4	2	3	73	70	84	59
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

**ANNEX 4**

**RESULTS OF INDICATOR SCORING FOR CLP EVALUATION**

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#### **A4.1. REDUCE THE NEGATIVE HEALTH IMPACTS ARISING FROM OCCUPATIONAL EXPOSURE TO CHEMICALS**

Table A4.1 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation.

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Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	CLP Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Number of substances/mixtures reclassified with a 'higher' classification	5	4	5	3	93	85	89	74
Number of substances/mixtures reclassified with a 'lower' classification	5	4	5	3	93	85	89	74
Change in incidence of chemically-related occupational asthma	3	5	1	5	60	70	77	78
Change in incidence of chemically-related occupational chronic obstructive pulmonary disease (COPD)	3	5	1	5	60	70	77	78
Change in incidence of chemically-related occupational respiratory cancers	3	5	1	5	60	70	77	78
Change in incidence of chemically-related occupational skin cancers	3	5	1	5	60	70	77	78
Change in incidence of chemically-related occupational skin disease	3	5	1	5	60	70	77	78
Change in rates of serious worker injury or death attributable to chemicals	3	5	1	2	60	55	73	40
Change in the number of chemical incidents involving exposure of workers	3	5	1	3	60	60	74	53
Change in the number of the workers affected by chemical incidents	3	5	1	3	60	60	74	53
Change in number of prescriptions for chemically-related occupational dermatitis	3	3	2	3	53	55	59	55
Change in number of prescriptions for occupational asthma	3	3	2	3	53	55	59	55
Change in industry expenditure on local and general ventilation equipment	4	2	2	3	53	55	59	55
Change in industry expenditure on protective gloves	4	2	2	3	53	55	59	55
Change in incidence of work-related chemically-induced respiratory disease	3	2	1	3	40	45	49	49
Change in incidence of work-related chemically-induced skin disease	3	2	1	3	40	45	49	49
Change in numbers claiming compensation because of industrial injuries attributable to chemicals	1	5	1	5	47	60	60	75
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.2. REDUCE THE NEGATIVE HEALTH IMPACTS ON PUBLIC HEALTH OF EXPOSURE TO CHEMICALS**

Table A4.2 shows, for this objective, the results of the scoring exercise for indicators relevant to the CLP regulation. Several other indicators identified that relate to this objective were considered to only be relevant to REACH, and have therefore been omitted from this table.

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<b>Table A4.2: Indicators for Objective 'Reduce the Negative Health Impacts on Public Health of Exposure to Chemicals'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Change in the numbers of the public affected by chemical incidents	3	5	1	4	60	65	76	65
Change in the number of chemical incidents involving exposure of the public	3	5	1	3	60	60	74	53
Change in usage of chemicals of concern in consumer products	3	5	3	3	73	70	77	63
Numbers of substances withdrawn from the UK market because of concerns regarding human health	5	3	3	3	73	70	77	63
Change in public opinion of adequacy of controls on chemicals	2	3	1	2	40	40	47	36
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.3. REDUCE THE NEGATIVE IMPACTS ON THE ENVIRONMENT FROM CHEMICALS**

This objective was not considered of direct relevance to the aims of the CLP regulation and so no indicators of the environmental effects of chemicals were proposed for inclusion in the CLP evaluation programme.

#### **A4.4. MAINTAIN THE COMPETITIVE POSITION OF THE UK CHEMICALS SECTOR**

Table A4.3 shows, for this objective, the results of the scoring exercise for those indicators considered to be of some relevance to the CLP regulation. Three other identified indicators (Overall output of UK chemical industry, Percentage contribution to GDP and Profitability) were considered to only be relevant to REACH, and have therefore been omitted from this table.

#### **A4.5. MINIMISE ADVERSE STRUCTURAL CHANGES TO UK INDUSTRY**

This objective was not considered of direct relevance to the aims of the CLP regulation and so no indicators were proposed for inclusion in the CLP evaluation programme.

Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	CLP Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Value of exports	4	5	2	5	73	80	87	84
Value of imports	4	5	2	5	73	80	87	84
Volume of exports	4	5	2	5	73	80	87	84
Volume of imports	4	5	2	5	73	80	87	84
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.6. MINIMISE ADVERSE EFFECTS ON THE PATTERNS OF INDUSTRIAL ACTIVITY IN THE UK**

Table A4.4 shows, for this objective, the results of the scoring exercise for those indicators considered to be of some relevance to the CLP regulation. Three other identified indicators (Number products removed from market due to unsupported uses, Percentage change in number of suppliers per DU company and Risk characteristics of withdrawn substances) were considered to only be relevant to REACH, and have therefore been omitted from this table.

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<b>Table A4.4: Indicators for Objective 'Minimise Adverse Effects on the Patterns of Industrial Activity in the UK'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of process changes carried out	2	3	3	3	53	55	51	59
Number product reformulations carried out	2	3	3	3	53	55	51	59
Percentage change in DU product portfolios	2	3	3	3	53	55	51	59
Percentage change in price of chemical inputs (compared to overall industry inputs)	4	2	2	3	53	55	59	55
Reasons for withdrawal of substances	5	3	4	3	80	75	79	68
Total number of substances available on UK market	2	5	2	4	60	65	69	69
Total number preparations/mixtures available on UK market	2	5	2	3	60	60	67	56
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.7. MAXIMISE THE POTENTIAL FOR INNOVATION**

Table A4.5 shows, for this objective, the results of the scoring exercise for each relevant indicator in relation to the CLP regulation.

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<b>Table A4.5: Indicators for Objective 'Maximise the Potential for Innovation'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of high-risk substances substituted (and cost) by downstream users	2	3	2	3	47	50	50	54
Number of new products developed using lower risk substances by downstream users	2	3	2	3	47	50	50	54
Number of PPORD exemptions sought with reasons (UK sites) (manufacturers and importers)	4	5	2	4	73	75	86	71
REACH/CLP related R&D expenditure as a percentage of total R&D for selected sectors (manufacturers and DUs)	5	3	2	3	67	65	76	58
REACH/CLP related R&D expenditure as percentage turnover for selected sectors (manufacturers and DUs)	5	3	2	3	67	65	76	58
Reasons for substitution by downstream users	5	3	2	3	67	65	76	58
Value of new products developed by downstream users using lower risk substances	2	3	2	3	47	50	50	54
Value of REACH/CLP-related services provided to customers (manufacturers, importers and downstream users)	5	3	3	3	73	70	77	63
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

**A4.8. ENCOURAGE THE DISSEMINATION AND UTILISATION BY STAKEHOLDERS OF INFORMATION SOURCES AND ADVICE RELATING TO CHEMICALS**

Table A4.6 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation. One indicator under this objective (Number of consumer requests for information regarding SVHCs in articles) was considered to relate solely to REACH and was therefore omitted.

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<b>Table A4.6: Indicators for Objective 'Encourage the Dissemination and Utilisation by Stakeholders of Information Sources and Advice Relating to Chemicals'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Number of CA helpdesk enquiries	2	5	5	5	80	85	74	96
Number of guidance items downloaded from CA website	2	5	5	5	80	85	74	96
Number of information events (CA and other government bodies)	2	5	5	5	80	85	74	96
Number of subscriptions to CA e-Bulletin	2	5	5	5	80	85	74	96
Number of visits to CA website	2	5	5	5	80	85	74	96
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.9. ENCOURAGE THE PROVISION OF HIGH QUALITY INFORMATION AND ADVICE ABOUT CHEMICALS**

Table A4.7 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation. Two indicators under this objective (Number of (e)SDS failing legal requirements and Percentage of consumers with knowledge of right to request information on SVHCs in articles) were considered to relate solely to REACH and was therefore omitted from consideration here.

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<b>Table A4.7: Indicators for Objective 'Encourage the Provision of High Quality Information and Advice about Chemicals'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Completeness of CA website information	2	3	5	3	67	65	54	69
Quality of CA website information	2	3	5	3	67	65	54	69
Relevance of CA website information	2	3	5	3	67	65	54	69
Completeness of CA helpdesk responses	2	3	5	3	67	65	54	69
Quality of CA helpdesk responses	2	3	5	3	67	65	54	69
Relevance of CA helpdesk responses	2	3	5	3	67	65	54	69
Number of substance and mixture labels meeting CLP requirements	3	5	5	4	87	85	81	85
Percentage of retailers with knowledge of their customers' right to request information	2	2	2	2	40	40	40	40
Number of SDS meeting DU requirements	2	3	4	3	60	60	53	64
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.10. PROMOTE THE DEVELOPMENT OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS**

This objective was not considered of relevance to the aims of the CLP regulation and so no indicators were proposed for inclusion in the CLP evaluation programme.

#### **A4.11. PROMOTE THE USE OF ALTERNATIVE (ESPECIALLY NON-VERTEBRATE) TEST METHODS**

This objective was not considered of relevance to the aims of the CLP regulation and so no indicators were proposed for inclusion in the CLP evaluation programme.

#### **A4.12. MINIMISE THE USE OF VERTEBRATES IN THE TESTING OF CHEMICALS THAT FALL WITHIN THE SCOPE OF REACH**

This objective was not considered of relevance to the aims of the CLP regulation and so no indicators were proposed for inclusion in the CLP evaluation programme.

#### **A4.13. SUPPORT THE EFFICIENT OPERATION OF THE REACH AND CLP PROCESS BY UK GOVERNMENT AND GOVERNMENT ORGANISATIONS**

Table A4.8 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation.

**REACH Evaluation Scoping Study: Annex 4**

<b>Table A4.8: Indicators for Objective 'Support the Efficient Operation of the REACH and CLP Process by UK Government and Government Organisations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Cost of training of emergency service staff	5	5	4	4	93	90	97	83
Cost of training of enforcement officers	5	5	4	4	93	90	97	83
Cost saving from having a common CA and enforcement for REACH and CLP	5	5	5	4	100	95	99	88
Cost to emergency response bodies from adapting emergency response guidance in the light of CLP (CLP Article 45)	5	5	3	4	87	85	96	78
Number of emergency health responses by emergency response bodies regarding mixtures (CLP Article 45)	5	5	4	4	93	90	97	83
Format of data held by emergency response bodies (CLP Article 45)	5	5	4	4	93	90	97	83
Nature of data held by emergency response bodies (CLP Article 45)	5	5	4	4	93	90	97	83
Number of requests for statistical analysis submitted to emergency response bodies (CLP Article 45)	5	5	4	4	93	90	97	83
Number of preventative or corrective measures prepared by emergency response bodies (CLP Article 45)	5	5	4	4	93	90	97	83
Nature of preventative or corrective measures prepared by emergency response bodies (CLP Article 45)	5	5	4	4	93	90	97	83
Number of proposals for harmonised classification (from UK government with reason)	5	5	5	5	100	100	100	100
Numbers and nature of REACH and CLP enforcement actions	5	5	5	4	100	95	99	88
Person days for REACH and CLP awareness/ promotion events (CA and other government bodies)	5	5	5	5	100	100	100	100
Person days of CA helpdesk activity	5	5	5	5	100	100	100	100
Person days of REACH and CLP website development (CA and other government bodies)	5	5	4	4	93	90	97	83
Person days of REACH and CLP activity at EU level by type (CA and	5	5	5	4	100	95	99	88

<b>Table A4.8: Indicators for Objective 'Support the Efficient Operation of the REACH and CLP Process by UK Government and Government Organisations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
other government bodies)								
Person days of REACH and CLP activity at UK level by type (CA and other government bodies)	5	5	5	4	100	95	99	88
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

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**A4.14. ENSURE THE ADEQUACY OF THE UK GOVERNMENT RESOURCE BASE TO MEET REACH & CLP OBLIGATIONS**

Table A4.9 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation.

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**REACH Evaluation Scoping Study: Annex 4**

<b>Table A4.9: Indicators for Objective 'Ensure The Adequacy of the UK Government Resource Base to Meet REACH &amp; CLP Obligations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Adequacy of skill sets of staff assigned to REACH and CLP activities (CA and other government bodies)	5	5	5	5	100	100	100	100
Budget for REACH and CLP work (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of CA helpdesk	5	5	5	5	100	100	100	100
Cost of CA website	5	5	5	5	100	100	100	100
Cost of REACH and CLP activity at EU level by type (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of REACH and CLP activity at UK level by type (CA and other government bodies)	5	5	5	5	100	100	100	100
Cost of REACH and CLP awareness/ promotion events supported by CA	5	5	5	5	100	100	100	100
Numbers of staff assigned to REACH and CLP activities (CA and other government bodies)	5	5	5	5	100	100	100	100
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

#### **A4.15. ENCOURAGE THE EFFICIENT OPERATION OF THE REACH & CLP PROCESSES BY UK INDUSTRY**

Table A4.10 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation. Several of the indicators that have been identified under this objective relate solely to REACH and have, therefore, been omitted from this table.

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Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	CLP Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Number of manufacturers and importers (UK based)	3	5	4	4	80	80	80	80
Number of notifications of classification and labelling under CLP by UK based companies	5	5	5	4	100	95	99	88
Number of proposals for harmonised classification (from industry with reason)	5	3	5	5	87	90	83	98
Actual cost of stock disposal due to CLP changes	5	3	4	3	80	75	79	68
Actual expenditure by industry informing customers of changes due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure by industry on relabelling due to CLP (set-up and ongoing)	5	3	4	3	80	75	79	68
Actual expenditure by industry on repackaging due to CLP (set-up and ongoing);	5	3	4	3	80	75	79	68
Actual expenditure by industry on updating and/or replacement of IT systems due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure on by industry on staff training due to REACH and CLP	5	3	4	3	80	75	79	68
Actual expenditure on reclassification of mixtures due to introduction of CLP	5	3	5	3	87	80	80	73
Actual expenditure on reclassification of substances due to introduction of CLP	5	3	5	3	87	80	80	73
Consumer confidence in chemicals industry	4	3	2	2	60	55	66	44
Cost of changes to obligations under downstream legislation triggered by CLP (particularly REACH, BPD, PPPD and Seveso II)	5	3	4	3	80	75	79	68
Cost savings from using REACH registration data for reclassification of substances	5	3	5	3	87	80	80	73

Indicator	Scores for individual criteria				Weighted scores as % of maximum score possible for specified Option*			
	CLP Specificity	Quality of Information	Confounding Factors	Cost	System A	System B	System C	System D
Costs of updating SDS due to REACH and CLP	5	3	5	3	87	80	80	73
Level of consumer understanding of hazard labels under CLP as compared to hazard labels under CHIP	5	3	2	3	67	65	76	58
Number of campaigns by NGOs and trade unions on chemicals use	5	5	4	3	93	85	96	70
Number of REACH dossiers updated for classification changes (with reason for change)	5	3	5	3	87	80	80	73
Number of separate lists of prohibited substances prepared by retailers	1	3	2	2	40	40	40	40
Number of substances (and mixtures) reclassified using Annex VII alone	5	2	5	3	80	75	71	71
Savings in data costs due to SIEFs	3	3	5	3	73	70	63	70
Savings in environmental management costs due to better information on chemicals used	2	3	3	3	53	55	51	59
Savings in occupational health costs due to better information on chemicals used	2	3	3	3	53	55	51	59
Time taken by consumers to familiarise themselves with CLP	5	3	5	2	87	75	79	60
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								

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**A4.16. ENCOURAGE THE PROVISION OF AN ADEQUATE RESOURCE  
BASE BY UK INDUSTRY WITH WHICH TO MEET REACH &  
CLP OBLIGATIONS**

Table A4.11 shows, for this objective, the results of the scoring exercise for each indicator in relation to the CLP regulation.

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<b>Table A4.11: Indicators for Objective 'Encourage The Provision of an Adequate Resource Base by UK Industry with which to meet REACH &amp; CLP Obligations'</b>								
<b>Indicator</b>	<b>Scores for individual criteria</b>				<b>Weighted scores as % of maximum score possible for specified Option*</b>			
	<b>CLP Specificity</b>	<b>Quality of Information</b>	<b>Confounding Factors</b>	<b>Cost</b>	<b>System A</b>	<b>System B</b>	<b>System C</b>	<b>System D</b>
Adequacy of scientific and technical resource base available to industry for demands of REACH and CLP	1	3	2	3	40	45	41	53
Capacity of UK contract laboratories and extent of involvement in REACH support activities	1	4	2	3	47	50	50	54
Numbers of toxicologists/ ecotoxicologist and risk assessors based in the UK	1	4	2	3	47	50	50	54
* System A: Unweighted scores excluding costs System B: Unweighted scores including costs System C: Weighted – Specificity (60), Quality of information (60), Cost (10) and Confounding (10) System D: Weighted - Specificity (10), Quality of information (10), Cost (100) and Confounding (40)								