

# Environmental Statement 2022

1 January 2022 – 31 December 2022





This environmental statement provides stakeholders and the public with information on the environmental performance of the European Chemicals Agency up to the end of 2022. Its aim is to raise awareness of our policies on environmental issues.

This document was drafted in accordance with EMAS standards and is available on our website.

The European Chemicals Agency is officially EMAS-registered since 30 March 2022.

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### 1. INTRODUCTION

## 1.1. The European Chemicals Agency

The European Chemicals Agency (ECHA) was established by Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and is the central Agency to implement the EU's chemicals legislation to protect people and the environment from the hazards of chemicals. It also contributes to a well-functioning internal market and the innovation and competitiveness of the European chemicals industry.

ECHA develops independent scientific and technical opinions and takes binding decisions to ensure that chemicals companies comply with European law. Its committees provide scientific advice to the European Commission, relating to hazards and risks of chemicals, their impact on society and ways to mitigate their risks. ECHA practices transparent decision-making and its independency policy is used to monitor and prevent any conflicts of interest.<sup>1</sup>

The Agency hosts the largest database on chemicals in the world and uses this knowledge to advance the safe use of chemicals. The database is publicly available and free of charge, containing more than 245 000 chemicals. Companies, researchers, industry, and consumers can benefit from this data as well as the software formats and tools to use it.<sup>2</sup>

ECHA plays an important role in reducing chemical pollution in the EU. Together with EU Member States and the European Commission, ECHA ensures safer chemicals use in Europe by improving the available data, disseminating, and checking it and proposing risk management measures when needed.<sup>3</sup>

The Agency contributes to sustainability and circular economy. All materials and products are made of chemicals. Better knowledge and regulation of hazardous chemicals makes recycling easier, protects workers, consumers, and the environment, and enables industry to innovate, improve product quality and replace hazardous substances with safer ones.

ECHA's work has a global dimension. The Agency helps to make the import and export of dangerous chemicals more transparent and contributes to limiting the most hazardous pollutants worldwide. This work is part of the United Nations' worldwide conventions that protect people and the environment from hazardous chemicals.

The Agency is located in Helsinki, Finland, and moved at the end of 2019 to its new premises at Telakkakatu 6. The premises consist of two buildings, covering a total area of 18.200m<sup>2</sup>.

The office building accommodates about 640 staff members. It offers a modern and energy-efficient work environment distributed over nine floors. The adjacent conference building is part of the historic Helsinki shipyard and was renovated to contain a state-of-the-art conference facilities and meeting rooms. While the office is rated Platinum, the conference is rated with the Gold standard of LEED for Core and Shell development, which is a green building system that was designed to provide a set of performance criteria for certifying the sustainable design and construction of speculative developments and core and shell buildings.

<sup>&</sup>lt;sup>1</sup> https://echa.europa.eu/about-us/the-way-we-work/procedures-and-policies/conflicts-of-interest

<sup>&</sup>lt;sup>2</sup> <u>https://echa.europa.eu/information-on-chemicals</u>

<sup>3</sup> https://chemicalsinourlife.echa.europa.eu/

## 1.2. ECHA's 2030 climate neutrality pledge

The European Union aims to be climate-neutral by 2050. This is at the heart of the European Green Deal and follows the EU's commitment under the Paris Agreement, as well as the United Nations 2030 Agenda and the sustainable development goals.

The European Commission announced its intention to reduce its own environmental impact, and to present an action plan in 2020 to facilitate becoming climate-neutral by 2030. It also called on the other EU institutions and Agencies to come forward with similar ambitious measures.

During the 58th Meeting of the Management Board 17-18 June 2020, the ECHA MB supported the vision of an Agency with net-zero greenhouse gas emissions and endorsed the Executive Director's proposal for ECHA to become climate-neutral by 2030:

"As an Agency mandated with public health and environmental protection, it is considered that ECHA should become, as an organisation and employer, climate-neutral by 2030."

This vision will guide the setting of ECHA's environmental objectives in the coming years.

## 1.3. ECHA's Integrated Management System

ECHA's Integrated Management System<sup>4</sup> (IMS) Strategy and Framework consolidates and integrates the different elements of the Agency's management system such as the ECHA Quality Management System and the ECHA Environmental Management System (EMS) (see figure 1).

The European Chemicals Agency is certified under ISO 9001<sup>5</sup> since 2014 and ISO 14001<sup>6</sup> since 2016 and was recertified in 2020. Since March 2022 the Agency is registered under the EU Eco-Management and Audit Scheme (EMAS) (Regulation (EC) No 1221/2009<sup>7</sup> (EMAS); Commission Regulation (EU) 2017/1505 (updated Annexes I, II and III) and Commission Regulation 2018/2026 (amended Annex IV)).



Figure 1 ECHA's IMS Integrated Management System

https://echa.europa.eu/about-us/the-way-we-work/integrated-quality-management

<sup>&</sup>lt;sup>5</sup> https://echa.europa.eu/documents/10162/13607/echa iso 9001 2015 certificate en.pdf/4add4092-02c7-49d3-9327-f6b65af8c475

<sup>&</sup>lt;sup>6</sup> <a href="https://echa.europa.eu/documents/10162/13607/echa">https://echa.europa.eu/documents/10162/13607/echa</a> iso 14001 2015 certificate en.pdf/9bf0b651-e1c8-31cd-ca33-ec0f353e04a8

<sup>&</sup>lt;sup>7</sup> EUR-Lex - 32009R1221 - EN - EUR-Lex (europa.eu)

## 1.4. Purpose and Scope of the EMS

ECHA's environmental management system (EMS) is a component of the Agency's Integrated Management System (IMS) Strategy and Framework<sup>8</sup>.

The EMS applies to ECHA's administrative and technical activities in the broadest sense, i.e. the activities of all staff and any other people working at the premises, such as service providers, and covers the ECHA premises.

ECHA regularly carries out on behalf of the Commission and the EU Member States assessments of the operation of the EU Chemicals legislation within its mandate. These reports ("Costs and benefits of REACH restrictions proposed between 2016-2020<sup>9</sup>", "Report on the operation of REACH and CLP 2021<sup>10</sup>") include descriptions of the observed indirect environmental impacts of ECHA's work under REACH. They contribute to the revision of EU legislation which is carried out through the impact assessment system by the European Commission's Regulatory Scrutiny Board (RSB)<sup>11</sup>. Whereas responsibility of the adoption of EU policies is shared with the European Council and European Parliament – the EU Legislator, the EMS is not the appropriate tool for the governance, management or reporting on the environmental impacts of these policies. As such, the environmental impacts of ECHA's operational activities under the REACH Regulation and other EU Chemicals legislation are dealt within the EU Legislative framework.

The EMS at the Agency aims to continuously improve the environmental impact of the Agency and increase sustainability in the day-to-day operations of ECHA by carefully using natural resources and making corresponding choices when selecting products and services from external suppliers.

ECHA is registered in Finland under NACE Code 99.00 (Activities of extraterritorial organisations and bodies). This is consistent with the NACE code assigned to the main EU Institutions and other EU Agencies. ECHA's corporate registration is maintained by the Finnish Tax Administration and available in the Finnish Business Information System<sup>12</sup>.

ECHA operates an Environmental Management System which contains the following scope for the verification of EMAS:

Managing and performing technical, scientific and administrative aspects of the implementation of the REACH (Registration, Evaluation, Authorisation and Restriction), CLP (Classification, Labelling and Packaging), PIC (Prior Informed Consent) and Biocide regulations and developing supporting IT applications.

Whereas no specific sectoral reference document (SRD)<sup>13</sup> exists under NACE 99.00, for the purpose of EMAS, it is considered that ECHA's activities fall into the Public Administration (PA) sector.

By analogy, ECHA uses the relevant parts of the sectoral reference document to identify its core indicators as approved by "Commission Decision (EU) 2019/61 of 19 December 2018 on the sectoral reference document on best environmental management practices, sector environmental performance indicators and benchmarks of excellence for the public administration sector under Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS)".

<sup>&</sup>lt;sup>8</sup> https://echa.europa.eu/about-us/the-way-we-work/integrated-quality-management

<sup>&</sup>lt;sup>9</sup> Costs and benefits of restrictions (europa.eu)

<sup>&</sup>lt;sup>10</sup> Report on the operation of REACH and CLP 2021 - ECHA (europa.eu)

<sup>11</sup> https://ec.europa.eu/info/law/law-making-process/regulatory-scrutiny-board en

<sup>12</sup> BIS - Business information system - BIS-Search (ytj.fi)

<sup>13</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019D0061&from=EN

## 1.5. Management of the EMS

Senior Management defines the Agency's corporate strategy, work programmes and objectives.

Objectives concerning the improvement of environmental performance of ECHA, its processes and overall output are referred to as **environmental objectives**. The objectives shall be realistic and measurable, and include:

- objectives for decreasing adverse impacts made by the Agency's environmental aspects and thus increasing environmental efficiency of operations,
- objectives facilitating the compliance with legal environmental obligations as well as environmental obligations introduced by diverse stakeholders,
- objectives for reducing and mitigating environmental risks.

A core group of ECHA staff (the Environmental Compliance and Sustainability Team) monitors ECHA's progress in meeting its environmental objectives and reports on a regular basis (at least once a year) to senior management. If necessary, corrective action can be taken to ensure that the Agency meets its agreed targets.

The information is presented during the annual Management Review and is published on the internal ECHAnet according to the communications plan as well as in the ECHA Annual Report.

#### **Documentation**

ECHA maintains documented information of the Agency's environmental performance, including criteria and assumptions which is used when determining significant aspects and environmental indicators. These form part of the **environmental review that defines** ECHA's environmental objectives, targets and environmental work programme. In 2022, the other inputs included:

- Environmental Impact Assessment;
- Environmental monitoring and reporting;
- Carbon footprint calculator;

## **Improvement opportunities**

Improvement opportunities are evaluated and can be used to plan actions that improve the Agency's environmental performance.

The ideas for improvement can be suggested from various sources e.g. by staff, the landlord; external contractors and other stakeholders. Improvement proposals are recorded in the IMS tool or in suitable meeting minutes or staff feedback to ensure that they are not lost and handled in an appropriate way by the relevant party.

When planning improvement actions, the Agency's ability to control or influence (both directly and indirectly) the relevant environmental aspect is considered.

## 1.6. Environmental Policy

## **ECHA ENVIRONMENTAL POLICY**

The European Chemicals Agency (ECHA) implements the EU's chemicals legislation to protect people and the environment from the hazards of chemicals.

ECHA's management duly affirms its commitment to environmental protection and sustainability, to the continual improvement of ECHA's environmental performance and environmental management system (EMS) and will pursue all opportunities to:

- promote the careful use of natural resources in the Agency's day-to-day operations and strive to reduce adverse impacts on the environment;
- set and implement environmental objectives and targets, and regularly measure their achievement in line with ECHA's environmental work programme;
- continually raise staff awareness and encourage staff to act sustainably and contribute actively to achieving the environmental objectives and targets;
- be net-carbon neutral by 2030.

In implementing ECHA's Environmental Policy, the Agency will follow its stakeholders' needs and its mission for environmental and human health protection.

ECHA will align its environmental planning and implementation approach to the commitments and provisions of <u>ECHA's Integrated Management System Strategy and Framework</u>, the EU Eco-Management and Audit Scheme (EMAS), as well as to its work programme.

ECHA has identified and conforms to the applicable legal requirements relating to the environment.

## 1.7. Environmental Impact of the Agency's activities

#### 1.7.1. Determination of environmental aspects

This section describes the identification, ability to control or influence and significance of environmental aspects and the legal and regulatory obligations.

Identification of environmental aspects

The European Chemicals Agency distinguishes the environmental aspects of its activities, products and services according to the nature of their impact on the environment:

- Positive impact on the environment

The Agency's mandate (operational business) is determined by the EU chemicals legislation, the REACH, CLP, PIC, Biocides and POPs Regulations, and the Waste Framework Directive (WFD), which all have environmental protection as a core objective. ECHA's processes are designed and operated to deliver the products and services to a high-quality standard and in compliance with the applicable regulations. The Agency's Integrated Management System (IMS) supports the effective governance of its operations and the achievement of its objectives in this respect.

- Negative impact on the environment

In ECHA's daily operations, the consumption of resources as well as the generation of waste and emissions contribute to the depletion of resources and pollution of the environment. The Agency strives to reduce these negative impacts on the environment by using resources carefully and minimising sources for pollution and emissions while not compromising its compliance obligations, under the Regulations and the Directive, and the quality of its products and services.

These environmental aspects are assessed considering:

- (i) The Agency's ability to control or influence the aspect,
- (ii) Legal and other compliance obligations.
- (iii) The significance of their associated adverse impact(s) on the environment

Furthermore, the environmental aspects of operational changes, including planned or new developments, temporary conditions and unforeseen emergency situations may be subject to assessment when appropriate.

#### (i) Ability to control or influence the environmental aspect

Environmental aspects are classified as direct or indirect aspects according to the Agency's ability to control or influence the respective aspect.

The level of control or influence is determined by analysing and agreeing on the risks and opportunities related to climate conditions, compliance obligations, travel of staff and other experts, and physical boundaries (building). Based on a common agreement, a numerical score for the "level of control/influence" is given to each environmental aspect.

ECHA lists the classification nomenclature in the Environmental Impact Assessment tool.

## (ii) Legal and other compliance obligations

The Agency has identified the implications to the organisation when determining the environmental aspects of all applicable legal requirements relating to the environment. These are updated periodically and listed in a register. Further details can be found in Section "2.5 Legal Obligations" below.

#### (iii) Significance of environmental aspects

The environmental aspects are classified according to the significance of their environmental impacts, by considering the occurrence/quantity of the aspect and the severity of its associated impact(s).

The impact assessment is carried out in preparation of the Environmental Work Programme and recorded in the Environmental Impact Assessment Report. It is based on the aggregated data of the previous years. The outcome of the assessment is part of the background material feeding into the Management Review.

#### Determination of impact severity

The relevant process owners or team leaders determine a numerical score for the severity of the impact considering

- potential impact(s) on the environment;
- legal and regulatory implications;
- stakeholder expectations (reputational damage);
- financial impact.

#### Determination of aspect occurrence/quantity

ECHA determines a numerical score for the occurrence or quantity of each environmental aspect. The occurrence/quantity score of an aspect is determined based on collected environmental data. Historical data is used for trend analyses, where applicable. The Agency's activities have a direct and indirect impact on the environment. ECHA regularly monitors the consumption and generation of the following core indicators:

- Electricity
- Energy for heating and cooling
- Water
- Printing paper
- Waste
- Emissions

In the reporting of core indicators, the European Chemicals Agency does not report on land use with regards to biodiversity. The premises of the Agency do not cover land, nature-oriented areas, or sealed areas as defined in the EMAS regulation<sup>14</sup>.

The Agency has recorded its environmental related data since 2015. The environmental statement 2022 presents data for a four-year period including 2022, the final year of the current environmental work programme using 2019 as the baseline.

 $<sup>^{14}</sup>$  Commission Regulation (EU) 2018/2026 amending Annex IV to Regulation (EC) No 1221/2009 on EMAS

Environmental aspect	Environmental indicator	Impact severity
Air emissions*	Meeting and conference visitors' flights (t CO2 eqv.)	Climate change, fossil fuel depletion
Air emissions*	Staff's mission flights (t CO2 eqv.)	Climate change, fossil fuel depletion
Choice and composition of goods and services	Green Procurement of fixed assets and services	Environmental impact caused by third parties
Choice and composition of goods and services	Outsourced services (data centres)	Environmental impact caused by third parties
Energy efficiency	Electricity consumption (kWh, kWh/person)	Climate change, fossil fuel depletion
Energy efficiency	District heat consumption (MWh, kWh/person)	Climate change, fossil fuel depletion
Paper consumption	Paper consumption (sheets/person)	Climate change, soil, air and water contamination
Waste generation	Generation of mixed waste (tonnes)	Energy recovery, air and soil pollution
Waste generation	Generation of energy waste (tonnes)	Energy recovery, natural resource conservation, air pollution
Waste generation	Generation of recyclable waste (tonnes)	natural resource conservation, climate change
Waste generation	Generation of Waste Electrical and Electronic Equipment waste (tonnes)	Natural resource conservation, air, water and/or soil pollution
Waste generation	Generation of lighting residue waste (tonnes)	Energy recovery, hazardous waste, air pollution
Water use	Water consumption (m³, m³/person)	Risk of eutrophication, water contamination

<sup>\*</sup> Significant aspects for 2020-2022 as determined by the Management Review 2019

## 1.7.2. Positive impacts of the Agency<sup>15</sup>

This section is an extract of the key achievements of the Agency in 2022 as listed in the annual report 2022.

#### 1.7.2.1. REACH and CLP

#### Registration preparation and submission

In 2022, we continued to receive and process registration dossiers, providing companies with the tools and support they need to successfully register and update their registration information.

<sup>&</sup>lt;sup>15</sup> Annual Report 2022 - ECHA (europa.eu)

Throughout the year, we received 13 530 registrations (including updates). To ensure the completeness of submitted information, we conducted technical completeness checks on all submitted registrations, including manually verifying certain aspects. We reached our annual target for verifying company size, checking 411 small and medium-sized enterprises (SMEs), and continued working towards reducing the time lag between submission and size confirmation for these companies.

The opportunity for companies to claim registration numbers assigned to their notifications of new substances (NONS)<sup>16</sup> ended in July. More than 4 700 numbers remained unclaimed, and these can no longer be used by registrants. The unclaimed registration numbers cover more than 2 800 substances, mostly registered in low volumes, and presumably abandoned by manufacturers or importers before 2008.

When the registrations were declared not valid, the substances were removed from this pool and dropped from ECHA's regulatory activities. The information from the unclaimed NONS remains available in our chemicals database but has been updated to show that the unclaimed numbers are no longer valid.

Since April 2022, only representatives have had to identify the non-EU manufacturers they represent and provide their contact details to ECHA. We released a manual to guide them on how to rearrange their REACH-IT accounts to ensure separate accounts are held for each non-EU manufacturer they represent. By October, this action had identified companies behind more than 95 % of registrations by only representatives.

Initial steps have been taken to develop a future vision for REACH-IT ensuring its long-term sustainability, preparing the tool to handle submissions for the various chemical regulations currently assigned to us, and to make it agile enough to accommodate future legislation we may work on.

The latest release of IUCLID includes new features such as improved search options, better handling of datasets, and enhanced cross-referencing capabilities. Additionally, the software has been modernised and adapted to better meet the needs of different users, including those who wish to use their own IT systems to prepare and submit classification and labelling notifications through ECHA's system-to-system service.

Chesar was maintained and remains available for registrants to prepare their chemical safety reports. In parallel, work continued to develop the Chesar Platform, a new risk assessment tool that will harmonise assessments under both REACH and biocides (see Section 1.7 Safe and sustainable use of chemicals).

In 2022, the ECHA Helpdesk received 9 500 enquiries related to regulatory or IT issues, while national helpdesks active in the HelpNet network handled 45 000 questions. Since we now dispatch more questions to the national helpdesks, we introduced legislation-focused videoconferences where national helpdesks can present their challenges and engage in discussions with other helpdesks. The aim is to ensure consistency in responses across the EU. The majority of helpdesks participate in these videoconferences, which have resulted in even more productive collaboration than the two workshops previously organised each year.

## Identification and prioritisation

In 2022, ECHA continued to assess the regulatory needs of groups of substances. Assessing substances in groups allows all the available information to be used and publishing the groups provides companies with a clearer understanding of the actions planned by regulators, which in turn will help them better prepare to replace harmful chemicals with safer alternatives.

<sup>&</sup>lt;sup>16</sup> In 2008, ECHA assigned registration numbers to all substances notified under the Dangerous Substances Directive, for use by registrants under REACH.

During the year, ECHA continued its work on screening structurally similar substances in groups. The planned number of groups of substances for which the assessment of regulatory needs is carried out was 65 and we started assessments for around 2 000 substances across 61 groups<sup>17</sup>. Nearly 500 of the substances covered were registered above 100 tonnes per year.

In terms of assessments made during 2022, for the substances registered above 100 tonnes per year, roughly 200 were concluded as potentially needing regulatory follow-up. The Integrated Regulatory Strategy has led to around 75 % of substances registered above 100 tonnes being assessed by the end of 2022. This means, around 1 000 high-tonnage substances still need to be assessed. ECHA will publish a more detailed report on the results in the course of 2023 as well as completing a review of the overall Integrated Regulatory Strategy.

We continued the practice of publishing reports on the assessment of regulatory needs (ARN) for groups of substances, making the possible regulatory actions and the progress made on grouping more transparent. During the year, we published reports for 63 groups covering around 1 600 substances. These included a group of 148 bisphenols, of which more than 30 are potential candidates for restriction because of hormonal or reprotoxic effects, and 52 hydrocarbylsiloxanes, for which restriction may be considered due to persistent and bioaccumulative properties. For a number of substances, hazards need to be clarified before risk management can be recommended.

The assessment reports are publicly available on ECHA's website in the public activities coordination tool (PACT)<sup>18</sup>, which provides an overview of substance-specific activities that authorities are working on under REACH and CLP.

#### **Evaluation**

The REACH Evaluation Action Plan sets targets for checking the compliance of registration dossiers submitted to ECHA. A minimum of 20 % of registrations for substances registered in quantities of 100 tonnes or more per year need to be checked for compliance, with a similar percentage for substances in tonnage bands less than 100 tonnes per year. This means that all registered substances go through a grouping and screening process, and that about 30 % will be checked for compliance.

In 2022, we continued to screen structurally similar substances in groups, and based on the assessments of regulatory needs, we selected 294 substances from 46 groups for compliance checks.

In total, ECHA performed 330 compliance checks in 2022. We carried out 302 full compliance checks<sup>19</sup> and 213 testing proposal examinations, covering 475 unique substances. These checks resulted in 459 draft decisions being issued: 277 on the compliance checks and 182 on the testing proposal examinations. We also conducted 28 targeted compliance checks<sup>20</sup> based on specific concerns. In 2022, a total of 421 decisions were adopted. Collaboration with the Member State competent authorities was effective and showed good alignment as only 5 % of the draft decisions had to be discussed by the Member State Committee following proposals for amendment.

ECHA conducts follow-up actions to verify that any updated information provided in response to evaluation decisions addresses what was requested. In 2022, the considered requests were addressed adequately in 59 % of cases. 41 % remained unaddressed and these were notified to Member States for enforcement. Some of these unaddressed cases were due to delays in

<sup>19</sup> As a minimum, full compliance checks cover genotoxicity, repeated-dose toxicity, pre-natal developmental toxicity, reproductive toxicity, carcinogenicity, long-term aquatic toxicity, biodegradation and bioaccumulation.

 $<sup>^{17}</sup>$  61 groups of which 10 were large (>39 members, more than double the median group size), so this is equivalent to 71 groups.

<sup>18</sup> https://echa.europa.eu/pact

 $<sup>^{20}</sup>$  In a targeted compliance check, ECHA evaluates a specific part of the registration dossier based on specified concerns.

conducting the studies resulting from capacity constraints in laboratories that worsened during the COVID pandemic.

An analysis for 2020-2022 revealed that around 20 % of completed dossier evaluation cases were being considered for further regulatory action (harmonised classification and labelling (CLH), endocrine disruptor (ED), and persistent, bioaccumulative and toxic (PBT) assessment or substance evaluation). The most frequent outcome by far was the consideration of a CLH process, particularly for reproductive toxicity concerns.

For substance evaluation, the Community rolling action plan (CoRAP) update for 2022–2024 was published in March 2022. The list was updated with 27 substances for evaluation by 10 Member States. Of these 27, four were due to be evaluated in 2022 by three Member States – two by Denmark, and one each by France and Germany<sup>21</sup>.

For 31 substances, a conclusion was reached in substance evaluation. Some of the regulatory follow-up actions at EU level include harmonised classification and labelling for carcinogenicity (2 substances), mutagenicity (1), reproductive toxicity (2), sensitisation (4), identification as a substance of very high concern (5), and restriction (4). For 11 substances, the evaluating Member State competent authority will prepare a separate risk management option analysis to determine appropriate follow-up actions. In the December MSC meeting, the draft CoRAP update for 2023-2025 was referred to the Member State Committee.

In 2022, nine substance evaluation decisions were issued requesting data to address concerns regarding endocrine disruption (3 substances), persistence, bioaccumulation and toxicity (PBT/vPvB) (4) and/or mutagenicity (2). Of these nine, five were adopted by the Member State Committee (four through written procedure and one in the meeting), and four were directly adopted by ECHA as no proposals for amendment were received.

Following a decision by the Board of Appeal, ECHA now takes changes to a registrant's tonnage band into account until an adopted evaluation decision is communicated to the registrant. If a registrant wants ECHA to take these changes into account, they need to inform the agency and update their dossiers after they receive a draft evaluation decision. They also have to provide evidence of the previous year's imported or manufactured volumes if they downgrade their tonnage band.

Once the adopted evaluation decision is communicated to the registrants, they must fulfil all information requirements outlined in the decision, regardless of any subsequent changes in their tonnage band or if they cease manufacture.

#### **Biocides**

Biocidal products protect people, animals, and goods by controlling harmful organisms, including pests and microorganisms. They contain active substances that need to be approved before the biocidal product can be authorised. Member States assess the applications for approval of active substances and for Union authorisation of products, and ECHA's Biocidal Products Committee (BPC) forms scientific opinions on these assessments. The committee's opinions serve as a basis for the European Commission to decide on whether or not to approve the active substances or grant the Union authorisations.

In 2022, the BPC adopted 19 opinions for active substance approvals within the review programme, maintaining the levels seen in the previous year (18 opinions in 2021), which is below the targets set to make significant progress in the review programme based on the initial plans of Member States. For Union authorisations<sup>22</sup>, a positive trend continued, with the number

<sup>22</sup> The procedure through which companies can apply for permission to place their biocidal products on the market throughout the EU, without needing specific national authorisations.

<sup>&</sup>lt;sup>21</sup> 2-furaldehyde (EC 202-627-7, CAS 98-01-1) and reaction products of phosphoryl trichloride and 2- methyloxirane (EC 807-935-0, CAS 1244733-77-4) by Denmark; 1,3,4,6,7,8- hexahydro4,6,6,7,8,8- hexamethylindeno[5,6-c]pyran (EC 214-946-9, CAS 1222-05-5) by France; and 2-Pentanone oxime (EC 484-470-6, CAS 623-40-5) by Germany.

of BPC opinions on Union authorisation increasing to 22 this year (15 in 2021 and 9 in 2020).

It has become evident that the obligation in the Biocidal Products Regulation of reviewing all existing active substances<sup>23</sup> by 2024 will not be achieved, as Member States are submitting fewer draft assessment reports than expected. ECHA will continue to offer support to Member States to complete as many substance assessments as possible. Specific support is also provided on the assessment of endocrine disrupting properties, which has been particularly challenging in the evaluation of active substances in several Member State dossiers.

Throughout the year, the BPC provided opinions on various challenging cases that were pending, such as the approval of sulphur dioxide and ozone. Many biocidal active substances can also be used as pesticides, food additives, or components in food contact materials and, as such, are also regulated under other EU legislative frameworks. In collaboration with the European Food Safety Authority (EFSA), we make substantial efforts to align our perspectives in the context of the 'one substance, one assessment' concept as a key aspect of the Chemical Strategy for Sustainability. Despite these efforts, it was not possible to achieve full alignment in the case of sulfur dioxide<sup>24</sup>, and a broader alignment of EU chemicals regulation requirements, approaches and decision-making procedures will be needed to fully achieve the 'one substance one assessment' concept. In the meantime the efforts will continue with the aim to bring about harmonisation and coherence in hazard and risk assessments to the extent possible

Another example of the groundwork in 'one substance, one assessment' is our collaboration with EFSA to develop joint guidance on the impact of water treatment processes on active substance residues in drinking water, which is expected to be concluded in 2023.

Another area of significant progress is the development of a specific guidance on the assessment of alternatives to active substances meeting the exclusion and substitution criteria, the *Guidance for applicants and Member States*<sup>25</sup> that was adopted by the BPC in its December meeting. The guidance is based on pilot cases: in June, the BPC found that there are no suitable alternatives currently available for hexaflumuron for use as an insecticide, acaricide and in products to control arthropods. Due to its persistence, bioaccumulation, and toxicity, this active substance meets the exclusion criteria, which means its approval is only possible on the grounds of protection of public health, as there are currently no alternatives.

Later in the year, the committee carried out a comparative assessment for anticoagulant rodenticides, looking at both chemical and non-chemical alternatives. The committee found that mechanical traps are suitable for controlling indoor mice infestations, but that their effectiveness is uncertain for other uses and for controlling other rodents like rats.

In September, we took a step forward in developing guidance for assessing the risk to pollinators, by publishing a scientific report on the biodiversity, ecology, and sensitivity of pollinators other than bees to biocides<sup>26</sup>. The report thoroughly explains the ecology of four insect groups that together cover the majority of flower-visiting pollinators. The findings showed that certain species can be just as sensitive, or even more so, to some active substances compared to honeybees. However, due to limited knowledge on the variability of sensitivity, further research is necessary to fill data gaps on the species' ecological traits before a proper assessment of the risk posed by biocidal products can be conducted.

#### **Environmental Directives and International Conventions**

#### **Prior informed consent**

<sup>23</sup> Active substances which were on the market in biocidal products on 14 May 2000.

 $<sup>^{24}</sup>$  https://echa.europa.eu/documents/10162/763823/joint echa efsa comparison evaluations en.pdf/9805dc77-9434-6ae1-0267-fa68ecb3b9c2?t=1671533934305

 $<sup>\</sup>frac{25}{\text{https://echa.europa.eu/documents/10162/1276600/guidance analysis alternatives biocides en.pdf/10646cd2-8ec9-36a8-2f00-201fcc49c43e}$ 

<sup>&</sup>lt;sup>26</sup> https://echa.europa.eu/documents/10162/17231/nbp\_report\_en.pdf/7ea8718e-2d64-141e-9f23-3c9207dcd824

In April 2022, 22 chemicals were added to the Prior Informed Consent (PIC) Regulation, including the first substance-in-substance entry for substances containing benzene as a constituent in concentrations equal or greater than 0.1 % weight-by-weight. The update started to apply in July, while the necessary changes to ePIC – ECHA's IT system for PIC implementation – were in place since April 2022 already.

In 2022, ECHA processed 10 071 export notifications – an approximate 6 % decrease compared to the previous year. The workload for explicit consent requests increased by around 10 % compared to 2021, while waiver-related tasks stabilised. Our workload on PIC also increased with the receipt in 2022 of 11 new access to document requests – seven of which were completed by the end of the year $^{27}$ .

Our October report on the exchange of information under PIC highlighted a 23 % increase in export notifications during 2020-21, compared to 2018-19. The notifications contain information on where the chemicals are exported, their uses and hazardous properties, as well as how to safely store, transport, use and dispose them. The EU must provide these export notifications to authorities in non-EU importing countries before the chemicals can be exported.

In 2022, we drafted seven new final regulatory action (FRA) notifications and provided them to the European Commission. We also revised five existing FRAs. These notifications inform Parties to the Rotterdam Convention<sup>28</sup> that the use of certain chemicals has been banned or severely restricted in the EU and are a first step towards the possible inclusion of these chemicals in the global convention.

In December, we published our report looking back at the trade in chemicals exported from and imported to the EU under PIC in 2021. The report showed a significant increase in reported trade volumes of PIC chemicals, in large part due to the change in status of the United Kingdom (UK) from an EU to a non-EU country. No longer considered internal market trade, exports and imports between the EU and UK are now reported under PIC.

The UK also contributed considerably to increases of imports to the EU in 2021. The total amount of PIC chemicals that came into the EU in 2021 was around 883 000 tonnes, a 120 % increase compared to 2020 figures. Around one third of this volume came from the UK.

In November, data on chemicals subject to PIC, export and import notifications, explicit consents and waivers, and lists of designated national authorities were all fully integrated into ECHA's dissemination platform. Searching PIC data has been streamlined with each PIC dataset having its own custom search functionality and available for bulk download.

ECHA continued throughout the year to provide support to the European Commission, not only in *ad hoc* discussions with EU and non-EU authorities, but also in reporting, international cooperation (particularly participation at the Rotterdam Convention Conference of the Parties meeting in June) and policy implementation and development through meetings with designated national authorities and providing input on possible improvements to PIC legislation.

#### **Persistent organic pollutants**

Exposure to persistent organic pollutants (POPs) can have various severe adverse health effects. For instance, they may lead to conditions such as cancer and birth defects. To tackle these concerns, the Stockholm Convention was set up as a global treaty to address the negative impact that these biodegradable resistant chemicals have on human health and the environment.

The EU enforces the Stockholm Convention through the POPs Regulation, tasking ECHA with, for example, identifying and proposing new POPs within the EU.

<sup>&</sup>lt;sup>27</sup> The four ongoing requests were closed in early 2023.

<sup>28</sup> http://www.pic.int/

The draft risk management evaluation for methoxychlor, an organochlorine pesticide used as an insecticide, was adopted in January. ECHA played a supportive role in the process, assisting the European Commission in drafting the risk management evaluation and the substance was recommended for inclusion in the Stockholm Convention by the Persistent Organic Pollutants Review Committee (POPRC).

In its role of providing technical and scientific support, ECHA assisted the European Commission and Member States in preparing and reviewing the draft risk profile for chlorpyrifos and draft risk management evaluations for Dechlorane Plus and UV-328. ECHA's committees adopted opinions on the restriction proposal for Dechlorane Plus, that supported the risk management evaluation of the substance in the POPRC.

In May, we launched consultations looking for relevant information to support draft risk management evaluations for Dechlorane Plus and UV-328, and to invited comments on the draft risk profiles for chlorpyrifos, chlorinated paraffins and long chain perfluorocarboxylic acids (LC-PFCAs). The risk management evaluations for each of these substances were adopted by the POPRC in September, with both substances recommended for listing under the Stockholm Convention.

In November, ECHA released a Union Overview report<sup>29</sup> and individual reports for each Member State<sup>30</sup>, detailing the implementation of the POPs Regulation in the EU. The reports provide information on various aspects of POPs, such as manufacturing, market placement, stockpiling, enforcement actions and releases of POPs into the environment.

#### **Waste Framework Directive**

Data on products containing substances of very high concern (SVHCs) is collected in ECHA's SCIP database<sup>31</sup>. This information is made available throughout the product's lifecycle, including when it becomes waste. This aims to help waste operators improve their recycling practices so they can prevent harmful substances from re-entering the market. It may also help consumers make more informed and sustainable purchasing choices. All of this supports the goals of a circular economy.

In 2022, companies across the EU had successfully submitted almost 10 million notifications (including updates) to the database. The data collected increases knowledge about which harmful chemicals are present in supply chains and can help companies to phase them out.

Throughout the year, ECHA continued to improve the way information is displayed in the database, stabilising the system, and providing help to stakeholders through support documents and events. ECHA also made progress in developing reports that would allow this information to be used for regulatory purposes, specifically for the restriction process.

A survey was launched in March to collect ideas from users on how to further enhance the database, and a workshop was held with waste operators who gave feedback on their use of SCIP data.

In May, this was followed up by an evaluation<sup>32</sup> of SCIP, assessing the extent to which objectives have been achieved and performing an assessment of the costs incurred. The results will help in assessing the future needs and determine priority areas for the database, albeit several of the shortcomings identified would require amendments to the legal text (for example, mandatory information requirements).

<sup>&</sup>lt;sup>29</sup> https://echa.europa.eu/documents/10162/16596982/pops union overview report en.pdf/0995480d-5f55-4f08-999c-339395c93482

<sup>30</sup> https://echa.europa.eu/planning-and-reporting

<sup>&</sup>lt;sup>31</sup> SCIP is the database for information on Substances of Concern In articles as such or in complex objects (Products) established under the Waste Framework Directive (WFD).

<sup>32</sup> https://echa.europa.eu/documents/10162/6205986/scip\_evaluation\_report\_en.pdf

New service releases for IUCLID brought improvements that also benefitted SCIP users. The IUCLID validation assistant was aligned with official Candidate List updates, and further fixes helped to increase confidentiality when managing SCIP data and avoid duplications of submitted data.

#### **Drinking Water Directive**

The revised Drinking Water Directive came into effect at the start of 2021. The recast gave ECHA a new role in setting up and managing lists of chemicals that can be safely used in materials that come into contact with drinking water. The aim of the directive is to improve people's access to safe drinking water, protect them from contamination and to ensure that safety and hygiene standards for companies are harmonised throughout the EU.

Member States notified their existing national lists to ECHA in July 2021. These covered around 2 300 substances. ECHA compiled them into draft European positive lists for the different materials that come into contact with water – organic, cement, metal and enamel, ceramic, or other inorganic materials.

Throughout 2022, the Agency has been verifying the lists. ECHA will recommend an expiry date for each entry taking the hazardous properties of the substances and any related risk assessments into account. Once the lists have been verified, they will be sent to the European Commission which will decide on their adoption and set the expiry dates by 12 January 2025 at the latest, and most likely earlier than that.

Companies that want their substances to remain on the lists must send a review application to ECHA before the relevant expiry date. To guide them, we have been drafting guidance, which will be made available in 2024.

ECHA's Committee for Risk Assessment (RAC) will adopt opinions on the applications and send them to the European Commission, which will then decide whether to keep the entries, amend them or remove them from the lists.

More information about these and our other achievements in 2022 can be found in the ECHA Annual report 2022.

## 1.7.3. Negative impacts of the Agency

In ECHA's daily operations, the consumption of resources as well as the generation of waste and emissions contribute to the depletion of natural resources and increases of pollution of the environment. The Agency strives to reduce these negative impacts on the environment by using resources carefully and minimising sources of pollution and emissions while not compromising its ability to implement its mandate under the chemicals Regulations or negatively affecting the quality of its products and services.

These are presented in Section 2 below.





Figure 2 ECHA's Office building and Conference centre

#### **Premises**

The European Chemicals moved to its current premises at the end of 2019. The premises consist of two buildings, covering a total of 18.199m2. With the move to the new premises, ECHA reduced its leased office area by approximately 18%. There are no laboratories at the premises of the Agency and no chemical testing is performed at the Agency.

Since May 2022, the Agency also offers covered spaces for bicycle parking to promote green commuting and environment friendly modes of transport.

The office building covers 9 floors (incl. basement) and achieved LEED PLATINUM level certification with LEEDv2009 for Core & Shell certification system in March 2020.

The conference centre covers 3 floors and achieved LEED GOLD level certification with LEEDv4 for Core & Shell certification system in April 2020.



Figure 3 ECHA LEED certification

The consumption data of the years 2020-2022 is calculated against the respective data of the previous premises of the Agency in 2019.

Leased square metres							
	2019	2020	2021	2022			
Leased square metres	24 808	17 679	17 679	18199			

#### Staff

Staff working at the Agency are counted as full-time equivalents (FTE).

An FTE counts working as one of: Temporary Agent (TA), Contract Agent (CA), Seconded National Expert (SNE), trainees and interims. FTEs are adjusted in case of part-time work.

FTEs working at ECHA						
	2019	2020	2021	2022		
FTE	605	591	629	637		

## 1.9. Communications and staff engagement

ECHA implements an annual environmental communication plan to inform and engage with staff and stakeholders about ECHA's environmental performance and relevant topics based on its objectives as well as on the consumption/generation of energy, waste, emissions, and other topics of interest.

ECHA's progress in achieving its environmental objectives are documented and communicated to staff and stakeholders e.g., via ECHA's web pages and internet pages.

ECHA's formal reporting documents (SPD, CAAR) are aimed at external stakeholders and include environmental information which provides an overview of the state of play of meeting our environmental objectives and the success in reaching our targets.

ECHA participates to the inter-institutional environmental management group (GIME) and the EU Agencies' Greening Network.

Staff engagement is ensured through the participation of the ECHA Staff Committee in the Environmental Compliance and Sustainability Team, which manages the ECHA Environmental management system (EMS) and through feedback received via formal and informal channels. Feedback is also collected from individuals through regular meetings, articles and comments received on how ECHA can further improve its environmental performance.

Annual events are organised for staff to raise awareness, training and encourage participation. These include lunch time lectures with external speakers, information campaigns and promoting national and international environmental initiatives.

In 2022 ECHA launched a Staff Commuting Survey to get an accurate update of our total carbon production. We also aimed to measure the impact of ECHA following the move to the new offices and the hybrid working conditions after COVID. The good news is that our carbon footprint related to commuting has reduced since the previous survey, and the main factors for this are due to an increase in teleworking, public transport improvement and raised awareness and support for of alternative means of transport, in particular walking and cycling.

In order to improve awareness for staff of future plans for sustainability in Helsinki, ECHA organised a series of presentations from representatives of ECHA's key stakeholders in Helsinki: the City of Helsinki and ECHA's main energy provider Helen Oy. They informed staff of their

environmental objectives and future plans that aim to achieving a carbon-neutral Helsinki by 2030. These activities will have a direct impact on how ECHA can achieve its climate objectives and on our quality of life as residents.

Throughout the year, ECHA raised awareness of World Environmental Day and Finland Overshoot Day 2022. ECHA also participated in Earth Hour and with our EU Institutional EMAS partners promoted International Women's Day whose theme was "Women and Climate Change", which honoured many women from different backgrounds and their role in fighting climate change and helping those most affected by it.

Closer to home, ECHA celebrated the Baltic Sea Day which is celebrated every year and organised by John Nurminen Foundation. The aim of the day is to encourage people to enjoy this unique sea and to take concrete actions that benefit the sea and its protection. ECHA participated by serving a special Baltic Sea menu in the canteen, and encouraged participation at various events, including the popular Baltic Sea dip.

#### 2. ENVIRONMENTAL PERFORMANCE

ECHA's environmental performance is monitored based on the following performance indicators:

- Electricity consumption
- Energy consumption for heating and cooling
- Water consumption
- Printing paper consumption
- Waste generation
- Emissions

The performance indicators are benchmarked against the year 2019 and monitor ECHA's performance over a reporting period of three years.

With regards to the environmental impact of ECHA's electricity, heating and cooling, our contracts depend on a single provider which is regulated by our host city, Helsinki. In this light, Helsinki has set the objective to become the most functional city in the world, to adapt to the changing climate challenges and to achieve carbon neutrality by 2030<sup>33</sup>. Being carbon-neutral will mean that Helsinki's operations will no longer contribute to global warming, and this will have a positive effect on ECHA which fully supports this ambition.

For the purpose of monitoring and measuring our environmental performance, the data collected for ECHA's utilities concern the consumption at the Agency's premises.

The biggest impact of the return to work and physical meetings post-pandemic in March 2022 affected utility and travel related carbon emissions.

## 2.1. Objectives, Indicators and Targets

The Agency's environmental programme describes the environmental themes that the Agency will pursue in the frame of its sustainability management. The programme develops the evaluation of the Agency's environmental aspects into actions. It lays down goals and activities for improving the Agency's environmental performance within a time horizon of three years.

The ECHA Environmental Programme 2020-2022 updates the 2016-2018 (continued into 2019) programme which targeted measures that are suitable for strengthening the environmental management at the Agency and leading to a reduction in the Agency's Carbon footprint.

ECHA's environmental objectives for 2020-2022 target measures which aim at reducing by the end of 2022:

- 1) Building CO<sub>2</sub> emission by 20% from 2019 levels
- 2) Travel (meeting participants) CO<sub>2</sub> emissions by 75% from 2019 levels
- 3) Travel (staff missions) CO<sub>2</sub> emissions by 50% from 2019 levels

The ECHA environmental work programme 2020-2022 includes additional actions that support the achievement of its set objectives, and its implementation is monitored regularly. The actions listed in the work programme cover energy efficiency, IT hardware and network services, paper consumption, water use, waste generation and air emissions.

The environmental indicator data is collected on a regular basis and Senior Management reviews the Agency's environmental work programme during the annual Management Review. The 2022 management review of the ECHA Integrated Management System, which includes reporting of the EMS, took place in March 2023.

<sup>33</sup> https://www.myhelsinki.fi/en/think-sustainably/making-helsinki-carbon-neutral

# 2.2. Core environmental performance indicators and consumption trends

## 2.2.1. Electricity consumption

Consumption of electricity							
	<b>2019</b> <sup>34</sup>	2020	2021	2022	Change 2022 vs 2019		
MWh electricity consumption	3 035	1 473	1 374	1532	-50%		
kWh/m²	122.3	83.3	77.83	84.17	-31%		
kWh/FTE	5 016	2 492	2 187	2405	-52%		

The electricity ECHA consumed in 2022 was 100% renewable electricity and produced with wind power. All wind power is certified with a guarantee of origin by the energy provider Helen Ltd.

In the new premises systems are installed to reduce electricity consumption. The building is equipped with modern LED illumination. The interior lighting is set to uses motion sensors when a presence is detected. In the office areas the ceiling lights have daylight and presence sensors to adjust the light output and save energy.

In November 2022, ECHA has changed all the indoor lightings to motion-based activation also during office hours to save energy in light of the energy crisis.

The intensity of ventilation to optimise energy use is controlled via the building management system.

ECHA's data centres are outsourced, and no electricity consumption data is available, however the data centres use 100% renewable energy.

#### 2.2.2. Consumption of energy for Heating and Cooling

Consumption of energy for heating and cooling <sup>35</sup>							
	2019	2020	2021	2022	Change 2022 vs 2019		
MWh Heating	4 021	1 626	2 430	2058	-49%		
MWh Cooling	-	741	749	721	-		
MWh Total	4 021	2 367	3 179	2779	-31%		
kWh/m²	162.08	133.87	179.80	153	-6%		
kWh/FTE	6 646	2751	5 054	4362	-34%		
Heating degree day	3419	2906	3831	3541	+4%		

The Heating degree day<sup>36</sup> describes the demand for energy needed to heat buildings and was 3541 for Helsinki in 2022. It helps to compare the consumption of a building in different years as well as comparing buildings in different municipalities.

The premises are connected to the Helsinki district heating and cooling grid and heated via

<sup>&</sup>lt;sup>34</sup> In 2019, electricity consumption includes energy used for cooling.

<sup>&</sup>lt;sup>35</sup> Building Management System (16/01/2023)

<sup>&</sup>lt;sup>36</sup> Heating degree days - Finnish Meteorological Institute (ilmatieteenlaitos.fi)

radiation heating and cooling ceiling panels. The temperature of each panel is adapted individually via a thermostat. Centrally controlled via the building management system, the water temperature in the heating and cooling network is adjusted in accordance with the outside temperature and indoor conditions.

Heat origin, GWh, based on Helen OY's Sustainability report <sup>37</sup>						
	2020	2021	2022			
Coal	2 960	3 419	4 377			
Natural Gas	2 720	2 280	614			
Heat Pumps	495	842	669			
Biomass	217	0.14	684			
Fuel Oil	31	335	508			
Total	6 423	7 490	6 852			

In the premises leased by the Agency prior to 2020, cooling was not provided via the district cooling grid, but produced in a cooling tower on-site. This method of cooling consumed water and electricity. Hence, there is no data available for district cooling pre-2020, but a significantly higher consumption of electricity and water was observed in 2019.

The new premises have a modern HVAC system that recuperates heat from exhaust air using heat exchangers.

ECHA's data centres are outsourced, and no energy consumption for heating and cooling is available, however, this will be addressed in future.

## 2.2.3. Water consumption

Consumption of water <sup>38</sup>						
	2019	2020	2021	2022	Change 2022 vs 2019	
m³	8 133	2 528	3 228	3 538	-56%	
m <sup>3</sup> /m <sup>2</sup>	0.33	0.14	0.18	0.19	-41%	
m³/FTE	13.44	4.28	5.13	5.55	-59%	

The Agency's water consumption in 2022 increased compared 2021. The part of the high water consumption was due to a malfunction of the humidifiers which let the water pass through the system. The issue was recognised and corrected.

To achieve the LEED Platinum and Gold verification of the office building and conference centre, measures were put in place that actively reduce the use of indoor water in the buildings.

When compared to the baseline values of the LEED certificate (separate from the water consumption trend between 2019-2022 above) a 45% reduction of water was recorded in the office building and a 47% reduction of water was recorded in the conference centre.

<sup>&</sup>lt;sup>37</sup> <u>Vastuullisuusraportti | Helen</u> page 73

<sup>&</sup>lt;sup>38</sup> Building Management System (16/01/2023)

This was achieved by installing fittings set at the following specified flow rates:

- Toilets 4,0/2,0 l/flush
- Lavatory faucets 1,9 l/min
- Breakroom kitchen faucets 4,2 l/min
- Showers 5,0 l/min
- Waterless urinals

## 2.2.4. Printing paper consumption

Consumption of printing paper							
	2019	2020	2021	2022	Change 2022 vs 2019		
TOTAL Printed Paper sheets	1 679 459	718 417	333 106	511 963	-70%		
sheets/FTE/working day	11	5	2.45	3.31	-75%		

In 2017, the Agency implemented follow-me printing which prints documents only upon a login with a personalised token at the multifunctional device (MFD). In 2022, the number of MFDs was reduced from 36 to 22 MFDs in the office and conference centre.

The printer configuration is set via a group policy and sets documents to be printed two sided and black and white as a default. ECHA staff are encouraged to print in black and white rather than in colour. New staff starting at the Agency participate in a session on ICT Basics which promotes best printing practices to reduce printing paper consumption. In addition, messages to encourage to print conscientiously are periodically published on the ECHAnet.

The printing paper is licensed under the Nordic Swan Ecolabel and certified under the EU ecolabel.

No individual printers are supported by the Agency.

#### 2.2.5. Waste generation

Waste generation (in tonnes)						
	2019	2020	2021	2022	Change 2022 vs 2019	
Bio waste	25.1	17.59	6.91	18.22	-27%	
Energy	30.6	5.44	6.45	11.19	-63%	
Mixed & combustible	4.6	16.26	7.61	8.21	+77%	
Cardboard	5.2	1.96	1.29	2.63	-50%	
Paper (incl. magazines)	n/a	2.89	2.08	3.04	-	
Electronic equipment	0.2	1.32	0	0	-100%	
Fluorescent tubes	0.1	0	0	0	-100%	
Batteries	0.03	0	0	0	-100%	
Glass	1.87	1.91	1.78	2.78	+49%	

Waste generation (in tonnes)							
	2019	2020	2021	2022	Change 2022 vs 2019		
Metal	5.2	1.2	1.20	1.56	-70%		
EU Palette	0	0	0	1.1	-		
TOTAL	73.1	48.5	27.31	48.74	-35%		
kg/FTE	120.77	82.14	43.41	76.52	-37%		

The Agency collects data on the waste types listed in the table above. For information:

- The methodology on how waste is collected and separated has changed in 2020, which results in the increase of mixed and combustible waste and the decrease of energy waste.
- Before 2020, paper recycling was under the responsibility of the cleaning service provider and no data is available.
- A staff canteen is in the conference centre and a cafeteria in the office building. The catering service provider is responsible for oil waste resulting from food preparations. In 2022 the new catering service provider started at the beginning of March. The cafeteria was not in use.
- Individual dustbins are not available. Staff use collective central dustbins which offer sorting and recycling options.
- In 2022 1.1 tons of EU- and nonstandard wood pallets were returned to the waste management provider.

#### 2.2.6. Emissions

#### CO<sub>2</sub> Emissions from air travel

CO₂e Emissions from air travel							
	2019	2020	2021	2022	Change 2022 vs 2019		
TOTAL miles for meetings and staff missions	5 727 837	446 781	2 776	1 761 937	-69%		
t CO <sub>2</sub> e emissions from staff missions	232.6	24.7	0	44.6	-81%		
t CO <sub>2</sub> e emissions from meeting participants	832.0	59.9	0.4	193.8	-77%		
TOTAL t CO <sub>2</sub> e emissions	1 064.6	84.6	0.4	238.4	-78%		
kg CO₂e/FTE	1760	143	0.57	374.23	-79%		

The CO<sub>2</sub>e emissions include travelled flight miles of flights that are booked via the Agency's travel service Agency for ECHA staff missions and for ECHA meeting participants.

The greenhouse gas emissions are calculated by the travel service provider in accordance with

the Greenhouse Gas Protocol, based on emission factors provided by the UK Department for Environment, Food and Rural Affairs (DEFRA).

## **Emissions from energy consumption**

CO <sub>2</sub> Emissions from energy consumption						
	2019	2020	2021	2022	Change 2022 vs 2019	
Electricity: g/kWh	139	0	0	0	-100%	
Heat: g/kWh	198	182	182	223	+13%	
Cooling: g/kWh	-	0	0	0	-	
Total CO <sub>2</sub> in kg	1 218 023	295 932	442 251	459 010	-62%	

The energy provider publishes yearly the emission factors<sup>39</sup> for electricity, district heating and district cooling. In 2022, only the energy consumption for district heating produced  $CO_2$  emissions.

The premises leased by the Agency before 2020 were not connected to the district cooling network.

In 2019, the Agency offset the carbon emissions that resulted from its electricity consumption.

The electricity ECHA consumed in 2022 was 100% renewable and generated 0g/kWh CO<sub>2</sub> emissions.

#### SO<sub>x</sub> and NO<sub>x</sub> emissions

ECHA consumes energy for electricity, district heating and cooling. ECHA's energy provider Helen OY provides following data for acidifying emissions ( $SO_x$  and NO2). These are the total amounts of emissions produced by Helen OY in 2022 which includes ECHA's consumption.

GRI 305-7: Emissions of nitrogen oxides (NOx) and sulfur oxides (SOx) and other significant emissions into the air Particles <sup>40</sup>						
Gas emissions, t 2020 2021 2022						
NO <sub>x</sub> (nitrogen oxides)	2 100	2 526	2 539			
SO <sub>2</sub> (sulfur dioxide) 1 400 1 877 2 410						
Particles	59	51	118			

<sup>&</sup>lt;sup>39</sup> https://www.helen.fi/en/company/energy/energy-production/specific-emissions-of-energy-production

<sup>&</sup>lt;sup>40</sup> <u>Vastuullisuusraportti | Helen</u> page 68

## 2.3. Environmental Work Programme in 2020-2022

Environmental objectives					
Objective	Baseline value 2019	Value in 2022	Status 2022 vs 2019	Target value for 2022	
Reduce Building CO <sub>2</sub> emission by 20% from 2019 levels	1 218.0 t	459 t	Reduction target exceeded.	974.4 t	
Reduce travel (meeting participants) CO <sub>2</sub> emission by 75% from 2019 levels	832.0 t	193.8 t	Reduction target exceeded.	208 t	
Travel (staff missions) CO <sub>2</sub> emission by 50% from 2019 levels	232.6 t	44.6 t	Reduction target exceeded.	116.3 t	

ECHA's Environmental Management Work Programme outlines our goals, actions, and objectives for reducing the consumption of natural resources, cutting down waste, and minimising our carbon footprint.

In 2022, we successfully achieved our targets for reducing CO2 emissions from both business travel and building operations, surpassing the expectations set in the 2020-2022 programme. This was made possible with the collective effort of all ECHA staff, who resumed their travel and returned to the office in April 2022 after the pandemic.

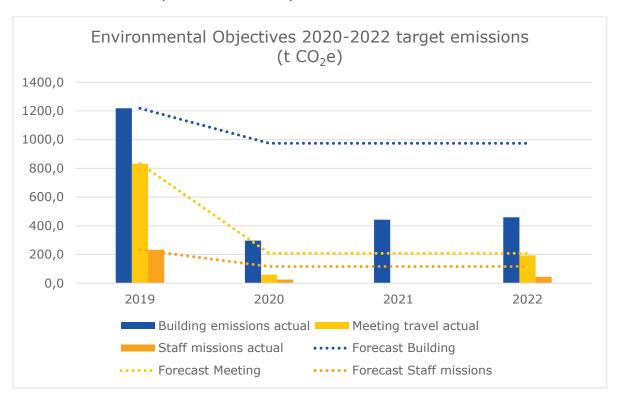


Figure 4 ECHA's environmental objectives 2020-2022

#### **Other Environmental Work Programme Actions:**

A BUILDING EMISSIONS					
Goal	Action	Responsible	Validity		
A1 Reduce the number of physical meetings in the building	Increase awareness of Audio- Visual equipment Institutionalise remote meetings culture	Corporate Services and respective meetings organisers	Continuous		
A2 Reduce use of stand-by mode of all electrical devices	All electrical devices (AV, studio, PCs, monitors, and printers configured to sleep after some minutes of idle.	Every staff member – Directorate I, Directorate R, Directorate A	Continuous		

#### **A1**

To increase visibility of the audio-visual equipment available for remote meetings at the various meeting rooms, a dedicated page on the intranet lists the available hardware, e.g. Video and web-conferencing equipment, supporting both WebEx and Skype meetings, and possible support for remote interpretation. ECHA has also renewed the instructions for the use of its web conference equipment to enable a better user experience.

#### **A2**

The multifunction printing devices (MFD) have two stand-by modes. The first mode is activated after 1 minute and the second mode is entered after 4 hours where the devices only consume a very low amount of energy of 0.8 W. Furthermore, the amount of MFDs was reduced from 36 to 22.

In 2020, ECHA renewed its IT hardware, such as screens, laptops, keyboard, mouse, and docking station. The Screens also have a very low energy consumption of 0.5 W in their standby mode and they are rated as A++ in the EU Energy Rating. Also, the laptops have times for standby and sleep mode pre-set.

B PAPER AND PRINTING				
Goal	Action	Responsible	Validity	
B1 Reduce colour printing	Whenever meaningful print in black and white	Every staff member	Continuous	
B2 Reduce printing	Provision of lightweight portable devices Use of portable devices instead of printouts	Directorate I  Every staff member	Continuous	
B3 Reduce paper use	Print double sided and multiple pages per sheet, whenever possible	Every staff member	Continuous	
B4 Reduce paper use	Reduce the quantity of printed brochures for external use	Communications Unit	Continuous	

#### **B1**

Staff is encouraged to print in black and white, if needed. This is also part of the newcomer training.

#### **B2**

Lightweight portable devices are provided to all the users. The recommendation to read on the laptop rather than printing is highlighted in the induction training for newcomers.

#### **B3**

Double sided printing is set in the default printers' configuration.

#### **B4**

In 2020, a revised publication printing policy was implemented to reduce externally printed products to better meet the demand. Further, the Agency stopped printing reports, newsletters, legislation and calendars.

C MOBILITY					
Goal	Action	Responsible	Validity		
C1 Reduce staff travel through missions	Increase the use of video conferencing and, whenever possible, apply it instead of organising physical meetings	All Directorates	Continuous		
C2 Reduce contributions to CO2 emissions generated through air travel undertaken in the frame of ECHA activities	Increase the use of video conferencing and, whenever possible, apply it instead of organising physical meetings.	All Directorates	Continuous		

#### C1

ECHA encourages its staff to choose a remote meeting instead of physical meetings where possible. This is implemented within the application form for mission travel requests with the following question:

"Is it possible to attend this meeting through alternative means like teleconference?"

#### C2

To increase the use of video conferencing, detailed instructions on how to organise virtual meetings have been provided to all staff. Further training sessions are held for the tools available and support from audio-visual technicians for conference organisers is available to provide a positive meeting experience.

D WASTE			
Goal	Action	Responsible	Validity
D1 Improve waste separation	Ensure containers are available and easily accessible throughout the premises.	Corporate Services	Continuous
D2 Improve waste separation	Update instructions to all staff and cleaning personnel, also on ECHAnet.	Corporate Services	Continuous
D3 Reduce food waste	Communicate food waste with the canteen provider.	Corporate Services, Communications Unit	Continuous

#### D1

Central waste collection points are available in staff kitchens. Additional sorting bins are available at high traffic points in the building. Labels at each bin indicate the correct waste separation.

#### **D2**

The campaign to raise awareness on waste separation and collection at the Agency's premises will be carried out post-covid in 2023 when the staff return to work at the premises.

Instructions on how to separate food waste were improved.

#### **D3**

In 2022 the canteen was in use from April onwards. The canteen has a campaign to reduce food waste and to offer unsold meals to staff to take home.

E ICT Data Centre/Hardware					
Goal	Action	Responsible	Validity		
E1 Improve CO <sub>2</sub> footprint of IT equipment	ICT procurement of energy- efficient/low carbon emitting IT equipment, e.g. phones, monitors, laptops, MFF printer.	Directorate I	Continuous		
E2 Improve CO <sub>2</sub> footprint of IT infrastructure services	ICT procurement of energy- efficient/low carbon emitting infrastructure services in the future.	Directorate I	Continuous		
E3 Increase life span of materials used in IT Hardware, e.g. laptops, monitors	Life-cycle/sustainability to be taken into account in ICT equipment procurement	Directorate I	Continuous		

## E1

The IT Workplace devices that are procured are lightweight computing devices with low energy consumption in all states, adhering to modern energy efficiency standards. The monitors are all EPA/GreenStar/TÜV compliant with power saving modes enabled by default.

The configuration of all the devices enforces power saving modes in all cases (screen savers, sleep modes, etc.)

#### **E2**

ECHA's data centres are outsourced. The contractor has committed to reach zero CO2 and zero waste by 2030.

#### **E3**

All devices are procured under the Device-As-A-Service model. At the end of their service life, by default the devices are returned to the supplier and can be re-used or re-purposed. Furthermore, certain components, such as chargers or cables, can be shared among the equipment, decreasing the demand for redundant identical components.

F MANAGEMENT AND STAFF ENGAGEMENT				
Goal	Action	Responsible	Validity	
F1 Inform and involve all staff in greening ECHA	Green communications plan, training, and info sessions.	Corporate Services	Continuous	
F2 Foster environmentally friendly work practices	Organise staff awareness campaigns (e.g. printing, PCs, waste, mobility, etc) according to the relevant annual Green Communications Plan.	Corporate Services, Staff Committee	Continuous	
F3 Formalise environmental management	Implement Environmental Management System	Corporate Services	Continuous	
F4 ISO 14001:2015 recertification	Develop roadmap and monitor project implementation	Corporate Services	2023	
F5 Strengthen Green public procurement	Ensure green public procurement practices	Procurement Team	Continuous	
F6 EMAS certification	Plan and implement EMAS	Corporate Services	2021	

#### F1

Regular communication to staff is published on the ECHA intranet following the annual communications plan.

#### F2

Environment friendly work practices are promoted and encouraged in line with the communications plan. In 2022, the commuter survey was carried out accompanied by a campaign to promote environment friendly modes of transport (such as cycling or walking, public transport).

#### F3

Implementation of the EMS is in line with the requirements set out by ISO14001, EMAS and ECHA's IMS.

#### F4

Successful recertification under ISO 14001:2015 was conducted in November 2022.

#### F5

ECHA implements Green Procurement since 2015 and benefits from the Hansel requirements (see 2.4 below).

#### F6

The application for EMAS registration was submitted to the local authority in 2021. In 2022 ECHA received the successful EMAS registration.

#### 2.4. Green Public Procurement

The Agency implements eco-friendly and sustainability criteria and requirements in its tenders when relevant.

In addition, ECHA uses the State of Finland's public procurement platform Hansel which is the procurement service for public administrations. All Hansel framework agreements require suppliers to promote environmentally friendly and sustainable practices and specify certification requirements for suppliers' products and services that aim to minimise the impact on climate and environmental matters. These conform to International, European and National standards and ECO-labelling schemes.

## 2.5. Legal Obligations

The Agency has identified the implications to the organisation of all applicable legal requirements relating to the environment which are listed in a register.

The register is checked annually and whenever:

- a relevant new project or activity which has an impact on the environment is introduced,
- information is received about new or updated applicable environmental legislation or other relevant compliance obligations.

ECHA complies with the Finnish Rescue Act (29.4.2011/379) and has implemented the recommendations under the Contagious Disease Act (COVID Amendment) Communicable Diseases Act 1227/2016 (and Government Decree on Communicable Diseases 146/2017).

The ECHA office is in compliance with the relevant parts of the Finnish legislation as contained in the Waste Act (646/2011); Environmental Protection Act (527/2014); Government Decision on Noise Level Guide Values (993/1992) and Law on building energy certificate (50/2013). The responsibility to comply with these obligations is under the responsibility of the landlord (ECHA Lease Agreement, Appendix 5), which is monitored continuously.

## 2.6. Nonconformity and corrective actions.

Nonconformities are recorded in the remedy system of the Agency.

In 2022, no nonconformities were reported.

## **Annex A: ECHA Environmental Work programme 2023-2025**

## ECHA's Environmental Work Programme 2023 - 2025

## Introduction

ECHA's Environmental Work Programme describes the environmental themes that the Agency will pursue in the framework of its sustainability management programme. The Programme translates the Agency's environmental commitments into goals and actions for improving the Agency's environmental performance within a time horizon of three years.

ECHA's Environmental Work Programme 2023-2025 - adopted 14 November 2022 - contains measures that support ECHA's pledge to become carbon-neutral by 2030, while acknowledging that this pledge will require significant commitment and effort from ECHA and its staff.

ECHA's Environmental Work Programme 2023-2025 includes actions that are carried over from the previous Work-Programme (2020-2022) and maintains the Agency's CO<sub>2</sub> reduction targets. Additionally, to meet our short- and long-term sustainable climate objectives, ECHA will aim to include all our actual emissions in our targets, statistics, and reporting by encompassing all sources of our emissions.

It is recognised that ECHA may only achieve climate neutrality by 2030 if emissions are reduced to a minimum and all remaining emissions are offset with climate protection measures. In order to act responsibly and considering the long-term climate neutrality ambition, and the Agency's primary objectives, ECHA plans to exhaust all possible actions to reduce its negative environmental impacts before considering offsetting carbon emissions through an authenticated compensation scheme approved by the European Commission.

## **Implementation and reporting**

The implementation of the Work Programme is closely monitored, and the environmental indicator data is collected and analysed on a regular basis by ECHA's Corporate Services Unit. Progress reports of the implementation of the Agency's environmental performance and Work Programme implementation are published through the following channels:

- ECHA's Environmental Statement
- ECHA's Annual report (Environmental management)
- Programming Document(s) 2022-2025: Annex VI: Environment management

<u>Note</u>: ECHA's Environmental Work Programme does not include the activities that relate to the Agency's regulatory tasks aimed at the protection of the environment. These activities are programmed in the Agency's multi-annual and annual Work Programmes.

## **Work Programme goals and actions**

A BUILDING EMISSIONS					
Goal	Action	Responsible	Validity		
A1 Reduce use of stand-by mode of all electrical devices.	All electrical devices (AV, studio, PCs, monitors and printers) configured to sleep after some minutes of idleness.	Every staff member – Directorate I, Directorate R, Directorate A	Continuous		
A2 Optimise consumption of energy used for electricity, heating and cooling.	Prepare relevant communications on ECHA's contribution to address the energy crisis.	Corporate Services	Continuous		
A3 Increase share of emission free energy for heating.	Investigate emission-free energy availability for heating.	Corporate Services	Continuous		
A4 Promote low energy consumption habits for teleworking.	Inform staff on teleworking with low impact on environment.	Corporate Services Communications Unit	Continuous		

B PAPER AND PRINTING				
Goal	Action	Responsible	Validity	
B1 Reduce colour printing.	Print in black and white, whenever possible.	Every staff member	Continuous	
B2 Reduce printing.	Provision of lightweight portable devices.  Use of portable devices instead of printouts.	Directorate I  Every staff member	Continuous	
B3 Reduce paper use.	Print double sided and multiple pages per sheet, whenever possible.	Every staff member	Continuous	
B4 Reduce paper use.	ECHA publications not printed by default.	Communications Unit	Continuous	

C MOBILITY					
Goal	Action	Responsible	Validity		
C1 Reduce staff travel through missions.	Increase the use of video conferencing and, whenever possible, avail of it (instead of attending physical meetings).	All Directorates	Continuous		
C2 Reduce contributions to CO <sub>2</sub> emissions generated through air travel undertaken in the frame of ECHA activities.	Increase the use of video conferencing and, whenever possible, avail of it (instead of organising/attending physical meetings).	All Directorates	Continuous		

C3 Improve booking of missions.	Introduce checklist for mission booking.	Corporate Services	2023
C4 Promote emission free commuting.	Promote environmentally friendly ways of commuting.	All staff Communications Unit	2023 – annual
C5 Promote emissions free commuting.	Promote available facilities to increase cycling or running to work.	All staff Communications Unit	2023 - annual
C5 Promote alternative modes of transport for missions <400km (for example, train, ferry).	Follow mission guidelines for selecting mode of transport.	All Directorates	Continuous

D WASTE			
Goal	Action	Responsible	Validity
D1 Improve waste separation.	Ensure containers are available and easily accessible throughout the premises.	Corporate Services	Continuous
D2 Optimise food order quantities.	Communicate building occupancy rates to catering company.	Corporate Services	Continuous
D3 Reduce waste.	Order office supply items with low waste or packaging.	Corporate Services	2023-2025
D4 Reduce waste.	Reduce one-time use dishes and phase-out plastic items.	Catering Company	2023
D5 Improve waste separation.	Campaign on waste sorting at premises.	Corporate Services, Communications Unit	2023
D6 Reduce food waste.	Provide examples of food waste reduction in canteen.	Corporate Services, Communications Unit	Continuous

E ICT Data Centre/Hardware				
Goal	Action	Responsible	Validity	
E1 Improve CO <sub>2</sub> footprint of IT equipment.	ICT procurement of energy- efficient/low carbon emitting IT equipment (for example, phones, monitors, laptops, MFF printer).	Directorate I	Continuous	
E2 Improve CO <sub>2</sub> footprint of IT infrastructure services.	ICT procurement of energy- efficient/low carbon emitting infrastructure services in the future.	Directorate I	Continuous	
E3 Increase life span of materials used in IT Hardware (for example, laptops, monitors).	Life cycle/sustainability to be taken into account in ICT equipment procurement.	Directorate I	Continuous	
E4 Improve energy consumption of data centre.	Ensure compliance with the European Union (EU) Code of	Directorate I	2023	

Conduct for Data Centres.

F MANAGEMENT AND STAFF ENGAGEMENT				
Goal	Action	Responsible	Validity	
F1 Inform and involve all staff in greening ECHA.	Green communications plan, training and info sessions.	Corporate Services, Communications Unit	Continuous	
	Continue to develop ECHA's sustainability reporting in all areas (for example, energy and climate).	Corporate Services		
	Continue ECHA's active participation in the Greening Network of the EU Agencies.	Corporate Services		
F2 Foster environmentally- friendly work practices.	Organise staff awareness campaigns (for example, printing, PCs, waste, mobility, etc) according to the annual Green Communications Plan.	Corporate Services, Staff Committee Communications Unit	Continuous	
F3 Strengthen green public procurement (GPP).	Develop and apply a GPP checklist for procurement.	Procurement Team	2023	
F4 Improve sustainability of events.	Introduce relevant guidelines for sustainable meeting organisation.	Chairs of Committees Event organisers	2023	
F5 Examine event sustainability management certification.	Examine the feasibility of obtaining a relevant certification to confirm, and improve, the sustainability of ECHA's event-related activities (for example, ISO 20121: Event Sustainability Management Systems).	Corporate Services Chairs of Committees Event organisers	2023	
F6 Extend scope of ECHA's carbon footprint.	Collect data and report CO2 emissions of teleworking, waste, and hotel nights of meeting participants.	Corporate Services	2023	
F7 Extend scope of ECHA's carbon footprint.	Establish baseline and reduction targets for CO2 emissions from teleworking, waste and hotel nights.	Corporate Services	2024-2025	

#### **References:**

- ECHA Environmental Policy
- ECHA Environmental statement 2021
- C(2022) 2230 final COMMUNICATION TO THE COMMISSION Greening the Commission, Strasbourg, 5.4.2022
- 'Feasibility and scoping study for the European Commission to become climate neutral by 2030' <a href="https://ec.europa.eu/clima/system/files/2020-09/climate neutral commission study en.pdf">https://ec.europa.eu/clima/system/files/2020-09/climate neutral commission study en.pdf</a>

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# **AENOR**

## ENVIRONMENTAL VERIFIER'S DECLARATION ON VERIFICATION AND VALIDATION ACTIVITIES

**AENOR INTERNACIONAL, S.A.U.**, with EMAS environmental verifier registration number ES-V-0001, accredited for the scopes: 99.00 "Activities of extraterritorial organisations and bodies", (NACE Code) declares

to have verified the sites as indicated in the environmental statement of **ECHA – EUROPEAN CHEMICALS AGENCY**, with registration number FI-000060

meet all requirements of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community Eco-Management and Audit Scheme (EMAS), amended by Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026.

By signing this declaration, I declare that:

- the verification and validation have been carried out in full compliance with the requirements of Regulation (EC)  $N^{o}$  1221/2009 amended by Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026,
- the outcome of the verification and validation confirms that there is no evidence of non-compliance with applicable legal requirements relating to the environment,
- the data and information of the environmental statement of the sites reflect a reliable, credible and correct image of all the sites activities, within the scope mentioned in the environmental statement.

This document is not equivalent to EMAS registration. EMAS registration can only be granted by a Competent Body under Regulation (EC) No 1221/2009 amended by Regulation (EU) 2017/1505. This document shall not be used as a stand-alone piece of public communication.

Done at Madrid, on May 22, 2023

Signature

Rafael GARCÍA MEIRO Chief Executive Officer