

Regulating the marketing and use of high-risk chemicals

Fields marked with * are mandatory.

Introduction

The EU is committed to taking measures to address the evolving chemical threat resulting from terrorist activity. In the 2017 Action Plan to enhance preparedness against chemical, biological, radiological and nuclear (CBRN) security risks, the Commission: (i) stressed that the capability of terrorists to carry out CBRN attacks depends on the accessibility of CBRN materials; and (ii) identified the need to better control access to high-risk CBRN materials. In May 2018, following the nerve-agent attack in Salisbury in the UK, the Commission published a Joint Communication on hybrid threats, in which it committed to work with Member States to develop a list of dangerous chemical substances in order to reduce their accessibility in the future. The Security Union Strategy and the Counter-terrorism Agenda confirmed the Commission's ongoing work to restrict access to certain dangerous chemicals that could be subject of misuse for malicious purposes. In 2020, the Commission launched a study on the feasibility of restricting access to dangerous chemicals, which confirmed the necessity of regulating access to a short list of nine chemical substances of most concern that could be used by terrorists and other malicious actors to conduct an attack. Such substances posing a particular threat (hereafter referred to as 'high-risk chemicals') fall under the following chemical classes: Cyanide Salts, Halogen Evolving Substances (Hypochlorites), Phosphide Salts, Metal Sulphide Salts.

The problem that the initiative aims to tackle is the risk of potential terrorists and criminal actors accessing and misusing high-risk chemicals to stage an attack in Europe. A great many chemicals are used every day in industrial processes, professional functions, and a diverse consumer sector. Most high-risk chemicals react upon intimate mixing with other readily available materials to produce highly toxic gases. If these highly toxic gases are produced in sufficiently high concentrations, they can kill and injure those in the immediate proximity. The risk of misuse of high-risk chemicals is high due to their easy accessibility in the market, as well as the low levels of technical skill needed to stage an attack. Since 1970, chemical terror attacks have killed 1 019 people and injured 14 027 worldwide. The threat of a chemical attack in Europe is further substantiated by the presence of actors possessing both the intent and capability to misuse chemicals for malicious purposes. According to the 2020 Europol TE-SAT report, the intention to carry out chemical terror attacks continues to appear on terrorist online fora and social media as well as in manuals on how to perform attacks. The Russian invasion of Ukraine highlights once again the threat of non-conventional weapons, including chemical weapons.

Current national measures aimed at restricting or controlling access to high-risk chemicals differ widely between Member States. There are no legislative measures to restrict access to high-risk chemicals for members of the general public in most European Economic Area (EEA) countries. This makes it easier for any potential terrorists and criminal actors to access these chemicals. Only a few EEA countries have measures addressed to businesses requiring them to: (i) keep records of transactions involving high-risk

chemicals; and (ii) report suspicious transactions, disappearances and thefts involving high-risk chemicals. The discrepancies in existing national laws make the enforcement of restrictions more difficult for law-enforcement agencies and public authorities, especially in cross-border law enforcement cooperation. Furthermore, high-risk chemicals can be sourced from online marketplaces and imported from non-EU countries. Due to resource constraints and the lack of specific EEA-wide provisions regulating access to these chemicals, it is particularly challenging for law enforcement agencies to enforce controls on online sales and for customs authorities to control goods upon import. Lastly, although some of the identified high-risk chemicals are commonly used household chemicals, the level of awareness about the risk of their misuse among businesses, particularly retailers and SMEs, remains low.

The new rules on the marketing and use of high-risk chemicals will be covered by this public consultation, providing citizens and stakeholders with an opportunity to voice their opinions on current problems in the field and on the impacts of potential policy options to address the problems identified.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☒ Dutch
- ☐ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian

- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business organisation
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☒ Public authority
- ☐ Trade union
- ☐ Other

* First name

* Surname

* Email (this won't be published)

* Scope

- ☐ International
- ☐ Local
- ☒ National
- ☐ Regional

* Level of governance

- ☐ Parliament
- ☒ Authority
- ☐ Agency

* Organisation name

255 character(s) maximum

* Organisation size

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☒ Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
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| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
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| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
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| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
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| <input type="radio"/> Bolivia | <input type="radio"/> Grenada | <input type="radio"/> Namibia | <input type="radio"/> Sweden |
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| <input type="radio"/> Bosnia and Herzegovina | <input type="radio"/> Guam | <input type="radio"/> Nepal | <input type="radio"/> Syria |
| <input type="radio"/> Botswana | <input type="radio"/> Guatemala | <input checked="" type="radio"/> Netherlands | <input type="radio"/> Taiwan |
| <input type="radio"/> Bouvet Island | <input type="radio"/> Guernsey | <input type="radio"/> New Caledonia | <input type="radio"/> Tajikistan |
| <input type="radio"/> Brazil | <input type="radio"/> Guinea | <input type="radio"/> New Zealand | <input type="radio"/> Tanzania |
| <input type="radio"/> British Indian Ocean Territory | <input type="radio"/> Guinea-Bissau | <input type="radio"/> Nicaragua | <input type="radio"/> Thailand |
| <input type="radio"/> British Virgin Islands | <input type="radio"/> Guyana | <input type="radio"/> Niger | <input type="radio"/> The Gambia |
| <input type="radio"/> Brunei | <input type="radio"/> Haiti | <input type="radio"/> Nigeria | <input type="radio"/> Timor-Leste |
| <input type="radio"/> Bulgaria | <input type="radio"/> Heard Island and McDonald Islands | <input type="radio"/> Niue | <input type="radio"/> Togo |

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| <input type="radio"/> Burkina Faso | <input type="radio"/> Honduras | <input type="radio"/> Norfolk Island | <input type="radio"/> Tokelau |
| <input type="radio"/> Burundi | <input type="radio"/> Hong Kong | <input type="radio"/> Northern Mariana Islands | <input type="radio"/> Tonga |
| <input type="radio"/> Cambodia | <input type="radio"/> Hungary | <input type="radio"/> North Korea | <input type="radio"/> Trinidad and Tobago |
| <input type="radio"/> Cameroon | <input type="radio"/> Iceland | <input type="radio"/> North Macedonia | <input type="radio"/> Tunisia |
| <input type="radio"/> Canada | <input type="radio"/> India | <input type="radio"/> Norway | <input type="radio"/> Turkey |
| <input type="radio"/> Cape Verde | <input type="radio"/> Indonesia | <input type="radio"/> Oman | <input type="radio"/> Turkmenistan |
| <input type="radio"/> Cayman Islands | <input type="radio"/> Iran | <input type="radio"/> Pakistan | <input type="radio"/> Turks and Caicos Islands |
| <input type="radio"/> Central African Republic | <input type="radio"/> Iraq | <input type="radio"/> Palau | <input type="radio"/> Tuvalu |
| <input type="radio"/> Chad | <input type="radio"/> Ireland | <input type="radio"/> Palestine | <input type="radio"/> Uganda |
| <input type="radio"/> Chile | <input type="radio"/> Isle of Man | <input type="radio"/> Panama | <input type="radio"/> Ukraine |
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena, Ascension and Tristan da Cunha | <input type="radio"/> Zambia |

- ☐ Democratic Republic of the Congo
- ☐ Lesotho
- ☐ Saint Kitts and Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☒ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☐ Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Sector of Activity

* 1. Please specify your sector of activity.

- ☐ Automotive industry
- ☐ Biotechnology
- ☐ Chemicals
- ☐ Construction sector

- ☐ Cosmetics
- ☐ Food and drink industry
- ☐ Maritime industries
- ☐ Mechanical engineering
- ☐ Pressure equipment and gas appliances
- ☐ Raw materials, metals, minerals and forest-based industries
- ☐ Textiles, fashion and creative industries
- ☐ Toys
- ☐ Transportation and storage services
- ☐ Wholesale and retail trade
- ☒ Other

* If you selected "Other", please specify here

Counter-Terrorism organisation

* 2. How would you classify your business?

- ☐ Manufacturer/Producer
- ☐ Distributor/wholesaler/importer not selling chemicals to the general public (B2B only)
- ☐ Distributor/wholesaler/importer also selling chemicals to the general public (B2B and possibly B2C)
- ☐ Retailer
- ☐ Professional user
- ☐ Transportation and storage services
- ☐ Online marketplace that operates only as an intermediary platform enabling third-party sellers to sell their products ("pure" third-party marketplace)
- ☐ Online marketplace that operates both as an intermediary platform enabling third-party sellers to sell their products and as an online retailer selling products directly to end customers ("hybrid platform")
- ☒ Other

* 4. How are you involved with chemical substances?

at least 1 choice(s)

- ☐ I produce them
- ☐ I sell them to other businesses
- ☐ I sell them to members of the general public

- ☐ I use them for my professional activities
- ☐ I use them for my non-professional activities (e.g., hobbies, household maintenance, etc.)
- ☐ I store them
- ☐ I transport them
- ☒ I do not deal with chemical substances

Problems and objectives

11. In your opinion, to what extent the issues listed below might be a source of security concerns in Europe today?

	Not at all	Low extent	Moderate extent	High extent	Completely	I don't know
* Improper storage of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improper shipment and transportation of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Deliberate misuse of high-risk chemicals by professional users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Deliberate misuse of high-risk chemicals by members of the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Thefts and disappearances of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Grant of a license/allow the purchase of high-risk chemicals to a person that previously had a denial or was reported for suspicious transaction in another Member State	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Unauthorized/uncontrolled internet sales of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Gaps in the identification of security risks stemming from high-risk chemicals by economic operators along the supply chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The uncontrolled intra-EU cross-border movement of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Import and circulation of high-risk chemicals labelled ambiguously or incorrectly (including deliberate mislabeling to avoid 'Dangerous Goods' classification for shipping)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of reporting of suspicious transactions involving high-risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Existence of different criteria to grant or refuse licenses to access to high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Low levels of awareness of security risks linked to high-risk chemicals along the supply chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Low levels of awareness of security risks linked to high-risk chemicals among relevant authorities such as law enforcement, first responders and customs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 12. Do you believe there are any other security concerns linked to the marketing, acquisition, import, export, possession and use of high-risk chemicals that were not mentioned in the previous question?

- ☐ Yes
- ☒ No
- ☐ I don't know

13. If yes, could you please specify what are these concerns?

De verwachting hangt af van de gekozen beleids optie, bij een wet die onvoldoende risico's afdekt zal een toename van incidenten te verwachten zijn. Een mogelijk wet die de WPE imiteert heeft de voorkeur.

14. In your view, how are the most serious security risks you indicated above going to evolve in the next five to ten years?

een incident dat andere actoren verleidt om de modus operandi te kopiëren.

15. To your knowledge, what are (if any) the main existing regulatory frameworks /legislative measures, either at international, EU or national levels, to reduce the risk of misuse of high-risk chemicals for malicious purposes that are currently implemented? Please provide reference to relevant legislation that applies to each chemical and explain how it reduces the risk of misuse.

REACH Verordening (EG) 1907/2006, CLP Verordening (EG) 1272/2008, Warenwet (NL) Artikel 18(a)

* 16. To your knowledge, what are (if any) the main practical non-legislative measures/initiatives to reduce the risk of misuse of high-risk chemicals that are currently implemented?

at least 1 choice(s)

- ☐ Awareness-raising initiatives
- ☐ Training programs addressed at economic operators (including e-courses)
- ☐ Circulation of leaflets and posters
- ☐ Creation of private-public partnerships
- ☐ Creation of community of practices
- ☐ Voluntary codes of conduct
- ☐ Exchange and adoption of good practices
- ☒ Cross-border cooperation (e.g., among law enforcement and/or customs authorities)

- ☐ Other
- ☐ No measures implemented

17. If you selected "Other", can you please indicate the measures/initiatives adopted?

18. Can you mention examples of specific non-legislative measures/initiatives you are aware of? Please specify the high-risk chemicals they cover, if any.

Nee

19. To what extent do the existing regulatory frameworks/legislative measures that reduce the risk of misuse of high-risk chemicals you identified above entail the following costs?

	Not at all	Low extent	Moderate extent	High extent	Very high extent
* Costs entailed by the licensing/registration/authorization/notification regimes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Costs incurred to circulate/get information on allowed concentration levels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Costs related to delays faced for obtaining a license or an authorization	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Costs incurred to carry out monitoring, inspections and reporting activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Costs incurred to monitor actors' compliance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Losses due to the unavailability of certain chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Raising awareness and training of personnel	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations to communicate information down the supply chain	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you selected "Other", please specify here

20. Can you please further elaborate on your previous answer, possibly by providing a quantification of the costs (in EUR) or additional burden (in time) for your business?

Niet van toepassing

21. To what extent existing regulatory frameworks, legislative and/or non-legislative measures that reduce the risk of misuse of high-risk chemicals you identified above contribute to the following?

	No extent	Low extent	Moderate extent	High extent	Completely	I don't know
* Increased security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Raised awareness in the supply chain about the risks related to the misuse of chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Harmonised controls and penalties	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improved traceability of sales and transactions concerning chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

22. To what extent existing legislative and non-legislative measures you identified above have a deterrent effect against the misuse of chemicals by criminal actors?

	Not at all	Low extent	Moderate extent	High extent	Completely	I don't know
* Regulatory frameworks /Legislative measures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-legislative/Practical measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. What are major areas of intervention to reduce security risks posed by the potential misuse of high-risk chemicals for malicious purposes (if any)? Please consider the following: manufacture, storage, processing, transport and distribution, import from outside EU, trade (including via online channels).

Online marktplaatsen buiten de EU en daarmee verkoop aan particulieren

Need for EU action and possible policy options

* 24. To what extent do you agree that the access to high-risk chemicals should be regulated in EU?

- ☐ Not at all
- ☐ Low extent
- ☒ Moderate extent
- ☐ High extent
- ☐ Completely
- ☐ No answer

25. Can you please explain your answer to the previous question? Where relevant, please give details of the specific high-risk chemicals and/or types of users that you think should/should not be regulated.

Cyaniden en fosfiden hebben voor particulieren geen enkele use case en zouden gereguleerd kunnen worden. Voor hypochlorieten en sulfiden is regulatie gezien de uiteenlopende toepassingen zeer lastig, zonder grote economische impact. Mbt sulfiden zijn alternatieven syntheses zeer eenvoudig te doen en daarmee is regulatie niet effectief.

* 26. If you think an EU intervention would be needed, what should its focus be?

at least 1 choice(s)

- ☒ Restrict access to high-risk chemicals by members of the general public (e.g., through a ban or licensing regime)
- ☐ Reporting obligations by economic operators and/or users in case of suspicious transactions, disappearances and thefts
- ☐ Obligations for sellers to keep records of each transaction involving high-risk chemicals
- ☐ Obligations for sellers to verify the proof of identity and the trade, business or profession of the prospective customer, and the intended use of the high-risk chemicals for each transaction
- ☐ The capacity of national customs authorities to effectively control high-risk chemicals upon import from outside EU
- ☐ Monitoring and traceability of sales of high-risk chemicals through online channels
- ☐ Awareness of security risks among economic operators in the chemical supply chain
- ☐ Other

If you selected "Other", please specify here

* 27. In your opinion, what would be the main barriers related to the adoption of new EU actions?

at least 1 choice(s)

- ☐ The perception that the current chemical threat level in EU is low
- ☒ Expected increase in administrative burden and implementation/enforcement costs faced by public authorities
- ☐ Expected increase in compliance costs, administrative burden and stifled competitiveness faced by businesses
- ☐ Expected reduction in consumer choice
- ☒ Risk of redundancy / overlap with existing chemical regulations
- ☒ Other

If you selected "Other", please specify here

De werkelijke chemische dreiging vanuit terroristische hoek is laag.

28. In your view, to what extent would the following measures contribute to mitigate the risk of misuse of high-risk chemicals in Europe?

	Not at all	Low extent	Moderate extent	High extent	Completely	I don't know
* Ban access to and use of high-risk chemicals by members of the general public	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Restrict the access to and use of high-risk chemicals by members of the general public with a legitimate interest in acquiring, introducing, possessing or using certain chemicals (through a licensing regime)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Require sellers to verify the proof of identity and the trade, business or profession of the prospective customer, and the intended use of the high-risk chemicals for each transaction	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Require sellers to keep records of each transaction involving high-risk chemicals						
* Require economic operators and/or users to report any suspicious transactions, disappearances and thefts involving high-risk chemicals						
* Require sellers to inform downstream recipients/users of high-risk chemicals along the supply chain that the substances are dangerous and regulated, e.g., by affixing an appropriate label to the packaging, by verifying that an appropriate label is affixed to the packaging, or by including that information in the safety data sheet						
* Support the capacity of law enforcement agencies and customs authorities to recognize high-risk chemicals in the course of their duties and to react promptly to a suspicious activity, e.g., through funding or training activities						
* Support the capacity of customs authorities to identify and eventually control high-risk chemicals upon import from third countries, e.g., through funding or training activities						
* Support capacity-building and awareness-raising activities for law-enforcement agencies, customs authorities, and businesses and supply chain actors						
* Establishment of a new EU expert group on high-risk chemicals to regularly discuss evolving chemical threats in classified meetings, in view of monitoring new threats and reacting to them in a coordinated way						

* Require online marketplaces to establish a single contact point in the EEA to allow national authorities to swiftly require the delisting of high-risk chemicals and exchange other relevant communications (e.g., send information requests during investigations)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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* 29. To what extent does legislation on chemicals safety (e.g., the Seveso III Directive 2012/18/EU) already address security concerns?

- ☐ Not at all
- ☐ Low extent
- ☐ Moderate extent
- ☐ High extent
- ☐ Completely
- ☒ I don't know

30. Please explain your answer to the previous question.

31. If you have additional options to suggest, could you please list them here?

Niet van toepassing

Impact of a possible EU intervention

32. What would be the impact of a complete ban on access to and use of high-risk chemicals for members of the general public?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Improve the functioning of the internal market for high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

33. What would be the impact of restricting the access to and use of high-risk chemicals by members of the general public with a legitimate interest in acquiring, introducing, possessing or using certain chemicals (through a licensing regime)?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
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* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes					
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals					
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals					
* Improve the functioning of the internal market for high-risk chemicals					
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)					
* Improve the safety and health of workers and the general public					
* Reduce the risk of business disruptions and subsequent economic losses'					
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the administrative burden/costs borne by professional users of high-risk chemicals					
* Increase the administrative burden/costs borne by members of the general public					
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the compliance costs borne by professional users of high-risk chemicals					
* Increase the compliance costs borne by members of the general public					
* Increase the implementation and enforcement costs borne by public authorities					
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)					
* Reduce consumers' choice					

* Limit trade flows with third-countries (e.g., import /export of substances)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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34. What would be the impact of requiring sellers to verify the proof of identity and the trade, business or profession of the prospective customer, and the intended use of the high-risk chemicals for each transaction?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Increase the compliance costs borne by members of the general public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

35. What would be the impact of requiring sellers to keep records of each transaction involving high-risk chemicals?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

36. What would be the impact of requiring economic operators and/or users to report any suspicious transactions, disappearances and thefts involving high-risk chemicals?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37. What would be the impact of requiring sellers to inform downstream recipients /users of high-risk chemicals along the supply chain that the substances are dangerous and regulated, e.g., by affixing an appropriate label to the packaging, by verifying that an appropriate label is affixed to the packaging, or by including that information in the safety data sheet?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
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* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes					
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals					
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals					
* Improve the functioning of the internal market for high-risk chemicals					
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)					
* Improve the safety and health of workers and the general public					
* Reduce the risk of business disruptions and subsequent economic losses'					
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the administrative burden/costs borne by professional users of high-risk chemicals					
* Increase the administrative burden/costs borne by members of the general public					
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the compliance costs borne by professional users of high-risk chemicals					
* Increase the compliance costs borne by members of the general public					
* Increase the implementation and enforcement costs borne by public authorities					
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)					
* Reduce consumers' choice					

* Limit trade flows with third-countries (e.g., import /export of substances)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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38. What would be the impact of supporting the capacity of law enforcement agencies to recognize high-risk chemicals in the course of their duties and to react promptly to a suspicious activity, e.g., through funding, awareness-raising or training activities?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Increase the compliance costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

39. What would be the impact of supporting the capacity of customs authorities to identify and eventually control high-risk chemicals upon import from third countries, e.g., through funding, awareness-raising or training activities?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

40. What would be the impact of supporting capacity-building and awareness-raising activities for businesses and supply chain actors?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

41. What would be the impact of establishing a new EU expert group on high-risk chemicals to regularly discuss evolving chemical threats in classified meetings, in view of monitoring new threats and reacting to them in a coordinated way?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
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* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes					
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals					
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals					
* Improve the functioning of the internal market for high-risk chemicals					
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)					
* Improve the safety and health of workers and the general public					
* Reduce the risk of business disruptions and subsequent economic losses'					
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the administrative burden/costs borne by professional users of high-risk chemicals					
* Increase the administrative burden/costs borne by members of the general public					
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)					
* Increase the compliance costs borne by professional users of high-risk chemicals					
* Increase the compliance costs borne by members of the general public					
* Increase the implementation and enforcement costs borne by public authorities					
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)					
* Reduce consumers' choice					

* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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42. What would be the impact of requiring online marketplaces to establish a single contact point in the EEA to allow national authorities to swiftly require the delisting of high-risk chemicals and exchange other relevant communications (e.g., send information requests during investigations)?

	No impact	Low impact	Moderate impact	Strong impact	I don't know
* Increase the level of security in the Union against the misuse of high-risk chemicals for malicious purposes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve information on and traceability of suspicious transactions, disappearances and thefts of high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the harmonization of EU rules concerning the making available, introduction, possession and use of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the functioning of the internal market for high-risk chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the likelihood and scale of environmental risks (e.g., on the likelihood or prevention of fire, explosions, breakdowns, accidents and accidental emissions of chemicals)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Improve the safety and health of workers and the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce the risk of business disruptions and subsequent economic losses'	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the administrative burden/costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by suppliers of high-risk chemicals (manufacturers, distributors, retailers, online marketplaces)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Increase the compliance costs borne by professional users of high-risk chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the compliance costs borne by members of the general public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increase the implementation and enforcement costs borne by public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce competitiveness of EU businesses, including SMEs (e.g., costs of inputs, capital and labor, market share in an international context and international competitiveness)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reduce consumers' choice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Limit trade flows with third-countries (e.g., import /export of substances)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

43. What type of positive or negative effects might the options listed in the previous questions have on your daily activity?

Er is onvoldoende zicht op goederen, die al dan niet onder verkeerde etikettering, van buiten de EU de gemeenschappelijke markt opkomen. Zicht hebben op deze stroom kan opsporingsdiensten een voordeel geven.

* 44. To what extent would you agree that an EU intervention to prevent the misuse of high-risk chemicals would be justified based on security concerns surrounding such chemicals, and that potential benefits would outweigh the economic costs?

- ☐ Strongly disagree
- ☒ Disagree
- ☐ Neither agree nor disagree
- ☐ Agree
- ☐ Strongly agree
- ☐ I don't know

45. Please explain your answer to the previous question.

Cyaniden en fosfides zouden via de REACH verordening gereguleerd kunnen worden en daarmee niet meer beschikbaar zijn voor het algemene publiek. Hypochlorieten en Sulfides hebben uiteenlopende use cases en voldoende alternatieve synthese routes. Reguleren van deze stoffen is ondoenlijk en heeft een significante economische impact.

* 46. To what extent would additional security measures also improve the health and safety of workers and the general public or have other benefits?

- ☒ No extent

- ☐ Low extent
- ☐ Moderate extent
- ☐ High extent
- ☐ Completely
- ☐ I don't know

47. Please explain your answer to the previous question.

De meeste giftige worden al gereguleerd, met name vanuit milieu en volksgezondheid.

Concluding remarks

48. If you wish to add further information — within the scope of this consultation — please feel free to do so here.

49. Please feel free to upload a concise document, such as a position paper.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

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