Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Purpose and Context of the Consultation

a) The Fitness Check of the most relevant chemicals legislation excluding REACH
The European Commission (DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) and DG Environment) is conducting a fitness check on chemicals legislation (excluding REACH), as well as related aspects of legislation applied to downstream industries.
The scope of this fitness check covers chemical and chemical-related legislation, encompassing legislation governing hazard identification; classification, labelling and packaging; and risk management. This includes chemical-related aspects of worker safety legislation, transport legislation, environmental protection legislation, product legislation, as well as supporting legislation. The full list of legislation covered by the fitness check can be found here.

Please note that the REACH Regulation is not covered by this exercise as it will be the subject of a separate evaluation, and a dedicated public consultation will be organised later this year.

The European Commission (DG GROW) has commissioned a team led by Risk & Policy Analysts Ltd. (RPA) to undertake a supporting study to the preparation of this fitness check (the terms of reference are available online at - http://ec.europa.eu/growth/sectors/chemicals/ec-support/index_en.htm). The current open online public consultation is part of the stakeholder consultation and its results will be analysed by the contractors. Please note that the results may also be used in the context of other studies in the chemicals field. The responses will be taken into consideration in the preparation of the Commission Staff Working Document, presenting the results of the fitness check.

For more details on the fitness check itself see:
• Fitness check background document
• DG GROW website
• DG ENV website

For more details on the REFIT Programme and public consultations:
• REFIT Programme
• Public consultations

b) Structure of this questionnaire (pdf version available here)
The questionnaire is available in English, German and French and has five parts:
• Part I – General Information about respondents (compulsory)
• Part II - General Questions for respondents interested in chemicals legislation, but who may not be familiar enough with the existing legislative framework to answer more detailed questions (compulsory)
• Part III – Specific Questions which require more extensive knowledge and/or experience of the chemicals and chemicals-related legislation (optional)

• Part IV – Specific Questions on the CLP Regulation(optional)
• Part V - Additional Comments (optional)

You may interrupt your session at any time and continue answering at a later stage. Once you have submitted your answers online, you can download a copy of the completed questionnaire.

To facilitate the preparation of your contribution, a pdf version of the questionnaire is available here.

c) Duration of the public consultation
The consultation will last for 12 weeks. Responses to the public consultation must be submitted by Friday 27 May 2016.

Privacy Statement: *The collected personal data and all information related to the above-mentioned public consultation is stored on a computer of the external contractor, acting as processor, who must guarantee data protection and confidentiality as required by Regulation (EC) 45/2001.*

Disclaimer: *This document does not represent an official position of the European Commission. It is a tool to explore the views of interested parties. The suggestions contained in this document do not prejudge the form or content of any future proposal by the European Commission.*

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Part I – General Information about Respondents

* 1. Address

Contact name	
Organisation/company	
Country	
Email Address	

2. If you have a Transparency Register ID number, please provide it below.

If your organisation is not registered, you have the opportunity to register now by following this link.
If your entity responds without being registered, the Commission will consider its input as that of an individual/private person and, as such, will publish it separately.

* 3. Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution.

Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

- ◯ My contribution may be published under the name indicated; I declare that none of it is subject to copyright restrictions that prevent publication
- ◯ My contribution may be published but should be kept anonymous; I declare that none of it is subject to copyright restrictions that prevent publication
- ◯ I do not agree that my contribution will be published at all

* 4. We might need to contact you to clarify some of your answers. Please state your preference below:

- ◯ I am available to be contacted
- ◯ I do not want to be contacted

* 5. Please indicate whether you are replying to this questionnaire as:

- ◯ A citizen
- ◯ A business
- ◯ A non-governmental organisation (NGO)
- ◯ A consumer association
- ◯ An industry association
- ◯ A trade union
- ◯ A government or public authority
- ◯ An intergovernmental organisation
- ◯ Academia or a research or educational institute
- ◯ Other

Other (please specify)

6. If a business or industry association, please indicate your field(s) of interest or activity(ies) - the letters in between brackets correspond to NACE codes [multiple choice]:

- [ ] Agriculture, forestry and fishing (A)
- [ ] Mining and quarrying (B)
- [ ] Manufacture of food products (C10)
- [ ] Manufacture of beverages (C11)
- [ ] Manufacture of tobacco products (C12)
- [ ] Manufacture of textiles (C13)
- [ ] Manufacture of wearing apparel (C14)
- [ ] Manufacture of leather and related products (C15)
- [ ] Manufacture of wood and of products of wood and cork excep furniture (C16)
- [ ] Manufacture of paper and paper products (C17)
- [ ] Printing and reproduction of recorded media (C18)
- [ ] Manufacture of coke and refined petroleum products (C19)
- [ ] Manufacture of basic chemicals, fertilisers, plastics and synthetic rubber in primary forms (C20.1)
- [ ] Manufacture of pesticides and other agrochemical products (C20.2)
- [ ] Manufacture of paints, varnishes and similar coatings, printing ink and mastics (C20.3)
- [ ] Manufacture of soap and detergents, cleaning preparations, perfumes and toilet preparations (C20.4)
- [ ] Manufacture of other chemical products (C20.5)
- [ ] Manufacture of man-made fibres (C20.6)
- [ ] Manufacture of basic pharmaceutical products and pharmaceutical preparations (C21)
- [ ] Manufacture of rubber and plastic products (C22)
- [ ] Manufacture of other non-metallic mineral products (C23)
- [ ] Manufacture of basic metals (C24)
- [ ] Manufacture of fabricated metal products, except machinery and equipment (C25)
- [ ] Manufacture of computer, electronic and optical products (C26)
- [ ] Manufacture of electrical equipment (C27)
- [ ] Manufacture of machinery and equipment (C28)
- [ ] Manufacture of motor vehicles, trailers and semi-trailers (C29)
- [ ] Manufacture of other transport equipment (C30)
- [ ] Manufacture of furniture (C31)
- [ ] Manufacture of games and toys (C32.4)
- [ ] Manufacture of medical and dental instruments and supplies (C32.5)
- [ ] Other manufacturing(excluding manufacturing of toys or medical and dental instruments) (C32)
- [ ] Electricity, gas, steam and air conditioning supply (D)
- [ ] Water supply; sewerage; waste management and remediation activities (E)
- [ ] Construction (F)
- [ ] Wholesale and retail trade (G)
- [ ] Transporting and storage (H)
- [ ] Professional, scientific and technical activities (M)
- [ ] Other

Other (please specify)

7. For businesses, please indicate the size of your business:

The definition of small and medium-sized enterprises depends on the staff headcount and either the annual turnover or the balance sheet of the company. Please consult the following website: http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition/index_en.htm

- ◯ Self-employed
- ◯ Micro-enterprise (under 10 employees)
- ◯ Small enterprise (under 50 employees)
- ◯ Medium-sized enterprise (under 250 employees)
- ◯ Large company (250 employees or more)

* 8. Please indicate the level at which your organisation is active:

- ◯ Local
- ◯ National
- ◯ Regional (e.g. Scandinavia)
- ◯ EU
- ◯ Global
- ◯ Not applicable

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Part II – General Questions

* 9. How important is it in your view that there is chemical and chemical-related legislation* at EU-level in order to achieve the following objectives? (1 = not important; 5= very important)

**This comprises the chemical-related provisions in all legislation within the scope of this fitness check. It encompasses legislation governing hazard identification and classification, as well as risk management measures, including chemical-related aspects of legislation on worker safety, transport, environmental protection, chemicals controls and supporting legislation, excluding REACH. The full list of legislation can be found here.*

***The internal market of the European Union (EU) is a single market in which the goods, services, capital and persons can move freely across borders. One of the key objectives of chemical and chemical-related legislation is to have a single market for chemical substances and mixtures, as well as products containing chemicals.*

	1	2	3	4	5	I don't know
Protecting human health	◯	◯	◯	◯	◯	◯
Protecting the environment	◯	◯	◯	◯	◯	◯
Ensuring a well-functioning internal market**	◯	◯	◯	◯	◯	◯
Stimulating competitiveness and innovation	◯	◯	◯	◯	◯	◯

* 10. Do you think the EU chemical and chemical-related legislation has been effective in achieving the following objectives? (1= not effective, 5= very effective). Please only consider chemical-related provisions in the legislation.

	1	2	3	4	5	I don't know
Protecting human health	◯	◯	◯	◯	◯	◯
Protecting the environment	◯	◯	◯	◯	◯	◯
Ensuring a well-functioning internal market	◯	◯	◯	◯	◯	◯
Stimulating competitiveness and innovation	◯	◯	◯	◯	◯	◯

* 11. If you think the EU chemical and chemical-related legislation is not effective (1) or only somewhat (2,3) effective, please indicate what you believe are the main reasons for this limited effectiveness in the following table:

	The legislation is unclear	The legislation is not adapted to the issues at stake	The legislation is not effectively implemented	No opinion or not applicable
Protecting human health	☐	☐	☐	☐
Protecting the environment	☐	☐	☐	☐
Ensuring a well-functioning internal market	☐	☐	☐	☐
Stimulating competitiveness and innovation	☐	☐	☐	☐

* 12. To what extent do you consider that EU chemical and chemical-related legislation has had an added value above what could have been achieved through action at a national level? (1= no value, 5= a very high added value)

	1	2	3	4	5	I don't know
EU-level legislation adds value to national level action	◯	◯	◯	◯	◯	◯

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Part III - Specific Questions

This part contains more detailed questions related to the five evaluation criteria underlying the fitness check: effectiveness, efficiency, relevance, coherence and EU added value.

13. For businesses and industry associations - Please select the legislation that regulates or otherwise affects your sector's or your company's activities.

For other stakeholders - Please select the legislation you are familiar with.

- [ ] Classification, labelling and packaging (Regulation No (EC) 1272/2008)
- [ ] Plant protection products (Regulation (EC) No 1107/2009)
- [ ] Biocidal products (Regulation (EU) No 528/2012)
- [ ] REACH, Annex XIII (Regulation (EC) No 1907/2006)
- [ ] Inland transport of dangerous goods (Directive 2008/68/EC)
- [ ] Chemical Agents (Directive 98/24/EC)
- [ ] Asbestos (Directive 2009/148/EC)
- [ ] Carcinogens and mutagens at work (Directive 2004/37/EC)
- [ ] Young people at work (Directive 1994/33/EC)
- [ ] Pregnant workers (Directive 1992/85/EEC)
- [ ] Signs at work (Directive 92/58/EEC)
- [ ] Industrial emissions (integrated pollution prevention and control) (Directive 2010/75/EU)
- [ ] Waste framework (Directive 2008/98/EC) and List of Waste
- [ ] Waste shipments (Regulation (EC) No 1013/2006)
- [ ] Major-accident hazards involving dangerous substances (Seveso) (Directive 2012/18/EU)
- [ ] Water Framework (Directive 2000/60/EC)
- [ ] Urban Waste Water (Directive 91/271/EEC)
- [ ] Marine Strategy Framework (Directive 2008/56/EC)
- [ ] Restriction of the use of certain hazardous substances in electrical and electronic equipment (Directive 2011/65/EU)
- [ ] End of life vehicles (Directive 2000/53/EC)
- [ ] Batteries (Directive 2006/66/EC)
- [ ] Packaging and Packaging Waste (Directive 94/62/EC)
- [ ] Export and import of hazardous chemicals (Regulation No 649/2012)
- [ ] Persistent organic pollutants (Regulation (EC) 850/2004)
- [ ] Contaminants in food and feed (Regulation (EEC) No 315/93 and Directive 2002/32/EC)
- [ ] Residues of pesticides (Regulation (EC) No 396/2005)
- [ ] EU Ecolabel (Regulation (EC) 66/2010)
- [ ] Safety of toys (Directive 2009/48/EC)
- [ ] Cosmetic products (Regulation (EC) No 1223/2009)
- [ ] Detergents (Regulation (EC) No 648/2004)
- [ ] Drinking Water (Directive 98/83/EC)
- [ ] Fertilisers (Regulation (EC) No 2003/2003)
- [ ] Medical devices (Directive 93/42/EEC regarding medical devices, Directive 90/385/EEC regarding active implantable medical devices, and Directive 98/79/EC regarding in vitro diagnostic medical devices, under revision)
- [ ] Aerosol dispensers (Directive 75/324/EEC)
- [ ] Explosives (Directive 93/15/EEC)
- [ ] Pressure equipment (Directive 2014/68/EU)
- [ ] Food contact materials (Regulation (EC) No 10/2011 and Regulation (EC) No 450/2009)
- [ ] General Product Safety (Directive 2001/95/EC)
- [ ] Test methods (Regulation (EC) No 440/2008)
- [ ] Good Laboratory Practice (Directives 2004/9/EC and 2004/10/EC)
- [ ] Protection of animals used for scientific purposes (Directive 2010/63/EU)
- [ ] *I am not familiar with any of the pieces of legislation listed above*

Other (please specify)

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Effectiveness

The following questions explore the extent to which the objectives of the EU legislative framework for chemicals have been met, and any significant factors which may have contributed to or inhibited progress towards meeting those objectives.

14. In the EU legislative framework for chemicals, risk management measures are, in some cases, determined directly based on the identified hazard using generic risk considerations (e.g. widespread exposure or exposure of vulnerable groups), which justify the automatic adoption of such measures. In other cases, the risk management measures are determined by a specific risk assessment that assesses the probability of adverse health and environmental effects resulting from the specific exposure scenarios associated with the proposed use(s) of the chemical.
In your view, do you think EU chemical and chemical-related legislation should, in general:

- ◯ a. Be more oriented towards specific risk assessments (i.e. differentiate more between chemicals depending on their use despite the possibility of prolonged discussions and implementation delays)
- ◯ b. Be more oriented towards generic risk considerations (i.e. take more cautious approaches, despite the possibility that certain uses of a chemical that are in the interest of society might be restricted)
- ◯ c. Remain as it is because the balance is more or less right (i.e. the legislation ensures appropriate application of specific risk assessments and generic risk considerations)
- ◯ d. I don't know

If you answered a or b, please explain

15. In your view, apart from the hazard and/or risk of a chemical substance or mixture, are all relevant considerations taken into account in regulatory decision making on risk management (e.g. whether there will be combined effects of chemicals, whether there are certain vulnerable groups, whether there will be impacts on jobs or on the competitiveness of EU industry, etc.)? Please explain your answer.

◯ Yes ◯ No ◯ I don't know

If you answered no, please explain which considerations are not (sufficiently) taken into account and, if relevant, explain which legislation you are referring to.

16. In your view, to what extent are the following elements of the overall EU legislative framework for chemicals satisfactory? (1= not satisfactory, 5= very satisfactory)

	1	2	3	4	5	I don't know
Transparency of procedures	○	○	○	○	○	○
Speed with which hazards/risks are identified	○	○	○	○	○	○
Speed with which identified risks are addressed	○	○	○	○	○	○
Time to allow duty holders to adapt	○	○	○	○	○	○
Predictability of the outcomes	○	○	○	○	○	○
Stability of the legal framework	○	○	○	○	○	○
Clarity of the legal texts	○	○	○	○	○	○
Guidance documents and implementation support	○	○	○	○	○	○
Effective implementation and enforcement across Member States	○	○	○	○	○	○
Consistent implementation and enforcement across Member States	○	○	○	○	○	○
Public awareness and outreach	○	○	○	○	○	○
International collaboration and harmonisation	○	○	○	○	○	○

Please explain your answers and list any other aspect you consider relevant. If you have specific legislation in mind, please specify it.

17. In your view, to what extent are the following elements of risk management satisfactory? (1= not satisfactory, 5= very satisfactory)

	1	2	3	4	5	I don't know
Hazard identification criteria	◯	◯	◯	◯	◯	◯
Risk assessment and characterisation	◯	◯	◯	◯	◯	◯
Hazard and risk communication measures to consumers (e.g. labels, pictograms, etc.)	◯	◯	◯	◯	◯	◯
Hazard and risk communication measures to workers (e.g. labels, pictograms, safety data sheets etc.)	◯	◯	◯	◯	◯	◯
Risk management measures restricting or banning the use of chemicals	◯	◯	◯	◯	◯	◯
Risk management measures regulating the safe use of chemicals (e.g. packaging requirements or requirements for the use of personal protective equipment)	◯	◯	◯	◯	◯	◯

If you answered 1, 2 or 3 above and would like to provide further information (in particular on specific pieces of legislation), please explain your answers.

18. Safety data for chemicals is subject to quality requirements, notably Good Laboratory Practice (GLP), aimed at ensuring the reliability and reproducibility of the data. Do you consider these requirements to be appropriate?

◯ Yes ◯ No ◯ I don't know

If you answered no, please explain your answer

Efficiency

The following questions explore the costs and benefits of implementing the EU legislative framework for chemicals. The legislation was designed to deliver benefits in terms of protection of human health and the environment, better functioning of the EU internal market (e.g. facilitating exports and imports between EU member states) and fostering competitiveness and innovation (e.g. better and safer chemicals). Costs can relate to costs for businesses, public authorities and society as a whole.

19. In your view, what are the most significant benefits generated for EU society by the EU chemical and chemical related legislation? (one or more answers possible)

- [ ] Reducing the exposure of consumers and of citizens in general to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc.
- [ ] Reducing the exposure of workers to toxic chemicals and, therefore, avoiding healthcare costs, lost productivity, etc.
- [ ] Reducing the damage to the environment and to eco-systems and, therefore, avoiding the costs of treating contaminated water, restoring impacted fisheries, cleaning-up of contaminated land, compensating for reduced crop pollinisation, etc.
- [ ] Encouraging research and innovation, generating new jobs, and improving the competitiveness of the EU chemicals industry by encouraging/supporting a shift towards green, sustainable chemistry and a circular economy
- [ ] Stimulating competition and trade within the EU single market
- [ ] Stimulating international trade between the EU and other countries
- [ ] I don't know

20. In your view, what are the most significant costs incurred by EU society due to EU chemical and chemical related legislation? (one or more answers possible)

- [ ] Costs for authorities at EU level
- [ ] Costs for authorities at national level
- [ ] Costs for small and medium sized enterprises
- [ ] Costs for large enterprises
- [ ] Costs for consumers
- [ ] Costs for society in general
- [ ] I don't know

21. In your view, do any of the following requirements in the legislative framework lead to significant costs for companies?

- [ ] Classification requirements for substances and mixtures
- [ ] Chemical labelling and packaging requirements
- [ ] Risk management measures under the different legislation
- [ ] Understanding and keeping up-to-date with changes in legal requirements
- [ ] Other (please specify)
- [ ] Training staff to ensure compliance with legal requirements
- [ ] Inspections and administrative requirements
- [ ] We do not view the business costs of meeting EU chemicals legislation to be significant
- [ ] I don't know

22. Are there specific requirements in the EU chemicals legislative framework which lead to particularly significant costs for authorities?

- ◯ Yes
- ◯ No
- ◯ I don't know

If you answered yes, please indicate what these are.

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Relevance

The following questions explore the extent to which the EU legislative framework for chemicals is consistent with current needs.

23. To what extent has the EU legislative framework for chemicals contributed to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives? (1= no contribution, 5= a large contribution)

	1	2	3	4	5	I don't know
Framework has led to a reduction in the number and/or use of hazardous chemicals and/or their substitution with safer alternatives	○	○	○	○	○	○

24. To what extent does the existing EU legislative framework sufficiently address emerging areas of concern, e.g. arising from advances in science and technology? (1= emerging areas of concern are not sufficiently addressed, 5 = emerging areas of concern are sufficiently addressed)

	1	2	3	4	5	I don't know
Novel areas of concern sufficiently addressed by framework	○	○	○	○	○	○

Please comment

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Coherence

This section explores whether the chemical-related provisions in the various pieces of legislation within the scope of this fitness check are consistent with each other, whether they are complementary or if there are significant gaps, overlaps and inconsistencies that stand in the way of their effective implementation.

25. Please indicate the extent to which you agree with the following statements relating to the EU chemicals legislation framework overall

	Strongly disagree	Disagree	Neutral	Agree	Strongly Agree
The EU chemicals legislation framework contains gaps and missing links	○	○	○	○	○
The EU chemicals legislation framework has overlaps	○	○	○	○	○
The EU chemicals legislation framework is internally inconsistent	○	○	○	○	○

26. Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between the different pieces of legislation which are under the scope of this fitness check. Please only consider aspects related to hazard identification, risk assessment and risk management of chemicals. The legislation covered by this fitness check can be found here.

Gaps or missing links

Overlaps

Inconsistencies

27. Please indicate any incoherence (gaps or missing links, overlaps, inconsistencies etc.) between legislation which are covered by this fitness check and any other legislation you consider relevant as regards the regulation and risk management of chemicals.

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Part IV: Specific questions on the CLP Regulation

Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (the 'CLP Regulation') governs the identification and classification of the health, environmental and physical hazards of chemicals, as well as the communication of these hazards to workers and consumers.

28. CLP communicates hazards to workers and consumers through various label elements, including danger words, pictograms, hazard statements and precautionary statements. (1= not effective; 5= very effective)

	1	2	3	4	5	I don't know
To what extent are CLP labels effective in communicating hazards to workers?	○	○	○	○	○	○
To what extent are CLP labels effective in communicating hazards to consumers?	○	○	○	○	○	○

29. Do the hazard classes in the CLP Regulation cover all relevant hazards?

	Yes	No	I don't know
Environmental	○	○	○
Physical	○	○	○
Human health	○	○	○

Please list any hazard classes that are not covered

30. How effective is the support to companies through formal guidance documents and national helpdesks? (1= not effective; 5= very effective)

	1	2	3	4	5	No experience
Guidance documents	○	○	○	○	○	○
Helpdesks	○	○	○	○	○	○
Industry association guidance and materials	○	○	○	○	○	○
Other (training, conferences, etc.)	○	○	○	○	○	○

Please add further details as necessary

31. To what extent is CLP enforced in a harmonised manner across Member States?

- ◯ Enforcement is harmonised across all Member States
- ◯ Enforcement is not harmonised across most Member States
- ◯ Enforcement is harmonised across most Member States
- ◯ I don't know

Please add further details as necessary

32. To what extent are the current elements relating to the CLP classification criteria satisfactory? (1= not satisfactory; 5= very satisfactory)

	1	2	3	4	5	I don't know
Ease of implementation for duty holders	◯	◯	◯	◯	◯	◯
Appropriateness of classification criteria and methods for substances	◯	◯	◯	◯	◯	◯
Appropriateness of classification criteria and methods for mixtures	◯	◯	◯	◯	◯	◯
International harmonisation through the Globally Harmonised System (GHS)	◯	◯	◯	◯	◯	◯

If you answered 1, 2 or 3 and would like to provide further information, please explain your answer

33. CLP is revised on a regular basis through adaptations to technical progress. Do transitional periods allow sufficient time to implement new or revised classification criteria?

- ◯ Transition period is sufficient
- ◯ Transtion period is too long
- ◯ Transition period is too short
- ◯ I don't know or have no opinion

Please elaborate if you answered that the transition period is too short or too long.

34. To what extent are the current elements of the procedures for harmonised classification & labelling (CLH) satisfactory? (1= not satisfactory; 5= very satisfactory)

	1	2	3	4	5	I don't know
Transparency of the procedures	○	○	○	○	○	○
Involvement of stakeholders	○	○	○	○	○	○
Quality of scientific data and related information	○	○	○	○	○	○
Speed of the procedure	○	○	○	○	○	○

If you answered 1, 2 or 3 and would like to provide further information, please explain your answers

Consultation on the regulatory fitness of chemicals legislation (excluding REACH)

Part V: Additional comments

35. In case you have any additional comments with relevance for this public consultation, please insert them here.

Please forward any position papers to the following email address: *enquiries@rpaltd.co.uk*

Thank you for your cooperation.