Appendix 1 Background information for appointment of BPR NEA Administrator and BPR SPOC

# BPR NEA Administrator

## Number of BPR NEA Administrators

Each Member State must nominate two BPR NEA Administrators, with one playing the role of an alternate in case of holidays or other absences.

## Institutional Location

Each Member State has to select the location and institution in which the BPR NEA Administrator and his alternate will be located. The institutional location of the BPR NEA Administrator may be different in each MS and depends on national administrative structures.

The two BPR NEA Administrators can be based in one location and organisation only. This organisation is referred to as the BPR NEA Administrator Institution.

## Role and tasks

The BPR NEA Administrator and his alternate shall manage BPR NEA users on a national level and have the following responsibilities:

**User Management and Administrative Tasks**

a) granting BRP NEA users access to the Interact BPR NEA application;

b) collecting and keeping up-to-date a list of BPR NEA users, with their contact details and positions that have been granted access as well as documented decisions of relevant national authorities;

c) collecting the declarations from National Enforcement Authorities whose staff has access to Interact BPR NEA, as specified in point 5 of the Security Recommendations;

d) ensuring that BPR NEA users, no longer within the enforcement organisation, are immediately removed from having all access and that user verification is done once a year to identify users that have changed position or left the organisation;

**Support related tasks**

e) offering support for BPR NEA users of Interact BPR NEA related to user management duties such as unblocking accounts;

**Security related tasks:**

f) organising security training or preparing security training materials for BPR NEA users to promote security awareness among Interact BPR NEA users[[1]](#footnote-2);

g) immediately reporting to ECHA all suspected, attempted or actual security breaches that may have compromised Interact BPR NEA data unless they have already been reported by the respective Enforcement Authority, including:

i) Any serious attempt at illegal or unauthorised entry into a security area

ii) Any loss, theft or compromise of BPR data available through Interact BPR NEA

iii) Any attempt to corrupt an official with a view to gaining access to biocidal data available through Interact BPR NEA or other sensitive material.

## Appointment procedure

The appointment of the BPR NEA Administrator(s) requires that a formal decision on who is to be the BPR NEA Administrator is taken at a national level, in consultation with SON member. The appointment is then made sending three documents to ECHA:

* The actual appointment decision from the appointing institution
* The cover letter signed by the member of the BPRS; the Member of the SON of the MS needs to be informed
* The declaration of confidentiality and non-disclosure as described in Appendix 4.

Please refer to Appendices 2-4 for templates for all documents needed in BPR NEA Administrator appointment.

###  The appointment decision

The appointment of the BPR NEA Administrator(s) must be signed by their superior in the relevant organisation.

Please refer to Appendix 2, “Template for nominating BPR NEA Administrators and BPR end-user support points-of-contact” which contains a ready template for such appointment decision, with all information needed by ECHA.

###  Cover letter

Since the role of NEA Administrator requires some IT expertise and will be serving the purposes of the enforcement authorities, the appointment must be solicited by the national member of the BPR Subgroup of the Forum for Exchange of Information on Enforcement (BPRS), in consultation with the member of the Security Officers Network (SON). This ensures that all relevant stakeholders on the national level are aligned about the appointment of the administrator.

###  Declaration of Confidentiality and Non-Disclosure

The “Declaration of Confidentiality and Non-Disclosure for BPR NEA Administrators” must be signed by the nominated BPR NEA Administrator and his alternate and sent together with the appointment decision. See Appendix 4.

###  Sending the documents to ECHA

The duly signed documents are to be scanned and sent via the contact form (<https://comments.echa.europa.eu/comments_cms/ContactFormAuthorities_Nominations.aspx> - “User administrator”).

## User Account for BPR NEA Administrator

The User Administrator needs to create an EU-login account, if not already having one. Upon receiving the full appointment documentation, ECHA will add the user administrator to the correct group (or invite him in case that it doesn’t have already an EU Login account) in order for the User Administrator to have the access to the ECHA Accounts Portal, used for the management of Interact BPR NEA users.

For more information about the EU Login they can consult the user guide <https://webgate.ec.europa.eu/cas/manuals/EU_Login_Tutorial.pdf>

## Replacement

Replacement is a process whereby the Member State wishes to change the person who is acting as a BPR NEA Administrator for another one. In such a case, ECHA shall receive a new appointment according to the procedure described above. The new appointment shall clearly specify which administrator(s) is being replaced and from which date.

On the date indicated in the new appointment, ECHA will disable the account of the old BPR NEA Administrator and enable a new account to the new BPR NEA Administrator and send to the new administrator a basic set of instructions related to obtaining access (login etc.) and how to manage accounts.

## Prolongation of current appointment

Prolongation of the current appointment is a process where the Member State does not wish to change the person who is the BPR NEA Administrator but only wishes to extend the duration of appointment of the current administrator.

In such case, the existing BPR NEA Administrator should send to ECHA a new and updated decision from his authority (Appendix 2), signed by a relevant superior. The prolongation decision should contain the same information as the appointment decision, in particular the new ending date of the appointment. Upon receiving the new appointment decision, ECHA will change the ending date of the account of the Administrator.

There is no need to send the cover letter from the BPRS member and the declaration of confidentiality and non-disclosure, as they are deemed to remain valid.

## Roles managed

The BPR NEA Administrators manage users with the following Interact BPR NEA roles:

1. Interact BPR NEA Users managed by NEA Administrator

|  |  |
| --- | --- |
| **Interact BPR NEA User role** | **Estimated number** |
| BPR NEA Inspector | 1 to 300 per Member State  |
| BPR NEA Auditor | 1 per Member State  |
| BPR MS Focal Point | 1-4 per Member State  |

# BPR NEA End User Support Single Point of Contact (SPOC)

## Number of SPOCs

There should be only one BPR NEA End-User Support Single Point of Contact (SPOC) per Member State. That person should have the most up to date knowledge on the functionalities of Interact BPR NEA.

## Institutional location

Member States are free to select the institution in which the BPR SPOC is located. Since no special connection to ECHA is needed to provide end-user support, the SPOC does not need to be located in the same institution as the BPR NEA Administrators.

## Role and tasks of the SPOC

The SPOC shall provide content related support to BPR NEA users of Interact BPR NEA on a national level. This shall include:

a) training of national Interact BPR NEA users

b) answering questions from Interact BPR NEA users related to the system’s functionalities and its use

The SPOC shall have the Interact BPR NEA account with an “BPR NEA Inspector" role.

## Appointment

The appointment of the BPR SPOC requires that a formal decision on who is to be the SPOC is taken at a national level, in consultation with the SON member. The appointment is then made sending two documents to ECHA:

* The actual appointment decision from the appointing institution
* The cover letter signed by the member of the BPRS; the Member of the SON of the MS needs to be informed.

Please refer to Appendices 2-3 for templates for all documents needed in BPR SPOC appointment.

###  The appointment decision

When deciding who is to become a BPR SPOC the national authorities should consider that the SPOC should have a good understanding of BPR enforcement and a thorough understanding of Interact BPR NEA functionalities as they are expected to answer questions related to the use of Interact BPR NEA for enforcement purposes. ECHA will provide training on Interact BPR NEA for the SPOCs.

The appointment of the BPR SPOC must be signed by their superior in the relevant organisation.

Please refer to Appendix 2, “Template for nominating BPR NEA Administrators and BPR end-user support points-of-contact” which contains a ready template for such appointment decision, with all information needed by ECHA.

###  Cover letter

Since the role of BPR SPOC will serve the BPR NEA users dealing with the biocidal product regulation, the appointment must be solicited by the national member of the BPR Subgroup of the Forum for Exchange of Information on Enforcement (BPRS), in consultation with the member of the Security Officers Network (SON). This ensures that all relevant stakeholders on the national level are aligned about the appointment of the SPOC.

###  Sending the documents to ECHA

The duly signed documents are to be scanned and sent via the contact form available at <https://comments.echa.europa.eu/comments_cms/ContactFormAuthorities_Nominations.aspx> .

##  Interact BPR NEA accounts for SPOC

ECHA shall create the account for BPR SPOC, using the appointment decision as a formal document justifying the granting of access to Interact BPR NEA.

## Replacement of SPOCs

Replacement is a process whereby the Member State wishes to change the person who is acting as a BPR SPOC for another one.

In such case ECHA shall receive a new appointment according to the same procedure described above. The new appointment shall clearly specify from which date the previous SPOC is being replaced. BPR NEA Administrator must also be notified by receiving the same appointment decision as sent to ECHA.

## Prolongation of current appointment

Prolongation of the current appointment is a process where the Member State wishes to extend the duration of the appointment of the current BPR SPOC and not to change the person who is the BPR SPOC.

In such case the BPR SPOC in question should send to ECHA and BPR NEA Administrator a new and updated decision from his authority, signed by a relevant superior. The prolongation decision should contain the same information as the appointment decision (see Appendix 2), in particular the new ending date of the appointment. It is up to the BPR NEA Administrator to ensure change of ending date in the SPOCs account.

There is no need to send the cover letter from the BPRS member as it is deemed to be still valid.

1. Interact BPR NEA users should be aware of the Interact Security Recommendations [↑](#footnote-ref-2)