

# EXHIBIT 13

## **ACTION PLAN ECHA**

- GTF statement positioning the publication of proposal in context of ECHA process and the recommendations by BAUA at high level : June 2<sup>nd</sup>
- Gain intel on household products classified with STOT-RE2 to put things into context
- **Technical comments (GTF) < July 18**
  - Technical comments on draft CLH classification proposal
  - Compilation of regional reviews on CARC
  - Other relevant technical comments in anticipation of NGO submissions/suggestions
- Decide on submission of EDSP data to ECHA (explore ways for ECHA to consider the data eg through JMPR)
- Convince independant experts to submit arguments against STOT-RE as well as issuing reinforcing comments confirming no need for carcino
  - -map which influential experts wants to do this (no funding; sensitive!)
- In parallel, gather intel on Norway in context of ECHA (track record)
- Gain intelligence on ECHA following EFSA classification proposals
- STOT-RE 2 classified compounds; what can we learn?
- Have toxicologist at RAC meeting (through ECPA)
- **Influence positions of MS on classification proposal**
  - - **Note:** panel members should not be approached !
  - - Map the panel members (who, affiliations, reputation,etc)
  - - Map Key Influential People (KIPs) to panel members
  - Understand panel memebers positions/concerns through KIPs /publicationsExpose panel members through KIPs-affiliates-communications in media they are exposed to
- Later, in anticipation of publication of final conclusions/classification by ECHA ,work on good public brief on ECHA process and next steps (idea

| Status  | Comments  | timelines                  |                                     |
|---|---|----------------------------|-------------------------------------|
| <div style="background-color: #92d050; width: 100%; height: 10px;"></div> <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | available on GTF website<br>Mark Martens; in progress level 2     | first draft available 14/6 | Contact§ Francesca for uploading    |
| <div style="background-color: #c8e6c9; width: 100%; height: 10px;"></div> <div style="background-color: #c8e6c9; width: 100%; height: 10px;"></div> <div style="background-color: #c8e6c9; width: 100%; height: 10px;"></div> | in progress level 1<br>in progress level 1<br>in progress level 1 |                            |                                     |
| <div style="background-color: #f44336; width: 100%; height: 10px;"></div>   | Access to EDSP pending; ECHA does typicall not review ED          |                            |                                     |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | genicity cl in progress level 2                                   |                            | Kimberly to draw up the list with B |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | in progress level 2   |                            |                                     |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | in progress level 2   |                            | ECPA can help                       |
| <div style="background-color: #92d050; width: 100%; height: 10px;"></div>   | ECPA will update  |                            |                                     |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | Mark Martens; in progress level 2                                 |                            |                                     |
| <div style="background-color: #92d050; width: 100%; height: 10px;"></div>   | need to notify ECHA one month ahead of RAC                        |                            | synergy with other a.i. discussions |
| <div style="background-color: #92d050; width: 100%; height: 10px;"></div>   | more intel needed on connections with activist authors            |                            | Mike/Jen to contact Bill reeves and |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | in progress level 2   |                            |                                     |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | in progress level 2   |                            |                                     |
| <div style="background-color: #ffff00; width: 100%; height: 10px;"></div>   | in progress level 2   |                            |                                     |

is to provide nuance to who really has the last word and on what exactly)

comments

Bill Heydens (Eu experts, Greim, Kirkland, Kier)

to be explored; experts can be inter-changed per discipline

of the fusion center