

REACH, June 2009

Aspects of identification and prioritisation of SVHCs

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REACH is...work in progress

27 EU Member States

NGOs

European
Chemicals
Agency (ECHA)

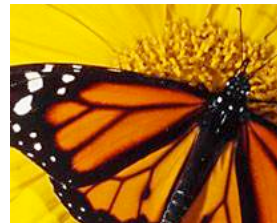


European
Commission

Manufacturers+
Importers

European
Parliament

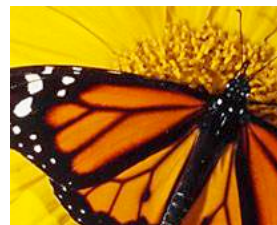
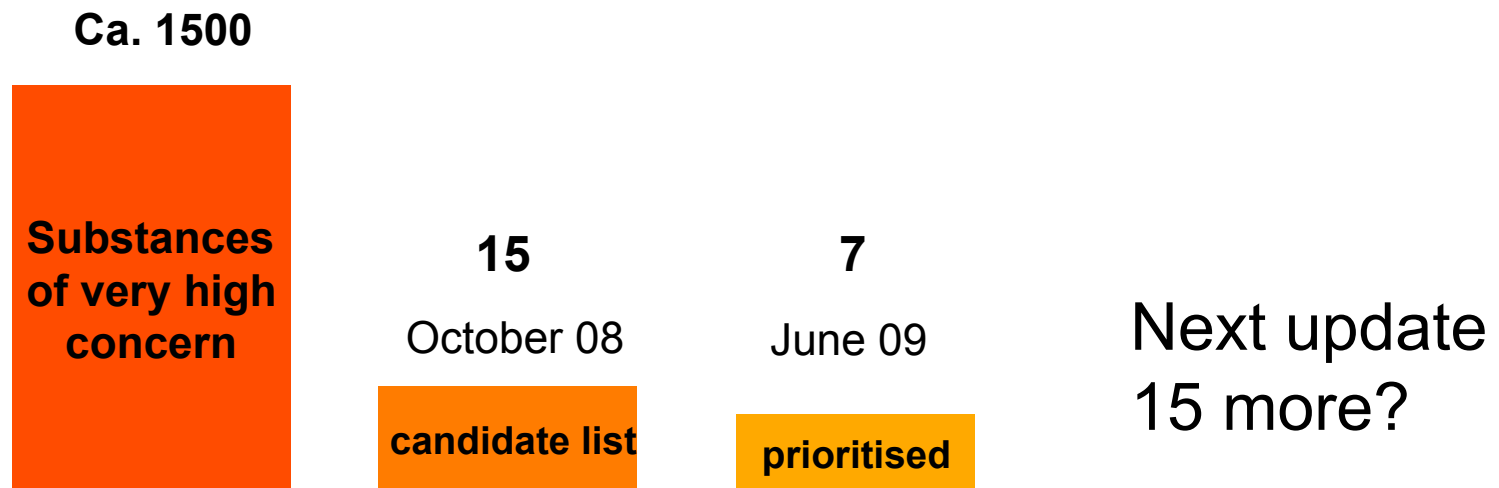
Downstream users





Insufficient progress on candidate list

- Authorisation procedure is very important to encourage substitution
- Concern about too short candidate list and slow official process





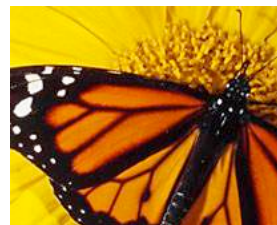
Helping the candidate list to grow



- SIN list 1.0 (“Substitute it now”)
- 267 substances
- Focus on consumers
- Including chemicals found through biomonitoring



- Comprehensive candidate list is needed for more information in supply chain & consumers and notification for SVHCs in articles





Further legal changes to REACH

Further legal changes to REACH (reviews of Annexes)

- Review of exemptions (Annex IV and V)
- Criteria for exposure-based waiving of tests
- Criteria for identifying PBTs





Controversies remain: What is a PBT?

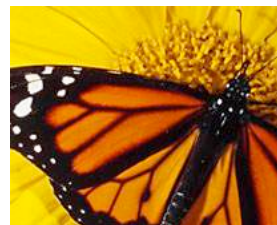
- Current REACH PBTs (Annex XIII) criteria too limited to catch known PBTs (conflict with international POPs treaty)
- Weight of evidence approach using all available scientific knowledge is needed (example PFOA)
- WWF legal analysis December 08: COM proposal does not solve the issue
- CA meeting asked COM to reconsider, decision still pending





Many open questions and challenges

- REACH obliges companies to provide hazard and exposure data: how much detail will we get? (e.g. exposure based waiving)
- How efficient will the quality control through evaluation be?
- Is the incentive for innovation strong enough? How often will companies argue „this level of a SVHC is safe“?
- Public access to registration data is delayed: how will the „gray zone“ of claiming information as confidential be dealt with?
- How can adequate protection from the impacts of hormone disrupting chemicals and the cumulative effects be achieved?





Conclusions

- REACH is a reality...but a very slow one
- Provision of data is the key for all steps: identification, prioritisation and alternatives assessment
- SIN list 1.0 has become important reference for companies, authorities due to official slow process
- Many similar challenges for California/US and Europe

