

From Regulatory Compliance to Sustainable Chemistry Solutions and Circular Economy

Ministry of Environment Seminar

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European Chemicals Agency

- Started on 1 June 2007 in Helsinki
- ~570 staff from 27 countries
- Originally REACH
- Since 2009 Classification and Labelling (CLP)
- From 2012 also Biocides and PIC (export/import)



REACH Regulation

- Principles, processes, achievements



Principles of REACH

- Industry responsible for safe manufacture and use
- Deal with the 'burden of the past' with a systemic program for registration of 'old' chemicals
- Get adequate information on hazards while minimising the use of experimental animals and the costs
- Promote substitution of hazardous substances with safer alternatives
- Authorities will focus on substances of highest concern



REACH and CLP – main processes and actors



Registration
Self-classification

Facilitated by ECHA, industry gathers information and ensures management of risks



Member States

Evaluation

- Dossier evaluation
- Substance evaluation

ECHA and MSCAs control and request further info



Authorisation
Restriction
Harmonised C&L

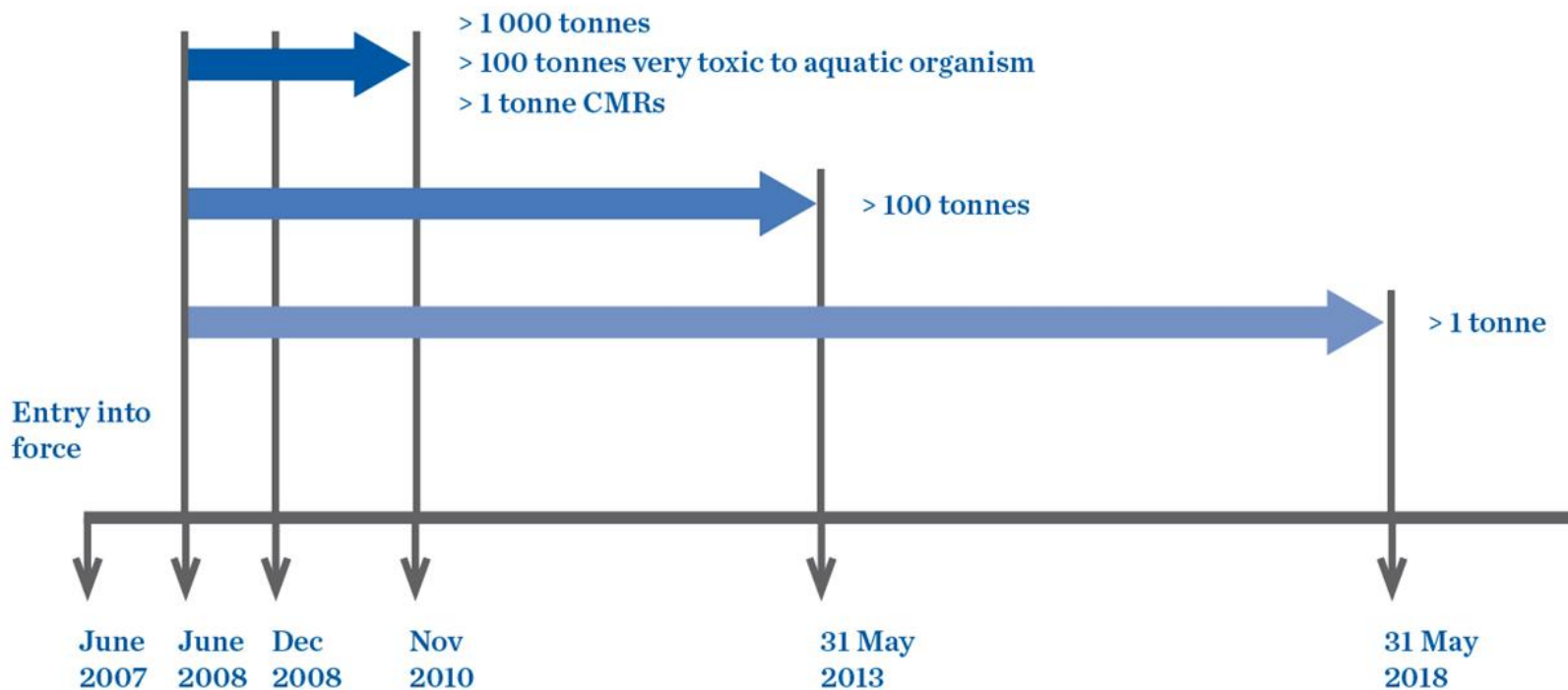
Commission, with support of ECHA and MSCAs, applies community wide risk management measures

REACH: Registration

- Core of REACH: Manufacturers and importers of chemicals collectively obtain information per substance and use knowledge to ensure safe use
- Registration:
 - Electronic submission of the registration dossier (IUCLID format)
 - Standard information linked to tonnage
 - Testing Proposals for higher-tier studies (high volume substances)
 - Chemical Safety Report for substances at 10 t.p.a.
 - Safety advice to users/customers is provided in extended Safety Data Sheets
- Information publicly available via ECHA website

Registration deadlines

Pre-registration

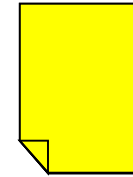
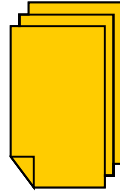
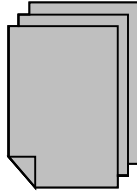


Supply Chain Communication in REACH

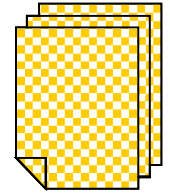
Manufacturers-
Importers



+



+



**Registration
dossier
C&L (GHS)**

**Chemical Safety Report
Exposure Scenarios**

**Safety Data
Sheet**

**Exposure
Scenarios**



Information on uses



Safety advice

Customers (Downstream Users)

ECHA – EU Authorities



Public

Risk management: authorisation

- Substances of very high concern (SVHCs): CMRs, PBT/vPvB or 'equivalent concern'
- Identification of substance in two steps:
 - Inclusion on the 'Candidate List' by ECHA
 - Some transferred on the 'Authorisation List' (Annex XIV of REACH) by Commission
- Once on the Authorisation List, the substance can only be marketed or used after 'sunset date' if authorised by the European Commission.
 - COM decides based on an ECHA opinion



Substances in Articles

- Registration information also covers incorporation of a substance into articles
- Notification to ECHA if articles contain
 - Substances on the Candidate List (SVHCs)
 - Exceeding 0.1 % w/w and 1 ton/annum
- Information on safe use of SVHCs in article to be submitted to professional uses
 - And for consumers at request
 - As a minimum the name of the substance
- Articles containing substances that pose a risk to human health or environment can be subject to restrictions

168

Substances of Very High Concern

460

Risk management proposals

1 500

Dossiers for HPV chemicals checked for compliance

14 000

Substances registered under REACH

120 000

Substances classified by industry

2 million

Study summaries on properties and effects of chemicals



REACH links with
Sustainable Chemistry and
Circular Economy



Sustainable chemistry

- Active use of REACH data in innovation and product design
 - Know your chemicals portfolio
 - Know and manage the risks, throughout the life-cycle
 - Integrate safety into your R&D
- Be proactive, not reactive
 - Is my substance on an list?
 - ü Do the properties of my substance trigger listing?
 - Avoid regrettable substitution
 - ü Know the properties & risks of your substitute



Linear economy vs. circular economy



Product design, durability
reuse, repair

Avoid solutions becoming problems

Lead



DecaBDE



Chemicals can
become an issue
at the end of the
life-cycle!

Commission Action Plan

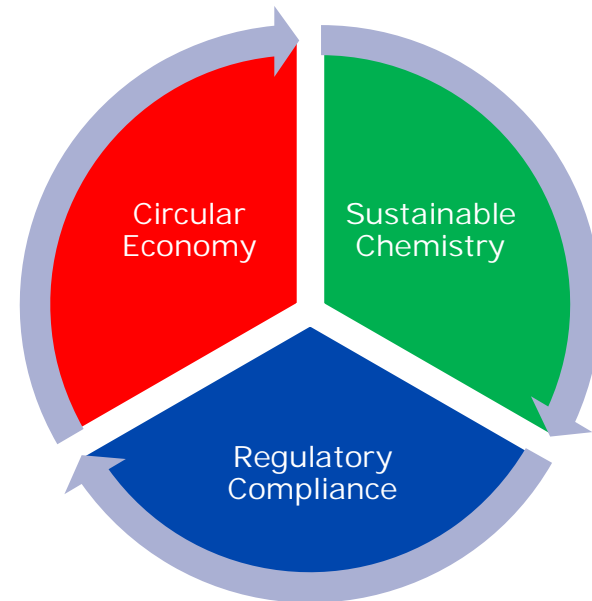
Circular economy & chemicals

Analysis and policy options

- to address the interface between chemicals, products and waste legislation,
- including how to reduce the presence and improve the tracking of chemicals of concern in products
- Timetable: 2017

REACH in support of circular economy

- Sustainable use of secondary raw materials and bio-based materials
 - Via REACH chemical hazards and risks should be known
 - Ensure recyclability of materials/products
 - Minimise the circulation of SVHCs in the society
 - Carrots: proactive use of REACH data by companies
 - Sticks: use of restrictions and authorisation
- Tracing and tracking hazardous substances in products/articles
 - And informing consumers
- Contributions to other policy instruments
 - E.g. Ecodesign, Green Public Procurement



Conclusions

- REACH compliance and sustainable chemistry & circular economy are interlinked
- REACH investment can be capitalized to benefit these (and other) policy sectors
- Companies can integrate REACH compliance into their R&D and product design

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