

How to encourage future applicants to focus on substitution and innovation?

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Lessons learnt on Applications for Authorisation

Helsinki 11th of February 2015





- ✓ Non-profit environmental organisation
- ✓ Working to eliminate the use of hazardous chemicals
- ✓ Funding from governments and charity funds
- ✓ Offering concrete tools and highlighting positive examples



Business dialogue

- ✓ The ChemSec business group
- ✓ Bilateral dialogue
- ✓ Tools and trainings on substitution



Reach § 55, Aim of authorisation and considerations for substitution

*The aim of this Title is to ensure the good functioning of the internal market while assuring that the **risks from substances of very high concern are properly controlled and that these substances are progressively replaced by suitable alternative substances or technologies where these are economically and technically viable.** To this end all manufacturers, importers and downstream users applying for authorisations shall analyse the availability of alternatives and consider their risks, and the technical and economic feasibility of substitution.*

Why is Substitution the best option?

- ✓ The most efficient way to control risks of hazardous chemicals
- ✓ Do not have to apply for authorisation
- ✓ Long term solution
- ✓ Market opportunities

Substitution means use other chemical substances, other techniques, other materials or to phase out.



How to hamper innovation...

- ✓ Disfavouring companies producing or using alternatives to SVHCs
- ✓ Give authorisation when alternatives are available and economically feasible, for example:
 - DEHP
 - HBCDD
 - Lead Chromates

“As part of our commitment to providing safer and more sustainable solutions for our customers, AkzoNobel phased out the use of lead compounds in paints some years ago. In 2011 we phased out the last remaining uses of lead chromate in all our industrial paints.

As safer and effective alternatives to lead chromate pigments are available for industrial paints and have been fully accepted in the marketplace, we are surprised that the EU looks set to grant an authorization for the continued use of lead chromate in these paints for at least 12 more years under REACH. AkzoNobel does not intend to re-introduce lead chromates in any of our products.”

AkzoNobel

“Granting this Authorisation will cause an economic disadvantage to those companies who have invested resources in substituting HBCDD, such as the FR manufacturers due to idling of plant and EPS bead manufacturers, other than the Applicants, due to increased costs and cause confusion in the industry about the regulatory process. Finally, it will stifle innovation in the European industry to develop substances with improved toxicological profiles and run counter to the policy objectives underpinning the Authorisation process.”

Response from Chemtura to the Public Consultation on application for authorisation of HBCDD.

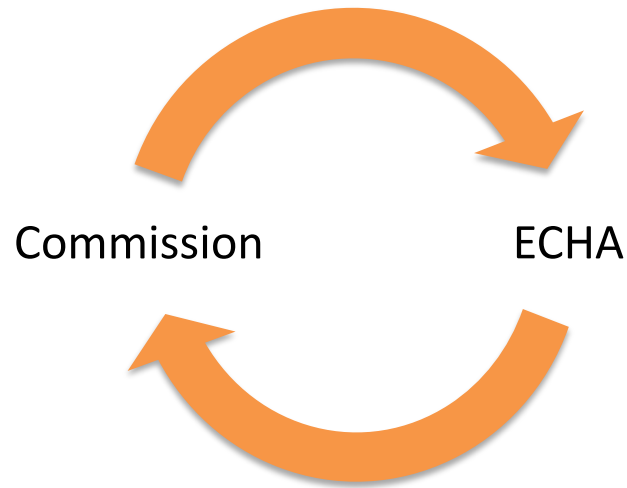
Effective applications for authorisation

- ✓ Make clear exact what information is needed from applicant
- ✓ Clear guidelines from ECHA
- ✓ Support in defining specific uses

How to encourage future applicants to focus on substitution and innovation?

How to encourage future applicants to focus on substitution and innovation?

- ✓ Follow the intentions of REACH
- ✓ Clear Communication



- ✓ Not give authorisation when alternatives are available and economically feasible
- ✓ Just give authorisations for a well defined use and with a suitable timeframe
- ✓ Help companies how to work with substitution when a substance they use is identified as an SVHC
- ✓ Communicate SVHCs should be phased out when added to annex XIV, when alternatives are available
- ✓ Communicate benefits with substitution



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