Webinar: Consultation on proposed restriction of substances in single-use baby diapers

Questions and answers

ECHA organised a webinar **Consultation on proposed restriction of substances in single-use baby diapers** on 26 January 2021. The event gave an update on the proposed restriction, explained the specific questions posed in the consultation and clarified how to submit comments.

This document compiles the questions and answers from the webinar. Minor editorial changes have been made to correct spelling mistakes and similar questions have been combined into one. The document will not be updated.

Question	Answer
EDANA, representing amongst others the suppliers and manufacturers of absorbent hygiene products, is drafting a submission to the consultation. Can you comment on how the restriction process will deal with the following facts? (continued in next question)	Thanks for your question. Here is the answer for all your questions. For now the Dossier Submitter provided in the dossier all the evidence available. ECHA's scientific committees will evaluate the information and deliver their opinion. If you have any further information, please feel free to submit it in the consultation.
Is ECHA aware that if those measures are put in place, it would eliminate the whole single-use diaper category from the EU market If the goal is to protect babies, why is the scope only on disposable baby diapers and not on other articles for babies, eg. reusable diapers?	Thanks for your question. Here is the answer for all your questions. For now the Dossier Submitter provided in the dossier all the evidence available. ECHA's scientific committees will evaluate the information and deliver their opinion. If you have any further information, please feel free to submit it in the consultation. Regarding re-usable diapers: No analytical tests were performed onto re-usable diapers, so no risk assessment was possible. Moreover, re-usable diapers are made in different materials compared to single-use baby diapers. Finally; most of them are made in textile and washed, so other

	contaminants can be on the article that are not due to the article itself. All the reasons led the Dossier Submitter to NOT include re-usable diapers in the scope of the restriction proposal.
Disposable baby diapers and other absorbent hygiene products are safe and have always been safe. We would be interested to see the evidence disposable baby diapers are unsafe under real use conditions?	Thanks for your question. Here is the answer for all your questions. For now the Dossier Submitter provided in the dossier all the evidence available. ECHA's scientific committees will evaluate the information and deliver their opinion. If you have any further information, please feel free to submit it in the consultation.
The substances in scope of this restriction proposal are not intentionally added. They are environmental contaminants. Levels required by the French proposal are so low, lower than the surrounding environment. How can this be appropriate as a product requirement?	Thanks for your question. Here is the answer for all your questions. For now the Dossier Submitter provided in the dossier all the evidence available. ECHA's scientific committees will evaluate the information and deliver their opinion. If you have any further information, please feel free to submit it in the consultation.
Is ECHA aware that the manufacturers of diapers launched its Stewardship Programme for absorbent hygiene products. This code of practice provides transparency and reassurance for consumers regarding trace levels of impurities found in absorbent hygiene products (AHPs), including baby diapers.	Yes, ECHA and the Dossier Submitter are aware that EDANA launched a Stewardship programme. Please provide any relevant information regarding this programme through the consultation.
The limits proposed are below (except for formaldehyde)the current Limits of Quantification (LOQ). How does ECHA expect to enforce these limits ensuring compliance?	An appropriate analytical method is proposed and must be developed before entry into effect (estimated in 2024). Enforcement-related aspects will be considered during the opinion development by ECHA's scientific committees. If you have any further information, please submit it during the consultation.
Can you please further explain what is the background document and what is its role in the process? Thanks	Thank you for the question. Once the restriction proposal is being discussed in ECHA's scientific committees, the restriction dossier submitted by the Dossier Submitter is turned into the Background Document to the opinions. The Dossier Submitter updates the information in the Background Document following any recommendations from the committees and due to the responses in the consultation. The Background Document is sent to the European Commission with the opinion for the further decision making.
Early in the presentation it was mentioned that "a risk could not be excluded" - then at the end it was stated that "a risk was identified", which then was the basis to make the assumption that there will be a significant benefit. That is a big difference. Can you clarify?	Thank you for your question, this means that a risk has been demonstrated. This is the Dossier Submitter's conclusion and it is currently being evaluated by ECHA's scientific committees.
In the report you mentioned other sources of exposure to SOI, like food or environment. Is there any data for comparing values from different exposures? Did you make sure restriction measures are appropriate?	There is no specific data for comparing exposures (food, environment etc...). It is the task of the scientific committees to assess the information and to conclude if the restriction measures are appropriate or not.
Referring the test method suggested: Urine simulant may be the right	The development of the analytical method depends mostly on industry

choice for the inner core of the diaper. But it´s not suitable for other parts of the diaper without urine contact at use. As results strictly depend on method, who will identify the analytical method for ensuring compliance?	but enforcement authorities can help/participate. In the restriction dossier, the Dossier Submitter provided information about the proposed analytical method.
Thank you. 1. At the end of the process, in which timeframe has the Commission to decide ? When could a decision be taken ? 2. Do some other national agencies already support the Anses' proposal ? 3. Do you also except informations from the "users" (parents...) ? If yes, which kind?	Thank you for the questions. (i) Once the restriction process has finished in ECHA's scientific committees and the opinion has been sent to the European Commission, it takes between 9 and 12 months for the restriction to be added to Annex XVII of REACH if supported by the Member States. (ii) During the consultation on the dossier we will see how other Member State authorities will comment (the comments submitted are made public every month). (iii) We are mainly looking for technical information on the restriction proposal that has been proposed but any person can send in information.
What is the difference between first and final deadline for comments?	Comments can be submitted at any time during the consultation (i.e. until 21 June 2021) and all submitted comments will be considered by the scientific committees and the Dossier Submitter. However, by submitting comments earlier, there will be more time to take these comments into account during the opinion-development. Comments submitted by the early deadline of 1 February will be considered in the committees' discussion about the proposal in March 2021.