

REACH E-NEWSLETTER

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SGS

WELCOME

Dear Reader,

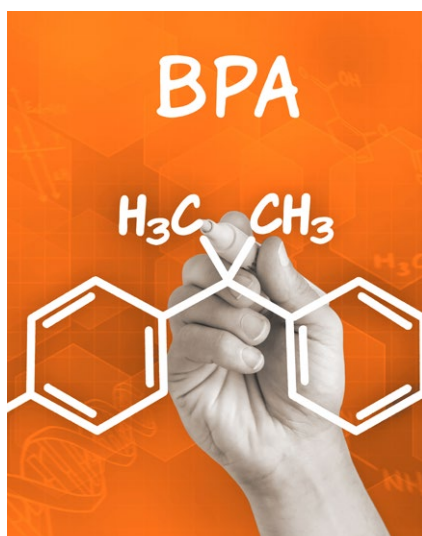
The UK REACH e-bulletin brings you key issues relating to the EU REACH (Registration Evaluation and Restriction of Chemicals) regulation.

We bring information on proposed changes, confirmed changes and the possible effects of these changes from a manufacturing, retail and consumer perspective. Opinions from all concerned parties are reported so a full picture of the workings and effects of the regulation are shared.

The information in the following pages is sourced from European Chemicals Agency (ECHA) and Chemical Watch. Each of our articles are linked back to source for further reading.

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ECHA STATE “ALL KNOWN SUBSTANCES OF VERY HIGH CONCERN BEING TACKLED”

ECHA's third report on implementing 'The Roadmap for SVHC identification and REACH Risk management measures from now to 2020', describes the achievements and progress made from its adoption in 2013 to the end of 2016. (The SVHC Roadmap gives an EU-wide commitment to having all relevant, currently known substances of very high concern (SVHCs) included in the Candidate List by 2020.)

Each year since 2013, ECHA has screened the full REACH/CLP substance database to identify substances of concern. This has resulted in around 900 substances being put forward for further manual screening by the Member States, of which more than 600 have now been screened.

Identifying substances of potential concern is becoming more and more difficult because of the lack of information on their hazards and on how they are used. In total, there are currently 540 substances, where more information is being requested.

ECHA's Executive Director Geert Dancet has drawn attention to the high proportion of dossiers containing inadequate information: “The compliance of the data provided by companies has got to improve. The best companies do this well – they take pride in providing reliable data to us and to their customers and they see it as an integral part of their business strategy towards a sustainable future.”

ECHA and the Member States have started to look more at groups of structurally similar substances. This will speed up the process of identifying substances of concern by enabling conclusions to be drawn on a larger number of substances at the same time.

Since 2013, ECHA and the Member States have decided on the best risk management option for a total of 67 substances of potential concern. Around half are being listed as substances of very high concern (SVHCs).

Article source: *ECHA.Europa.EU*

<https://echa.europa.eu/-/all-known-substances-of-very-high-concern-being-tackled>



CALL FOR EVIDENCE ON REVIEW OF LEAD IN JEWELLERY

The European Commission asked ECHA to evaluate the current restriction of lead in jewellery by 30 September 2017. ECHA has launched a call for evidence to gather information to inform the review. The call ends on 20 July 2017. The objective of this call for evidence is to gather concrete information on:

- The availability of alternatives to lead or its compounds used in:
 - crystal glass
 - internal components of watch timepieces
 - non-synthetic or reconstructed precious and semi-precious stones
 - enamels
- Analytical methodologies to determine migration of lead from the different materials used in jewellery

Article source: *ECHA.Europa.EU*

<https://echa.europa.eu/addressing-chemicals-of-concern/restriction/calls-for-comments-and-evidence>



COMMISSION CLARIFIES SCOPE OF PROPOSED CMR IN **TEXTILES** RESTRICTION

A list of articles to be included in the proposed restriction of 286 carcinogenic, mutagenic and reprotoxic (CMR) substances in consumer textiles and clothing will be drawn up by the European Commission.

Following a consultation last year, the Commission is preparing the draft restriction text, which is planned for discussion in the REACH Committee before the summer.

The proposal sees the ban taking effect in two phases, with articles that come into 'direct and prolonged contact with the skin' covered first. As well as clothing articles and footwear, this would cover some textile articles such as bed linen, pillow cases and towels.

However, industry associations have said it is not clear which articles will be included.

The Commission held a technical workshop in February, to discuss the scope of the restriction, possible exemptions, substances to be covered and concentration limits.

Attendees included textile and clothing production experts, industry associations, NGOs and member state authorities. Textile trade associations Euratex, the Apparel and Footwear International RSL Management group (AFIRM) and the Federation of the European Sporting Goods Industry (FESI) were among organisations to submit comments on the workshop.

AFIRM called for clarity on which materials are excluded from the restriction. It said there was "no justification" for including inaccessible parts of clothing, footwear and textile articles with no potential for skin contact under foreseeable use and abuse conditions.

The association also asked for clarification on whether non-textile parts of clothing, footwear and textile articles made from polymers and other materials, such as buttons, zippers, hooks, clasps, shoe outsoles, would be included.

In response to concerns, the Commission has announced it will produce "a non-exhaustive list of articles (including borderline cases) covered in the restriction and include it in a Q&A that could be updated when needed".

The proposed substances in the restriction are:

- Formaldehyde
- Cadmium, chromium, arsenic and lead compounds
- Chlorinated aromatic hydrocarbons
- Phthalates
- Aprotic solvents
- Benzene and polyaromatic hydrocarbons (PAHs)
- Azo-dyes and arylamines
- Quinoline

A list of the specific substances, the proposed limits and the available testing methods are available on the DG GROW webpage for the workshop.

The Commission has proposed a derogation for second-hand articles. It said that one for recycled fibres, or for parts of clothing and textiles reused to produce new articles, would be difficult to enforce. This is because it could lead to "the use of restricted chemicals in the production process in new products containing recycled fibres or other materials" as it would be difficult to verify whether the chemical was already present in the recycled materials or added afterwards.

Industry also want derogations for protective clothing potentially used by consumers, disposable clothing and textiles, and inner components of upholstery.

The Commission said it is open to consider ad-hoc exemptions for specific substances and articles.

Article source: [ChemicalWatch.com](https://chemicalwatch.com)
https://chemicalwatch.com/54806/commission-clarifies-scope-of-proposed-cmr-in-textiles-restriction?pa=true#utm_campaign=54685&utm_medium=email&utm_source=alert



DANCET REMINDS COMPANIES OF REACH **PRE-REGISTRATION DEADLINE**

Manufacturers and importers must pre-register their substances by 31 May this year to meet the 2018 REACH registration deadline exactly one year later, ECHA head Geert Dancet reminded delegates at the ECHA Stakeholders' Day in Helsinki.

This year is "crucial" for those pre-registering substances in volumes between one and 100 tonnes, he said. "If you start next year, you may really miss the boat." He added that pre-registering is "the only way to get immediate access" to substance information exchange forums (Siefs).

If companies do not do this by the deadline, they will need to submit an inquiry to ECHA to register before they can enter the market. Preparing an inquiry using IUCLID will take more time than pre-registering through REACH-IT, require more information and take ECHA longer to process.

Meanwhile, Cefic REACH director Erwin Annys has said that he, alongside authorities, is "surprised" to see that many pre-registrations are still coming in. "The extremely high number in 2008 made us think that they should be much lower [for 2018]." A high number of importers or only representatives are submitting them "to be on the safe side", he said.

Cefic has advised downstream industry associations that if their members are uncertain whether a substance needs to be registered, they can continue to act as an importer and complete the late pre-registration.

ECHA has so far received only around 8,000 dossiers for the last registration deadline – about a seventh or eighth of what it is expecting, Christel Musset, ECHA's director of registration, told the audience in Helsinki.

The agency plans to conduct a survey before the summer to collect information on companies' registration intentions, she told delegates. "It is very important you take the time to reply to us and tell us what you intend to register. It is important for us to prepare."

Article source: ChemicalWatch.com

https://chemicalwatch.com/54970/dancet-reminds-companies-of-reach-pre-registration-deadline?pa=true#utm_campaign=54841&utm_medium=email&utm_source=alert



EU MEMBER STATES BACK CMR SUBSTANCE RESTRICTIONS

EU member state officials have voted to unanimously approve the addition of 25 carcinogenic, mutagenic or reprotoxic (CMR) substances to REACH Annex XVII – the restricted substances list.

A draft regulation setting out the changes was approved at the REACH Committee meeting on 16 March.

The substances received new harmonised classifications as CMR category 1A or 1B, based on human and animal evidence respectively. The marketing or use for supply to the general public of the substances, as well as mixtures containing them, will be prohibited above specified concentrations.

The substances include:

- Bisphenol A
- Phenol, dodecyl-, branched
- Phenol, 2-dodecyl-, branched
- Phenol, 3-dodecyl-, branched
- Phenol, 4-dodecyl-, branched
- Phenol, (tetrapropenyl) derivatives
- Dicyclohexyl phthalate

For most substances, the regulation will apply on 1 March 2018. For others, it will enter into force on the 20th day after publication in the EU's Official Journal.

Article source: ChemicalWatch.com

https://chemicalwatch.com/54848/eu-member-states-back-cmr-substance-restrictions?pa=true#utm_campaign=54841&utm_medium=email&utm_source=alert



INTENTION TO RESTRICT D4 AND D5 SUBMITTED

On 13 April 2017, ECHA submitted an intention that they will prepare a restriction for octamethylcyclotetrasiloxane (D4) and decamethylcyclopentasiloxane (D5) (EC: 209-136-7; 208-764-9) in personal care products and other consumer/professional products (e.g. dry cleaning, waxes and polishes, washing and cleaning products) in concentrations > 0.1% for submission on 13 April 2018.

Article source: ECHA Europa.EU

<https://echa.europa.eu/registry-of-current-restriction-proposal-intentions>

REPORT ON EU AUTHORISATION ENFORCEMENT PILOT DUE BY JUNE

ECHA's enforcement Forum expects to finalise its report on its second authorisation pilot project by its next meeting on 20-22 June.

During this project – and the first one from 2015 – national enforcement authorities (NEAs) checked the marketing and/or use of substances subject to authorisation.

The second project marks the first-time NEAs also reviewed, where relevant, compliance with conditions laid down in authorisation decisions, new chair Katja vom Hofe said following the Forum meeting on 28-30 March.

Seventeen NEAs took part in the project, which ran from January to October 2016.

REACH PROJECTS

Ms vom Hofe also provided updates on the Forum's REACH En-Force projects. The reporting period for the Ref-4 group, which focused on restrictions, has just started, with the report expected to be finalised in time for the Forum meeting on 7-9 November. Data is being collected from 29 EU and European Economic Area (EEA) NEAs.

"As an additional output from the Ref-4 working group, the Forum will create a best practice document on enforcement of restrictions for inspectors," Ms vom Hofe said.

In the last quarter of 2017, 13 NEAs will begin operations on a pilot project on substances in articles. It will run until the end of Q2 2018. Results are expected by late 2018 or early 2019. It will address enforcement of REACH provisions relating to the notification and communication of information within the supply chain on substances in articles.

A pilot project on the control of internet sales of hazardous chemicals started last December and will run until the end of August, with 15 NEAs taking part. First results are due in March next year.

The Forum has set up a collaborative taskforce of chemical inspectors and experts from customs authorities to prepare for a potential European Commission workshop at the end of 2017. It will focus on customs and REACH.

Some EU and EEA states have separate enforcement bodies dealing with customs and chemicals legislation enforcement, which creates challenges for harmonised approaches. "Customs authorities and chemical inspectors need to collaborate on some areas of chemicals enforcement. It is a topic that will become more and more important," Ms vom Hofe said.

Article source: ChemicalWatch.com

<https://chemicalwatch.com/55159/report-on-eu-authorisation-enforcement-pilot-due-by-june>



RESTRICTION **DOSSIER** FOR LEAD AND LEAD COMPOUNDS SUBMITTED

ECHA has submitted a proposal to restrict the use of lead shots over wetlands (EC: 231-100-4) on 12 April 2017. ECHA's committees are currently performing a conformity check on the dossier. ECHA has published the dossier on its website to increase transparency and to help stakeholders prepare for the six-month public consultation on the dossier. The public consultation is expected in mid-May or beginning of June 2017 if the dossier passes conformity.

Article source: *ECHA.Europa.EU*

<https://echa.europa.eu/web/guest/registry-of-submitted-restriction-proposal-intentions>



SWEDISH AGENCY FINDS **PAHs** IN RUBBER GOODS

An enforcement project undertaken by the Swedish Chemicals Agency (Kemi) has found prohibited levels of polycyclic aromatic hydrocarbons (PAHs) in rubber and plastic goods.

It examined 58 products that come into contact with the skin, or can be inserted into the mouth. They included:

- bicycle handles;
- tools; and
- exercise equipment.

Prohibited levels of PAHs – which are suspected carcinogens – were found in five of the tested items.

The agency points out that the chemicals were present in all the goods but, in most cases, are not regulated by chemicals legislation.

It also found some of them contained other kinds of restricted substances, for example lead and short-chain chlorinated paraffins in a rubber handle and hammer. In six of the items, substances from the REACH candidate list were found in concentrations above 0.1%. The phthalate DEHP was the most common substance.

Several of the companies involved stopped sale voluntarily, and in two cases Kemi prohibited further sales.

Article source: *ChemicalWatch.com*

https://chemicalwatch.com/54935/swedish-agency-finds-pahs-in-rubber-goods?pa=true#utm_campaign=54841&utm_medium=email&utm_source=alert

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WHEN YOU NEED TO BE SURE

