

Helsinki Chemicals Forum 2021

PANEL 4 – **Safer substitution**

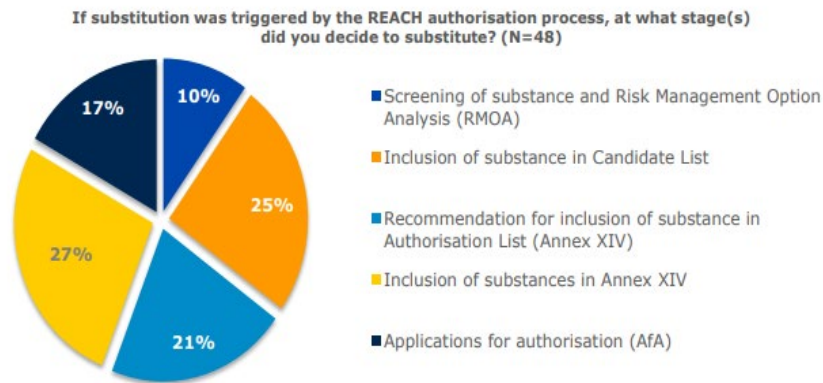
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Incentives for substitution in REACH

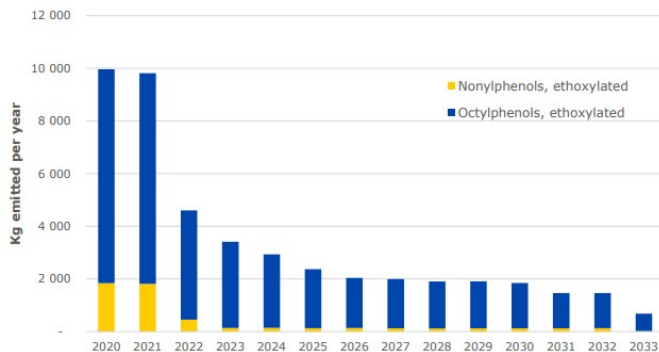
- REACH restrictions and authorisation drive substitution
- Candidate and Authorisation Lists trigger companies to start substitution
- Some market leading multinationals substitute early, motivated by corporate sustainability commitments
- Companies saw little financial incentive or competitive advantage when substituting
- Barriers: technical, economic, market



Source:
https://echa.europa.eu/documents/10162/24152346/impact_rest_auth_on_substitution_en.pdf/7c95222f-5f84-57f7-4cba-65b8463c79d4

Authorisation Impacts

- No applications for 15 of 54 SVHCs in Authorisation List and same is expected for 9 more substances ⇒ for 24 SVHCs (44 %) uses requiring authorisation no longer exist in the EU.
- First 24 authorisation decisions subject to review:
 - Original aggregated volume used: 19 kilotonnes/year
 - At review phase: volume reduced to 0.6 kilotonnes/year
- Emissions of 2 EDs projected to reduce from 10 to <1 tpy
- N.B. registration data not up-to-date on actual volumes



Source: https://echa.europa.eu/documents/10162/13637/socioeconomic_impact_reach_authorisations_en.pdf/12a126f2-9267-1dcd-75e3-ce0f072918e4

Strategy focus in 2020-21



Substitution in ECHA's regulatory activities:

- Authorisation, Restriction, analysis of alternatives
- Acceleration of Review Programme of active substances in biocidal products (BPR)

In support:

- Capacity building: training on analysis of alternatives
- Networking with stakeholders on substitution issues
- Support European Commission in R&I agenda on substitution
- Facilitate comparative assessment for biocidal products

Substitution in Chemicals Strategy for Sustainability



“Substitution of most harmful substances has not occurred at the expected pace and frontrunners still encounter economic and technical barriers.”

Commission’s Safe and Sustainable by Design action plan:

- development of S&SbD criteria for chemicals
- set up of an EU-wide S&SbD support network
- financial support to companies for S&SbD projects
- competence building in education, research, industry, regulators

ECHA supports and provides input

Driving and supporting substitution



- ➔ Substitution embedded in regulatory processes
- ➔ Stakeholder capacity building making informed choices:
 - Well-conducted analysis of alternatives and substitution
 - Involvement of the supply chain: awareness-raising, communication and adoption
- ➔ CSS: towards Safe and Sustainable by Design

Thank you!

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Authorisation vs registration data

Registrants do not usually update registrations

- if production ceases (Arkema and Grupa Azoty on DEHP)
- after the expiry of authorisation (Ineos, HBCDD)
- after Commission decision (conditions of use in exposure scenarios)
 - Scenarios on ECHA's authorisation website are up to date but registrants have not usually updated in the registration dossiers.
 - Enforcement authorities have correct information.
- if the use is reduced considerably during the authorisation period (DCC on lead chromates, BlueCube on trichloroethylene)