



Civil society's role in the implementation of the authorization process



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The EEB



- Europe's largest federation of environmental organizations with 140+ members, representing 15 million European citizens.
- Wide network with working groups on chemicals, nano, air, biodiversity, water, waste, etc.
- Ears and voice of its members towards the EU decision makers.
- Present at ECHA committees & fora: MB, MSC, SEAC, RAC, NMWG, PBT expert Group, etc.



The Union has agreed to achieve, by 2020, the objective for a **non-toxic environment** that is conducive to innovation and the development of sustainable substitutes including non-chemical solutions.



Living well, within
the limits of our planet

7th EAP — The new general Union Environment Action Programme to 2020

Decision No 1600/2002/EC; Johannesburg Plan of Implementation (WSSD 2002).

Authorisation under REACH



Aims that *SVHC are progressively replaced by suitable alternative substances or technologies... To this end all manufacturers, importers and downstream users applying for authorisation shall analyse the availability of alternatives and consider their risks, and the technical and economic feasibility of substitution*

REACH {Art. 55}.

MAIN TOOL FOR ELIMINATION/SUBSTITUTION OF SVHC

Authorizations should be an exception.

Only for specific uses and for very limited time.

CANDIDATE LIST for NGOs



NGOs' goal: All substances with SVHC properties (e.g. all CLH CMR, EDC,..) are included in the Candidate list

SIN LIST



TOX FOX



Trade Union List



CANDIDATE LIST for businesses



ZERO DISCHARGE OF HAZARDOUS CHEMICALS



A tool for businesses

If you work at a retail company, ask your suppliers about the chemicals used in your products. If a chemical is on the SIN List, then ask them to use a safer alternative - or find a supplier who will. If you represent a chemical company, become a progressive leader and innovator. Develop safer alternatives to the chemicals on the SIN List - and stay a step ahead of the competition. If you are interested in how other companies are using the SIN List, here are some examples.



Carrefour to suppliers: start substituting!

French-based Carrefour, Europe's leading retailer and the second largest supermarket chain in the world after Wal-Mart, uses the SIN List in their substitution work. According to Chemical Watch, Carrefour has drawn up a "pre-list" of 600 substances of very high concern, which, together with the SIN List, is sent to suppliers "so that they can begin work on substitution."

Sara Lee reviews ingredients

Sara Lee has initiated a Critical Ingredients Program (CIP) across all household and body care product categories. The program involves constant and systematic reviews of various ingredients and combinations of ingredients used in manufacturing. It has led, for example, to the substitution of certain musk substances in fragrance products. Sara Lee sees the SIN List as a natural fit to its CIP program that helps the program grow.

Sony Ericsson: substitution is all in the design

Sony Ericsson Mobile Communications actively works together with suppliers of components to find out if and where substances of concern are used in their products, so that these substances can be phased out. The successful substitution of SIN chemicals such as phthalates and brominated flame retardants are good examples.

Skanska builds an example to follow

Within the construction industry, Skanska is publicly advocating for increased transparency and disclosure of the chemicals contained in construction materials. Skanska is, through its collaboration with ChemSec and the ChemSec Business Group, actively pushing the chemicals policy agenda and encouraging implementation of the SIN List. By continuously updating its own voluntary chemical restrictions lists, Skanska aims at limiting the use of hazardous substances such as SIN List chemicals in its projects when a sustainable commercially available alternative

AUTHORIZATION PROCESS



OUR GOAL: Authorisations are not granted for SVHC for which feasible alternatives are available in the market

NGO PARTICIPATING THROUGH:

Public consultations on alternatives

Dialogues

Observers at RAC/SEAC meetings

Public consultations (PC)



Information on available alternatives is gathered

NGOs role:

- ❑ **Dissemination of PC:** NGO, substitution nets, green chemistry nets, SME nets, etc.
- ❑ **Contact** companies, technological institutes..
- ❑ **Coordinate** with NGOs
- ❑ **Provide information**

Trialogues



Understand applicants application:

- ✓ Continue with business as usual or need time for substitution?
- ✓ Listen to companies with alternatives
- ✓ Can the risk be adequately controlled during interim time?
- ✓ Review period needed?

RAC/SEAC Meetings



Understand/follow procedure:

- ✓ Information available
- ✓ Risk assessment
- ✓ Alternatives assessment
- ✓ Socio-economic assessment
- ✓ Review periods

Authorization procedure



NGO worries:

Transparency

Participation

Quality of information (e.g. exposure)

Risk assessment of non threshold substances (e.g. EDC)

Scope

Analysis of alternatives

ECHA's role?

Message to industry



Where do you want to position your company?

LEADERS

or

LAGGARDS



Thank you for your attention!

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