Upcoming chemicals legislative challenges for downstream users in Europe: REACH Authorisation

Lorenzo Zullo
Coordinator, Chemicals & Environment Legislation and Advocacy
Content

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   What should chemicals downstream users be worried about?

2 - NEW FAST TRACK REGULATORY DYNAMICS
   New fast track regulatory dynamics

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4 – KEY INDUSTRY CONCERNS and WAY FORWARD
   ECHA and EU Commission ongoing activities
Major upcoming challenges for chemicals downstream users

- REACH Registration (2018) and identified uses
- Substance evaluation (CORAP)
- New Chemical hazardous classification
- New Risk Management Measures
- Extended Safety Data Sheets
- Substances of very High Concern (SVHC)
- Authorization (Annex XIV)
- Restriction (Annex XVII)
- Fast track procedure (Art. 68.2)
ConsumERS
NGOs
Non-EU countries
Press/media
Industry
Scientific world
Market

EU COMMISSION AND MEMBER STATES

REACH-related PROCESSES

HARMONISED CLASSIFICATION
EVALUATION
CANDIDATE LIST (SVHC)
AUTHORISATION (ANNEX XIV)
RESTRICTIONS (ANNEX XVII)
REGISTRATION DEADLINES

IMPACT ON DOWNSTREAM USERS

RECLASSIFICATION
NEW RISK MANAGEMENT MEASURES
SUPPLY CHAIN COMMUNICATION OBLIGATIONS
AUTHORISATION
SUBSTITUTION
REGISTRATION

Chemicals manufacturers/imp orters

EUROPEAN TYRE & RUBBER manufacturers’ association

www.etrma.org

1 April 2015
Steptoe - Annual Chemicals Regulation Seminar
ETRMA – Lorenzo Zullo
REACH LEGISLATIVE CHALLENGES

2007
REACH entered into force

2010
1st registration deadline

2013
2nd registration deadline

2018
3rd registration deadline

Graph showing the progression of regulated substances over time with key dates:
- 2008: Candidate List (SVHC)
- 2009: REACH Annex XIV (Autorisation)
- 2010: CORAP (Substance evaluation)
- 2011-2014: Increase in regulated substances
Case study:

AZODICARBONAMIDE
- ADCA -
RUBBER APPLICATIONS FOR WHICH ADCA IS CURRENTLY USED

• Sealing gaskets
• Sealing components
• Expandable mastic for insulation and soundproofing
• Foam filler for (certain) tyres
• Parts of anti-vibration rubber components
CASE STUDY: ADCA

- **22/06/2012**: Substance entered in the registry of "Current SVHC Intentions"
- **06/08/2012**: Substance entered in the registry of "Submitted SVHC Intentions"
- **03/09/2012**: Beginning of the 45-days consultation on the proposal for identification as SVHC
- **18/10/2012**: End of the 45 days public consultation
- **19/12/2012**: Substance entered in the candidate list.
- **16/05/2013**: Chemical industry getting ready for worst case scenario: authorisation
- **24/06/2013**: ECHA recommends inclusion of ADCA in Annex XIV (Authorization): 3 months public consultation

- Annex XIV (Authorisation) → 3 year after inclusion (2016?)
**Case study: ADCA**

**EU COMMISSION AND MEMBER STATES 06/2012**

- **HARMONISED CLASSIFICATION**
- **EVALUATION**
- **CANDIDATE LIST (SVHC)**
- **AUTHORISATION (ANNEX XIV)**
- **RESTRUCTITONS (ANNEX XVII)**
- **NO REGISTRATION**

**LEGISLATIVE PROCESSES**

**IMPACT ON DOWNSTREAM USERS**

- **RECLASSIFICATION**
- **NEW RISK MANAGEMENT MEASURES**
- **SUPPLY CHAIN COMMUNICATION OBLIGATIONS**
- **AUTHORISATION 2016/2018 ?**
- **SUBSTITUTION 2016/2018 ?**
- **REGISTRATION**

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KEY CONCERNS FOR DOWNSTREAM USERS

WHAT ECHA AND EU COMMISSION ARE DOING?