

The importance of third party contributions through public consultations

Frida Hök, ChemSec

ECHA Stakeholder day

Helsinki, 27th of May 2015



Outline

- ChemSec
 - Way of working
 - ChemSec Business Group
 - SIN List and other tools
- Aim with authorisation process
- The importance of third party contributions
- Challenges
- Suggestions for improvements



- ✓ Non-profit environmental organisation
- ✓ Working to eliminate the use of hazardous chemicals
- ✓ Funding from governments and charity funds
- ✓ Offering concrete tools and highlighting positive examples





Political processes

→ Effective chemicals regulations

Business dialogue

→ Products free of hazardous chemicals

Financial investors

→ Avoid investments in high concern chemicals

Business dialogue

- ✓ The ChemSec business group
- ✓ Bilateral dialogue
- ✓ Tools and trainings on substitution



WWW.SINLIST.ORG
**SIN
LIST**
SUBSTITUTE IT NOW!



**The SIN List:
Staying ahead
of regulation**

REACH § 55, Aim of authorisation - substitution

*The aim of this Title is to ensure the good functioning of the internal market while assuring that the **risks from substances of very high concern are properly controlled and that these substances are progressively replaced by suitable alternative substances or technologies where these are economically and technically viable.** To this end all manufacturers, importers and downstream users applying for authorisations shall analyse the availability of alternatives and consider their risks, and the technical and economic feasibility of substitution.*

Input needed

ECHA committees need input from third parties in the public consultations to fulfil the intentions of REACH and only grant authorisation when alternatives are not available.



Who?

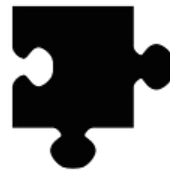
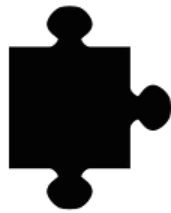
- Producers of alternatives to SVHCs/ Annex XIV substances
- Users of alternatives or alternative techniques to SVHCs
- Other parties with a knowledge in alternative substances or alternative techniques

Why?

- For ECHA and Commission to fulfil the intentions of REACH
- To make sure the opinions from ECHA Committees do not disfavour producers and users of alternatives

Challenges

- Clearer benefits of providing input
- Proportionate technical and economic input
- Input must make a difference



Suggestions for improvements

- to get the best out of the public consultation on Applications for authorisation

- Encourage applications to only contain relevant, short and straightforward information
- Encourage applications to have a well-defined use
- Develop a more efficient and interactive webpage
- Find the right companies
- Increase communication with parties having provided input
- Downstream users might also have useful information to provide, make sure the public consultations also attract these companies

Take home message

Producers and users of alternatives:

- Respond to the public consultation

ECHA:

- Improve the public consultation to attract all relevant producers and users of alternatives

SEAC:

- Give significant weight to the the replies from the public consultation and increase communication with the relevant ones





INTERNATIONAL
ChemSec
CHEMICAL SECRETARIAT