

Date
9 October 2018

To
ECHA

Comments from the Swedish Chemicals Agency on the ECHA call for input on a database on articles containing Candidate List substances under the Waste Framework Directive

In addition to the comments given in the web template, the Swedish Chemicals agency has some additional comments on the background documents.

Comments on the “Draft scenario” document

Page 5; What will be disseminated and to whom?

The Swedish Chemicals agency understands that ECHA does not expect to collect confidential business information and intends to make all the data received on articles publicly available on its website.

We believe that confidentiality for certain parts of the supply chain can be beneficial. Many companies are not willing to tell the rest of the world which commercial relations they have. Compliance may be easier if the companies can be reassured that some information on the supply chain relations may remain confidential.

It may be interesting to obtain the contact information for the supplier, at least the company name and an email address so that ECHA can contact the supplier if there are any questions or issues. This contact information could remain confidential to limit the risks of it being used for unwanted communications (e.g. spamming campaigns)

Page 5; Future outlook

ECHA intends to design the database and the related submission tools and formats in such a way that, in the future, they could be:

- Extended to address other substances of concern beyond Candidate List substances;

The Swedish Chemicals agency supports this.

- Made compatible with already existing or future supply chain communication tools to support duty holders and waste operators, as well as with the future AskREACH database to support consumers;

The Swedish Chemicals agency supports this.

Melli-id: MAG-0006, 2014-10-22

Swedish Chemicals Agency

Mailing address	Visit & delivery	Invoicing address	Phone & fax	Internet	VAT No
Box 2 SE-172 13 Sundbyberg Sweden	Esplanaden 3A SE-172 67 Sundbyberg Sweden	FE 124 SE-838 80 Frösön Sweden	Phone +46 8 519 41 100 Fax +46 8 735 76 98	www.kemi.se kemi@kemi.se	SE202100388001

Comments on the specific follow up questions in the Technical supporting document

Specific follow-up question: *Building on the unique identifier, what could be the best approach to manage updates (i.p. due to the inclusion of new substances in the Candidate List), changes in composition of the article, or the ceasing of supply?*

It may be interesting to add a fields specifying the date of the change in composition of the article or the date of ceasing supply, as well as a reference to the relevant version of the Candidate list.

Specific follow-up questions:

1. *Do stakeholders see the need to develop on a more systematic, complete and/or standardised way to communicate safe use instructions for articles/complex objects?*
2. *Is the development of standardised phrases/ statements for safe use instructions an appropriate way forward to address this need?*

Yes, the Swedish Chemicals agency believes that standardised phrases/statements for safe use instructions an appropriate way forward.

Additional comments on the Technical supporting document

3.2 Article/product information

The information about the article should be as simple as possible and in line with the legal provisions. It is preferable to refrain from adding more information requirements that would increase the complexity of the database. Only those that are necessary to run the database or to make it future-proof should be included.

In this regard, we wonder whether it is necessary - or even in line with the legal provisions - to request a detailed description of each article and complex object. It should however be possible to insert the name of an article/complex object in different languages.

We wonder whether it is necessary and in line with the legal provisions to ask for other identifiers like weight, density, package quantity or colour. We agree that it would be useful to have the possibility to add a picture. Maybe, this should not be made binding.

3.2.2.2 Description of articles as such or in complex objects

We wonder whether it is in line with the legal provisions to require information on different concentration ranges rather than just below or above 0.1%. Maybe such a field/feature could be introduced as a voluntary field.

3.2.2.3 Material based categories

Information about materials may be useful and helpful. It could be discussed whether it is better to include this information at the article level or at the level of the complex objects.

However, it is worth noting that material-based categories may already be going beyond the scope of the provisions of the waste framework directive. It may be interesting to include this feature as a voluntary field, not a mandatory one.

Building in such a feature in the system could also be useful in case the database evolves into a more detailed structure, containing information about more substances than just SVHCs.