Trade Union Priority List for REACH Authorisation

ISTAS/ETUI

Tatiana Santos-ISTAS 05/10/2010
ESTIMATED

100,000 substances listed in the European market.

1500 Carcinogens and mutagens
1500 Reprotoxicants
3000 Sensitisers
1300 Neurotoxicants
1500 Endocrine disrupters
400 PBT and/or POP

Under REACH: 1 500 substances of very high concern.
Why a TU Priority List?

- Millions of European workers exposed to chemical substances on a daily basis.

- 74,000 die each year from exposure to pollutants at work EU-27.
  EU-OSHA, 2009

- 1/3 of all occupational diseases recognised in Europe each year are due to exposure to hazardous chemicals.
  ETUI, 2006
Authorisation under REACH

Art. 56: “A manufacturer, importer or downstream user shall not place a substance on the market for a use or use it himself if that substance is included in Annex XIV”

Aim of authorisation:
The aim of authorisation 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.
How Authorisation can protect health & environment?

- **Official identification of new SVHC** (PBT/vPvB, EDC)
- **At publication of the candidate list**: Right for supply chain users to have information
  - Obligation to provide a SDS for substances on the candidate list whether on their own or in mixtures
  - Obligation to provide upon request a SDS for mixtures that are not classified as dangerous but contain substance(s) on the candidate list above specific %.
- **Applications for authorisation (by industry)**: Chemical safety report (CSR), Exposure Scenarios & Analysis of possible alternatives -> SUBSTITUTION
Where are we?

- SVHC Authorisation List (Annex XIV)
- SVHC Candidate List
- SVHC (art. 57)

- banned unless authorisation
- Trigger for workers info

0 200 400 600 800 1000 1200 1400 1600

6 38
TU´s demands

- Improve flow of information
- A comprehensive list
- Act promptly on priority chemicals
- Spur the development & adoption of safer alternatives
- Prioritisation methodology that includes workers exposure
TU’s proposal: Methodology

1. Identification of substances for prioritisation (SVHC)
2. Selection of prioritisation criteria
3. Scoring by effect
4. Development of the list

Results
- 279 WPVC
- 365 SVHC
- 190 Occupational diseases
- 91 CMR (1272/2008)
- 42 PBT
- 33 EDC

+ USES +
comparison with other lists

1. Substances with high prevalence of exposure (HPVC)
2. Health effects on workers
3. Environmental effects

Adapting the European criteria Risk Ranking Method to prioritize the substances of high production volume (EURAM) to include DE, neurotoxic and TFB:

<table>
<thead>
<tr>
<th>Substances</th>
<th>Categories</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>CMR</td>
<td>1A &amp; 1B (1272/2008)</td>
<td>10</td>
</tr>
<tr>
<td>Carcinogen</td>
<td>1 &amp; 2A (IARC)</td>
<td></td>
</tr>
<tr>
<td>EDC</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>TPD / VPvB</td>
<td>No categories</td>
<td></td>
</tr>
<tr>
<td>Possible CMR</td>
<td>2 (1272/2008) &amp; 2B (IARC)</td>
<td></td>
</tr>
<tr>
<td>Sensitiser</td>
<td>No categories</td>
<td></td>
</tr>
<tr>
<td>Neurotoxicant</td>
<td>No categories</td>
<td>7</td>
</tr>
<tr>
<td>Possible EDC</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>
Results: TU´s priorisation

4,290 HPVC + SIEF ➔ 334 entries (568 subst.) ➔ 209 Occ.disease
276 Annex VI
70 Annex VI CMR

31/38 substances on the TU list in common with the candidate list

05/10/2010
Substances included in the TU’s List

- **Dinitrotoluene** (CM&R, PBT, neurotoxicant)
- **Formaldehyde** (C, probable reprotoxicant)
- **Trichloroethylene** (C, probable M, sensitiser)
- **Chloroalkanes** (C&R, PBT, suspected EDC, neurotoxicant)
- **Naphtas** (carcinogens & neurotoxicants)
TU List - A useful tool

- Contribute to the practical implementation of REACH
- Call on the MS and/or the COM to propose more substances
- SUBSTITUTION: support companies, legislators, ECHA, and workers to accelerate the substitution of SVHC by safer alternatives.
- Allow professional users to get more information on the substances uses
- Improve protection of workers, consumers and the environment.
- Cut the incidence of chemical-related occupational diseases and the attendant costs for the community, workers and industry itself.

05/10/2010
How can industry use Trade Union list?

- **To identify & prioritise hazardous substances** which need to be replaced by safer alternatives or processes as soon as possible.

- **To predict SVHC**: early indicator of the Candidate List and Annex XIV

- **To gain time** to remove hazardous substances from the products and processes well ahead of any legal demands, improving human’ health & environment protection and creating a market benefit for companies

- **To innovate**
Conclusions

- Trade Unions have identified 568 chemicals considered to be substances of very high concern

- If the TU listed chemicals are included in the candidate and authorisation list:
  - workers will get better information on their uses
  - development of safer alternatives will be promoted
  - occupational diseases will be reduced
TU priority list for REACH Authorisation

Thank you!

More information:
http://www.etuc.org/r/830

For any comments or suggestions, please contact:
Tatiana Santos
Mail: tsantos@istas.ccoo.es
Tel: (0034) 91 449 1043