

# REACH – Annex XVII

## PAH restrictions

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# Project Background

➔ REACH annex XVII, restriction 50 entered into force 1 January 2010:

➔ Limits the amount of PAHs:

- in extender oils placed on the market in Europe, or used for the production of tyres
- In tyres placed on the market in Europe

# EU Project Timeline

- ➔ December 2009 (Forum 6) – 1st pan-European enforcement project on a restriction agreed
- ➔ January 2010 – research started
- ➔ June 2010 (Forum 7) – UK presented an enforcement manual
- ➔ July 2010 onwards – enforcement work

# EU Project Timeline

- ➔ March 2011 (Forum 8) – UK presented findings of UK campaign and issues identified
- ➔ October 2011 – some campaigns complete, others on-going
- ➔ Next steps – gather data, collate report, project conclusion

# Project Aims

- ➔ **Protect people and the environment**
- ➔ **Assess compliance** with the restriction
- ➔ **Raise awareness** of the restrictions
- ➔ **Take action** on non-compliances

# UK Campaign: Compliance Assessment

- ➔ Information notices – extender oil producers, tyre manufacturers & imported
- ➔ Audits of tyre manufacturers – assessed procedures for compliance
- ➔ IP346 analysis - extender oils used to manufacture tyres in the UK
- ➔ ISO 21461 analysis – tyres

# UK Campaign: Awareness Raising

- ➔ Aim: ensure relevant businesses:
  - ➔ know about the restriction
  - ➔ understand what they need to do to comply
- ➔ Guidance – UK a global focal point
- ➔ Trade associations
- ➔ Brityrex – tyre trade show
- ➔ Magazine & journal articles

# Other Member States: Overview

## ➔ Enforcement work:

- ➔ Working with customs to assess imported tyres
- ➔ Inspection of tyre manufacturers, importers, distributors and retailers
- ➔ Inspection of rubber mixers
- ➔ Analysis of tyres
- ➔ Requests for information from tyre industry
- ➔ Cascade of information through trade associations



# Compliance Assessment: Findings

- ➔ Combination of different approaches to assessing compliance
- ➔ Different aspects of the supply chain assessed
- ➔ No evidence of non-compliance found so far
- ➔ **BUT** – there are challenges and issues in assessing compliance!

# Issues & Challenges

## ⇒ Understanding the restriction:

- ⇒ Different viewpoints – enforcement, industry, legal
- ⇒ Difference between SVHC's & the restriction
- ⇒ Responsibility for compliance

# Issues & Challenges

- ➔ Assessing compliance
  - ➔ No visual tyre marking
  - ➔ Complexity of the tyre market
  - ➔ Cascade of information down the supply chain
  - ➔ Declarations

# Issues & Challenges

## ⇒ Analysis

⇒ Methods stated in the restriction

⇒ Limited laboratories

⇒ High cost

⇒ Alternative methods

⇒ IP346 suitability

# Next Steps

- ➔ Gather data – questionnaire to participants
- ➔ Collate report
- ➔ Alternative method for IP346
- ➔ Possible restriction amendment??

# Conclusion

- ➔ It's a complex restriction & a complex global market
- ➔ It can be difficult to determine compliance
- ➔ It's the first project of its kind

# Conclusion

- ➔ Assessed compliance
- ➔ Business focused approach
- ➔ Highlighted issues
- ➔ Raised awareness

# Questions?



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