



ECHA Forum Open Session

Helsinki, 5 November 2015

Complex intermediate uses:

Sharing understanding and interpretation experiences
with the inorganics sector



Background

5th and 6th priority list discussions in MSC confirmed the ***difficulty in assessing the Intermediate status*** in specific complex cases (e.g. inorganic matrix materials)

Nevertheless, a proper assessment is critical for:

- **ECHA**, to define a correct prioritisation
- **Commission**, to be informed of the potential scope of the Authorisation
- **Industry**, to ensure all prepare and submit an AfA as applicable
- **Member States**, to enforce on an equal basis



Intermediates

INTERMEDIATES

- Are substances *manufactured for and consumed in or used for chemical processing in order to be transformed into another substance*
- Are exempted from Authorisation
- If on-site isolated, are exempted from restriction

NON-INTERMEDIATES

- Substances used as catalysts
- Substances used as processing agents (e.g. dispersing agents, viscosity modifiers, lubricants, antistatic agents, etc.)
- Substances used as curing agents
- Substances used as surface treating agents
- Substances used as desiccants
- Other...

TO BE OR NOT TO BE AN INTERMEDIATE?
THAT'S THE QUESTION!

Project on Intermediates - Aims



- **Sharing technical knowledge**
 - Between involved sectors, manufacturers and users
 - On the technical description and demonstration of the intermediate uses in complex cases relevant for the inorganic sector
 - To clarify their status in the context of REACH risk management measures
- **Increasing the understanding**
 - With ECHA, Commission, and other implementing/enforcing authorities
 - On the technical and regulatory principles underlying the assessment of intermediate uses
 - To clarify the status under REACH of a particular complex use relevant to the inorganics sector
- **Aligning interpretation**
 - Between enforcement authorities
 - On the assessment of uses, and the resulting status under REACH
 - To achieve a transparent, consistent, and predictable enforcement

Voluntary benefits



Project on Intermediates - Steps



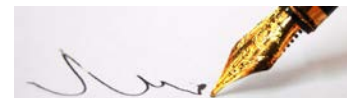
STEP 1 Sharing technical knowledge: technical exchange discussions for involved manufacturing and using sectors (e.g. informal workshop with ECHA and Commission attending as observers)

July 2015, and...



STEP 2 Formulate descriptions: technical summary papers, acting as internal guidance to provide recommendations to the concerned sectors

September-October 2015, and...



STEP 3 Communicate: examples to be communicated to and used by ECHA, Commission, Member States for a uniform implementation and enforcement

November-December 2015, and...



Anticipated result and question to ECHA Forum

- ✓ Better understanding and interpretation on complex intermediates cases (and boundaries) relevant for the inorganics sector
- ✓ Guidance and common reference materials for metals and DU industry to facilitate assessment
- ✓ Technical material for ECHA, Commission and Member States to facilitate their respective roles



Question to the ECHA Forum:

How to share current outcomes with the REACH enforcement authorities, and possibly extend the project to other materials?



Thank you!



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