

Comments on the substitution strategy thought starter - highlights

Workshop on substitution strategy

9 October 2017

Denis Mottet

Scientific officer

Risk Management Implementation Unit

European Chemicals Agency

Comments received: overview

- Seven written comments received, 15 oral comments during CARACAL
- Overall very supportive
- Additional suggestions and thoughts received
- Highlight of potential challenges

Thank you!

General remarks

- Importance of an EU-wide and coordinated action to support substitution
- Include life cycle considerations in the search and assessment of alternatives

Supply-chain workshops (1/2)

- Several workshop proposals from MS/IND/NGO
 - Bulgaria (Feb 2018 – CrVI plating)
 - Italy (Q1 2018)
 - Netherlands (anti-fouling paints in recreational boats – tbc)
 - Austria (Green Chemistry conference – Nov 2018)
 - Eurometaux (to link substitution and life cycle thinking)
 - Euratex
 - ChemSec?

➔ We need more!

Supply-chain workshops (2/2)

- Important to identify the needs of users/DUs first
- Participation of:
 - national industry associations
 - specialised R&D institutions,
 - technological support centres
 - funding support organisations

is key
- Potential issue of IP/confidentiality refraining participation and open discussions

Access to finance and support

- Priority setting needed, e.g. on projects including a holistic assessment of the suitability of the alternatives
- REACH Authorisation and Restriction can help identifying priority areas for support
- Technical support: making more use of topic-specific expertise (universities, R&D and technical centres)
- Mapping of available funding schemes & technical expertise?
- Creating an ERA-Net on substitution? (co-operation of national RTD programmes)

Access to REACH/CLP data

- Grouping approach is welcomed
- REACH/CLP data: quality? usefulness for substitution purposes?
- Should be complemented with “broader picture” elements
 - e.g. life-cycle considerations, perspective from DUs: technical & economic feasibility, patents, etc.

Networks

- several types considered potentially relevant
- need for synergies with the OECD Ad-Hoc Group on Substitution of Harmful Chemicals
- Composition depending on the purpose
 - exchange on policies: experts from chemicals, R&D, circular economy policies
 - specific substitution challenges: companies and other stakeholders from the entire material flow
- Establishing sector-specific European expert's databases to support e.g. SEAC?

Additional remarks

- Better integration of chemicals in **circular economy, biobased economy** policies and **green chemistry** – could encourage substitution and save resources
- inspire from the process under the IED where BATs are identified through Technical Working Groups
- ...

Conclusions

- Overall supportive to ECHA's thought starter
- Several workshops/events on alternatives/substitution under consideration
 - We need more!
- Fewer comments on facilitating access to finance and other support
- Substance grouping considered useful but mixed view on the usefulness of REACH/CLP data to support substitution
- Types of networks needed: still to be clarified

Thank you!




denis.mottet@echa.europa.eu

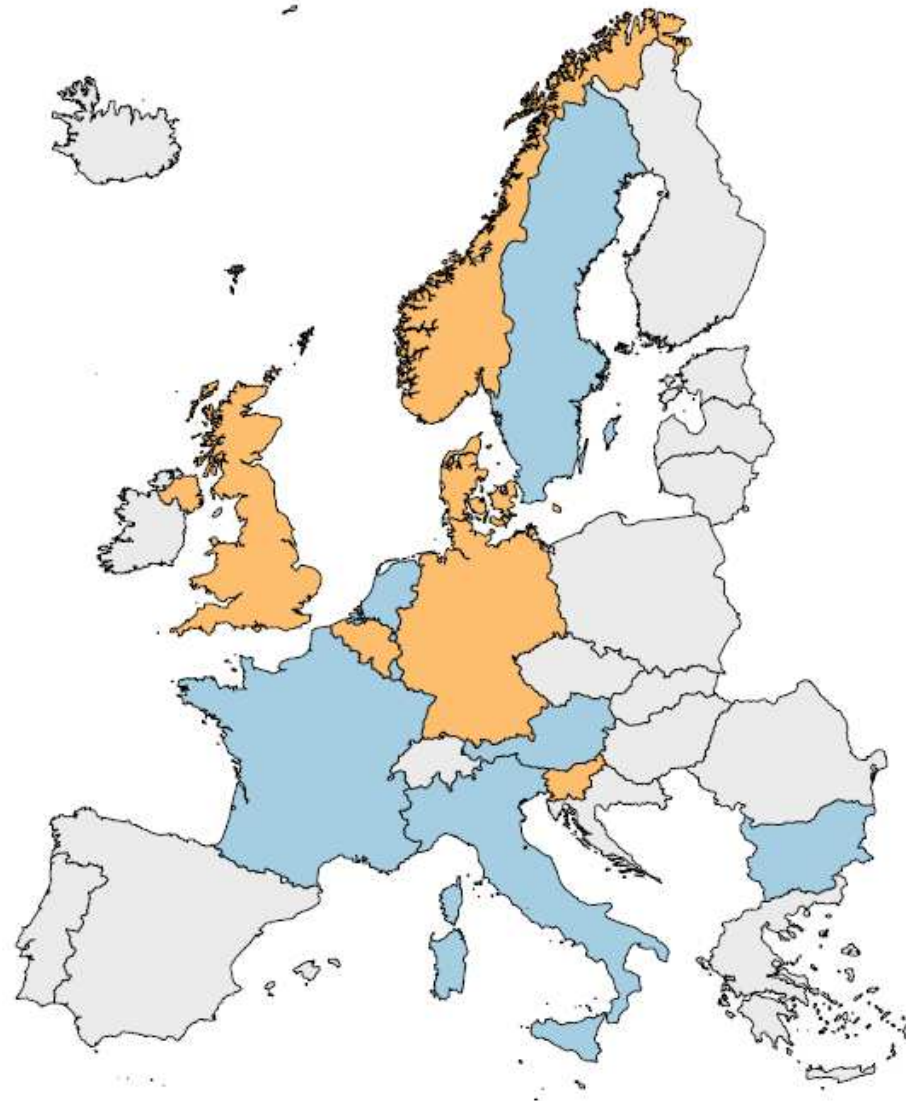
Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
[@EU_ECHA](https://twitter.com/EU_ECHA)

Follow us on Facebook
[Facebook.com/EUECHA](https://www.facebook.com/EUECHA)

comments received

-  written comments received
-  oral comments received at CARACAL
-  no comments received



In addition: comments from stakeholders:

Written: ChemSec, EEB, Euratex, UEAPME, Eurometaux/Reach Alliance

Oral: ChemSec, Cefic, EEB, Euratex, UEAPME