

# REACH and Substitution in Italy: challenges and opportunities

Italian Competent Authority for  
REACH and CLP

DG Health Prevention  
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## REACH and Substitution in Italy: the scenario

- Competitiveness of the Italian Industry: ability to develop extremely customized high quality products.
- The Italian Chemical Industry is particularly focused on specialty chemistry (chemicals/formulated products for the downstream industry of Made in Italy), with an eye on sustainability of products and processes (reduction and/or substitution of hazardous substances).
- The Italian manufacturing competitiveness can be challenged by REACH (substitution)
  - risk of seeing a considerable drop in the availability of substances needed for the production of other chemicals
  - substitution costs can be extremely high

# REACH and Substitution for Italian Industry: challenges and inputs

## Challenges

- Poor knowledge about research offer and experience in substituting chemicals
- Research and innovation funding
- Lack of technical assistance structures

## Inputs

- A “wide” LCA (Life Cycle Analysis) approach is needed (up to the use of the products where the substance is incorporated to be considered)
- No compromise on functionality when assessing “safer” alternatives
- Priority to substances which are found unchanged in the consumer product

# Italian first steps to promote the substitution of hazardous chemicals

## **Actions already undertaken by public bodies:**

- **Year 2010**

- Murano glass makers's story and the funding of substitution research project by public authorities (see background information)

- **Year 2017**

- 2 dedicated events organized in June (Rome) and in November (Rimini, ECHA and EC participation)
- Training on analysis of alternatives for about 100 industry representatives and other stakeholders
- Survey among industry under preparation to find out cases of substitution (results in 2018)
- Public funding

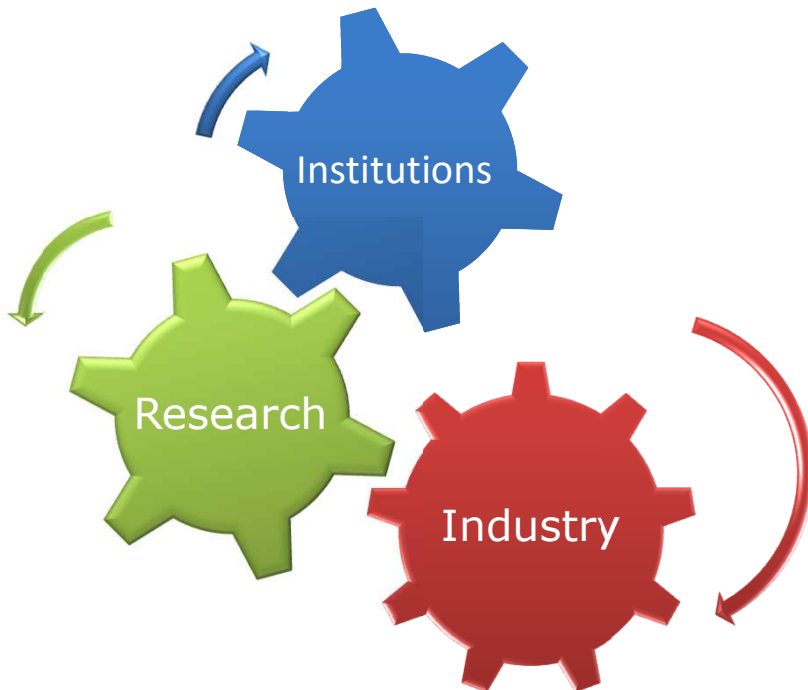
# Further Italian actions

- **2<sup>nd</sup> workshop in 2018**

## Goals

- to stimulate the matching of supply and demand (namely between companies and research centers)
- to steer public research towards substitution (Innovation is the driver!)
- to identify public resources for research (map the funding and other support)

- Setting up a **Working Party on Substitution**



- Build capacity of concerned actors (e.g. Workshops or ad hoc events)
- Define common projects between Companies and Universities/Research Institutes and make use of research clusters
- Stimulate Public Research to take responsibility for the problem
- Facilitate access to financial support
- Promote best practice examples
- Support sustainability assessment of Companies
- Interact with relevant EU and International bodies (ECHA-COM, OECD)

# Background information



# Italian SMEs and substitution: the story of $\text{As}_2\text{O}_3$

- The destiny of arsenic trioxide and Italian master glassmakers' obstacles
- Government-funded research (264.000 euros) undertaken to replace arsenic trioxide by less toxic substances to humans and the environment
- Two alternatives identified
  - cerium dioxide
  - ground granulated blast furnace slag (GGBS)

But.....

Analysis of alternatives results:

- process agents performances do not fully meet the expectations
- additional support for SMEs might be necessary to save artistic glass niche



# Changing the mindset: public research for substitution

**1° Workshop:** Research and Innovation for substitution held in Rome  
@University Sapienza on **26 June 2017**



The Ministry of health with the University of Rome «Sapienza» and all the administrations involved in REACH implementation organized the event

**«REACHERCA (Research) and innovation in REACH.  
Dialogue between research and enterprises»**

## **Objective:**

Strengthening synergies between Research & Industry based on the need for substitution of SVHC and relating obligations for industry

## **Outcomes:**

- Second event in 2018
- Highlighted possibilities for cooperation
- Network between actors to be initiated
- Research clusters
- Support from Ministry of University and Research
- Mapping financial support routes: e.g. the Ministry of Health support to public research



# Strategy for substitution

## Inputs from Italian Industrial associations

1) Principles on which basing our strategy:

- a. risk-based approach (fundamental);
- b. no compromise on functionality when assessing "safer" alternatives;
- c. in order to better achieve such two principles, a "wide LCA" approach should be endorsed;**
- d. give priority - for substitution - to those substances which you find unchanged in the consumer product** (it's maybe better to focus not so much on raw materials, which are then transformed chemically and are operated under stricter control conditions, as on those which remain unchanged (or at least formulated), in articles in direct contact with the public).

2) We agree on the difficulty in defining what actually "safer" may really mean, taking in account that chemical companies are managing substances in a safe way specifically those of very high concern; they commit to adopt **further** risk management measures to improve **sustainability** and - where possible - to substitute SVHCs with **more sustainable** alternatives.

