

# Conclusions

ECHA's workshop on substitution strategy  
10 October 2017 Helsinki  
Matti Vainio & Joel Ticker

# 1. Using ECHA data

## **Key discussion points:**

- Using ECHA data can be helpful in particular to avoid regrettable substitution, yet refinements are needed for users to more easily access information for substitution purposes.
  - E.g. PPORD notifications: preventive dialogue between ECHA and notifiers in case in case of indication of possible regrettable substitution
- Complicating factors: Usually substances have more than one function.
- Industry has done this, too: e.g. ICL grouped flame retardants to red, orange, yellow and green categories
- Various databases at MS level (e.g. national labour inspection data) could be useful for substitution considerations, but barriers currently exist given confidentiality restrictions.
  - Confidentiality issues can be overcome (e.g. through aggregation)
- A grouping approach would help to avoid piece meal substitution
  - Can be expensive for industry

## **Specific ideas for ECHA substitution strategy:**

- Improve web navigation functionality for substitution purposes can be pursued by linking use descriptions and Candidate List substances.
  - Agreed that testing the functionality with a small group using “mock-up screens” would be useful.
    - Can pilot test the functionality by searching for substitution-related information on the SVHCs that are the focus of the supply-chain collaborations – examining alternatives/options through the use descriptions.

## 2. Facilitating access to financing and substitution support

### **Key discussion points:**

- Funding and financing two different things. Technical support is multifaceted.
- Technical assistance, joint testing, networking/partnering are needed. Funding might help here, too
- Are there priority chemicals/functions/applications for which coordinated efforts make sense?

### **Specific substitution strategy ideas:**

- There is a clear need to understand funding and technical support activities at the MS level that could be supportive of substitution. Sector organisations know who are key researchers in areas.
  - Discussed how to coordinate these resources at MS and EU levels (landscape analysis? meeting?)
  - Non-Toxic Environment study (of DG ENV) results can give suggestions.
  - Funding, financing and/or support needs depend on multiple factors (alternatives available or need new ones)
- MS/ECHA could work together to define a common set of grant review criteria (for both MS and Commission-level RFPs) to integrate considerations about chemical safety/safer chemicals into MS and Commission funding programmes that involve the use of chemicals.
- Concluded that it would be important to ensure focus on safer chemistry research and development as a societal priority in FP9.
  - Discussion with relevant DGs as a follow up

# 3. Capacity building and collaboration through supply chain workshops

## Key Discussion Points:

- **Supply chain collaborations can take several forms based on identified needs:** in depth analysis of alternatives; performance testing; R&D
  - Some kind of decision-tree to understand what type of workshop depending on goals would be helpful – no single model. Key is to facilitate learning and shared knowledge and future collaborative activities
- **Supply chain collaboration critical for supporting innovation and informed substitution and overcoming barriers to change**
  - Requires on-going facilitation and follow-through, openness of those engaged, and motivation. Link to ongoing network?
  - Exchanges across supply chain are highly valued
  - Capacity building about substitution was not a direct objective of these projects, but occurred as a consequence of the work
  - Substitution “help desk” idea to support these efforts?
- **First steps:**
  1. Convene participants based on a shared need
  2. Develop trust around the table – good facilitation is critical
  3. Use as a chance to share key principles about substitution – transitioning to safer chemicals and technologies
  4. Identify concrete collaborative project(s)
  5. Identify collective interest in next steps

### 3. Capacity building and collaboration through supply chain workshops (cont.)

#### **Specific substitution strategy ideas:**

- MS expressed following interests
  - Bulgaria CrVI 5-6 February
  - Italy 1st half
  - Netherlands, antifouling paints
  - Denmark, Evaluation of funding schemes of substitution
  - Luxembourg (LIST), subject to be defined
  - Austria, 5-6 November, stock taking as part of Green Chemistry conference
  - Possible interest: Finland, France, Belgium and Sweden
- Organisations expressed the following interests
  - Euratex, building on MIDWOR Barcelona workshop (March 2017). One or several other workshops
    - Strong plea for "critical mass" and for support/facilitation. Seeking to host similar workshops on priority chemicals of concern in textiles (e.g., PFAS, Formaldehyde, etc. in other MS that would be willing to collaborate.
  - Eurometaux interested, subject to be defined
  - European Space Agency, workshop in 5 June– part of "stakeholder days"
  - OECD, *ad hoc* group in early May and sustainable plastics end May (DK)

# Development of networks

## Key Discussion Points:

- Process/trust building is key
- Clear goals/mission is essential – several ideas of what networks could achieve
- How deal with short term needs versus long term collaborations – bring together proactive with reactive (need to comply with regulation). Networks to respond more immediately but also focus on long term.
- First step may be to coordinate MS activities more effectively. Local connections, language, etc. are important. Lots of varied network needs. E.g. SMEs most likely connected at MS level not EU level. Could have nodes/connections between groups (MS help desks working on substitution) to share knowledge, resources.
- How to link learnings across networks/activities (even not really substitution focused but moving substitution forward)? Is this new networks or inserting substitution into R&D discussions.
- Needs a “connector” – someone with high level, broad knowledge who can build/facilitate network. Leadership is critical

## Specific Substitution Strategy Ideas:

- Clear interest among workshop attendees in joining a new small EU-wide multi stakeholder network on substitution
  - ECHA has an interest in facilitating a network, need to have more contact points from MS
- MS-level substitution networks also voiced as important and possible models were recommended
  - Supply chain specific networks may emerge as an outgrowth of the workshops – networks will be needed to sustain activities over time at MS or EU level
  - Look at other models for source of inspiration e.g., Helpnet and other models that are particularly relevant for SMEs
- Examine whether there is available DG Research funding to establish/fund networks – regulatory and authority – e.g. model of contaminated sites MS coordination?

## Other substitution strategy considerations

- Supply chain workshops, networks, funding – these strategies are all connected. A “map” that shows how different parts of strategy connect to overall substitution goals would be helpful (e.g. parts of the strategy overlap)
- Critical mass is needed for workshops or networks. These require a facilitator or convenor to move things forward.
- Would be useful to talk about longer term capacity building needs, including what capacity building is needed: Analysis of Alternatives, network building, etc. Low cost way of capacity building through webinars? Using NeRSAP?
- A lot of “latent” need in companies to convene to discuss substitution challenges/opportunities. How best to use this energy? Ad hoc discussion facilitation, workshops/webinars? Etc.