

REACH and space industry

MPTB stakeholder day

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Outline

- REACH regulation, ECHA and the Commission
- Applications for authorisation and SMEs
- Substitution work at ECHA
- Avoiding regrettable substitution
- Article 33 notifications



REACH and CLP – main processes and actors



Pre-registration
Data sharing
Registration
Self-classification

Facilitated by ECHA, industry gathers information and ensures management of risks

Member States

Evaluation

- Dossier evaluation
- Substance evaluation

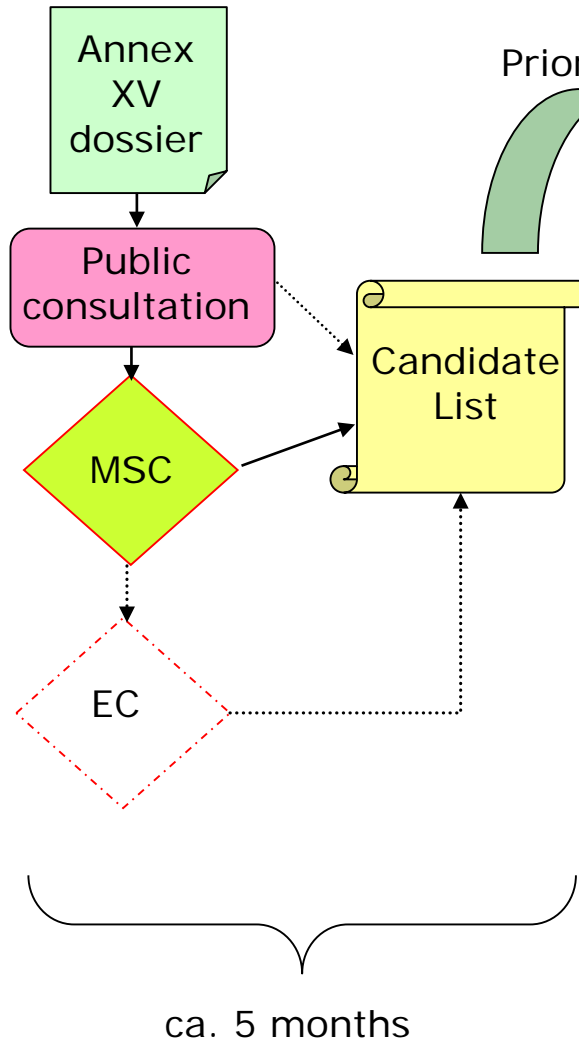
ECHA and MSCAs control and request for further info



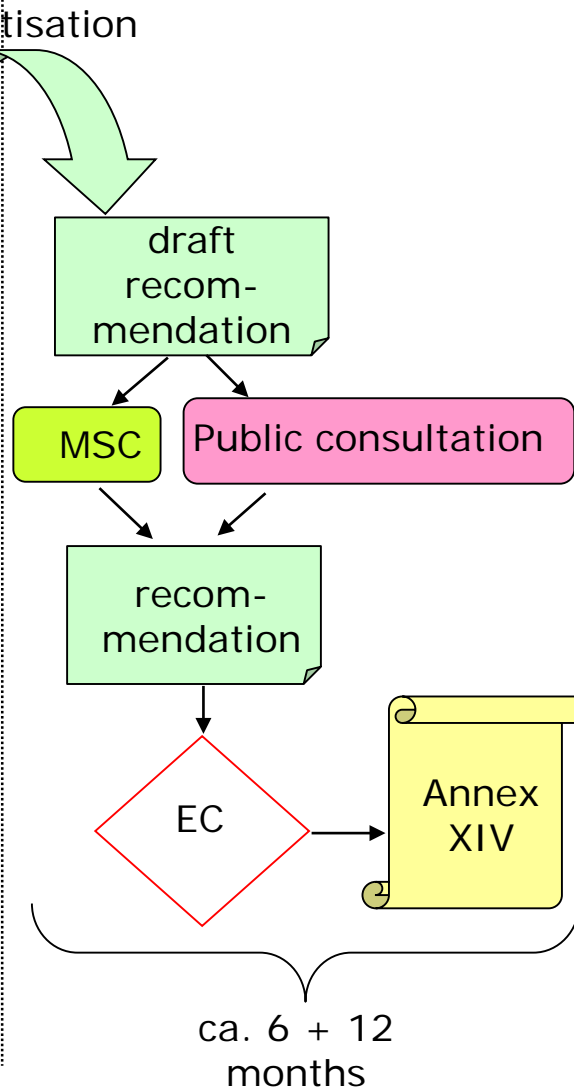
Authorisation
Restriction
Harmonised C&L

Commission, with support of ECHA and MSCAs, applies community wide risk management measures

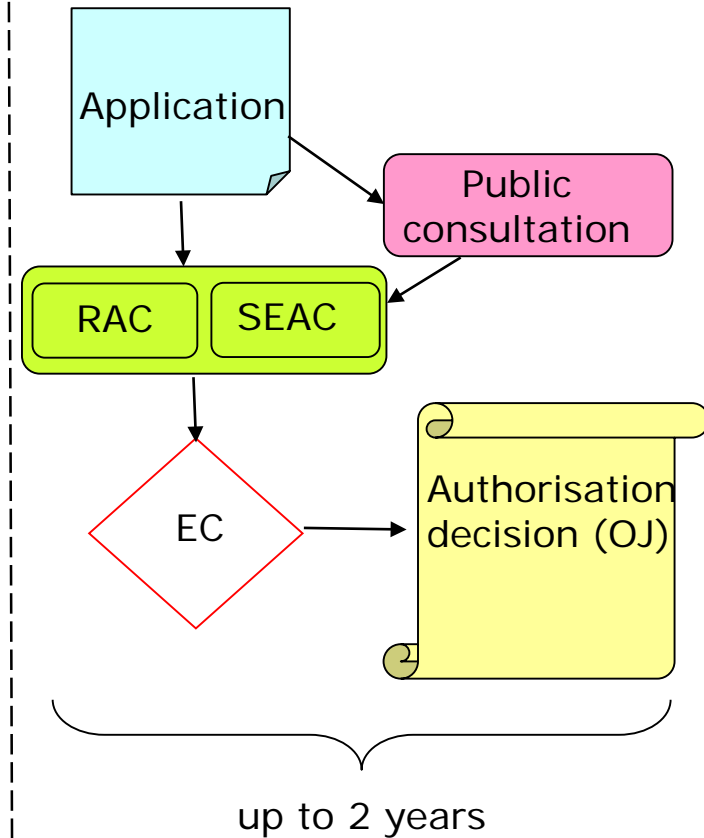
Step 1.1: Identifying SVHCs



Step 1.2: Subjecting priority substances to authorisation



Step 2: Granting (or not) authorisation



Applications for authorisation and SMEs

- Finnish hard chrome platers applied together
 - Robust applications with good exposure assessment - less uncertainties
 - Expensive compared to up-stream application
 - Good collaboration between the companies
- A study on impacts of applying for authorisation
 - 14 Finnish companies and TUKES interviewed
 - The report highlights
 - improved networking of companies who participated in consortiums, improved worker protection, accelerated substitution and increased awareness of the safety aspects of alternatives
 - importance of an effective flow of information between all relevant actors (applicants, suppliers, customers, consultants, sector associations and authorities).

Applications by company size

Updated: 05/05/2017

Table: Number of applicants 2013-17 by the company size

Received in*	Large	Medium	Small	Micro	Total	Share
2013	9			1	10	5%
2014	31	2			33	17%
2015	13		2	5	20	10%
2016	104	11	14	3	132	66%
2017**	2	1		1	4	2%
Total	159	14	16	10	199	100%
Share	80%	7%	8%	5%		

*An application is received in terms of Article 64(1) of REACH when ECHA has received the application fee

**As of May 2017

Substitution work in the EU

- ECHA is developing a strategy to support substitution in the EU. Current ideas:
 - Develop capacity building packages on AoA/substitution for industry (and others)
 - Map and encourage national & EU-wide funding to support R&D for substitution
 - Develop AoA/substitution networks with experts from various fields
- Create and expand mechanisms for greater supply chain collaboration

Innovation WS for Finnish chromium plating supply chain

- Objective to promote substitution of CrVI in plating
- Platers, their customers (end-users), providers of alternatives and funding organisations to meet in person
- Pilot event to create a model of WS that can be repeated in other EU-countries and with other SVHC-substances and industrial sectors

Avoiding regrettable substitution

- ECHA approaches
 - Candidate list - potential alternative substances with similar structure can be considered into the candidate list even if no current use
 - Recommendation to Annex XIV - grouping is considered based on e.g. structure (substitutes to each other)
- If substitution does not lead to reduced risk – not worth implementing the alternative
- If clear risk reduction – a solid case for authorisation in the next round

Some ongoing work

- CrVI applications for authorisation
- Boric acid recommended to Annex XIV 2015
- Cobalt
 - Commission considered restriction route more appropriate than authorisation
 - Risk established as a non-threshold substance – ECHA report published
 - A study on risk levels in different uses including plating to be published soon
 - ECHA will assess if a restriction should be proposed (July 2017 – July 2018)

Low quantities implementing act

- AfA task force finalised a simplified template for low quantity applications
- The implementation is on hold
- The assessment should be fit for purpose to the case - some info requirement e.g. for MvE relaxed
- We have seen low quantity cases may lead to high exposure – need to report your case
- Spare parts – same as low quantities – implementation on hold

Article 33 declarations

- Updated draft guidance (requirements for substances in articles) is published
 - Reflecting the clarified interpretation of 0,1%, e.g. examples
 - Setting the main principles – not possible to reflect all specific industries including production of very complex articles or supply chains
 - Commenting going on – hopefully ready by end of summer
- Complementary activities possible
 - Publishing sector specific guidances by industry
 - Some specific issues may be considered by ECHA later on (autumn)
- Enforcement
 - Enforcement of REACH is responsibility of the Member States
 - "Forum" coordinates and harmonises
 - Enforcement project agreed and planned (at least half of the MSs participate)
 - Enforcement activities should take place October-mid 2018

Thank you!

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