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REACH and CLP – the journey so far

ECHA has published a report which paints a picture of the impact, successes and remaining challenges of the ground-breaking European legislation on chemicals - REACH and CLP.



Agreed in 2006, REACH represents a sea change in the way in which chemicals are regulated and managed within Europe. Its objective is the safe manufacture and use of chemicals so as to protect human health and the environment, at the same time as enhancing innovation and the competitiveness of European industry.

Since 2009, CLP has been ensuring that the hazards presented by chemicals are clearly communicated to workers and consumers through the classification and labelling of chemicals. Through REACH and CLP, Europe leads the world on chemical safety.

1 WHAT ARE THE MAIN BENEFITS SO FAR?

Safer chemicals and transparent data

The use of chemicals is getting safer. Companies are generating information on the impact of their chemicals on human health and the environment which is now freely available to every authority, citizen and company on ECHA's website. Before REACH, not even the authorities responsible for chemical safety had access to that level of data. More data is being generated every day by companies in response to requests from ECHA and the Member States.

Although the quality of data has been mixed, an increasing number of companies are providing data of a sufficient quality both to ECHA and to their customers. Armed with that information, companies can ensure the safe use of substances in their supply chains and make sustainable business choices. This leads to improved chemicals management and improved product quality. Authorities can focus their efforts on the substances of most concern to protect human health and the environment. And ultimately, consumers can make safer choices.

Replacing dangerous chemicals with safer ones

The most dangerous chemicals – so called substances of very high concern – are being phased out and many are being replaced by safer alternatives. Relatively few companies have applied for an authorisation to use substances of very high concern.

European companies are increasingly taking innovative approaches to finding safer alternatives to the most hazardous substances. More can still be done, but the pressure for safer chemicals from downstream users, retailers and consumers should

not be underestimated. With increased awareness of substances of very high concern, consumer demand and the drive towards a circular economy, innovative solutions will become more attractive.

Almost 1 500 new substances have been registered since 2006, with an increasing annual trend. These new substances are often safer and more sustainable than older ones. REACH encourages this by ensuring that less data is needed for substances used in research and development.

Better test methodologies

Modern test methodologies also help to reduce the testing of chemicals on animals. REACH requires companies to share data when registering their chemicals so as to reduce unnecessary testing. Companies also make extensive use of alternatives to animal testing, although the justifications for this often need to be more robust. When companies propose a test on animals, they need to explain why and describe what alternative methods they have considered. To further reduce unnecessary animal testing, ECHA welcomes the further development and faster acceptance of more alternative methods.

FACTS & FIGURES

- ECHA's website has information on more than **120 000 chemicals**.
- **31 of the 168 substances of very high concern** have been placed on the authorisation list – they cannot be used without a specific authorisation.
- **20 restrictions** made under REACH limit the use and reduce risks of hazardous chemicals.
- **200 opinions** on harmonised classification and labelling trigger further risk management actions.
- ECHA has published on its website more than **54 000 registration dossiers** for **14 000 substances**.
- Nearly **10 000 companies** have registered chemicals.
- Over **10 000 companies** have informed ECHA of their substance's classification.
- Hundreds of companies have directly or indirectly applied for **authorisation to use a substance** of very high concern.

Substance Infocard

Chromium trioxide

Other names: IUPAC names [18]

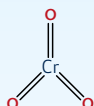
Regulatory processes names [3]

Trade names [5]

Groups:

Substance identity

EC no: 215-607-8
CAS no: 1333-82-0
Mol. formula: CrO₃



Hazard classification & labelling



Danger! According to the [Harmonised Classification and Labelling](#) approved by the European Union, this is fatal if inhaled, is very toxic to aquatic life with long lasting effects, causes damage to organs through prolonged or repeated exposure, is very toxic to aquatic life, may cause cancer, causes severe skin burns and eye damage, may cause genetic defects, is toxic if swallowed, is toxic in contact with skin, may cause fire or explosion (strong oxidiser), is suspected of damaging fertility, may cause allergy or asthma symptoms or breathing difficulties if inhaled and may cause an allergic skin reaction.

Additionally, the classification provided by companies to ECHA in [REACH registrations](#) identifies that this substance is fatal in contact with skin and is very toxic to aquatic life.

Properties of Concern



Important to know

- Substance of very high concern (SVHC) and included in the candidate list for authorisation.
- Substance of very high concern requiring authorisation before it is used ([Annex XIV of REACH](#)).

About this substance

This substance is manufactured and/or imported in the European Economic Area in 10 000 - 100 000 tonnes per year.

This substance is used in the following products: metal surface treatment products, non-metal-surface treatment products, pH regulators and water treatment products, adsorbents and laboratory chemicals. This substance has an industrial use resulting in manufacture of another substance (use of intermediates).

This substance is used for the manufacture of: chemicals, plastic products and fabricated metal products.

Release to the environment of this substance is likely to occur from industrial use: as an intermediate step in further manufacturing of another substance (use of intermediates), formulation of mixtures, formulation in materials, as processing aid, manufacturing of the substance and in the production of articles. Other release to the environment of this substance is likely to occur from: indoor use as reactive substance.

ECHA has no registered data indicating the type of article into which the substance has been processed.

How to use it safely

- [Precautionary measures](#) suggested by manufacturers and importers of this substance.
- [Guidance on the safe use](#) of the substance provided by manufacturers and importers.

INFOCARD - last updated: 10/02/2016

Information about chemicals' properties is now freely available on ECHA's website.

2 WHERE ARE THE MAIN CHALLENGES?

Quality of data on chemicals

Companies need to provide reliable and comprehensive data on their chemicals to ECHA. Without this information, the safe use of chemicals is not possible.

So far, a significant proportion of registration dossiers are not of a sufficient quality. The main weaknesses are:

- a lack of clarity about the identity of complex substances;
- poor justifications for using alternatives to animal testing;
- insufficient information on the uses of and exposure to substances; and
- not proposing robust risk management measures for each use.

Therefore, many companies need to provide better information on the substances they produce and update the data whenever new information is available. However, once ECHA notifies the companies of the need to improve the data, the vast majority do so.

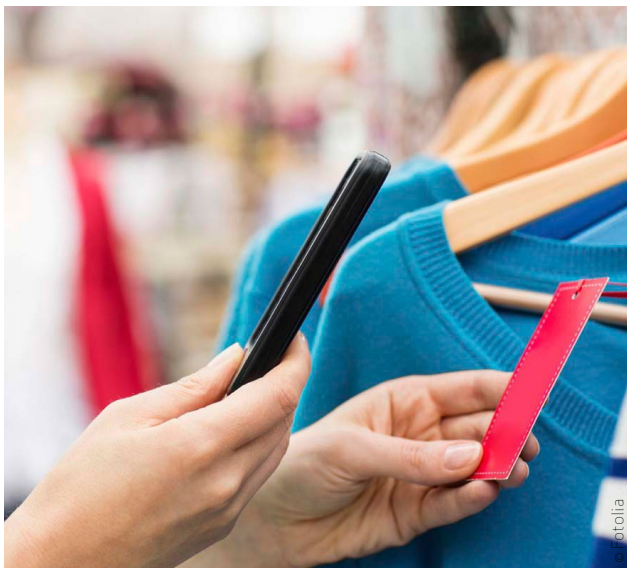
Missing data in registration dossiers delays the risk management of substances. ECHA and the Member States cannot prioritise the most hazardous substances for regulatory attention and implement risk management measures without sufficient data.

Communication in the supply chain

Companies need to assemble the data needed for each substance, produce practical advice on how to use it safely and communicate it in their supply chain. So far, important exposure data is frequently missing or poorly done in the safety data sheets. This means that the risk management of chemicals in manufacturing companies is made more difficult. The role of downstream users of chemicals is important - by demanding better quality, user-friendly safety data from their suppliers, they can improve the safe use of chemicals.

Different classifications of substances

Many companies have informed ECHA about how they classify their substances. Most of these classifications are not harmonised at EU level and there is considerable variation amongst the self-classifications provided by companies for the same



substance. Thanks to the increasing transparency of the data on ECHA's website, conflicting classifications are now easily seen. This will hopefully prompt companies to make improvements.

Missing information about chemicals in consumer products

For consumers, there is still too little information about substances of very high concern in products – especially in those imported to the EU. Companies are required to inform ECHA of such substances in products, but very few have done it so far. Importers especially need to take their responsibilities seriously and notify ECHA about the effects their products could potentially have on consumers.

3 WHAT NEEDS TO CHANGE?

ECHA does not see an urgent need to revise the REACH Regulation, but improvements should be made. These are the most important recommendations:

- In order to improve the quality of data on chemicals, we ask the European Commission to clarify the legal obligations to update dossiers.
- The coverage of nano forms of substances in registration dossiers needs to improve. At the moment, there are no explicit information requirements in REACH about nanomaterials and many companies are holding back on providing data on nanos. ECHA awaits clear information requirements on nanos from the European Commission.
- Some companies provide contradictory self-classifications of substances in the classification

and labelling inventory. ECHA recommends that the CLP legislation be changed to oblige companies to share data and agree on the classification.

- EU citizens need to have more reliable information on substances of very high concern in the products they buy. The current legal requirement for information is not working well enough and should be reviewed.
- The interface between REACH and CLP and other pieces of legislation should be optimised – for example, by making more use of the data generated to comply with other EU legislation. This would reduce unnecessary burdens on businesses and provide more clarity and consistency for consumers.

4 NEXT STEPS

After the 2018 registration deadline, we will have a complete, unique picture of chemicals used in Europe. This information will reveal further candidate substances for risk management and safer alternatives for industry to consider.

The chemicals industry is a dynamic sector – new substances are developed and old ones phased out on a regular basis. Also in the future, all new chemicals need to be registered and their effects described and assessed to ensure their safe use.

So far, the European Union is well on the way to a safer life for its citizens and our environment.

Report on the operation of the REACH and CLP Regulations: echa.europa.eu/publications => reports

