

# REACH restriction as a tool for the risk management of chemicals

Stakeholder workshop on  
intentional uses of microplastics

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# Outline

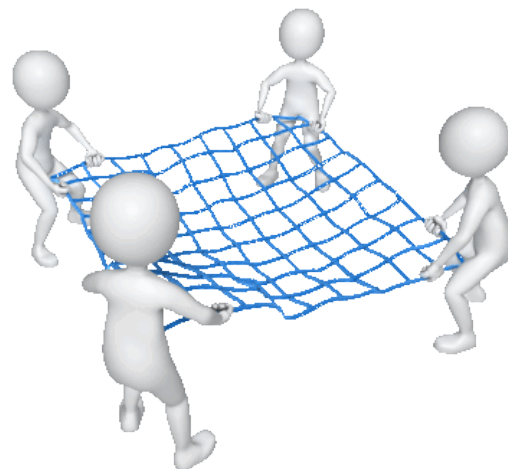
- When is a REACH restriction needed?
- What is a REACH restriction?
- Overview of timeline and process?

**When is a restriction  
needed?**



## When is a restriction needed?

- **‘Safety net’** for addressing unacceptable union-wide risks to human health or the environment from chemicals that cannot or have not been addressed by means of other REACH processes or Community actions
  - Registration
  - Evaluation
  - Authorisation
- **Annex XV Report**
  - Member State
  - ECHA (via Commission)



# What is a REACH restriction



## What is a REACH restriction?

- Union-wide action – same requirements apply to the whole EEA from entry into force
- May apply to any substance on its own, in a mixture or in an article
- Very few limitations to scope
  - No minimum tonnage (substances manufactured or imported below one tonne per year can be restricted)
  - Can apply to polymers (they are substances)
- Normally used to limit or ban the manufacture, placing on the market (including imports) or use of a substance

## What is a REACH restriction?

- Restriction can comprise '**any relevant condition**' to address a risk e.g.
  - Technical measures to limit risk
  - Training requirements
  - Labelling requirements
- There is a 'separation of substance and scope'
- The 'scope' of a restriction can:
  - Specifically address the use/s of a substance that pose an unacceptable risk
  - Recognise that certain uses should continue where society overall would not benefit from stopping them

## What is a REACH restriction?

- 'Derogated' uses, where there is robust justification, can continue [can be time limited]
- Concentration limits derived to prevent intentional use, but not confound enforcement
- Transitional periods usually apply once a restriction enters into force
  - to allow the supply chain to adapt (18 months +)
  - justified on a case-by-case basis

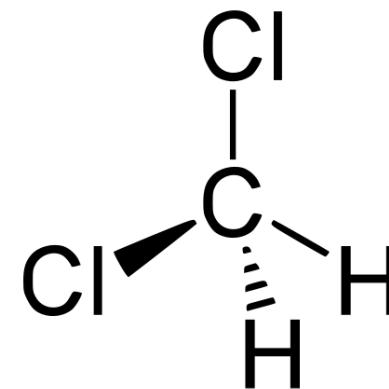




## Some examples (i)

- *Methylene diphenyl diisocyanate* (MDI) – 56
- Restriction on ‘placing on the market’ as a constituent in mixtures for the general public
- Unless:
  - Packaging contain protective gloves
  - Following elements are included on product label
    - Warnings for those with prior sensitisation
    - Warnings for those with specific pre-existing health conditions
    - Instructions on appropriate use conditions (ventilation etc)

## Some examples (ii)

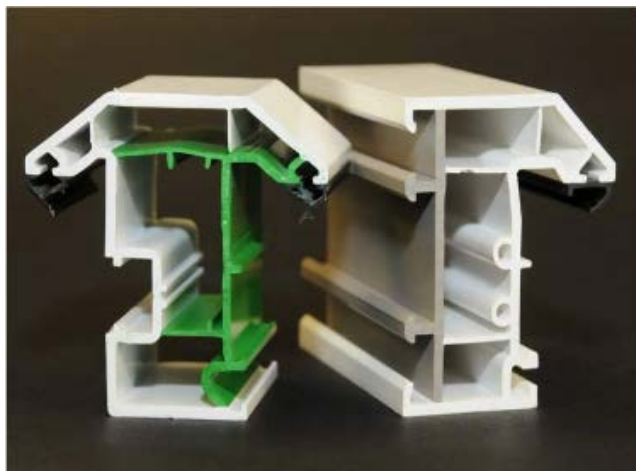


- *Dichloromethane* (DCM) – 59
- Restriction on ‘placing on the market’ as a constituent in mixtures for the general public or professionals
- Unless:
  - MS allowed to derogate use as a paint stripper by ‘specifically trained professionals’
    - Requires certification
- Continued use in ‘industrial installations’
  - Require minimum standard operational conditions and risk management measures (i.e. ventilation requirements, minimisation of evaporation, PPE etc)



## Some examples (iii)

- Lead in PVC (not decided)
- Restriction on the use of lead-based stabilisers in PVC and the placing on the market of PVC articles containing lead-based stabilisers (imports) – conc limit of 0.1% Pb w/w
- Unless:

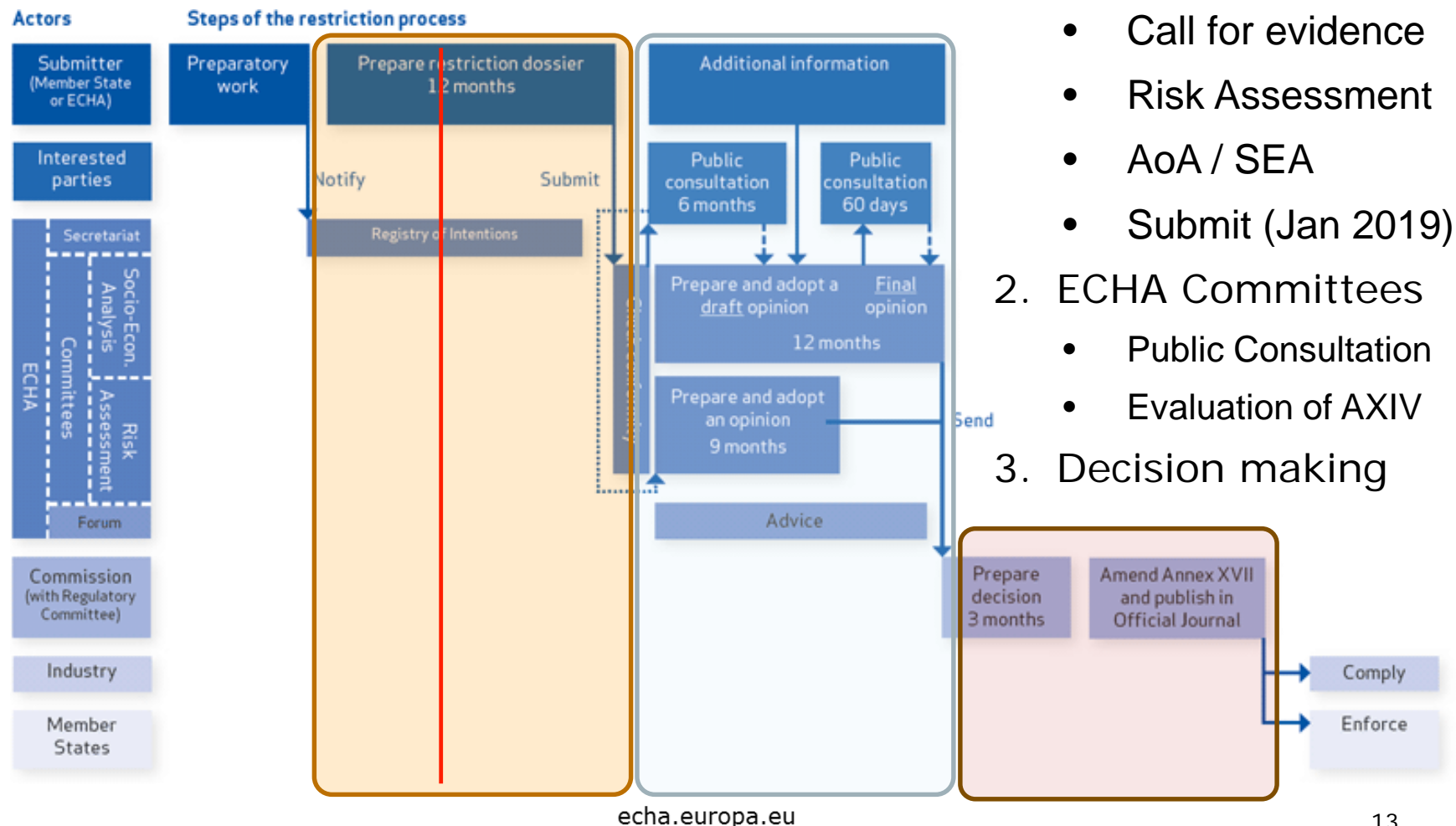


- Certain articles types produced using recycled PVC
- Encapsulation required for articles used in occupied areas of buildings (doors, windows)

# Outline of timeline and process



# Restriction timeline & process



1. Dossier preparation
  - Call for evidence
  - Risk Assessment
  - AoA / SEA
  - Submit (Jan 2019)
2. ECHA Committees
  - Public Consultation
  - Evaluation of AXIV
3. Decision making

## Conclusions

- REACH restriction is a safety net with very few limitations to its applicability
  - However, it is not a blunt instrument
- The range of measures available can ensure proportionate targeted risk management
  - But only on the basis of good quality information
- The process is highly transparent and can be influenced by public consultation

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