

Yltäkö kiertotalous kemikaaleihin

Kemian päivät

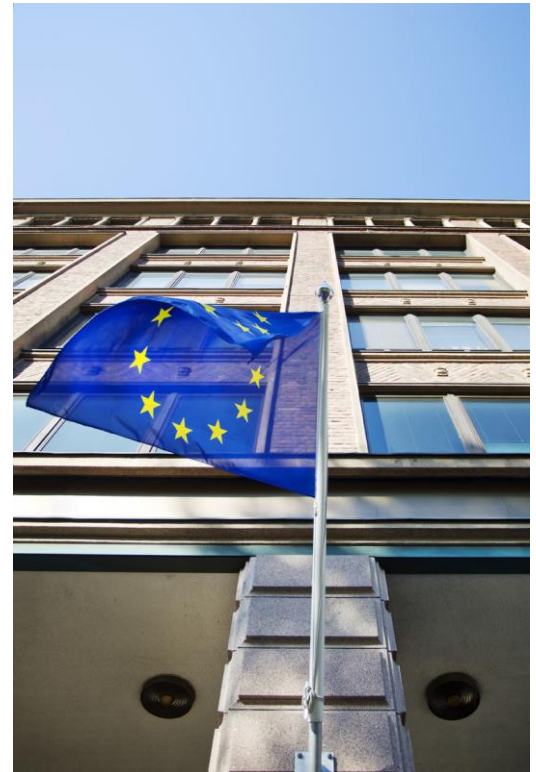
29.03.2017

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Euroopan Kemikaalivirasto



ECHA key facts

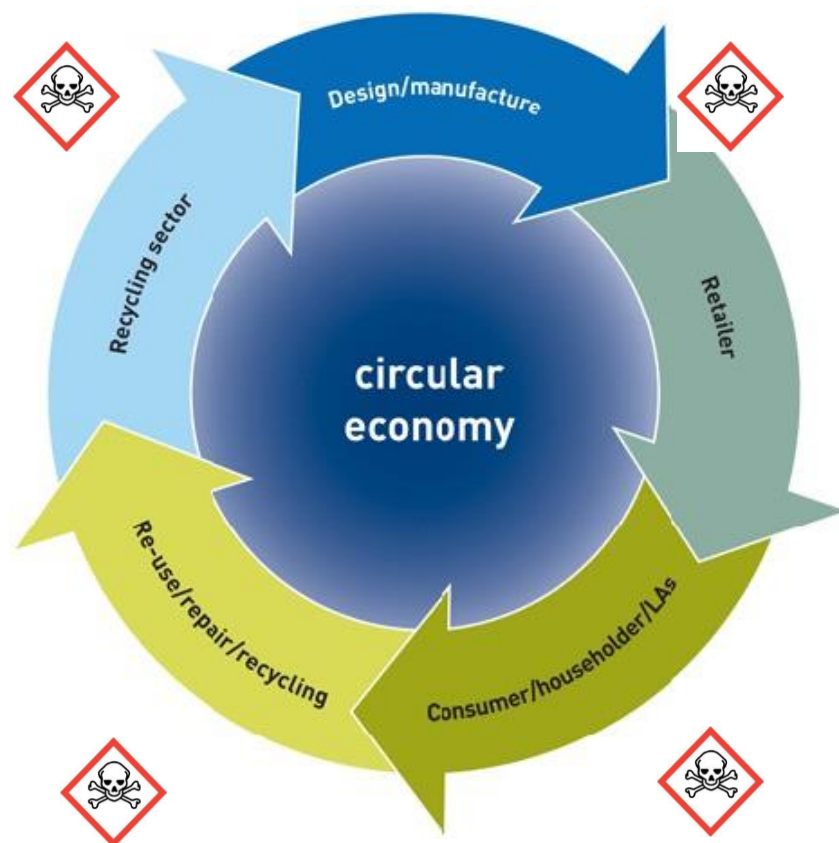
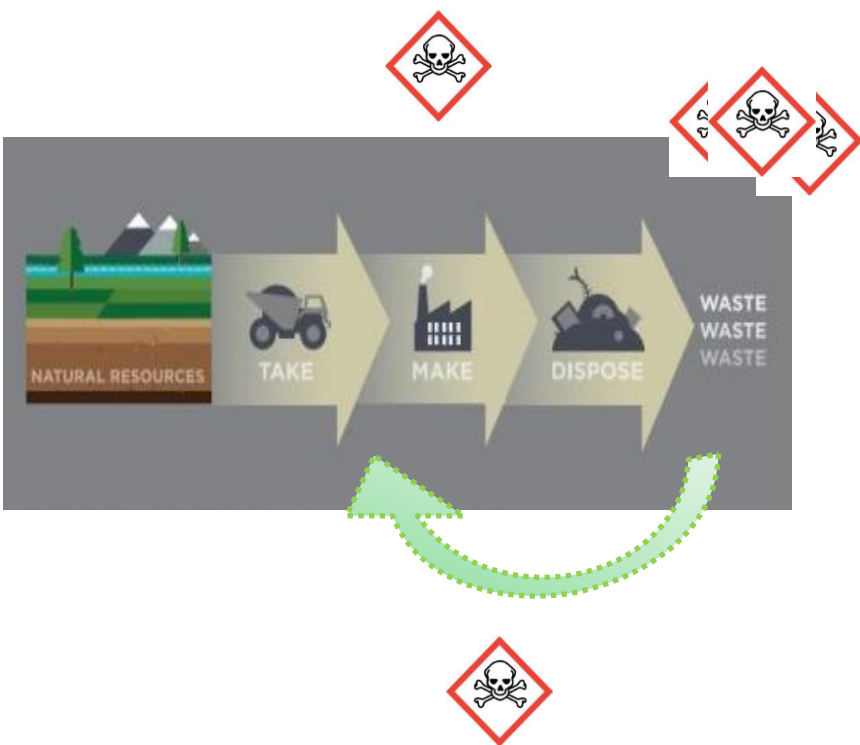
- Started on 1 June 2007
- 580 staff from 28 countries
- 2007: REACH
- 2009: Classification and Labelling (CLP)
- 2013: Biocides
- 2014: Prior Informed Consent (PIC)



Content

- Chemicals: a challenge for the circular economy?
- REACH/CLP contribution to circular economy
- What next?

Linear economy vs. circular economy



Avoid solutions becoming problems

DecaBDE



Wood preservatives

PFOS/PFOA



The chemical challenge of the Circular Economy

- To have sufficient **information to identify and assess** which substances are of potential concern for the circular economy
 - Which substances are in “products” which may be recycled?
 - Properties of these substances?
- To ensure **information flow** on substances throughout the supply chains and cycles
- To make informed decisions to **reduce or exclude** substances from materials cycles

REACH Regulation

- contribution to enabling and promoting the circular economy



Principles of REACH

- Industry responsible for safe manufacture and use
- Deal with the 'burden of the past' with a systemic program for registration of 'old' chemicals
- Get adequate information on hazards while minimising the use of experimental animals and the costs
- Promote substitution of hazardous substances with safer alternatives
- Authorities will focus on substances of highest concern



REACH and CLP – main processes and actors



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 further info



Authorisation Restriction Harmonised C&L

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

REACH/CLP information on substances



Information on chemicals to support circular economy

REACH

- Registration: major increase in information available on substances above 1 tpa (hazards and uses)
- Evaluation: mechanism to produce further information, where needed for safe use
- SVHC identification: confirmation of PBT and ED properties

CLP

- Harmonised classification and labelling
- Self-classifications in the C&L inventory

173

Substances of Very High Concern

460

Risk management proposals

1 500

Dossiers for HPV chemicals checked for compliance

14 000

Substances registered under REACH

120 000

Substances classified by industry

2 million

Study summaries on properties and effects of chemicals



Information gaps

Registration data

- Higher tier health and environment endpoints; often not compliant with requirements
- Quality of information on uses, and in particular on uses in articles
- Exposure assessment, in particular during the article service-life and waste stage

Information gaps

Substances in imported articles

- Limited information on limited number of substances: Notification to ECHA on substances included in the Candidate List
- Compliance? Only 359 notifications for 38 Candidate List substances in articles!

Supply chain communication



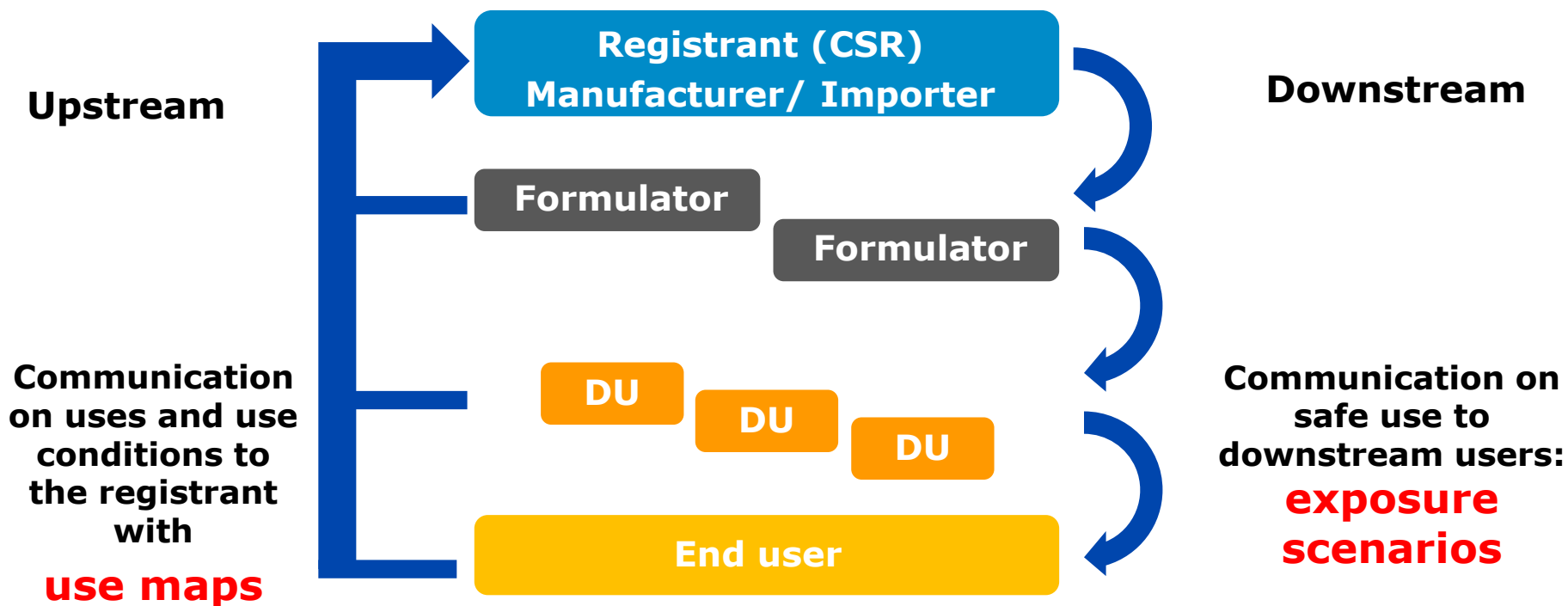
Supply chain communication

Who receives the REACH/CLP information?

- All actors from manufacturers/importers of substances to last industrial or professional user;
- Including EU article producers

- ECHA, together with industry and MSCAs have developed tools and methods for efficient communication

Chemical and DU industry should improve supply chain communication



Supply chain communication

Who does not receive the information?

- Waste management and recyclers
- Article retailers
 - After the incorporation of substance in article and imported articles: focus on the Candidate List substances only

Exclude substances from the circulation



Regulatory possibilities

- Authorisation:
 - push for progressive replacement, with risk control/limitation in the meantime
- Restrictions
 - Can limit or ban the use of certain substances in certain articles/materials
 - Apply to the EU produced and imported articles
 - Restrictions may exempt recycling: when it is better not to recycle materials containing hazardous substance?
- Other EU legislation: RoHS, toys directive...
 - Limited number of substances and article types

Next steps



Commission Action Plan

Circular economy & chemicals

The interface between chemicals, products and waste legislation (2017), including

- insufficient information about substances of concern in articles and waste
- presence of substances of concern in recycled materials and in articles made thereof

Strategy on plastics in the circular economy (2017)

Many areas to further develop, e.g.:

- How to improve tracking substances in materials and products?
- How to get better information on substances in imported articles?
- How to assess the exposure from waste, recycling, and reuse?
- When recycling is better than elimination, especially for SVHC/POP like substances

Conclusions

- REACH/CLP provide, and generate further, information to support circular economy
- Be active: use REACH information to make informed decisions (also) from circular economy point of view
- Imported articles: extra effort needed to bridge the information and information flow gaps

Thank you!

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