EuPC Raw Materials Committee Webmeeting

7 October 2020

Agenda

	Topic	Time
1	Welcome of the participants, Competition law reminder and approval of the draft agenda	10.00 – 10.05
2	Registration of Polymers	10.05 – 10.25
3	TiO_2 Classification - update	10.25 – 10.35
4	SCIP database - update	10.35 – 10.50
5	Bioelution	10.50 – 11.05
6	ADCA	11.05 – 11.15
7	Pellet loss	11.15 – 11.30
8	Update on CLH, SVHC, Evaluations and Restriction	11.30 – 11.50
8	AoB and date of next meeting	11.50 – 12.00

Polymers Require Registration (PRR)

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Introduction: legal basis for the Commission's actions

Legal Basis:

Article 138(2): "the Commission may present legislative proposals as soon as a practicable and cost-efficient way of selecting polymers for registration on the basis of sound technical and valid scientific criteria can be established, and after publishing a report on the following:

a) the risks posed by polymers in comparison with other substances;
b) the need, if any, to register certain types of polymer, taking account of competitiveness and innovation on the one hand and the protection of human health and the environment on the other."

Status Quo

- There are polymer registration requirements in most other regions, demonstrating that it is possible.
- NGOs and EU member states push for action by the Commission – REACH review clause was not fulfilled yet, no clear reason for further delay.
- Plastic waste/microplastics issue fueling the topic – DG ENV said «public concern is now».
- Concerns: persistence of polymers, not recognized hazardous polymers, especially CMRs and PBTs.

✓ DG ENV will bring forward a legislative proposal on polymers in 2021/22.

✓ Highly unlikely that it will be stopped by Member States or the European Parliament.

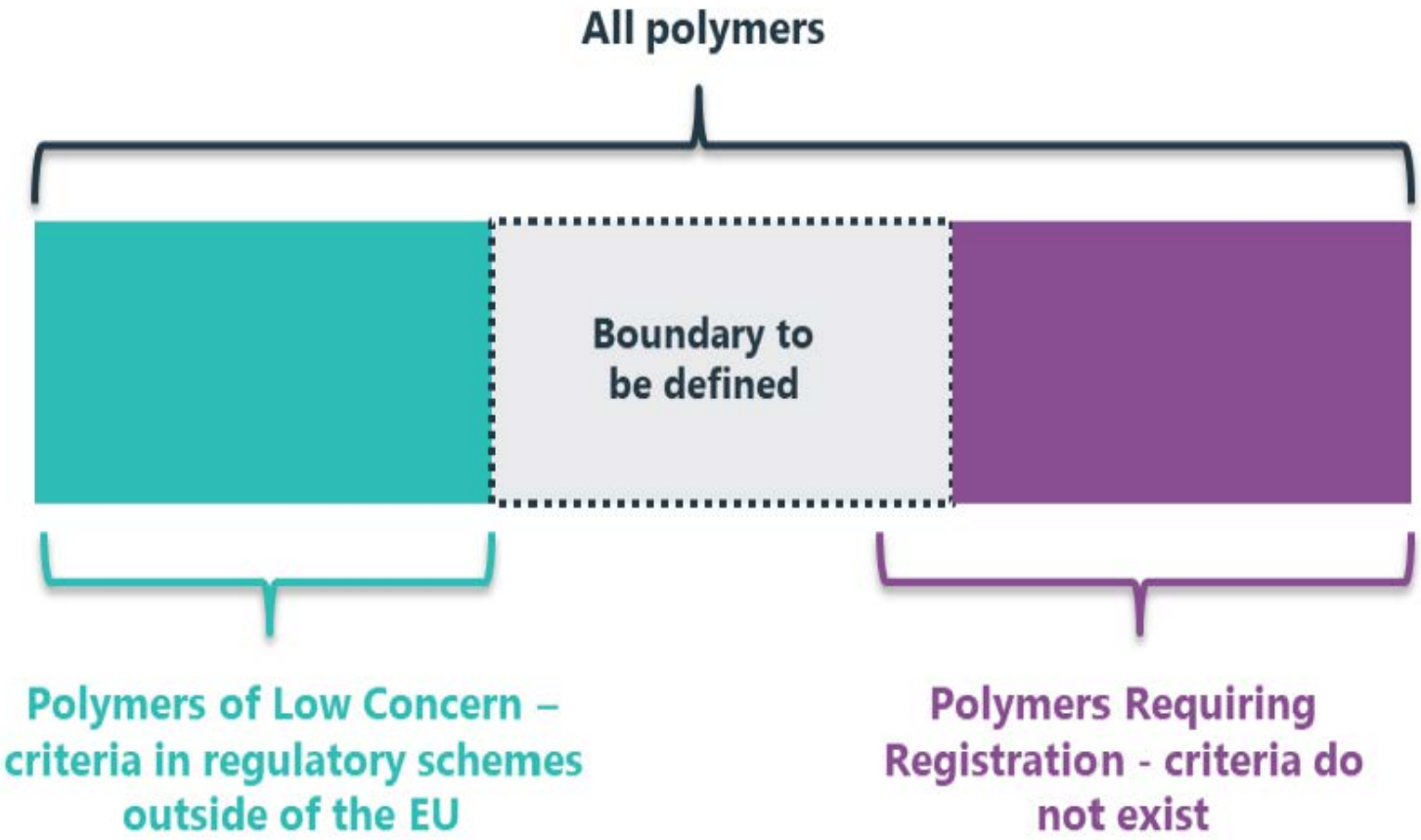
✓ Industry has to prepare for registration of polymers.

The Commission's goal

The Commission's aim is to develop criteria to identify Polymers Requiring Registration **(PRR)**:

- Only those should be subject to REACH Registration and Evaluation
- Exact registration provisions still to be discussed and could differ from other substances

The Commission understands that REACH is different than most non-EU legislations as it covers existing substances & that a large group of polymers is expected as not particularly hazardous.


All polymers
Boundary to be defined
Polymers of Low Concern – criteria in regulatory schemes outside of the EU
Polymers Requiring Registration - criteria do not exist

Wood/PFA report

WOOD/PFA was commissioned by the Commission to study ”Scientific and technical support for the development of criteria to identify and group polymers requiring registration for Registration/Evaluation under REACH and their impact assessment”.

The study addressed the following distinct tasks:

- Task 1 – Propose criteria for the identification of Polymer Requiring Registration (PRR) including the possibility of grouping PRR
- Task 2 – Assess appropriate registration requirements for PRR under REACH;
- Task 3 – Provide a detailed cost-benefit analysis of the registration requirements that could be used by the Commission in a subsequent impact assessment.

Task 1: Draft criteria for the identification of Polymer Requiring Registration

- Molecular weight (MW) below 1000 Da or higher MW but certain content of oligomers below 500 Da and below 1000 Da
- Cationicity
- Anionicity
- Amphoteric properties (with a minimum ionic density)
- Surface-active properties
- Certain reactive functional groups

Task 2: Assess appropriate registration requirements for PRR under REACH

The PRRs are divided into 3 types based on MW:

- Type 1 < 1000 Da,
- Type 2 1000 – 10,000 Da and
- Type 3 > 10,000 Da

- ➢ Data requirements proposed are highest for Type 1.
- ➢ Quantities placed on the market are also relevant.
- ➢ Bioavailability is a critical issue under these approaches.

CASG-Polymers

The objective of the CARACAL sub-group on polymers (CASG-Polymers) is to advise the Commission on how to best consider the outcomes of the recent study by Wood & PFA in its development of a possible proposal for registration of certain types of polymers.

- Which type or classes of polymers may deserve registration under REACH for the benefit of further assessment and potential risk management, taking into account EU competitiveness and innovation on the one hand as well as the protection of human health and the environment on the other;
- What information requirements should be proposed for polymers requiring registration under REACH;
- Provide options to be considered in the context of an impact assessment.

CASG-Polymers

The following MS and observer organisations have nominated themselves for the subgroup:

- Austria, Belgium, Demark, France, Germany, Italy, Norway, Poland, Spain, Sweden, The Netherlands, ECHA.
- AISE, CEFIC, CFI, EEB, DUCC, ISOPA/ALIPA, ECETOC, FEICA, PLASTICS Europe, PISC, EuPC, HSI.

Main points of criticism on polymers report across all stakeholders

PRR criteria

- PRR criteria would cover many PLC
- Lack of clarity on polymer definition(s)
- Lack of suggestion how to address sameness and grouping
- Safety net criterion ill-defined
- Bioavailability needs more complex evaluation than proposed
- PRR criterion/type subdivision based on MW too simplistic.

Registration of PRR / data requirement

- Report does not define a workable approach for polymers in a sufficient way
- Registration only as of 10 tonnes?
- Information requirements for polymers need to be different than for non-polymeric substances, more precise determinants of exposure and hazard should be used.
- Reduced data requirement possible on basis of low exposure or regulation under product-specific legislation (e.g. food packaging, drinking water)?
- Need to validate or develop alternative methods to avoid lots of animal testing

Next steps

- CASG-polymers discussion on report conclusions or other available data for Registration of polymers: MS and stakeholders – Q3/4 2020
- Commission Impact Assessment of options for Registration of Polymers (PRRs) 2020/21
- Consultation of this sub-group: 2020/2021 on a preliminary proposal from COM
- Finalisation of Commission proposal on the basis of an impact assessment 2021/2022

TiO2 Classification – Remaining issues

Labelling:

	Code	Label on packaging
Solid mixtures containing 1 % or more of titanium dioxide	EUH212	Warning! Hazardous respirable dust may be formed when used. Do not breathe dust.
Liquid and solid mixtures not intended for the general public and not classified as hazardous which are labelled with EUH211 or EUH212	EUH210	Safety data sheet available on request.

- Although the mixture would not be classified, there is for the time being a labelling obligation. It is expected an amendment to the CLP should be adopted during the transition period confirming the conditions for exemption of labelling of those mixture that are not classified.

EuPC submitted a letter together with (PRE, Plastics Europe and EuMBC) to CARACAL so that an exemption from labelling is inserted in the next amendment of the CLP. This is expected to be discussed in the next CARACAL meetings.

Brussels, August 2020

Ref: Classification of TiO2 and plastics – Labelling obligation: memo for CARACAL

The second largest use of TiO_2 after applications in paint industry is its use in the plastics sector. TiO_2 is necessary to ensure the functionality of about 77% of the European plastics articles produced. This represents a value of € 170 billion of converted products or € 270 billion for the whole plastics supply chain.

Waste classification:

- About the waste, EC intends to address the potential issue of classification of waste containing TiO_2 as hazardous through a modification of the waste guidance instead of a legal text.
- A draft guidance has been prepared and will be addressed to the EC Technical Expert Committee on Waste soon. The discussion in the Commission expert committee on waste shall begin in the coming days.
- The draft guidance will be shared with concerned stakeholders after internal discussion within the EC Technical Expert Committee on Waste.

The form/physical state of the waste must be taken into account when undertaking the classification of that waste.

This implies that if the waste is not in the form or physical state in which the substances contained in it are hazardous, then those substances will not participate in the calculation against the concentration limits defined in Annex III to the WFD.

Similarly, if waste contains hazardous substances for which applicable notes are assigned, if the condition of the notes are fulfilled, the waste should be classified accordingly.

SCIP Database Overview

Marco Perfetti, marco.perfetti@eupc.org

7 October 2020 – EuPC RMC Telco

What is SCIP?

- SCIP is the database for information on **Substances of Concern In articles as such or in complex objects (Products)** established under the Waste Framework Directive (WFD)
- Companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration **above 0.1% w/w** on the EU market have to submit information on these articles to ECHA, as from 5 January 2021
- The SCIP database ensures that the information on articles containing Candidate List substances is available throughout the whole lifecycle of products and materials, including at the waste stage
- The information in the database is then made available to waste operators and consumers

Who is affected?

- The following **suppliers of articles** need to provide information to ECHA:
  - EU producers and assemblers
  - EU importers
  - EU distributors of articles and other actors in the supply chain placing articles on the market.
- Retailers and other supply chain actors supplying articles directly and exclusively to consumers are not covered by the obligation to provide information to the SCIP database
- **As from 5 January 2021**, information on articles containing SVHCs (on the Candidate List) in a concentration above 0.1 % w/w placed on the EU market needs to be notified to ECHA

Required information

- Suppliers of articles **need to submit the following information** to ECHA:
  - information that allows the identification of the article
  - the name, concentration range and location of the Candidate List substance(s) present in that article
  - other information to allow the safe use of the article, notably information to ensure proper management of the article once it becomes waste
- The information submitted to the SCIP database will be **publicly available** and therefore readily available to waste operators to bridge the current gap in the information flow
- ECHA will publish the information, as received, on its website
- The quality of the data remains the responsibility of each duty holder. At the same time, ECHA will ensure the protection of confidential business information where justified

https://echa.europa.eu/documents/10162/28213971/scip_information_requirements_en.pdf/9715c4b1-d5fb-b2de-bfb0-c216ee6a785d

SCIP database trial

- **A trial period** for the preparation of a SCIP notification is now ongoing
- SCIP Database Trial Instructions are available
- These instructions provide:
  - Information to access IUCLID Cloud Beta instance in the ECHA Cloud Services
  - Information to guide the user through all the steps that characterise the functionality of the application related to the SCIP dossier preparation
- The Candidate List reference substances is needed in order to prepare the SCIP notification: **this list is available** https://echa.europa.eu/candidate-list-package
- **Access credentials have been diffused** to members during the trial period
- **A Q&A section with typical questions on SCIP notifications will be reported at the end of this presentation**

Important dates

- **Feb 2020 – Oct 2020**

  SCIP DATABASE TRIAL PERIOD

- **28 Oct 2020**

  RELEASE FINAL SCIP DATABASE VERSION

- **5 January 2021**

  ENTRY INTO FORCE

Advocacy Actions

- On **21 September** 40 different associations sent a letter to the **President of the EU Commission** asking to take immediate actions to:
  - Postpone the SCIP notification deadline of 5th January 2021 by at least 12 months after the database will be finalised
  - Conduct a study on the usefulness, feasibility, proportionality and impact of the database
  - Instruct the European Chemicals Agency (ECHA) to adapt the SCIP database according to the outcome of such study
- A similar letter will be sent to the **German Presidency** and EuPC will cosign it together with the other associations that supported the first letter

Advocacy Actions: feedback and next steps

- The Commission did not confirm President Ursula von der Leyen's receipt or consideration of the requests laid out in the letter sent on 21 September
- The Commission is aware of the concerns expressed by numerous industry associations regarding the challenges to comply, but its position on industry's requests is not clear at the moment
- **On 28 October, the SCIP database will be formally open** for submitting notifications to comply with the legal obligation
- ECHA is hosting a webinar on **19 November** that will set out how companies can prepare SCIP notifications.

Preparation of a SCIP notification: Q&A

- Some examples of questions on the SCIP database sent to ECHA are reported in this section, together with the related answers
- The interested companies are invited to keep on using the trial version of the SCIP database to prepare their notifications
- **In case you wish to submit specific questions on how to prepare a SCIP notification, do not hesitate to contact Marco Perfetti (marco.perfetti@eupc.org)**

Preparation of a SCIP notification: Q&A

- QUESTION 1

In terms of timing, how do companies manage the fact that for buy & sell transactions they will probably not have the notification number of supplier's articles containing SVHCS by early October, but they do need them to create their own (complex) object notifications in the ECHA database. Any guidance on that?

Preparation of a SCIP notification: Q&A

- ANSWER 1

It is precisely part of the communication strategy to be considered when providing information on SVHC substances in articles further down the supply chain

The option to submit a notification to the SCIP database that it is based on simplified notifications options such as SSN or referencing is based on the principle that a successful "full" notification is already provided up in the supply chain

Consequently it is recommended that those with a foreseeable knowledge and notification obligation within the supply chain, such as first time manufacturers/importers, start already initiating the submission of their own notifications to fulfil not only their own obligations but also support their customers

Whereas the legal obligation to submit a notification to the SCIP database applies from 05 January 2020, nothing prevents a notifier to initiate already their notifications from October 2020 with the final release of the SCIP database, and update these notifications at a later stage, if needed be.

Preparation of a SCIP notification: Q&A

- QUESTION 2

What rule should be followed if companies have, for example, a complex object with 5 components where 3 parts have SVHC above the 0,1%; should they create 5 parts or only 3 in the ECHA database?

Preparation of a SCIP notification: Q&A

- ANSWER 2

All components, meaning articles as such or as part of a complex object, need to be reported. A distinction needs to be made between:

  - articles considered as substance of concern, i.e., with a SVHC substance
  - other articles

Reporting an article as an article as such (substance of concern) could not be considered as reporting a complex object, nor it would be sufficient to properly justify the identification of the location of the SVHC substance

Preparation of a SCIP notification: Q&A

- QUESTION 3

There are different ways to prepare data – cloud solution, local installed software on PC or server and System to System (S2S) data protocol interface via harmonized format. Looking for a mass upload solution, what does the S2S harmonized format look like?

Preparation of a SCIP notification: Q&A

- ANSWER 3

The IT tools accepted for the submission of notifications to the SCIP database are via ECHA Cloud Services, using IUCLID or a system-to-system service using a IUCLID-compliant format. Useful information on this topic can be found in the SCIP database tools website

The system-to-system service (S2S) has been implemented in ECHA to allow companies to create notifications to be submitted to the SCIP database in an automatic way using their own internal database. The aim of the S2S service is to allow users:

- To build their own interface using their own database in a format that will be compliant for the submission of SCIP notifications
- To connect directly to the ECHA Submission Portal

S2S does not provide a new format, since it relies on the same IUCLID format available to IUCLID notifications

Bioelution

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7 October 2020 – EuPC RMC Telco

Bioelution: background

- At previous CARACAL meetings, the Commission and ECHA have presented documents regarding the use of results from application of the **bioelution method to determine the classification of metal compounds and alloys in accordance with article 12(b) of the CLP regulation**
- Recently, the EURL ECVAM Scientific Advisory Committee (ESAC) gave a positive opinion on the scientific validity of a **bioelution test method recently developed by the metals industry to assess the relative in vitro bioaccessibility of metals and metalloids in inorganic metal compounds and metal (metalloids)-containing materials** using a simulated gastric fluid
- On the basis of the ESAC opinion, its Working Group Report, the discussion of ECHA's bioelution expert group and any additional information (e.g., results of bio-elution tests), the Commission aims to finalise the discussion on how and under which conditions the relative in vitro bioaccessibility of a hazardous metal in metal compounds or alloys can be used for (the refinement of) their classification under CLP

CARACAL Subgroup on Bioelution (CASG-BIO)

- The objective of the **CARACAL sub-group on the use of relative in vitro bioaccessibility data (CASG-BIO)** is to provide advice and exchange views on technical, legislative and policy issues in relation to the potential use of the relative in vitro bioaccessibility (i.e., IVBA) of a hazardous metal in metal compounds or alloys, i.e. for the refinement of their classification under CLP
- The CASG-BIO should provide advice to the Commission, in particular on **whether and under which conditions the IVBA of a hazardous metal in a metal compound or an alloy can be used for the (refinement of the) classification of metal compounds and alloys under CLP**, taking into account aspects related to:
  - consistency with the current classification framework (GHS/CLP - article 12(b) and concentration limits in Annex VI)
  - safeguarding the protection of human health
  - (hazard) communication (e.g., SDS)
  - practicability and enforceability
  - the physical form of the alloy and its representativeness of a reasonable expected use, and lifecycle considerations
- The activities of this group will be carried out until 1 June 2021

First meeting: method discussion

- On 25 September EuPC attended the first meeting of the experts group on Bioelution
- **The meeting represented a good forum for discussions of possible ideas and proposals for the use of *in chemico* test data for the classification of metal compounds or alloys**:
  - Alloys are considered as special mixtures under CLP and follow the mixtures' rules for classification. When no information on the mixture itself (tier 1) or similar mixtures (bridging, tier 2) exists, the classification is based on the ingredients and derived by comparing the mass concentration of classified metals to their corresponding GCLs or SCLs) (tier 3).
  - The tier 3 approach based on mass concentration does not work for alloys. Alloys have different properties from the metal ingredients they contain. In alloys, the ingredients are so combined that they cannot be separated by mechanical means. This combination can affect the metal release of classified ingredients and hence the bioavailability of the metal ion and the toxicity compared to what can be predicted by the mass concentration

First meeting: proposed method and possible extension to other material matrixes

- Relative metal release from alloy and pure ingredients are measured by an *in chemico* test method relevant to the route of exposure of interest. With this information **a relative bioaccessible concentration (RBC) can be calculated that more closely reflects the hazardous potential of this special mixture (i.e. its potential for metal release)**
- Then, the tier 3 of the current CLP approach can be followed by simply **replacing the mass concentration of classified metals with the RBC before comparing it to the GCL* or SCL** of the metal ingredient**. Safety nets can be included to make sure no alloy is under-classified
- The choice of alloy sample should reflect the conditions of the sample as reasonably expected to be used. The current scope of the proposed alloy-specific approach is narrow (systemic effects-oral route) to match the OECD work on the *in chemico* (HCl 0.032M) test: **however, the proposed approach could be adapted in the future to other routes of exposure and/or metal containing matrix materials**

*__GLC Generic Concentration Limit__: minimum concentration for a substance to trigger the classification of a mixture for a specific hazard class. **__SCL, Specific Concentration Limit__: a concentration limit that is specific to a substance and takes precedence over generic concentration limit or cut-off value

ADCA update

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7 October 2020 – EuPC RMC Telco

ADCA: status quo

- Blowing agent used for foaming 3 million tons of plastics and rubber product
- Proposed to be included in REACH authorization list (draft to REACH Committee)
- High level advocacy with EuPC, ETRMA (rubber) and ADCA TF in lead
- Intense advocacy since November 2018
- Compilation of comprehensive report (medical retrospective survey, socio-economic impact
- REACH committee decided not to prioritize ADCA for the time being

- Probably 2 to 3 years time won but then ADCA would come back on the table
- Letter to EC sent on 12 September in order to build an alternative risk management option: OEL or workplace Environmental Reference Value through a restriction
- Industry will have to support the development of alternative (including complementary studies) and follow up of regulatory process

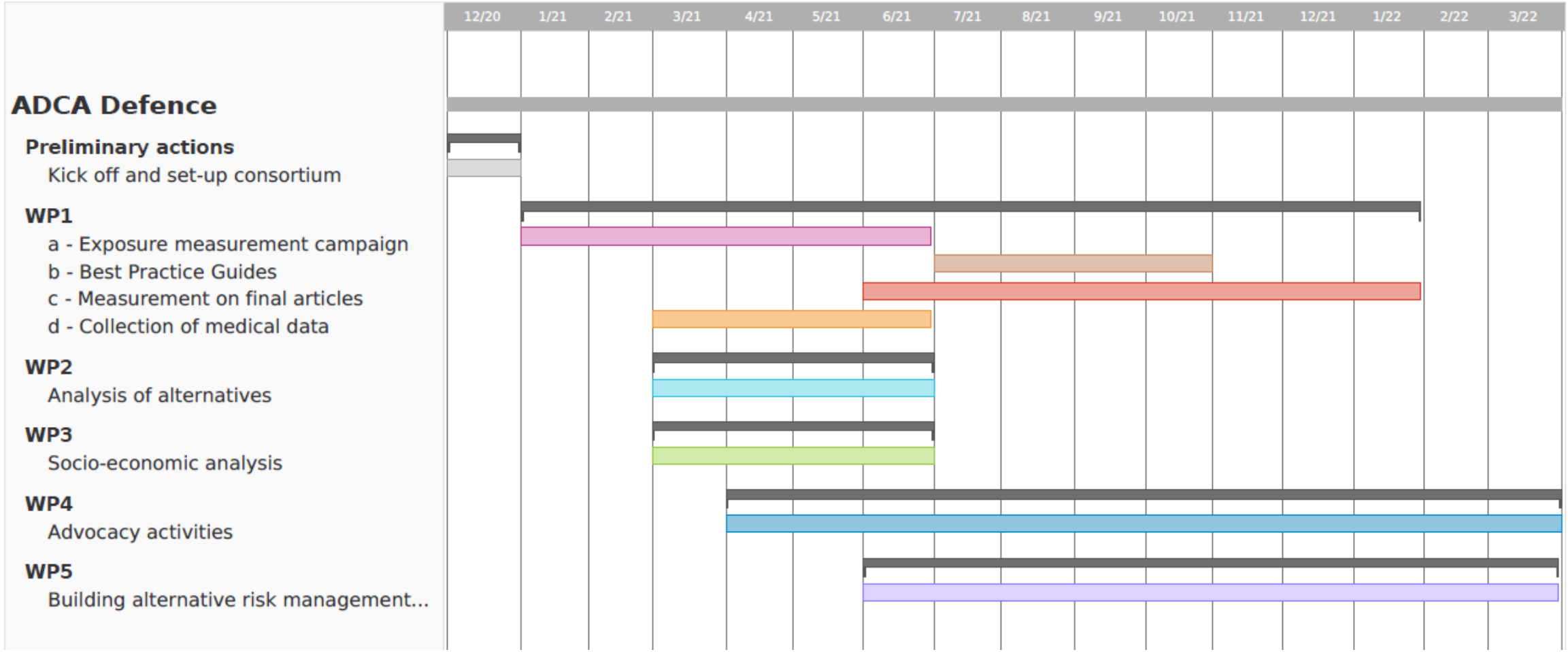
ADCA-related projects

- EuPC is proposing **two potential projects focused on ADCA**:
  - PROJECT 1: ADCA defence
  - PROJECT 2: ADCA's alternatives screening (research project). This project will involve those companies interested in looking for alternatives that might effectively replace ADCA in their products. More information on this project will be given once the related costs are clarified (probably EU or interreg funded project)
- A briefing call to discuss these projects was held in Mid-September
- **A preference questionnaire was sent to EuPC RMC members on 30 September. Companies and associations are kindly asked to submit their feedback by 13 October**

ADCA defence project: objectives

- The objectives of the ADCA defence project that we propose are:
  - Updating the medical data
  - Updating the information on potential workers' exposure through the development of a new air monitoring measurement campaign
  - Investigating the possibility of replacing the use of ADCA through an updated analysis of alternatives
  - Carrying out an updated socio-economic analysis considering both an authorisation and a non-use scenario
  - Building alternative risk management options, e.g. Voluntary Commitment or a restriction proposal together with the proposal of a workers' exposure limit

ADCA defence project: timeline



ADCA defence project: potential costs

Activity	Service Provider	Days	Cost	
Consortium Coordination	PCE	5, senior manager 20, experienced manager	5 days x 1016 €/day 20 days x 678 €/day	18,640 €
Communication	PCE	1, senior manager 6, experienced manager	1 day x 1016 €/day 6 days x 678 €/day	5,084 €
WP1a	PCE	2, senior manager 13, experienced manager + cost of testing 2000-3000 /plant	2 days x 1016 €/day 13 days x 678 €/day	10,846 €
WP1b	PCE	2, senior manager 8, experienced manager	2 days x 1016 €/day 8 days x 678 €/day	7,456 €
WP1c	PCE	2, senior manager 8, experienced manager	2 days x 1016 €/day 8 days x 678 €/day	7,456 €
WP1d	PCE	1, senior manager 4, experienced manager	1 day x 1016 €/day 4 days x 678 €/day	3,728 €
WP2	PCE	1, senior manager 6, experienced manager	1 day x 1016 €/day 6 days x 678 €/day	5,084 €
WP3	PCE External	2, senior manager 8, experienced manager -	2 days x 1016 €/day 8 days x 678 €/day -	7,456 € 35,000 €
WP4	PCE	10, senior manager 25, experienced manager	10 days x 1016 €/day 25 days x 678 €/day	27,110 €
WP5	PCE	5, senior manager 20, experienced manager	5 days x 1016 €/day 20 days x 678 €/day	18,640 €
Miscellaneous	-	-	-	10,000 €
			TOTAL	**156,500 €**

ADCA defence project: your feedback

- In case you are interested in some of the working packages, you can select specific working packages and/or combinations of working packages
- Some working packages go necessarily with other working packages. For example:
  - WP4 (advocacy activities) goes necessarily with WP1a (exposure measurement campaign), WP1b (best practice guide), WP1d (collection of medical data) and WP3 (socio-economic analysis) since they represent preliminary steps
  - WP5 (alternative risk management options) goes necessarily with WP4

EuPC RMC Meeting

OCS Europe pellet loss prevention certification

7 October 2020

Context

- Restriction on intentionally used microplastics expected to be adopted in the course of 2021. A labelling and **reporting obligation on pellet losses might be imposed by 2024.**
- In parallel DG ENV (EC) as part of the Green Deal is expected to develop policies aimed at reducing/controlling losses of those raw materials and has been regularly in contact with EuPC and Plastics Europe
- **EC expects industry to deliver during this Commission mandate i.e. by end 2024**
- **Pressure is increasing at National level** (law in France making Operation Clean Sweep mandatory as well as rigid containers to transport those, queries from authorities when renewing environmental permits by 01/01/2022)
- Increasing NGO and media attention
- Several EuPC NPA are Operation Clean Sweep Partners and their member companies are implementing measures

Potential impact and threat:

- **Additional regulatory requirements** (see France : mandatory monitoring, change of raw materials packaging to rigid containers, Echa restriction)
- **Restriction of environmental permits**
- **Increase in the level of administrative or penal sanction (fines) in case of pellet loss or not a proper management system in place**
- **Extra costs** for industry imposed by analysis and sampling and its frequency
- **Potential litigation** from NGO's and local based environmental and citizen associatons **based on increased civil liability**

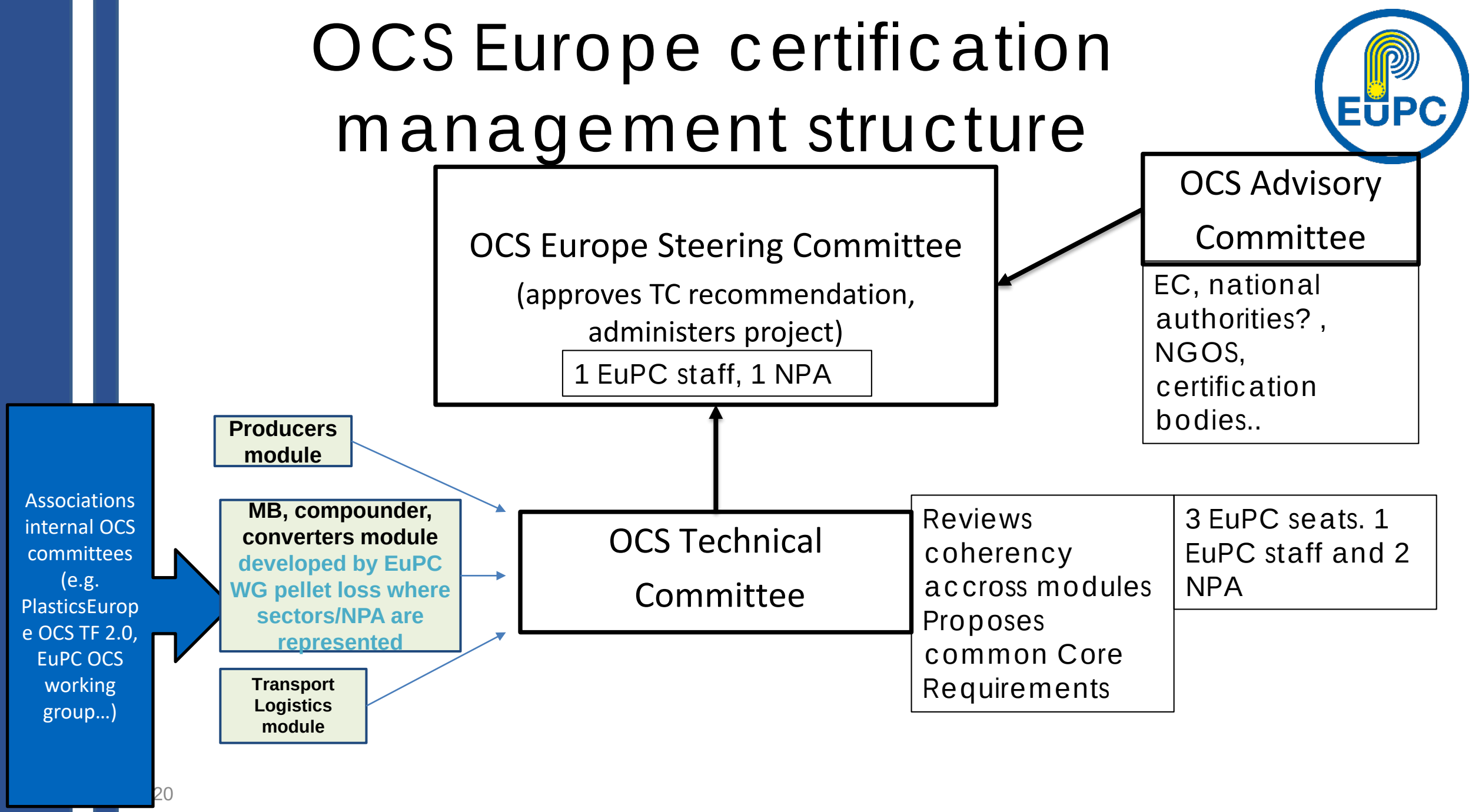
Industry strategy

- European industry **voluntary commitment to prevent pellet/powder loss**
- Covering the **whole supply chain**. Probably **the coverage of the voluntary commitment for converters and compounders should be anticipated to reach 80% of volumes by end 2024**
- In parrallel, development of an **EU wide certification relying on existing initiatives at National level**. The **reporting into that scheme would exempt companies to report directly to Echa**
- A **monitoring scheme** of pellet losses at selected facilities will enable to define Specific Environmental Categories with a pellet loss rate corresponding to the implementation of certain measures **avoiding unnecessary testing cost by companies (potentially LT funded in a LIFE project)**

Status Quo of OCS Europe certification

- 7 modules
  - Module resin production and integrated compounder
  - Module converters, compounders and masterbatchers
  - 4 modules in the SQAS system involving CEFIC (chemical industry) and the main transport and logistics partner associations ECTA, FECC, EFTCO (transport, distributor,warehouse, tank cleaning
  - 1 module for smaller transport and logisitics operators
- Contract with CEFIC and Plastics Europe subject to approval of EuPC Senior Executive Forum on 30/11.
- Converters and compounder OCS Europe TF to review and organize existing info
- Management plan draft finalized to be reviewed by members to enable kick off with CEFIC after SEF approval
- EuPC representative in different Steering Groups, TCs, TF completed
- Project manager EuPC : Marjan Ranogajec
- EuPC created and distributed three surveys on the topic in order to better understand the current situation (1) baseline, 2) transport, 3) measures, spill/loss quantification and KPIs)

OCS Europe certification management structure



How does project fit in EuPC organization?

EuPC raw materials committee

Microplastics WG
Tasks :
- Monitor scientific development on the microplastics issue (state of toxicology, exposure…
- Monitor regulatory initiatives on microplastics in genral
- Facilitate communication on the topic
- Support advocacy
- Initiate specific project when needed

Senior executive forum supported projects

OCS Europe masterbatchers, compounder and converters module

Converters and compounder OCS Europe TF
Membership : Converters and compounders experts NPA, companies/sector associations
Tasks:
-Develop masterbatchers, compounder, converters requirement module
- Review and agree on joint Core requirements with other parts of the supply chain
-Design and follow monitoring programme and converter/compounders Spercs
-Design training modules
-Exchange info on the quality of audits
-Guide and monitor the implementation of the Voluntary Commitment for masterbatchers, compounder and converters
Contribution to Overall objective
Avoid regulation related to pellet loss management or make sure the certification is the way to comply with the regulatory requirement

Project supported by ad-hoc consortia

Mira Project looking at emissions from plastics articles in roofing and flooring

OCS Europe phases/timeline

			Oct-Nov 2020	Dec 2020	Q1 2021	Q2 2021	Q3 2021	Q4 2021	2022	2023	2024	Remark
Regulatory timeline												
									OCS mandatory in FR		on pellet/powder loss to Echa (preferably by OCS Europe scheme	
Phase 0	Preparation phase EuPC/PLEUR until EuPC Senior Executive Forum validation of project with CEFIC (review and organizaiton of existing information , approval project plan and detailed tasks.											
Phase 1	Development of OCS requirements											
	Pilot (including monitoring pilot)					15 May						
Phase 2	IT implementation											Timing tbc, depending on available funding
	Accreditation and training of auditors											
Phase 3	Certification and quality management											
	Monitoring programme											
	Yearly progress report Voluntary Committemnt				update survey							

Survey on plastics pellet/powder loss assessment, monitoring and indicators

- The first step towards a harmonised assessment tool for the entire industry to monitor the release of microplastic and evaluate the efficiency of the implemented barriers
- Distributed the survey in September 2020
- A focus was on the quantitative figures
- Received 70 responses
- In the process of analyzing the results

UPDATE ON EVALUATION, SVHC, RESTRICTION AND AUTHORIZATIONS SINCE MAY 2020 NOT ELSEWHERE DISCUSSED IN THIS SLIDESET

Registry of CLH Intentions

Name	EC Number	CAS Number	Scope
Ethanol	200-578-6	64-17-5	Flam. Liq. 2, H225#Eye Irrit. 2, H319#Repr. 2, H361d#Lact., H362#STOT SE 3, H336#STOT RE 2, H373
3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctan-1-ol	211-477-1	647-42-7	Specific target organ toxicity - repeated exposure#Hazardous to the aquatic environment
pethoxamid (ISO); 2-chloro-N-(2-ethoxyethyl)-N-(2-methyl-1-phenylprop-1-enyl)acetamide	600-765-6	106700-29-2	Acute Tox. 4, H302#Skin Sens. 1A, H317#Aquatic Acute 1, M-factor=100#Aquatic Chronic 1, M-factor=10
2,3-epoxypropyl neodecanoate	247-979-2	26761-45-5	Skin Sens. 1A, H317#Muta. 2, H341
tert-butyl 2-ethylperoxyhexanoate	221-110-7	3006-82-4	Reproductive toxicity
Sodium 3-(allyloxy)-2-hydroxypropanesulphonate	258-004-5	52556-42-0	Reproductive toxicity
carfentrazone-ethyl (ISO); ethyl (RS)-2-chloro-3-[2-chloro- 4-fluoro-5-[4-difluoromethyl-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl]propionate	603-291-8	128639-02-1	Carc. 2, H351#STOT RE 2, H373#Aquatic Acute 1, H400#Aquatic Chronic 1, H410
Aqueous extract from the seeds of Lupinus albus (Fabaceae), germinated	701-313-1	-	To be further specified

Registry of CLH Intentions

Name	EC Number	CAS Number	Scope
1-[2-({[1-(4-chlorophenyl)-1H-pyrazol-3-yl]oxy}methyl)-3-methylphenyl]-4-methyl-1,4-dihydro-5H-tetrazol-5-one; metyltetraprole	-	1472649-01-6	
1,3-diphenylguanidine	203-002-1	102-06-7	Acute Tox. 3, H301#Skin Irrit. 2, H315#Eye Dam. 1, H318#Skin Sens. 1, H317#Repr. 2, H361f***#STOT SE 3, H335#Aquatic Chronic 2, H411
Rape oil	232-299-0	8002-13-9	no classification proposed
Potassium hydrogencarbonate	206-059-0	298-14-6	
mancozeb (ISO); manganese ethylenebis(dithiocarbamate) (polymeric) complex with zinc salt	616-995-5	8018-01-7	Skin Sens. 1, H317#Repr. 2, H361d#Aquatic Acute 1, H400#Aquatic Acute 1, M-factor=10
Malathion	204-497-7	121-75-5	Acute Tox. 4*, H302#Skin Sens. 1B, H317#Aquatic Acute 1, H400#Aquatic Chronic 1, H410
m-phenoxybenzyl 3-(2,2-dichlorovinyl)-2,2-dimethylcyclopropanecarboxylate	258-067-9	52645-53-1	Acute Tox. 4, H302#Acute Tox. 4, H332#Aquatic Acute 1, H400#Aquatic Acute 1, M-factor=1000#Aquatic Chronic 1, H410
hypobromous acid [active bromine]	927-683-6	13517-11-8	Repr. 1B, H360Df#Lact., H362#Aquatic Acute 1, M-factor=10#Aquatic Chronic 2, H411

Registry of CLH Intentions

Name	EC Number	CAS Number	Scope
fenpropidin (ISO); (R,S)-1-[3-(4-tert-butylphenyl)-2-methylpropyl]piperidine	614-049-6	67306-00-7	Acute Tox. 4, H302#Acute Tox. 4, H332#Eye Dam. 1, H318#Skin Sens. 1B, H317#STOT SE 3, H335#STOT RE 2, H373#Aquatic Acute 1, H400#Aquatic Chronic 1, H410
dichloromethane; methylene chloride	200-838-9	75-09-2	Carc. 1B, H350
Chlorpropham	202-925-7	101-21-3	Carc. 2, H351#Aquatic Chronic 2, H411
chloromethane; methyl chloride	200-817-4	74-87-3	Muta. 2, H341#Repr. 2, H361
4-phenoxyphenyl (RS)-2-(2-pyridyloxy) propyl ether	619-166-6	95737-68-1	Aquatic Acute 1, M-factor=10#Aquatic Chronic 1, M-factor=10 000
flazasulfuron (ISO): 1-(4,6-dimethoxypyrimidin-2-yl)-3-(3-trifluoromethyl-2-pyridylsulfonyl)urea	600-514-0	104040-78-0	Aquatic Acute 1, M-factor=1000#Aquatic Chronic 1, M-factor=100
Magnesium metaborate	237-235-5	13703-82-7	Repr. 1B, H360FD
2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one	438-340-0	119344-86-4	Repr. 1B, H360
Peracetic acid	201-186-8	79-21-0	Flam. Liq. 3, H226#Org. Perox. CD, H242#Acute Tox. 3, H301#Acute Tox. 2, H310#Acute Tox. 2, H330#Skin Corr. 1A, H314#STOT SE 3, H335#Aquatic Acute 1, M-factor=1#Aquatic Chronic 1, M-factor=10

Registry of CLH Intentions

Name	EC Number	CAS Number	Scope
Diethyl oxalate	202-464-1	95-92-1	Acute Tox. 4, H302#Eye Irrit. 2, H319#Reproductive toxicity#Specific target organ toxicity - repeated exposure#Hazardous to the aquatic environment
Tetrasodium 4-amino-5-hydroxy-3,6-bis[[4-[[2-(sulphonatooxy)ethyl]sulphonyl]phenyl]azo]naphthalene-2,7-disulphonate	241-164-5	17095-24-8	
5-chloro-2-methyl-2H-isothiazol-3-one	247-500-7	26172-55-4	
Dazomet	208-576-7	533-74-4	Acute Tox. 4, H302#Eye Irrit. 2, H319#Aquatic Acute 1, H400#Aquatic Chronic 1, H410#Skin corrosion/irritation#Reproductive toxicity#Specific target organ toxicity - single exposure#Specific target organ toxicity - repeated exposure
Reaction mass of 1,3-dioxan-5-ol and 1,3-dioxolan-4-ylmethanol	911-694-8	-	Repr. 1B, H360D
copper	231-159-6	7440-50-8	Hazardous to the aquatic environment
Trimethyl borate	204-468-9	121-43-7	Repr. 1B, H360D
Barium chromate	233-660-5	10294-40-3	Carc. 1B, H350#Repr. 1B, H360D

Registry of CLH Intentions

Name	EC Number	CAS Number	Scope
3,6,9-trioxaundecamethylene dimethacrylate	203-653-1	109-17-1	To be further specified
1,4-dichloro-2-nitrobenzene	201-923-3	89-61-2	Muta. 2, H341#Carc. 1B, H350
2,2'-ethylenedioxydiethyl dimethacrylate	203-652-6	109-16-0	To be further specified
Acetone oxime	204-820-1	127-06-0	Skin Sens. 1B, H317#Carc. 1B, H350
dimethachlor (ISO); 2-chloro-N-(2,6-dimethylphenyl)-N-(2-methoxyethyl)acetamide	256-625-6	50563-36-5	Acute Tox. 4, H302#Skin Sens. 1, H317#Carc. 2, H351#Aquatic Acute 1, H400#Aquatic Chronic 1, H410#Specific target organ toxicity - repeated exposure
N-1-naphthylaniline	201-983-0	90-30-2	Skin sensitisation
1,4-Benzenediamine, N,N'-mixed Ph and tolyl derivs.	273-227-8	68953-84-4	Reproductive toxicity

Registry of SVHC Intentions

Name	EC Number	CAS Number	Scope
Bis(2-(2-methoxyethoxy)ethyl) ether	205-594-7	143-24-8	Toxic for reproduction (Article 57c)

SVHCs

Name	EC Number	CAS Number	Outcome	Scope
Dibutylbis(pentane-2,4-dionato-O,O')tin	245-152-0	22673-19-4	Candidate list	Toxic for reproduction (Article 57c)
Butyl 4-hydroxybenzoate	202-318-7	94-26-8	Candidate list	Endocrine disrupting properties (Article 57(f) - human health)
2-methylimidazole	211-765-7	693-98-1	Candidate list	Toxic for reproduction (Article 57c)
1-vinylimidazole	214-012-0	1072-63-5	Candidate list	Toxic for reproduction (Article 57c)

Registry of Restriction Intentions

	EC Number	CAS Number	Scope
1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene (“Dechlorane Plus”™)	-	-	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.
1,4:7,10-Dimethanodibenzo[a,e]cyclooctene, 1,2,3,4,7,8,9,10,13,13,14,14-dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-, (1R,4S,4aS,6aR,7R,10S,10aS,12aR)-rel-	-	135821-03-3	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.
1,4:7,10-Dimethanodibenzo[a,e]cyclooctene, 1,2,3,4,7,8,9,10,13,13,14,14-dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-, (1R,4S,4aS,6aS,7S,10R,10aR,12aR)-rel-	-	135821-74-8	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.
1,6,7,8,9,14,15,16,17,17,18,18-dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene	236-948-9	13560-89-9	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.
rel-(1R,4S,4aS,6aS,7S,10R,10aR,12aR)-1,2,3,4,7,8,9,10,13,13,14,14-dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-1,4:7,10-dimethanodibenzo[a,e]cyclooctene	-	-	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.
rel-(1R,4S,4aS,6aR,7R,10S,10aS,12aR)-1,2,3,4,7,8,9,10,13,13,14,14-dodecachloro-1,4,4a,5,6,6a,7,10,10a,11,12,12a-dodecahydro-1,4:7,10-dimethanodibenzo[a,e]cyclooctene	-	-	The proposal intends to restrict the manufacture, use and placing on the market [covering any of its individual anti- and synisomers or any combination thereof] as substances, constituents of other substances, mixtures and articles or parts thereof.

Registry of Restriction Intentions

Substance name	EC Number	CAS Number	Scope
BPA	201-245-8	80-05-7	A) Restricting the use as an additive and the content in articles (0.02% by weight) B) Restricting content of residues (unreacted monomer) in articles – also for imported goods (0.02% by weight) C) Restricting the use of mixtures with content of 0.02% by weight for non-automated processes D) Introducing release rates for BPA from articles (products and subassemblies) during service life (weathering, leaching due to cleaning action) preventing release into the environment and/or (direct) migration to organisms.

Annex XVII (restriction)

Name	EC Number	CAS Number	Condition
Perfluorooctanoic acid (PFOA), its salts and PFOA-related substances	-	-	https://echa.europa.eu/documents/10162/7a04b630-e00a-a9c5-bc85-0de793f6643c
Diisocyanates	-	-	https://echa.europa.eu/documents/10162/503ac424-3bcb-137b-9247-09e41eb6dd5a

Annex XIV (authorisation)

Name	EC Number	CAS Number	Scope	Sunset date
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)	247-384-8	25973-55-1	PBT (Article 57d)#vPvB (Article 57e)	27/11/2023
2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327)	223-383-8	3864-99-1	vPvB (Article 57e)	27/11/2023
2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350)	253-037-1	36437-37-3	vPvB (Article 57e)	27/11/2023
2-benzotriazol-2-yl-4,6-di-tert-butylphenol (UV-320)	223-346-6	3846-71-7	PBT (Article 57d)#vPvB (Article 57e)	27/11/2023