REACH Information and Experience Exchange Forum II

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SVHC Roadmap 2020

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please don't shoot
the PIANO PLAYER
nostalgic player piano music

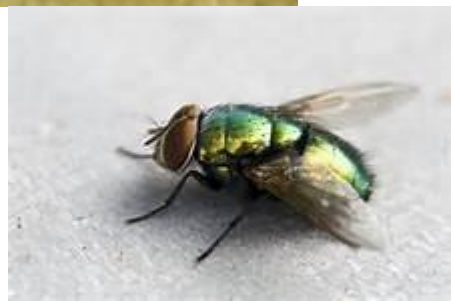
The legal text

Authorisation requirement *Article 55*

Aim of authorisation and considerations for substitution

The aim of this Title is to ensure the good functioning of the internal market while assuring that the risks from substances of very high concern are properly controlled and that these substances are progressively replaced by suitable alternative substances or technologies where these are economically and technically viable. To this end all manufacturers, importers and downstream users applying for authorisations shall analyse the availability of alternatives and consider their risks, and the technical and economic feasibility of substitution

Proportionality of authorisation

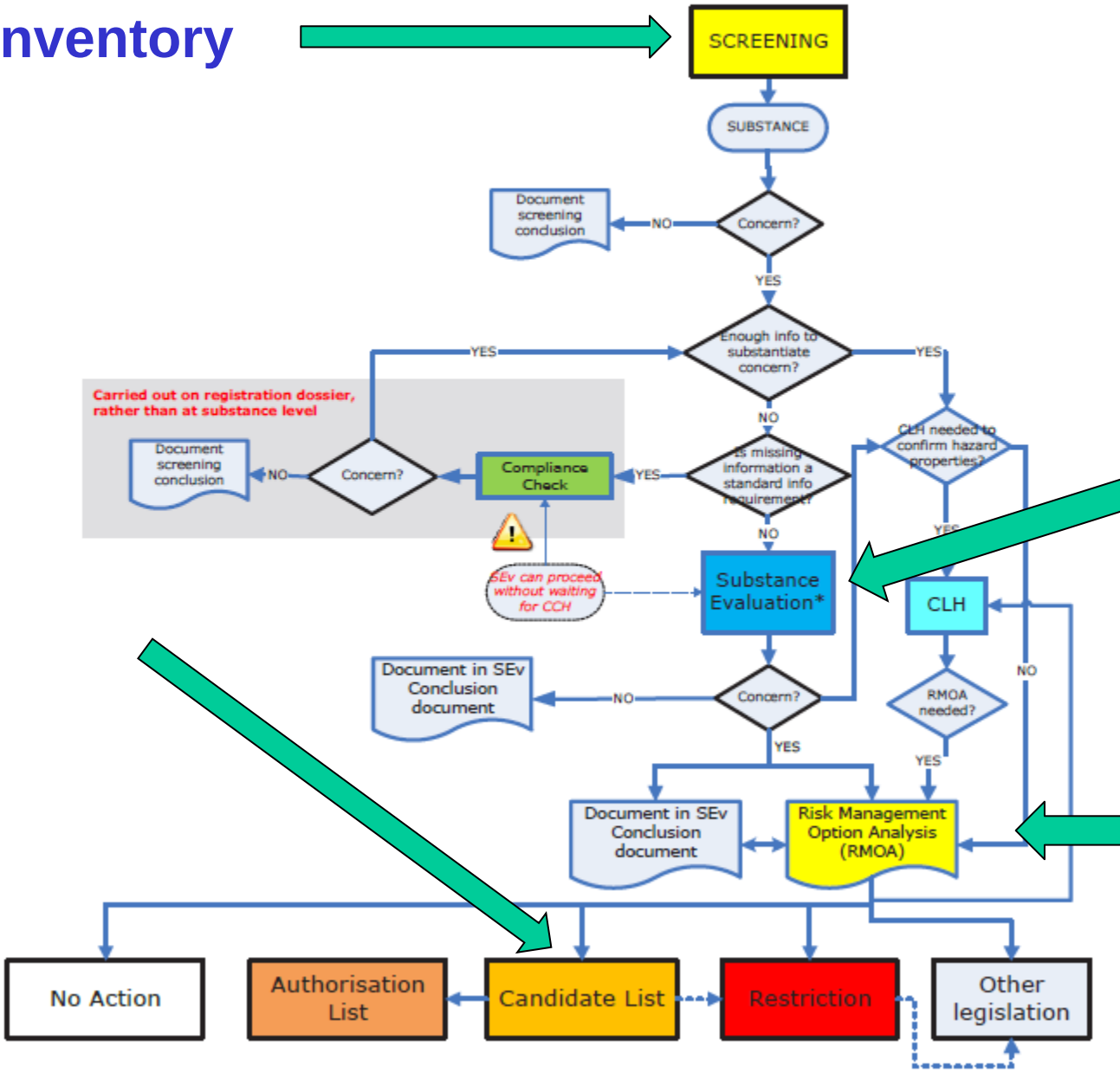


Are there still certainties?

- RIP
  - REACH Implementation Projects?
  - SVHC Roadmap to 2020 Implementation Plan!

Figure 1: SVHC Screening in wider context: inter-linkages between the REACH and CLP processes.

C&L Inventory



Screening

Substances of potential concern

RMOA

SVHC

Annex XIV

Support for the screening

- **A substance specific coordination group**
  - **CMR**
  - **Sensitisers**
- **An expert group**
  - **PBT EG**
  - **ED EG**
- *In order to be transparent in terms of complex assessment issues and to benefit from respective experience of experts from accredited stakeholder organisations, the ED expert group, as is already practiced by the PBT EG, will include nominated experts from industry organisations and other "public interest" NGOs. For the CMR and Sensitiser coordination groups such stakeholder involvement is not foreseen as these groups concentrate on practical co-ordination of authorities' work and do not deal with assessment, respectively Classification and Labelling related issues (assessment of the CMR or sensitising properties is carried out in the CLH process in accordance with the provisions set out in Art. 37 of the CLP Regulation).*

Can industry contribute?

- In the screening process?
  - In the previously mentioned PBT and ED expert groups
- In the RMOA?
  - From the presentations given at the 2020 roadmap of SVHC workshop of the Commission: Yes
  - But…only information that is not foreseen for the registration dossier
  - All the information that can be in the registration dossier should be in the registration dossier

Can industry contribute?

- In the prioritisation process?
  - Again all information has to be in the registration dossier in order to be considered
  - Even in the updated priority setting tool the wide dispersive use scoring system remains not sufficient for industry
    - Argumentation is the non consequent use of the use descriptor system by industry

One learning

- **In order to have the best outcome from the screening process and the RMOA only one message:**
  - **Your registration dossier is more or less your only chance to get it right**

Thanks for your attention