

The public interest organisations point of view Involvement in ECHA's work

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Need for effective REACH implementation

- High production of harmful/toxic chemicals in EU-25: over 200 million tonnes (2006)
- Abundance of recent studies of hazardous chemicals in environment, homes and people
- new research linking chemicals exposures to serious health impacts such as cancers or reproductive disorders





REACH is a compromise

- Good elements, weak parts, reduced scope
- still many open issues and untested procedures
- Controversial issues in reviews and in interpreting the law
- REACH implementation requires a lot of work to deliver on protection of environment and human health





Coalition of public interest organisations



Friends of
the Earth
Europe

GREENPEACE



Close collaboration with consumer organisations and trade unions





Participating in the Management Board

- + Access for observers to ECHA meetings
- + good efforts to inform public through website
- +/- Link to Aarhus Regulation on access to information
- nomination procedure of ECHA's executive director
- no public consultation on first multiannual work programme





ECHA committees & consultations

- Member State committee
- Socioeconomic analysis committee
- Risk assessment committee
- Forum: Future stakeholder exchange on national enforcement
- Making use of public consultations





Insufficient progress on candidate list

- Authorisation procedure is very important to encourage substitution
- Concern about too short candidate list and slow official process
- Comprehensive candidate list is needed for more information in supply chain & consumers and notification for SVHCs in articles

1500 (est.)

Substances
that meet
article 57
criteria

16 to date

Proposed
by MS/EC

0 to date

Candidate
List

?

Auth. List
(Annex XIV)





Helping the candidate list to grow

- SIN list 1.0 (www.sinlist.org), Chemsec: 267 substances
- REACH specific minimum list of potential candidate substances
- Relevant to authorities, businesses and consumers
- SIN 1.0 list does not contain ALL existing substances of very high concern, will be updated
- Official candidate list will be expanded and SIN list can help





Developing REACH further

- REACH guidance (SEGs and future PEGs)
- COM subgroup on REACH Annexes
- Annex XIII review: PBT criteria need to cover all PBTs
- COM subgroup on nano: close loopholes





Informing consumers

- New possibility to obtain information on hazardous substances in articles (Article 33)
- Awareness raising activities (consumer guides, websites, factsheets, consumer guides)
- Chemicals health monitor website provides latest science news on health impacts (www.chemicalshealthmonitor.org)
- Risk communication network





Reaching beyond Europe

- Collaborating with US NGOs: US relevance of SIN list 1.0 (Report by Environmental Defense)
- Linking with Japan: NGO coalition “Toxic watch”: chemicals law reform planned for 2009
- Coordinating with SAICM and POPRC activities





Conclusions

- ECHA is making serious efforts in integrating stakeholders
- Practice will show how much transparency and independence can be guarded
- Risk that ECHA gets stuck in procedures
- ECHA needs to facilitate Member State contributions for the candidate list and to ensure more resources for authorisation procedure

