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Our journey to meet the 2020 sustainable development goals

Did you know that the REACH and CLP regulations were developed to fulfil the European Union’s commitment to meeting the goal of the World Summit on Sustainable Development (WSSD)? The goal, adopted in 2002, states that “by 2020, chemicals are produced and used in ways that minimise significant adverse impacts on human health and the environment”.

With just four years to go, now is the right time to check that we are on target.

To do this, we have come up with a list of success factors and measures that explain what we think needs to be done to successfully meet the WSSD goal. They address four main themes, which are:

- Robust data available on chemicals in Europe.
- Effective regulatory risk management.
- Effective communication in the supply chain.
- Step-change for citizens, businesses and regulators.

We are aware of the challenges that we have ahead of us. We know, for example, that the data we receive through REACH registrations is not always good enough to enable us to make judgements on the need for risk management actions. We need to work together to improve the quality of data, but also to address many of the other areas where we need to get better. We share the same goal and I believe that we all want to make sure that we in Europe have the highest standards for our citizens.
At the end of October, we met with our accredited stakeholder representatives in an annual strategic workshop. We discussed our success factors and the measures that we plan to take.

Our stakeholders told us that more emphasis is needed on improving enforcement and supply chain communication. We also have to make sure that non-animal testing methods become the standard and that information on chemicals is freely available. They also stressed the importance of supporting substitution and innovation – without safer alternatives, it will be difficult to ensure the safe use of chemicals.

We are now revising our original document to take into account the feedback from our stakeholders. The next step is to discuss it with the Member State competent authorities and then with our Management Board later this year to get their feedback. After that, they will be built into our strategic planning for the coming years.

It is our job to make sure that Europe meets the goal of WSSD. I hope I can count on your help - keep challenging us to make sure that we stay on course!
REACH 2018

Register now!

TEXT BY HANNA-KAISA TÖRKKELI

The sixth and final step to successfully register your chemicals by the 31 May 2018 deadline is to submit your dossier electronically through REACH-IT to ECHA. You will receive your registration number once ECHA verifies that your dossier is complete and that you have paid the invoice for the registration fee. After completing your REACH registration, you can continue to legally supply your chemicals on the EU market.

BEFORE YOU SUBMIT

Before you log into REACH-IT to send your data, go through this simple checklist:

• Check the completeness of your registration dossier with IUCLID’s Validation Assistant and save the correct IUCLID file on your computer.

• Make sure you are part of the correct joint submission for your chemical. By law, all registrations for the same substance must be part of the same registration.

• Check that your company contact details are up-to-date in REACH-IT as ECHA might contact you about your registration.

• Check your company size category. Your registration fee depends on the size of your company, and there are guidelines to help you determine your correct size. We follow the European Commission’s definition of micro, small and medium-sized enterprises. If you indicate that you are a micro, small or medium-sized company, you will need to give documentary evidence to back this up. ECHA will ask you for this information if it is missing from your submission.

• Have a look at the document Discover REACH-IT to get familiar with the new interface of the tool.

STEPS TO TAKE

If you are a lead registrant, make sure you submit your registration well before the deadline, preferably before April 2018, so that member registrants have enough time to submit theirs. Member dossiers can only be sent after the lead dossier has been successfully submitted.

As a lead registrant, you need to:

• Create the joint submission in REACH-IT;

• Give member registrants access to the joint submission with the security token;

• Submit the lead dossier, containing the joint part of the registration.

As a member registrant, you need to:

• Get access to the joint submission from the lead registrant;

• Use the security token to confirm your membership in the joint submission in REACH-IT;

• Submit your member dossier through REACH-IT.

The REACH-IT submission wizard will guide you through the submission process – it identifies the tasks and actions you need to take according to your submission type and role (lead/member).
If your member registration relies solely on the information submitted by the lead registrant, you can both prepare and submit your dossier directly in REACH-IT. Otherwise, you will need to first use IUCLID to create your dossier and then use REACH-IT to submit it.

The REACH-IT submission wizard will guide you through the submission process – it identifies the tasks and actions you need to take according to your submission type and role (lead/member). There is also help available on each action if you need more specific assistance. There is no need to read additional manuals.

AFTER SUBMISSION

After you have submitted your dossier, it will go through the following steps in ECHA:

1. **Business rules check:** This automatic check will make sure that ECHA can process your dossier. For example, ECHA checks that your registration is in the appropriate IUCLID format and that certain administrative information is consistent with your submission type.

2. **Technical completeness check:** At this stage, ECHA checks that your dossier includes all the information required by REACH. It includes a verification by ECHA staff of certain elements that cannot be checked automatically. These additional checks cannot be replicated in the Validation Assistant. If information is missing, ECHA will inform you and you will need to resubmit a complete dossier within the specified timeframe. Read more about the technical completeness check in our September Newsletter.

3. **Invoice for the registration fee:** An invoice for the registration fee is created and sent to you through REACH-IT. You must pay the invoice by the due date, otherwise your registration will be rejected and you will need to make a new submission.

4. **Decision on your registration:** If the technical completeness check is successful and you have paid the invoice in time, your dossier is considered complete and you will get a registration number through REACH-IT.

5. **Publishing information from your dossier:** ECHA will automatically publish all non-confidential information from your registration dossier on its website. You may request that some information be kept confidential. You will need to justify this and also pay an extra fee. ECHA will assess the justification for your request and let you know.

Practical help and a hands-on webinar to show you how to submit your dossier will be held on 30 November, at 11:00 Helsinki time.

Further information:


HOW TO FIND THE LEAD REGISTRANT OF YOUR SUBSTANCE

The new version of REACH-IT, published in June 2016, makes it easier to find the lead registrant for your chemical. The lead registrant’s name and contact details are now automatically available in REACH-IT to all preregistrants of the same substance – you no longer have to find it yourself.

If the lead registrant has agreed, their name will also be published on ECHA’s website on the List of lead registrants. This list is useful especially to downstream users, who can check to see if their substance is being registered.
Coming in 2017
Simpler IUCLID for smaller companies

TEXT BY HANNA-KAISA TORKKELI

What if you no longer needed to install and manage IUCLID for your REACH registration, but could just work online? What if you were able to store your REACH data securely online with ECHA and access it from anywhere you want? This will be possible in 2017.

ECHA is doing this for small and medium-sized companies (SMEs). The first step is to make IUCLID available online, as a cloud service. The second step is to make it easier to prepare the dossier in IUCLID.

The European Commission is funding the project as part of their efforts to help SMEs to comply with the requirements of REACH.

WHAT’S IN IT FOR YOU?

By using IUCLID online, you no longer have to download and install the application – and its regular updates – onto your desktop computer or your IT servers. As everything can be accessed online, it will mean that:

• You can always work on the latest version of IUCLID;
• You will not lose any data – your data will be stored and backed up by ECHA. You can also reduce the number of local copies of your data;
• You and your colleagues can work on the data from anywhere, any time;
• You will need less manual processing of your data, for example to share files, as all your data will be freely available in one location;
• You will need fewer resources to manage the installations and hardware to host and update IUCLID.

If you are already using IUCLID, you can easily export your data from the desktop version to the online service. Of course, if you would prefer to continue working with the traditional IUCLID or use the possibility to create your member registration directly in REACH-IT, you can.

TIMELINE

ECHA will make these services for SMEs available in 2017. In mid-2017, IUCLID will be available online, accessible through an app. By the end of 2017, the cloud services will be accessible from your internet browser directly and it will be simpler for you to create a REACH registration than using the traditional IUCLID.

HAVE YOUR SAY - TAKE PART IN THE PROJECT

ECHA is currently looking for micro, small or medium-sized companies to take part in a focus group to help fine tune the ECHA cloud services to the needs of SMEs.

We are particularly interested in hearing about the kind of data you have to register. We also want to know about the issues you face when using IUCLID.

We expect to establish this group in early 2017. Participants will be interviewed and invited to give feedback on the development ideas. They will also get to test the service before the official launch.

Would you like to participate? Contact cloud-services@echa.europa.eu to learn more.

Further information:

Creating your registration dossier https://echa.europa.eu/support/registration/creating-your-registration-dossier
Multilingual explanation of terms https://echa-term.echa.europa.eu/

SURVEY: COMPANIES COULD SAVE OVER EUR 5 MILLION A YEAR

In 2015, ECHA conducted a survey of 1 000 companies that use IUCLID, asking them if they were interested in an online service.

• 70 % of the respondents were interested in an online service.
• 60 % expected the service to reduce their costs, with the majority estimating a saving of EUR 1 000 or less a year.
• The potential savings for SMEs could amount to EUR 5.4 million a year in total.
• The three main benefits were:
  1. Ability to always work with the latest version of IUCLID.
  2. Reducing the risk of losing data.
  3. Ability to work remotely from anywhere.
Want to know about... harmonised classification and labelling?

TEXT BY NEDYU YASENOV

You know the symbols printed on a white background framed within a red border on product labels? These pictograms tell the user that the product may cause harm if it is not handled correctly. ECHA Newsletter explains what is behind the labels and why the hazard classification is sometimes harmonised.

WHAT IS THE CLP REGULATION?

All substances and mixtures have to be classified and any hazardous ones have to be labelled and packaged according to the Regulation on classification, labelling and packaging of substances and mixtures (CLP Regulation) before they can be placed on the market. This is important for workers and consumers who are using mixtures such as cleaning products or paints daily. Some of these contain hazardous substances that need to be handled with care and kept away from children.

The CLP Regulation entered into force on 20 January 2009. It aligns the EU legislation with the United Nations’ Globally Harmonised System (GHS). The internationally agreed classification criteria and labelling helps to protect human health and the environment. The standardised statements and pictograms are useful, for example, when the hazards of chemicals are communicated to workers and consumers using them.

WHEN IS A CLASSIFICATION HARMONISED?

The most hazardous substances, in particular those that cause respiratory sensitisation, cancer, mutations, or are toxic for reproduction, have a harmonised classification.

This is agreed at EU level and is legally binding for all suppliers of that substance.

EU Member States, manufacturers, importers and downstream users of substances can propose that a substance has a harmonised classification if they believe it to be hazardous. Member States can also propose to revise an existing classification.

A public consultation is organised every time there is a proposal to harmonise the classification of a substance. The consultation lasts for 45 days and anyone, from the EU or other parts of the world, can comment. Comments are received from EU Member States, individual experts, companies and organisations representing industry or civil society.

After the consultation period, ECHA’s Committee for Risk Assessment (RAC) prepares a scientific opinion on the proposal, taking into account the received comments. The opinion has to be adopted within 18 months from the receipt of the proposal. RAC examines the evidence for all hazard classes proposed, and those that were open for commenting during the public consultation. They may also consider another category more appropriate for the classification of the substance after examining the evidence.

ECHA sends RAC’s opinions and any comments received during the public consultation to the European Commission, which decides on the proposal and updates the list of the harmonised classification in Annex VI to the CLP Regulation.

SELF-CLASSIFICATION

For most substances, the classification is not harmonised. Even when a substance has a harmonised classification, it may not be for all the hazard classes. In these cases, companies need to self-classify their substances and mixtures.
when a substance has a harmonised classification, it may not be for all the hazard classes. In these cases, companies need to self-classify their substances and mixtures. It is important to collect all available information, evaluate its reliability and review it against the classification criteria before concluding on the self-classification.

Important sources of information are industry associations and the existing classifications in the C&L Inventory.

**CLP - THE BIGGER PICTURE**

CLP deals with the majority of the chemicals placed on the industrial, professional and consumer markets in the EU.

More than 20 EU laws refer to classifying and labelling chemicals, meaning that once a substance is classified, other legal requirements kick-in to control their use. These range from the requirement on employers to undertake workplace risk assessment to the possibilities to get an eco-label on a product.

When substances cannot be placed on the market for certain uses because of their classification, companies need to find safer alternatives. For example, substances which are classified as carcinogenic, mutagenic or toxic for reproduction cannot be used in mixtures supplied to consumers above certain concentration levels. A further example is that chemicals with this classification can be added to the Candidate List of substances of very high concern, which means that in the future, an authorisation may be needed for continued use of the substance. A recent example is bisphenol A, which was classified as toxic for reproduction category 1B in July 2016 and which is now proposed for the Candidate List.

**Further information:**


### Did You Know?

- Over 4 200 substances have a harmonised classification.
- The C&L Inventory includes over 130 000 substances.
- There are over 6.5 million notifications for substances in C&L Inventory.

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**Further information:**


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**Manufacturers and importers of substances and mixtures must notify ECHA of each substance that meets the criteria to be classified as hazardous and is placed on the market on its own or in a mixture.**

They also have to notify ECHA about each substance that has to be registered under REACH. If the substance has already been registered, then there is no need to notify ECHA about the classification separately.

Companies have to make every effort to agree on the self-classifications and labelling of the same substance. There should not be different classifications for the same substance without a justified reason.

CLP notifications are submitted free-of-charge and there is an online tool designed to guide companies through the process. Mixtures themselves do not have to be notified, but they cannot be placed on the market unless all the hazardous substances they contain have been notified by their manufacturers or importers.
IKEA: Putting consumer safety first

INTERVIEW BY PAUL TROUTH

From their ban on formaldehyde in wood coatings in 1993, through to the removal of per- and polyfluoroalkyl substances (PFAs) from textiles in 2016, IKEA has a track record of removing hazardous chemicals from their products. We spoke to Charlott Jönsson, Team Manager of the Laws and Standards Chemistry Team at IKEA of Sweden AB, to find out more about the path IKEA has taken to ensure their products are safe for their customers.

BEING CLEAR WITH SUPPLIERS

IKEA has set company-wide safety standards to minimise the use of potentially harmful substances in their products.

“We are currently working on ways to communicate more about our work with chemicals. Our customers’ safety is one of the most important points on our agenda. Our approach has always been to refrain from using chemicals that may be harmful to people. We also try to choose better alternatives, wherever this is possible,” Ms Jönsson explains.

The standards are written out in detailed specification documents, which the company gives to their suppliers. They need to follow them to comply with the chemicals legislation and stay in business with IKEA. By following the specifications, suppliers are able to minimise any potential harmful effects that substances in their products may have on consumers and the environment.

GLOBAL STANDARDS THAT PUT SAFETY FIRST

When there are concerns about articles or substances in them, IKEA goes back to their supply chain to pinpoint where in the manufacturing process the issue occurs so that it can be corrected. In Ms Jönsson’s opinion, having a good working relationship with suppliers who understand their obligations and are aware about the substances used throughout the production process is vital.

“We work together very closely with our suppliers to isolate and fix any issues. It is a pre-requisite for our suppliers to meet our IWAY standards, which are a code of conduct they have to adhere to if they want to stay in business with us. They know that customer safety comes first for us, and it needs to be a high priority for them, too,” Ms Jönsson insists.

IKEA increasingly requires its suppliers to provide a breakdown of the materials used and the substances contained in articles, usually in the form of safety data sheets (SDSs). This is a requirement for all their suppliers around the world, not just in Europe. “The standards in Europe are extensive, mostly due to REACH. We demand that all of our suppliers adopt the same standards. This means that there is extra pressure on those suppliers in other parts of the world to follow the high standards for chemical safety that Europe has,” Ms Jönsson says.

“We use ECHA’s database extensively, and so are happy that it is openly available and free-of-charge. It is a key resource for us. It helps us to get information quickly and resolve any issues in our production process. This has obvious beneficial knock-on effects for our customers’ safety,” she explains.

BEYOND SUBSTITUTING CHEMICALS

IKEA’s approach tries to go further than just substituting dangerous chemicals with safer ones.

One example of this is the company’s efforts to avoid using flame retardants. They are only allowed...
communicating about safety

to be used with IKEA’s approval but some, including organic brominated compounds and chlorinated paraffins, are completely banned from their products.

Flame retardant chemicals help slow the speed at which fires spread and reduce the chances of ignition, but since they are not chemically bound to the products they are added to, they have the potential to leach out into homes and contaminate the environment. “We don’t only want to assess alternative chemicals that could be used as replacements, but we want to develop and use better materials with physical properties that create a physical barrier that prevents ignition,” she explains.

CUSTOMER IMPORTANCE

Much of the chemical safety work goes on in the background, away from the retail side of the company, but customer feedback has a role to play in steering the company’s communication. “Our customers can help to highlight areas that we should be focusing on. If several questions with the same theme repeatedly come up, we keep a track of these, and if there is a potential concern about particular products or substances, we can address this directly with information from our supply chain,” she says.

Under REACH, customers have the right to ask whether the articles they buy contain certain hazardous substances that are included in the Candidate List of substances of very high concern. By law, IKEA, and all other retailers, have 45 days to give sufficient information, free-of-charge to their customers that will allow them to use the articles safely. “We are fully aware of our obligations as a retailer and are working hard to make sure that our staff are prepared for any questions they get from customers on the safety of our products,” Ms Jönsson concludes.

Further information:

IWAY standard

Are there safer alternatives?
https://echa.europa.eu/chemicals-in-our-life/are-there-safer-alternatives

Candidate List of substances of very high concern
https://echa.europa.eu/candidate-list-table

Use your right to ask

The price you pay
http://www.youtube.com/watch?v=WSWIAEDjF5g

From their ban on formaldehyde in wood coatings in 1993, through to the removal of per- and polyfluoroalkyl substances (PFAs) from textiles in 2016, IKEA has a track record of removing hazardous chemicals from their products.

IWAY STANDARDS

The IKEA Way on purchasing products, materials and services (IWAY) is a global code of conduct for IKEA’s suppliers. It outlines requirements related to the environment, social and working conditions.

For chemicals, this includes the suppliers having valid safety data sheets (SDSs); documented routines for purchasing, storing, handling and using chemicals; records of competence and training; and appropriately labelling their chemicals with easy to understand explanations to ensure worker safety.
Nanomaterials – angels or demons?

INTERVIEW BY JAKOB AAAHAUGE

Why did the European Commission decide to set up an observatory for nanomaterials instead of a registry? How will this affect you as a European consumer? Are nanomaterials actually dangerous? We spoke with Otto Linher, Deputy Head of Directorate General Enterprise’s chemicals unit at the European Commission and Jukka Malm, the Deputy Executive Director at ECHA to get some clarity.

Nanomaterials are widespread in everyday products and have been for a long time. The European Commission has asked ECHA to host an observatory to gather data and information on nanomaterials. The alternative option would have been to set up a registry that would have required industry to register nanomaterials in consumer products. The decision to go for an observatory has sparked criticism from stakeholders, arguing that the observatory will not have the information or power to protect consumers and workers against the hazards of nanomaterials.

WHY AN OBSERVATORY?

In recent years, the Commission has investigated how the EU should deal with nanomaterials. “Due to the widespread use of nanomaterials, setting up a registry of all products containing nanomaterials would be extremely burdensome and expensive. The impact assessment estimated costs of more than EUR 5 billion in the first year and EUR 2.5 billion annually thereafter. Additionally, that information would not help the consumer or worker. Firstly, because they would not have access to the database anyway, as it would contain confidential information, and secondly because that information would not tell them whether there is a risk in using those products,” Otto Linher of the Commission explains.

One of the aims of the observatory is to filter the available information so that it suits the audience, according to Linher. “If you tell consumers that a particular watercolour paint contains nanomaterials, what would they do with that information? Rather than registering all types of watercolours, it is more important to give an overview of where nanomaterials can be found in general and to tell people what the presence of nanomaterials actually means for them. They should take issues seriously but at the same time not worry when there is no reason to.”

INFORMATION IN ONE PLACE

The observatory will not result in new data, but will collect the information that is already available on nanomaterials in one place and present it in an easily understandable way.

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observatory needs to be useful for consumers and workers. The issue of nanomaterials is very scientific and to help the general public understand and to correctly interpret any of the content, special attention needs to be paid to the way this is communicated.

**SHOULD WE BE WORRIED?**

Some stakeholders have voiced their concern that an observatory will not be sufficient to protect European consumers from the potential hazards of nanomaterials. Mr Linher does not agree. “I think that the concern is based on a deeply entrenched and erroneous view that nanomaterials are few, unknown and potentially dangerous. While there are indeed issues, for example with fine dusts in working environments, there are few, if any, indications that there are issues with the vast majority of everyday life products containing nanomaterials. My key message would be rather to focus work on identifying relevant issues and potential risks than registering what is not worth registering,” Mr Linher says.

Mr Malm is keen to have a dialogue with stakeholders. “Many stakeholders and some Member States think that the observatory is not strong enough as a measure to deal with their concern. While it is true that the observatory as such does not bring new obligations and therefore cannot really fill data gaps, it can still help different audiences to understand what information we have and what is missing. We also know that the current registrations of substances do not yet cover all nanoforms that are on the market. We lack information on the safety aspects of those and I understand why that lack of information is causing concerns,” he says.

Mr Malm emphasises the need for legal clarity on how the safety of nanomaterials should be assessed under REACH. He explains that there is a common agreement in the OECD that nanomaterials need to be seen as any other substance. “This makes it difficult to discuss the risks of nanomaterials on a general level. You cannot automatically rely on the data of the bulk form. All nanomaterials have to be assessed case-by-case as any other substance. Some nanomaterials may be hazardous, and some may not.”

Despite the observatory not generating new data, Mr Malm thinks that it can bring added value to European citizens. “There may be more information available than many people are aware of and by presenting that information we can already increase our understanding of nanomaterials.”

**NATIONAL REGISTRIES**

Some Member States, for example Denmark and France, have created national registries for nanomaterials. Whether this data can one day be part of the EU observatory, is still too early to say. “We want to discuss with the Member States how we can best use the data they are generating. We know that there are limitations to what they can make public because the national registries are based on notifications from individual companies and the detailed information is often considered confidential. We want to see if there is at least summary level information that could be used in the EU observatory,” Mr Malm says.

**WHAT HAPPENS NEXT?**

ECHA is now preparing the first phase of the observatory which is planned to go live around summer 2017. There will be web content on what nanomaterials are, how they are used, safety issues and links to the research projects. Both the Commission and ECHA expect the observatory to become a reliable, transparent and user friendly source of information on nanomaterials, where people with different backgrounds and needs can find information on the safety and use of nanomaterials. “It would be a success if ECHA and the observatory are accepted as a sound source of information for the general public. The observatory should contain a good overview of the market and products, as well as health and safety issues. It should also de-mystify the debate on nanomaterials, and play an active role in the nanomaterial debate itself,” Mr Linher concludes.

**Further information:**

Nanomaterials
https://www.echa.europa.eu/regulations/nanomaterials

Nanotechnology

Multilingual explanation of terms
https://echa-term.echa.europa.eu/

Online questionnaire – What do you want to know about chemicals
Harmonising the information submitted on hazardous mixtures – new tools coming

TEXT BY JAKOB AHAUGE

To make it easier for poison centres to give advice in emergency situations, companies will need to put a unique formula identifier (UFI) on the label of their hazardous mixtures. They will also have to give this identifier to the poison centres as part of the notification, which has to be in a harmonised format. The UFI generator is now available on ECHA’s Poison Centres’ website.

When a poison centre gets a call about an emergency related to chemicals, they need to be able to find out which substances in the product are causing the poisoning. Quick access to this information allows the poison centres to give the best possible advice to medical staff, consumers or workers that need help in an emergency situation.

UNIQUE FORMULA IDENTIFIER

Importers and downstream users will need to put a unique formula identifier on the label of their hazardous mixtures. This identifier will create a direct and unambiguous link between the mixture they place on the market and the information on that specific mixture they provide to the poison centres. This will make it easier for the poison centres to instantly find the information they need to provide an appropriate emergency health response.

HOW DO YOU GENERATE THE UFI?

Unique formula identifiers are needed from 2020 for hazardous mixtures intended for consumer use, and 2021 and 2024 for professional and industrial uses, respectively. Therefore, you don’t need to generate the codes yet, but it is a good idea to start preparing, because you need to make sure that the identifier will fit on the label of your mixture.

There are two ways to generate the UFI. ECHA’s website hosts the UFI generator, a web-based tool, which will allow you to insert your company’s VAT number and a formulation code that you have given to your formulation. The tool will then create the identifier for you.

DID YOU KNOW?

Why do we have poison centres in the EU?

All Member States have a body that is appointed to receive data from importers and downstream users placing hazardous chemical mixtures on the market. These bodies are often referred to as poison centres. The centre is a hub for information on poisoning.

Besides offering a service to health care personals and to the general public in cases of emergency, the centres also formulate preventive and curative measures and undertake statistical analysis.

The poison centres in the EU receive on average 600 000 calls every year related to different kinds of emergencies. About half of the cases are related to accidents involving children.
Alternatively, you can integrate the UFI generator directly into your own IT-system. This could be particularly useful and efficient for companies managing large numbers of formulations and that need to create many identifiers.

You can already now get the developer’s manual from ECHA’s Poison Centres’ website and start planning how to make the generator part of your own system.

**PREPARING THE INFORMATION IN A HARMONISED FORMAT**

Information on hazardous mixtures will need to be provided to poison centres in a harmonised format. You can choose between two tools to do this. A draft version of each of them is available on ECHA’s Poison Centres’ website and they will be updated in 2017.

The poison centre notification format is useful for companies that want to integrate the new data requirements in their own IT system. This could be the case for companies dealing with large numbers of formulations. You can already download the draft version of the format and see what you need to do to prepare your own system. However, remember to wait for the updated version before you start integrating it into your IT infrastructure.

If your company only manages a small number of formulations, you could also choose to use the online poison centre notification editor to prepare your submission for the poison centres in the correct harmonised format. This way, you can simply go to ECHA’s Poison Centres’ website and use the editor to prepare your notification. You can already familiarise yourself with a draft version of the tool.

**WHAT’S CHANGING?**

**Who needs to act?** Importers and downstream users

**What needs to be done?** Submit a notification on hazardous chemical mixtures to poison centres in a harmonised format with all the required information including:

- The chemical composition of the hazardous mixtures;
- The UFI;
- The identity and concentration ranges of ingredients;
- The product category according to the harmonised European product categorisation system.

**When?** Before placing a hazardous mixture on the market. Phased deadlines for the submission of information will apply on 1 January in a stepwise manner, depending on the intended use of the mixture:

- Consumer uses: 2020
- Professional uses: 2021
- Industrial uses: 2024.

**Further information:**

Poison centres
https://poisoncentres.echa.europa.eu/

European Commission’s announcement on harmonising hazard and safety information for use by poison centres

Tools
https://poisoncentres.echa.europa.eu/tools

CLP Regulation
https://echa.europa.eu/regulations/clp

With the help of the unique formula identifier, poison centres can instantly find the information they need to provide an appropriate emergency health response.

**WHAT IS A UNIQUE FORMULA IDENTIFIER?**

- A unique code that will be printed on the label of the product.
- It creates an unambiguous link between a mixture placed on the market and the information on that specific mixture submitted to poison centres, for precise and rapid identification of the chemical formulation of the product.
- You will need to use it from 2020 onwards.
Universities, public funding and business – a match made in heaven?

INTERVIEW BY PÄIVI JOKINEN

Finding funding and getting your business started is not easy for a small start-up company. Add to that the complexity of trying to find a safer alternative to traditional chromium plating and you see the scale of the challenge. We spoke with the Chief Executive Officer (CEO) of a Finnish start-up company Savroc, to find out what it takes to turn a promising green technology idea into a reality.

To reduce the toxic hexavalent chrome used in decorative and functional coating processes, Savroc has developed an alternative multilayer coating method using trivalent chrome-based chemicals. Since hexavalent chrome is carcinogenic for people who are exposed to it in their work and it is polluting the environment, finding a safer alternative would bring societal benefits. According to Osmo Jahkola, the CEO of Savroc, it has been possible to use the trivalent chrome as an alternative for decorative coatings for some time now, but for functional coatings where corrosion and wear resistance is needed, trivalent chrome has not had the necessary technical performance. He says that although Savroc’s innovation cannot replace the use of hexavalent chrome completely, it could be used as an alternative in many industry processes.

RESEARCH DONE AT THE UNIVERSITY

Collaboration with universities and academia is often a way of innovating safer alternatives. Savroc is a good example of that, since the company itself and their alternative technology, would not exist without the Savonia University for Applied Sciences.

The founders of Savroc, Juha Miettinen and Jussi Räisä, were employed by the university as researchers and teachers on material technology until they founded the spin-off company Savroc in 2012. Their work with trivalent chrome-based platings and coatings started already in 2008. “Of course it is possible to invent something by accident, but in most cases, a lot of time and hard work is needed. For our technology, the time consuming research was done at the university,” Mr Jahkola explains.

It was the university environment and mind set that made the innovation possible. The research allowed them to study the issue in a wider perspective, perform many tests and learn from the mistakes during the process. “As an SME or a start-up company, you do not usually have the luxury of making mistakes and learning from them – you are lacking time and financial resources for that. However, having the freedom to fail, brings you closer to the right solution,” Mr Jahkola says.

The university’s network of experts and high-quality premises also played an important role. “The university can provide you with very expensive equipment that a start-up company could not afford to buy. We would have never come up with this solution if the researchers could not have used the university’s facilities before Savroc was founded,” Mr Jahkola adds.

FINDING FUNDING

Developing new products and processes is very time consuming. For a small company, this means having the necessary financing in place so that you can focus on the operational work. “You have to map and monitor the different funding programmes but also contact suitable companies and people who can support you,” Mr Jahkola points out. A good starting point when looking for financing are the national agencies that support innovation. “For us, it has been very important to get funding from the Finnish Funding Agency for Innovation (Tekes). Without them, there would be no Savroc today,” Mr Jahkola says. Direct funding and research and development loans received from Tekes allowed Savroc to continue the process development even though they have not had regular income yet.

The European Union also has several funding programmes for SMEs and for companies working on research and innovation. Savroc has been interested in applying for EU funding but, so far, they have not had the resources. “We have understood that it is difficult to get EU funding and you would need to have one person working full time on the application. For us, this has
not been possible. We have had our hands full with the operational work and it is very uncertain if the time put into the application would pay off,” Mr Jahkola says. However, applying for EU funding in the future is still something Savroc sees as a possible option.

FIND PRIVATE INVESTORS

When it comes to finding private investors, Mr Jahkola emphasises that companies need to be active. However, he points out that it is not only about finding someone who is willing to invest money in you, it is also important to find the right kind of investors who can contribute to the success of the company. “If you only have a few people working for the company, you are all the time lacking expertise or knowledge. You really want to have a Board that has a wide range of expertise from different fields.”

Mr Jahkola encourages small company owners’ to attend seminars and events where they can meet future investors. It is important to get the news out and make investors aware of the new product or technology that you have developed.

The most important thing to keep in mind when meeting possible investors is to be well prepared. The first question they will ask is to see your business strategy and plan. “If you are not capable of doing a proper business plan yourself, you need to use an expert. You need to have good tools when you meet investors. If they understand that you don’t have a proper strategy and plan, you are wasting everybody’s time,” Mr Jahkola says.

However, the bottom line is that your product or technology must be good enough to get the investors’ interest. There are many requirements for new solutions and they are not easy to fulfil. “Your innovation should be cheaper than the existing solution, better when it comes to technical performance and it must be environmentally friendly and safe. It sounds tough, but these are the rules of the game.” At the same time, green technology is something that investors are very keen to see today. Therefore, if your innovation is safer for people and the environment, you have a very good chance of attracting investors’ interest in it.

The other key client that small companies need to convince are the customers – particularly the big companies and important players in the market. Many think that if big companies in the same business have not been able to bring a greener alternative to the market, then how can a small company do it? “To solve the problem, you need to let prospective customers test your solution for themselves. This takes a lot of time, but you have to give customers the chance to test it out and show that your innovation really works for their needs,” Mr Jahkola explains.

STRICTER REGULATION COULD PROMOTE ALTERNATIVES

According to Mr Jahkola, most companies are afraid of change. The REACH Regulation and especially the authorisation process, can have a great impact on Savroc’s business. “Most companies using hexavalent chrome will only change to a safer alternative when they really have to. That is why we would welcome even stricter regulation, because it would push companies to explore safer alternatives.”

The decision-making process on whether to grant authorisation for certain uses of chromium VI is still ongoing and Savroc has participated in some public consultations, where they have explained their alternative technology. “We are looking forward to hearing what happens next. We hope that if the Commission grants the authorisation, it would not be for too many years. It would be wise to gradually ramp up the alternative technologies during an eventual transition period,” Mr Jahkola concludes.

Further information:
REACH authorisation
https://echa.europa.eu/regulations/reach/authorisation

Candidate List of substances of very high concern
https://echa.europa.eu/candidate-list-table

Are there safer alternatives?
https://echa.europa.eu/chemicals-in-our-life/are-there-safer-alternatives

The Finnish Funding Agency for Innovation
https://www.tekes.fi/en/

Horizon 2020 – EU Research and Innovation programme

Life programme
http://ec.europa.eu/environment/life/funding/lifeplus.htm

SAVROC

Savroc is a small university spin-off company based in Kuopio, Finland. It employs three people directly and has altogether around 10 people working for the company.

Savroc develops and markets tough chromium solutions for several industrial applications. Their patent pending technology uses trivalent chrome-based chemicals that are safer for people and the environment.

www.savroc.com
Now’s the time for wise substitution

INTERVIEW BY IRENE POZA LATORE

The time when the European textile industry was characterised by mass-market production is long gone. Today, it stands for high quality production which brings value to many business areas including fashion, automotive, construction and many other industries. We spoke with Mr Mauro Scalia, Manager of Sustainable Businesses at the non-profit trade organisation Euratex, to hear about this development and learn how REACH has affected the industry.

REACH IS A BOOSTER FOR INNOVATION

Mr Scalia calls REACH the official instrument that can drive standards and changes in supply chains. Chemicals are used in many different stages of textile and garment production and they are needed to give textiles specific functionalities. "Rather than being seen as an inhibitor to the industry, REACH should be used as a booster for innovation across the supply chain and an instrument for establishing a level playing field in the industry," Mr Scalia says.

According to Mr Scalia, REACH has improved data sharing, transparency and communication along the supply chain. "REACH obliges industry to provide safety data sheets (SDSs) and relevant exposure scenarios including information on environmental hazards and safety precautions. However, ensuring coherence and completeness of the SDS still remains a challenge, especially for smaller companies supplying larger retail chains."

NEED FOR BETTER ENFORCEMENT

However, the level playing field in the textile sector is a complex concept. "In Europe, there is generally strong scrutiny on manufacturers of chemicals. But competition between companies that do not face the same obligations or scrutiny may lead to unfair practices and low quality goods especially in the absence of adequate and more visible market surveillance mechanisms," Mr Scalia points out.

He gives an example of the RAPEX reports from the last three years, which suggest that more surveillance on products on the EU market is needed. "RAPEX’s data shows how often a textile product imported in the EU market breaches REACH and therefore can potentially pose a risk to European consumers."

Mr Scalia insists that if rules are not equally enforced or compliance is not verifiable, the gap between REACH-compliant business operators and competitors outside the EU and with lower standards becomes wider. That will disturb competition and undermine the protection of consumers and the environment.

MORE INNOVATION TAKING PLACE

Mr Scalia thinks that there is a growing culture for sustainability in the textile industry. There is a clear trend within all segments of the industry towards investing in and committing to reducing or phasing out the use of harmful chemicals.

There is a growing culture for sustainability in the textile industry and a clear trend within all segments of the industry towards investing in and committing to reducing or phasing out the use of harmful chemicals.

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As harmful substances are restricted, industry and particularly the small and medium-sized enterprises (SMEs) need help to successfully replace them with safer alternatives. At the same time, it is important to make sure that these alternatives are technically feasible and efficient enough. According to Mr Scalia, substitution is still a big challenge for SMEs that have significantly less resources and may lack the necessary expertise in-house.

Finding safer chemicals rarely happens in a vacuum. Cooperation between different actors improves the chances to make a breakthrough. “We are aware of research and innovation projects taking place all over Europe to assess perfluorooctanoic acid (PFOA) (CAS 335-67-1) substitutions for different applications which involve SMEs and universities. Some of them benefit from EU programmes for research and innovation, like LIFE+ or Horizon 2020. This illustrates the complexity, but also shows good examples of how regulatory developments and collaborative research are part of the same goal,” Mr Scalia explains.

**BUYER BEWARE!**

“If you, as a consumer, want to have a better product, you must be prepared to pay a reasonable price for it,” Mr Scalia insists. Sustainable products require know-how, investments and a constant search for better solutions as well as a trustworthy and responsible supply chain. All of this comes at a cost.

Therefore, there is a need to change consumer behaviour. It is not enough to be prepared to pay a fair price for a safe product in theory; consumers also need to do this in practice. “If you are in doubt whether the product that you are planning to buy is safe, take the time to check it before you buy it,” Mr Scalia urges. He reminds that everyone plays an important role in wiser substitution – the business side, researchers, authorities and ultimately also consumers.

**Further information:**

- Information on chemicals [https://echa.europa.eu/information-on-chemicals](https://echa.europa.eu/information-on-chemicals)
Authorisation of biocidal products now more flexible
TEXT BY VEERA SAARI

With a recent change in legislation, there are now more options for you to get an authorisation for your biocidal product when the same product has already been authorised. We asked Dr Marko Susnik from the European Association of Craft, Small and Medium-Sized Enterprises (UEAPME) how the changes help small businesses.

The Same Biocidal Products Regulation provides an easier, faster and cheaper way to get an authorisation for your product when an identical product has already been authorised (or is waiting to be). Starting from an already existing authorisation application for an identical product authorisation can be thousands of euros cheaper than, for example, a separate national authorisation – and you will get the decision faster. It is also less time-consuming for you, as you don’t have to fill in a IUCLID file but simply apply through the biocides submission tool, R4BP 3.

The regulation was amended in October 2016 to offer more options to benefit smaller companies in particular. You can apply for authorisations with a reduced scope:

1. For a **national** authorisation for your product when the identical product has a Union authorisation (or is waiting for one).
2. For an authorisation for a single **product** or a smaller **product family** when there is an already authorised product family (or it is waiting to be authorised). You can use this option when the original product family has a Union, national or simplified authorisation.

For example, if there is already an application to get a product family authorised at Union-level and you are entitled to use it as starting point, you can apply for a separate authorisation for just one of the products (or a smaller family of products) in one Member State. Before this change to the legislation, you would have had to apply for exactly the same options as the original application: the whole product family for Union authorisation.

**APPLY FOR WHAT YOU NEED**

Dr Marko Susnik, Advisor for UEAPME, says that applying for national authorisation based on an existing Union authorisation is a real benefit for smaller companies, particularly in smaller countries. “Companies in Austria, where I live, are very active in exporting biocidal products to the central European countries. For them, it’s too costly to apply for authorisation for the whole EU market, which they don’t need.” Now, they can go for the less expensive, national authorisation route for their identical product.

**REMOVING BARRIERS**

“Without these changes in the Same Biocidal Products Regulation, it could have been a show-stopper for small companies in the long run,” Dr Susnik says. This is why, together with the European Chemical Industry Council (Cefic) and the Association for Soaps, Detergents and Maintenance Products (A.I.S.E.), UEAPME lobbied to change the legislation. “We were able to make the process more flexible for small companies – without any negative impact on the level of protection for EU citizens’ health and the environment. It is early for these to be problems yet, but it is better to fix the rules now when the issue is not yet acute for companies,” Dr Susnik explains.

**PRACTICE WILL MAKE PERFECT**

The first Union authorisations are expected to be granted in 2017. According to Dr Susnik, the process needs to speed up so that companies can gain experience. “We do not want to see the market dominated by a couple of big players only because the fees and the processes are too heavy for the smaller ones.” He says that even though Union authorisation is not widely used yet, it could become much more attractive for small companies once the process is seen to be working and the necessary support is available.

He finds similarities with the REACH authorisation process in its early stages. “In the beginning, we saw predominantly large companies applying for authorisation. But if you look now for example at the recent chromates authorisation case under REACH, it was dominated by small companies,” he concludes.
What do you want to know about chemicals?

TEXT BY ADAM ELWAN

Today, we are more concerned about the effects of chemicals in our lives than ever before. According to our online questionnaire, over 1,000 people have told us that they want to know more about chemicals that cause cancer and chemicals in food. They also want to understand the effects of chemicals on children and their development. What would you like to know? Tell us, so we can make sure that our new website includes the information that you need.

A NEW WEBSITE ABOUT CHEMICALS – TELL US WHAT INTERESTS YOU

At the end of 2017, we will be launching a new website about chemicals – a digital space where you can find the latest information on chemicals and how to use them safely. We plan to include topics such as the impact of chemicals on health and the environment and how the most dangerous chemicals are being replaced by safer ones. You will also find advice on how to handle chemicals safely and read what products and chemicals may not be safe to use.

We are currently running an online survey to find out which topics you are most interested in and will use your feedback to help us create a site that answers your real needs. So far, themes such as chemicals and health, chemical safety for parents and chemicals in food products have been ranked highest. Many also wish to find out more about very hazardous chemicals and chemicals that are banned in Europe.
Although we already have some preliminary results, it is not too late to tell us what you want to read on our new website. Spread the word, and encourage your friends and family to respond. The survey will be open until 31 November.

FROM SCIENTIFIC DATA TO USEFUL READING FOR CONSUMERS

A well-functioning market needs informed and engaged consumers with access to high quality, appropriate information. As consumers, the more aware you are of your rights and the impact of hazardous chemicals on you and the environment, the greater the demand for safer chemicals in consumer products.

The REACH Regulation started a new era for how the chemical industry and EU authorities improve safety and control the production, import and use of chemicals in Europe. Thanks to REACH and the efforts made by industry, Europe now has information on over 130,000 chemical substances - the most comprehensive chemicals database in the world.

Already now, the database on ECHA’s website allows you to search for chemicals and find out about their hazards and how to use them safely. Since the search function was improved in January 2016, it has been used by 2 million people, to find out about the impact of specific chemicals on themselves, their families, their workers, their customers, and the environment.

With the help of the data we have received through REACH registrations, we aim to build a new website that transforms the scientific data into information that you can use to make informed choices about the products you buy and the chemicals you use.

Further information:


Chemicals in our Life https://echa.europa.eu/chemicals-in-our-life


Use your right to ask https://echa.europa.eu/chemicals-in-our-life/how-can-i-use-chemicals-safely/use-your-right-to-ask

Information on chemicals https://echa.europa.eu/information-on-chemicals

Candidate List of substances of very high concern https://echa.europa.eu/candidate-list-table

The price you pay http://www.youtube.com/watch?v=WSWIAEDJfSg

DID YOU KNOW?

Use your right to ask

To be able to make informed choices, you have the right to ask if the products you buy contain certain hazardous chemicals. This applies to substances of very high concern that are included in the Candidate List. The supplier has to provide you with this information, free-of-charge, within 45 days.

You can use your right to ask to get information on items such as textiles, furniture, shoes, sports equipment, toys or electronic equipment. These are defined as articles under REACH. However, the right to ask does not cover mixtures such as paints, detergents, medicine, cosmetics or food.

How to request information?

You can request information either directly from the shop where you bought the article or from its producer or importer. It is best to make your request in writing. You can find some model letters that can be used from our website.