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Doc. **CA/106/2018**

28th Meeting of Competent Authorities for REACH and CLP (CARACAL)

21 - 22 November 2018

**Venue: Room 1A Centre Albert Borschette
Rue Froissart 36
1040 Brussels, Belgium**

Concerns: REACH review Action 5: promote substitution of SVHCs

Agenda Point: Information point 4

Action requested: For information

Action 5: *Promote substitution of SVHCs*

The Commission, ECHA and Member States will step up support activities to facilitate substitution of SVHCs. Such activities may include the promotion of capacity building and collaborative networks and promoting R&D investment (EU, Member States resources) in sustainable chemicals and technology innovations.

Leading actor: ECHA / COM – Other actors: MS, industry

Timeline: ongoing

Annex 1: ECHA's strategy to support substitution to safer chemicals through

innovation: achievements in 2018 and prospects for 2019

Annex 2: Response to comments further to CA/49/2018 on REACH review action 5

ECHA's strategy to support substitution to safer chemicals through innovation: Achievements in 2018 and prospects for 2019

ECHA's substitution strategy¹ was published in January 2018. It focuses on four action areas: (1) capacity building on analysis of alternatives and substitution, (2) facilitation of access to research funding and technical support, (3) facilitation of access to relevant data to avoid regrettable substitution and (4) networking. This note summarises the achievements in its implementation in 2018 and the plans for 2019.

1. Achievements in 2018

The main aim of the first year of the implementation of the substitution strategy was to initiate the four action areas and learn from the experience so that the plan for 2019 is made as realistic as possible.

1.1. Capacity building on analysis of alternatives and substitution

In 2018, ECHA published² how substitution supply chain workshop could be held and made available a web form for Member States and Stakeholders to indicate their interest in organising one. On 18 April 2018, ECHA held a webinar³ on tools to support substitution of hazardous chemicals. Furthermore, ECHA collaborated with Member States and industry stakeholders in organising substitution supply chain workshops or substitution-related events. In total, ECHA participated, supported or co-organised around ten events in 2018 (see AnnexA) and is already supporting similar events that are planned for 2019.

ECHA contracted the Lowell Center for Sustainable Production (at the University of Massachusetts Lowell) to prepare an online introductory training package on analysis of alternatives and substitution. This package will be delivered in 2019.

1.2. Facilitation of access to research funding and technical support

ECHA has held several discussions with the European Commission services, in particular with the Directorate General Research and Innovation, on how to enhance support to research activities that aim at directly or indirectly to substitute away of harmful chemicals. These discussions are held in the context of the forthcoming Horizon Europe, which is an ambitious €100 billion research and innovation programme that will succeed Horizon 2020. The initial discussions have demonstrated a keen interest for instance to develop safe, sustainable materials. ECHA will continue these discussions in 2019.

ECHA developed new substitution webpages which include also a list of funding and technical support organisations and programmes⁴ available at EU and national level. Furthermore, ECHA

1 https://echa.europa.eu/documents/10162/13630/250118_substitution_strategy_en.pdf

2 See <https://echa.europa.eu/substitution-supply-chain-workshops>

3 See <https://echa.europa.eu/-/tools-to-support-substitution-to-safer-chemicals>

4 See <https://echa.europa.eu/funding-and-technical-support>

collaborated with the Netherlands in its Safe Chemicals Innovation Agenda project initiated by the Dutch authorities.

1.3. Facilitation of access to relevant data to avoid regrettable substitution

In April and September 2018, ECHA presented in two webinars how to make use of ECHA's public database in support of substitution⁵.

Since 2018, ECHA is also piloting the monitoring of innovation and substitution across the different REACH and CLP processes. The purpose of this pilot is to make use of ECHA's databases for the purpose of confirming and complementing information from other sources. This pilot should provide an insight in the REACH & CLP data that could be considered when looking at substitution.

In the latter part of 2018 ECHA extracted summary of the information from all analyses of alternatives made in applications for authorisation. It will make this information available on its website in 2019.

Furthermore, ECHA has discussed with interested stakeholders, such as Chemsec and ClientEarth, how to ensure that the applicants for authorisation have carried out a thorough research and a detailed enough analysis of alternatives. As one promising idea is to give additional instructions to applicants to name the suppliers of alternative substances and technologies that they have consulted when preparing the analysis of alternatives.

1.4. Networking

ECHA's networking started by holding an event in late 2017 to discuss the draft substitution strategy and to get the engagement of Member States and stakeholders. This was followed up by the adoption of the strategy in the Management Board in December 2017 and its publication in January 2018. Since then, ECHA has publicised its strategy via several channels and events, calling for the involvement of stakeholders in supporting and actively contributing to substitution initiatives. In 2018 ECHA's main networking activities to promote substitution were:

- LinkedIn group [Substitution to Safer Chemicals - European Information Sharing Network](#) was launched. It currently has over 265 members and has had 24 posts from stakeholders.
- ECHA has set up a "substitution contact list" which consists of over 110 stakeholders interested in substitution-related events and news.
- ECHA revamped its [substitution webpages](#), organised around the four action areas of its substitution strategy. The older pages "Why substitute" and "How to substitute" are also being revised with a publication expected early 2019.

⁵ In ECHA webinar on "Tools to support substitution to safer chemicals (see [here](#))" and in ChemistryWorld's webinar "From Reach compliance to innovation – making use of data and tools" (see [here](#))

- In May, ECHA participated in the OECD expert workshop in Paris on approaches to support alternatives assessment and substitution. This workshop gathered 27 participants across the world and allowed an exchange on practices to support substitution initiated by different types of stakeholders.
- In May, ECHA co-chaired the parallel session on “substitution and analysis of alternatives” in SETAC Europe (Rome).
- In February and November ECHA co-organised the Network on Socio-economic Analysis and Analysis of Alternatives Practitioners (NeRSAP) meetings with OSHA (Bilbao) and Eurometaux (Antwerp). Some 40 experts from authorities, industry, consulting companies, research institutions and NGOs discussed, amongst others, concrete cases of analysis of alternatives and debated how such analyses can be improved so that substitution is considered in a meaningful manner.

1.5. Conclusions

With essentially one permanent and one interim staff member ECHA has tried in 2018 to be a catalyst for Member States and stakeholders to take on substitution as their key activities, in a particular so that they would actively change the mind set on how innovation and substitution interact in a positive manner. ECHA has tried to focus on the essential building blocks and participated and co-organised key events to maximise its leverage.

What ECHA has learnt is that substitution is still a “Sunday church talk” where people have good intentions in seminars and workshops but that it is hard to see progress in real life. There are positive signs, though. Some Member States (e.g. the Netherlands, Germany, Belgium, Norway, Italy and France) and industry organisations (Euratex, Eurometaux) have organised or have announced to organise substitution-related workshops where the suppliers and users of harmful chemicals, including the alternative suppliers meet and identify how to overcome the obstacles of substitution in a meaningful manner.

It is too early to say what the concrete learnings or results of these workshops are in terms of advancing substitution. Likewise, it is too early to say to what extent the other activities – increase of funding, capacity building or networking – have promoted substitution. As these activities continue in 2019 there will be more concrete evidence based on which the lessons learnt can be drawn at the end of next year.

2. Prospects for 2019

Year 2019 will be a continuation of the work initiated in 2018, a review of the outcomes achieved and an adaptation of ECHA’s substitution strategy for the period 2020-2022.

More specifically, the main outcomes for 2019 are the following:

- Support the supply chain workshops and substitution-related events that Member States and industry have organised.

- Have the alternatives data of applications for authorisation published on ECHA's website in a user friendly manner.
- Based on an internal assessment establish how ECHA's use of own data can better be used to support substitution and act on this.
- Provide concrete examples of how analyses of alternatives are carried out in practice, including making studies specifically demonstrating this.
- Hold the 2nd European substitution network meeting (probably in May 2019) and the outcome published. This meeting will help in making the update of ECHA's substitution strategy for 2020-22.
- Have organised in May 2019 a special session at SETAC Europe annual conference on analysis of alternatives and substitution
- Have co-organised one NeRSAP event in mid 2019, which will partly focus on analysis of alternatives and substitution.
- Make REACH data available for the tools for alternative selections (e.g. GreenScreen) in such a way that is easy to use for these specific applications
- Have held at least one training event (e-learning or in person) on analysis of alternatives
- Have established with Directorate General Research and Innovation how Horizon Europe would support substitution.
- Have chaired the OECD substitution network meeting end of 2019 to a successful outcome.
- Take the lessons learnt in 2018 and 2019 and have the substitution strategy updated for 2020-22 and endorsed by the Management Board by December 2019.

Annex A

Substitution-related events where ECHA participated or co-organised in 2018

- 16 January 2018 | Brussels [Stakeholder workshop “Advances in the substitution of hazardous flame retardant chemicals in home textiles”](#) | [Presentations](#)
- 28 March 2018 | Netherlands [Workshop Towards a Safe Chemicals Innovation Agenda - From Substitution to Safe-by-design](#) | [Presentations](#)
- 11 April 2018 | Denmark [Danish conference on practical experience from substitution of hazardous chemicals](#) | [Presentations](#)
- 12 April 2018 | Luxembourg [Substitution of hazardous chemicals – Training on decision support tools to assess hazard and sustainability of chemicals and alternatives](#) | [Presentations](#)
- 5 June 2018 | Brussels [Supply chain workshop on alternatives to hazardous Durable Water and Oil Repellents \(DWORs\) in textile \(MIDWOR-LIFE\)](#) | [Presentations](#)
- 4 - 5 October 2018 | Netherlands [Substitution supply chain workshop on antifouling paints for recreational boats](#) | [Presentations](#)
- 20 - September 2018 | Lithuania [Substitution of Chemicals](#) | [Presentations](#)
- 23 – 24 October 2018 | Latvia- [International seminar - Encourage and support enterprises to minimise the use of harmful substances](#)
- 1-2 November 2018 | Sacramento, | [2nd International Symposium on Alternatives Assessment: Building the Field](#)

ECHA also participated in the following events where the issue of substitution of hazardous chemicals was presented and discussed:

- 13 September 2018, Frankfurt - Chemical Innovation Exchange Conference 2018
- 3 October 2018, Helsinki - Seminar on refining the classification of metals and alloys to enable non-toxic society and circular economy, Helsinki
- 16 October 2018, Stockholm - Swedish chemical tax round table discussion
- 24 October 2018, Vienna - International Chemical Policy from a European Perspective conference
- 5-6 November 2018, Vienna - Green Chemistry Conference