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from harmful chemicals



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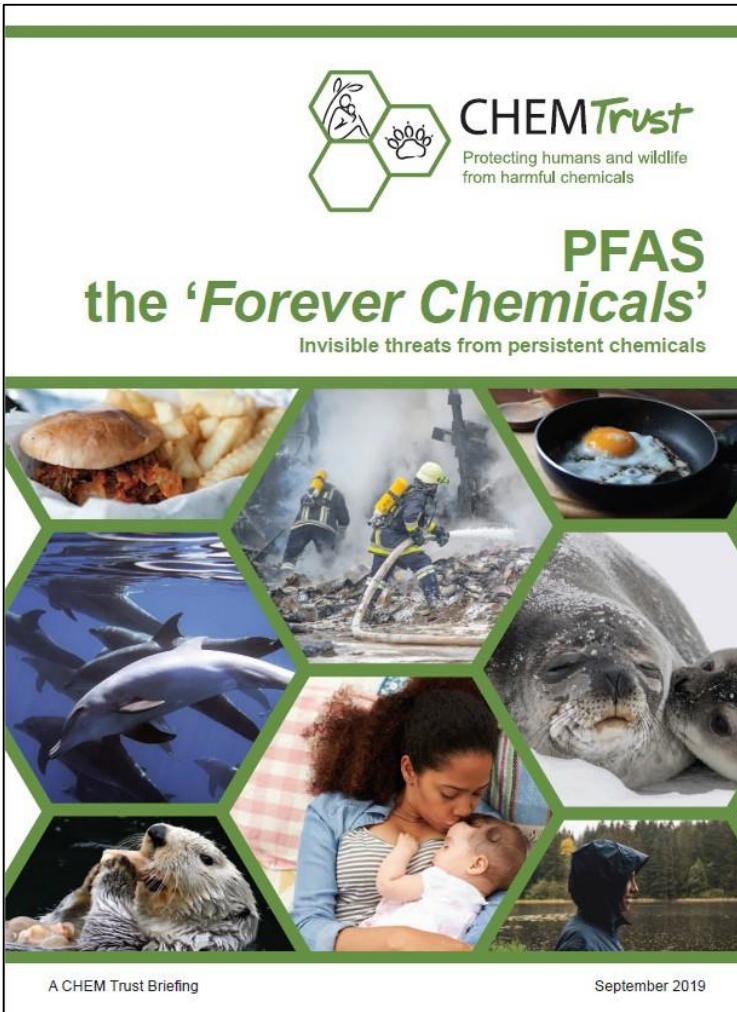
*Getting control of PMT and vPvM substances under REACH
26th March 2020*

How to achieve better protection of the environment and human health from PMT/vPvM substances

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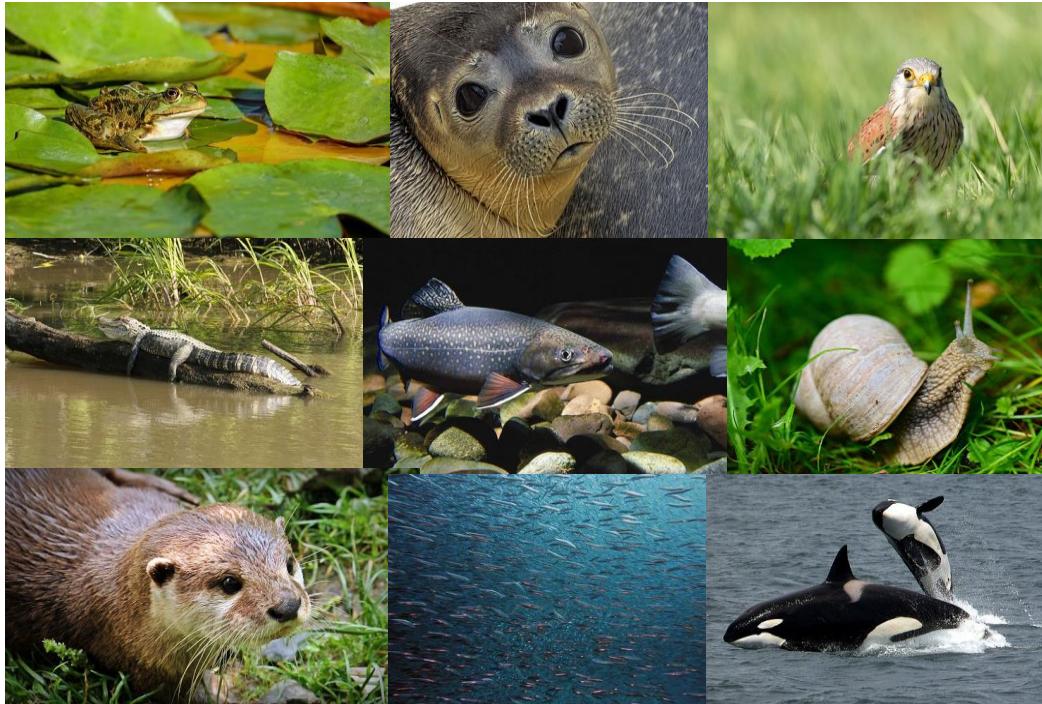
- An NGO working at EU, UK, German & global levels to protect humans & wildlife from harmful chemicals
- Working at the science policy interface, in partnership with other civil society groups
- See our blog & twitter account for more: www.chemtrust.org @chemtrust

Content

- Need for addressing PMT/vPvM substances
- REACH: advancing controls for persistent chemicals
- CLP: PMT/vPvM criteria - Learning from endocrine disrupters
- Key principles for better protection of environment and health
- Conclusions

Substance properties of concern

- Persistence
- Bioaccumulation/ Mobility
- Toxicity



Insufficient controls for PBTs/PMTs

e.g. PFAS levels in German children

- Levels of PFOS/PFOA decreased over last 20 years
- 20% of kids still above HBM-I- Value, just for PFOA
- Short-chain PFAS used as replacements

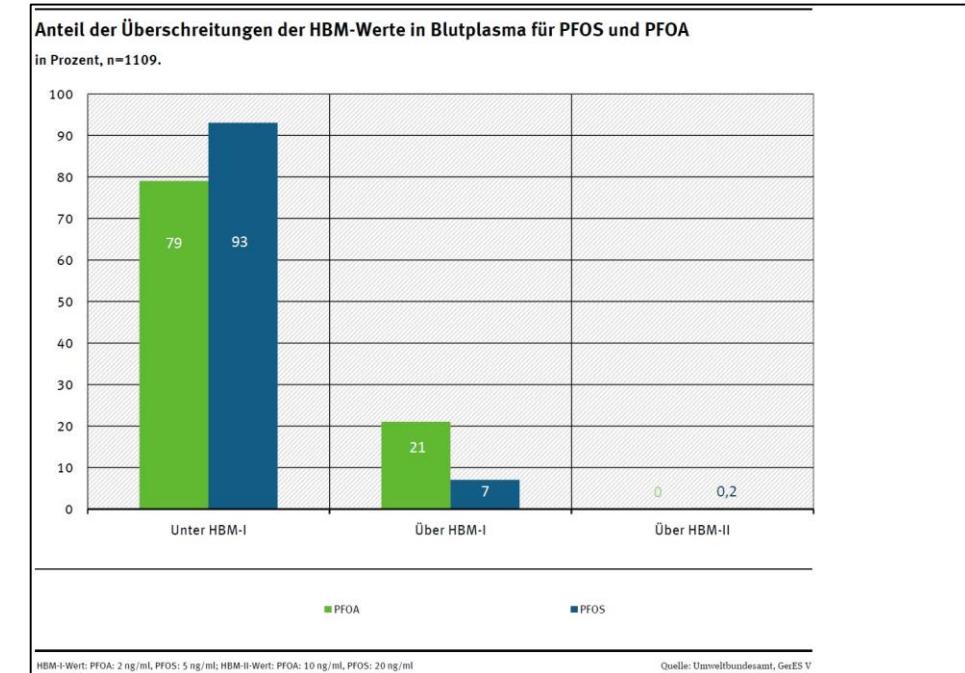


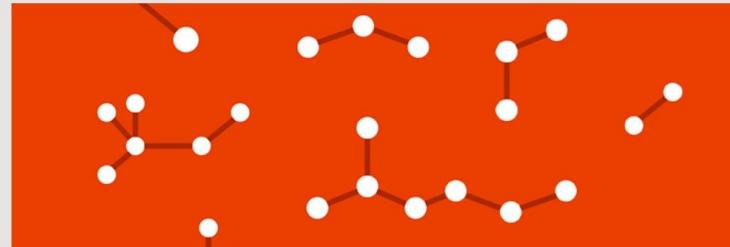
Figure: German Environment Agency
<https://www.umweltbundesamt.de/en/press/pressinformation/pfas-excessively-high-in-blood-of-children>



Ever growing number of PMTs/vPvMs

- GenX
- PFBS
- Dioxane
- Trifluoroacetic acid
- ...

- Home
- What is the SIN List?
- How to use the SIN List
- The new chemicals
- Chemical groups
- Focus: Endocrine disruptors
- Focus: Persistent chemicals
- Focus: Nanomaterials



Chemicals added to the SIN List November 2019

PMTs/vPvMs

NORMAN
Network of reference laboratories, research centres and related
organisations for monitoring of emerging environmental
substances

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Home

NORMAN Suspect List Exchange

The NORMAN Suspect List Exchange (NORMAN-SLE) was established in 2015 as a central access point for NORMAN Exchange documents all individual collections that form a part of **NORMAN SusDat**, the merged NORMAN Substance Data Bank.

UPDATE: Dec 2020: Check out updated Transformations Tables and the NORMAN-SLE Classification Tree in PubChem

Feedback/Contributions: If you have any feedback or a list to contribute, please contact suspects@normandata.eu

Citing the NORMAN-SLE Website: Please cite the full website as "NORMAN Network (2021) NORMAN Suspect List Exchange".

Citing Individual Lists: Please cite individual collections using the Zenodo dataset DOI as well as additional references authors! You can find "Cite as" instructions on the Zenodo pages for the given list (bottom right). Example: "NORMAN Network NORMAN-SLE SusDat (Version NORMAN-SLE-SO 0.3.1) [Data set]. Zenodo. DOI: [10.5281/zenodo.4300000](https://doi.org/10.5281/zenodo.4300000)

Additional access: Check out the NORMAN-SLE on [Zenodo](#), on [PubChem](#) with a [Classification Tree](#), plus as lists on the [SUSDat](#).

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TEXTE
126/2019

**REACH: Improvement of
guidance and methods for
the identification and
assessment of PMT/vPvM
substances**

Final Report

Rüdel *et al.* *Environ Sci Eur* (2020) 32:5
<https://doi.org/10.1186/s12302-019-0286-x>

COMMENTARY

**Persistent, mobile and toxic
in the environment: a spot of research and regulatory action**

Heinz Rüdel^{1*} , Wolfgang Körner², Thomas Letzel³, Michael Neumann⁴, Karsten Nödler⁵ and Thorsten Reemtsma^{6,7}

Abstract

Certain persistent and polar substances may pose a hazard to drinking water resources. To foster the knowledge exchange in this field the Working Group *Environmental Monitoring* of the German Chemical Society (GDCh) Division *Environmental Chemistry and Ecotoxicology* discussed at their meeting in December 2018 the significance and relevance of persistent, mobile and toxic chemicals (PMT substances) in the environment. Five oral contributions highlighted not only various aspects such as the identification of potential PMT substances based on certain properties and the possible risks to the environment, but also the importance of the European REACH regulation for the assessment of PMTs.

Achieving better protection means:

- + scrutiny and prevention at source
- + via regulation (REACH and CLP)

The following applies to PBTs/vPvBs as well as PMTs/vPvBs:

- Once in the environment, impossible to get them back
- Potential for serious and irreversible effects
- Clean-up of drinking water difficult and only at very high cost
- Burden for future generations



PMT and vPVM substances pose an equivalent level of concern to PBT and vPvB substances under REACH (Hale et al., 2020 Environ Sci Eur (2020) 32:155)

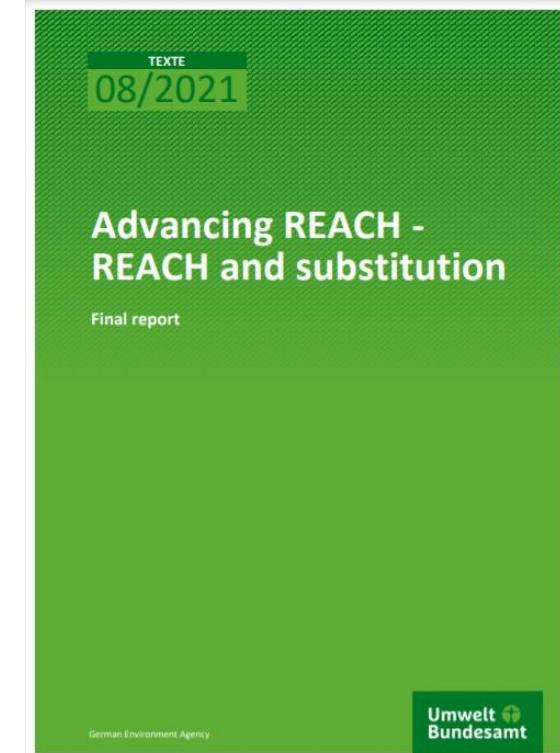
REACH: Addressing PMTs/vPvMs

NOW:

- Industry has to ensure safe use over entire life cycle
- SVHC identification under PMT/vPvM possible under 57f
- BUT identification and regulatory measures are very slow

FUTURE:

- Improved data provision in registration
- New criteria for PMT/vPvM (separate entry in article 57)
- Speeding up controls via authorisation/restriction



CLP: PMT/vPvM criteria - Learning from endocrine disrupters

- Discussion on new CLP hazard classes ongoing
- Different categories to reflect the scientific evidence and available data
- Suspected category provides transparency and allows differentiated follow-up action
- We need to do this faster than for EDs – we can't lose another decade!



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HEAL
HEALTH AND
ENVIRONMENT
ALLIANCE

ClientEarth 

Identification of EDs under CLP

Criteria for hazard classification of EDs and allocation
to hazard categories, incl. for Suspected EDs

March 2021

1 Introduction

The EU Commission announced in its communication on a Chemicals Strategy for Sustainability, on 14 October 2020¹, that it will propose legally binding criteria for the identification of endocrine disruptors (EDs) for application across all legislation to be included in the CLP Regulation. The Commission announced it will base this work on the WHO ED-definition and will build on the criteria already developed for endocrine disrupting biocides and plant protection products. Furthermore, it announced that the identification effort will be supported by efforts to get sufficient and appropriate information by strengthening the information requirements as well as screening and testing of substances.

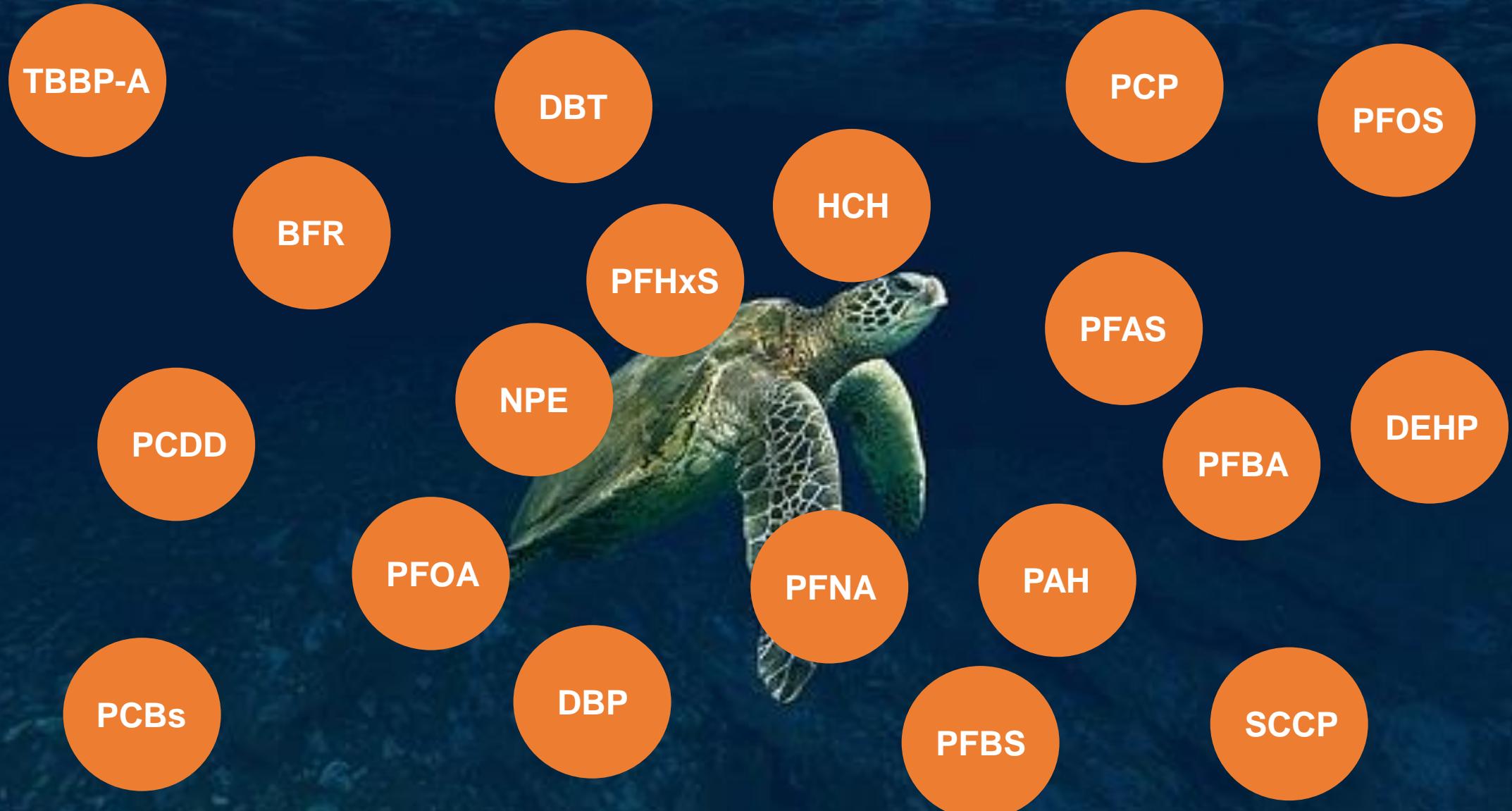
In this briefing, we outline how horizontal ED criteria, including for suspected EDs, can be set up for the identification and classification of endocrine disruptors under the CLP Regulation, building on what was developed for the Biocidal Products and Plant Protection Products Regulations (BPR/PPPR). However, the BPR/PPPR ED criteria are set up to address known and presumed EDs only to meet the cut-off provision. They ignore suspected EDs, that is, substances for which there is some evidence of endocrine disrupting properties, but not sufficient to meet the ED criteria. This is a weakness which absolutely needs to be fixed when developing the new horizontal ED criteria. The latter should be in line with the approach for hazard identification and classification of carcinogenic and mutagenic substances, and substances toxic to reproduction (CMRs) under the CLP Regulation.

https://chemtrust.org/wp-content/uploads/Joint-CT_HEAL_CE-proposal-on-CLP-ED-criteria-March-2021-final-with-date.pdf

Key principles for achieving more protection

- Regulating groups of substances
- Addressing combination effects of chemical mixtures (see actions in CSS)
- 'No data - no market' (currently ***No data = no problem***)
- Quicker processes needed:
 - ❖ ECHA PBT expert group: very few substances identified
 - ❖ REACH substance evaluation too slow and often no follow-up (example DBDPE)
- 'Polluter pays' principle

Exposed to a cocktail of synthetic chemicals



Conclusions and recommendations

- Persistence alone is a major cause for concern
- Substitution of substances with PBT/PMT properties has to be advanced
- Risk management must focus on groups of substances and address mixtures
- Research needs resources for methods and (bio)monitoring
- EU Chemical Strategy has great potential to deliver on '*zero pollution ambition*'

For more protection of
environment and
human health

→ **From persistent pollution to
precaution and prevention**

