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Protecting humans and wildlife 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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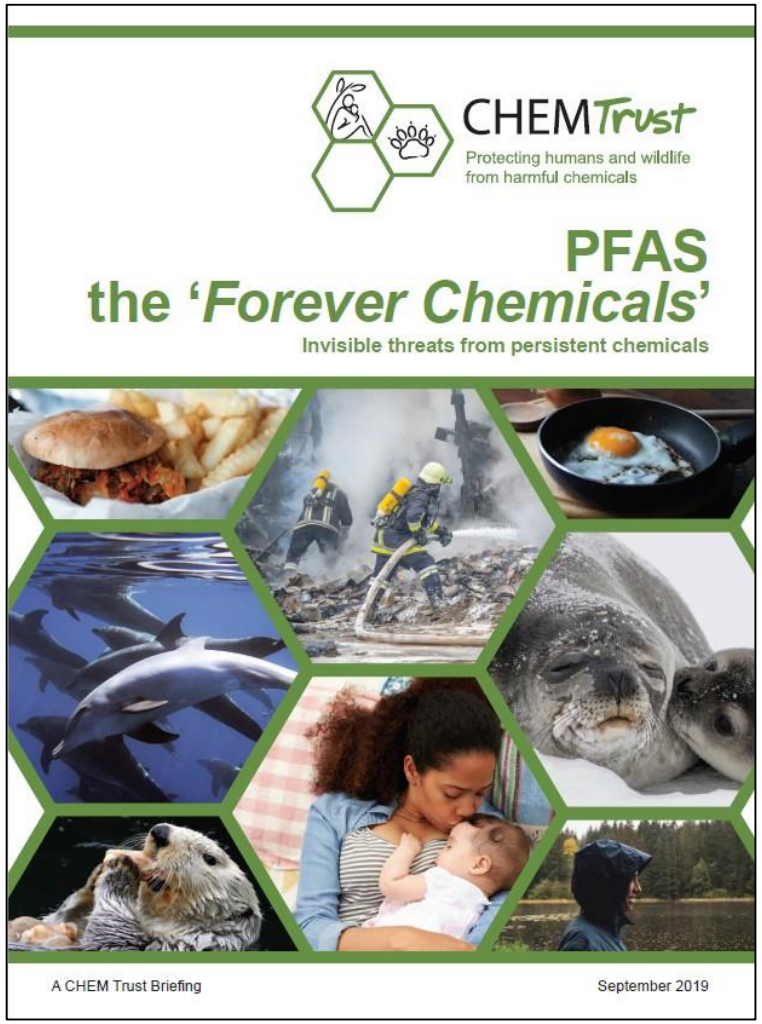

- An NGO working at EU, UK, German & global levels to protect humans & wildlife from harmful chemicals
- Working at the science policy interface, in partnership with other civil society groups
- See our blog & twitter account for more: www.chemtrust.org @chemtrust

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Content

- Need for adressing 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

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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

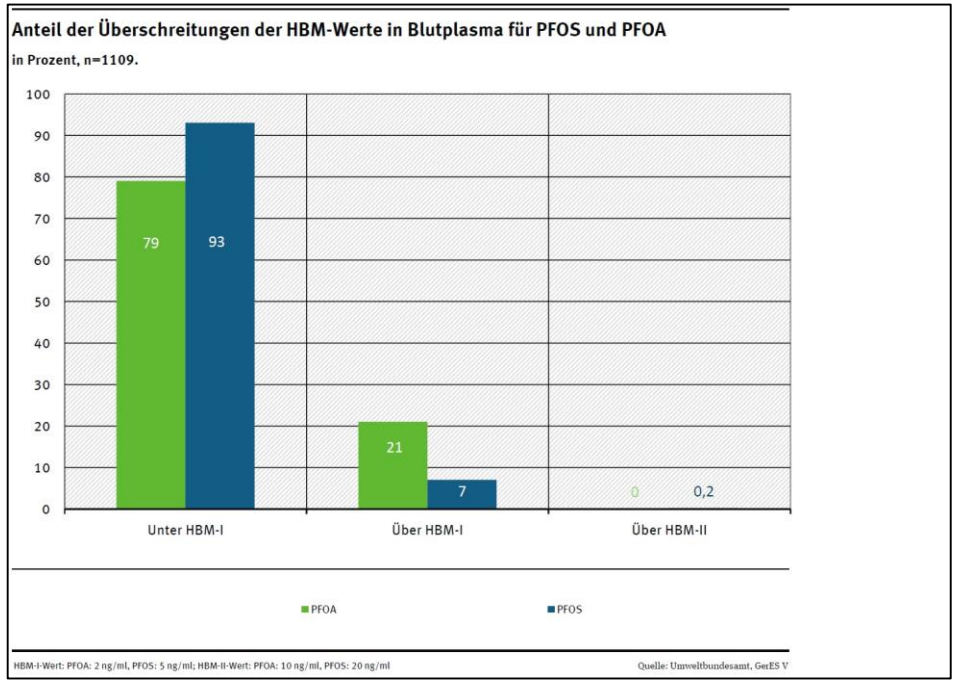

Figure: German Environment Agency
https://www.umweltbundesamt.de/en/press/pressinformation/pfas-excessively-high-in-blood-of-children

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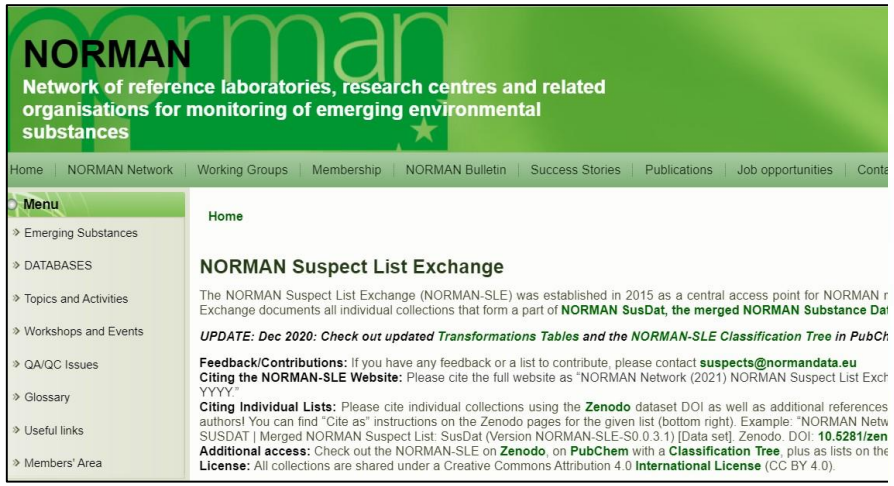
Ever growing number of PMTs/vPvMs

- GenX
- PFBS
- Dioxane
- Trifluoroacetic acid
- …



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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)

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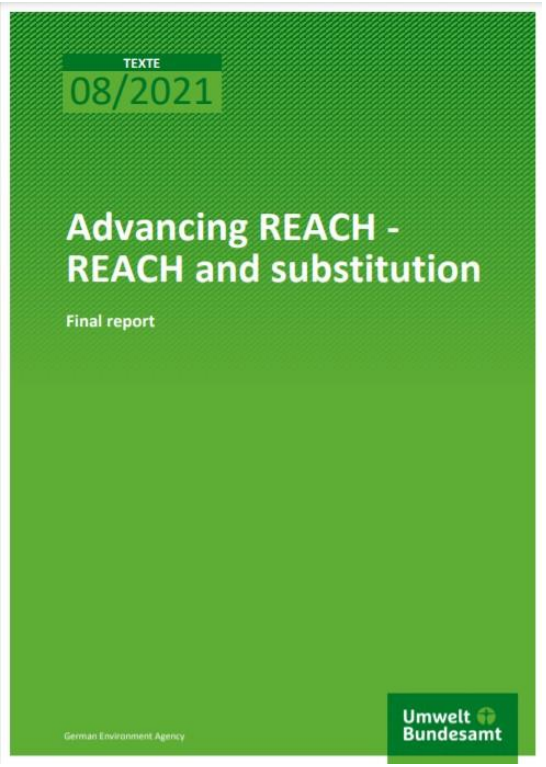
REACH: Addressing PMTs/vPvMs

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

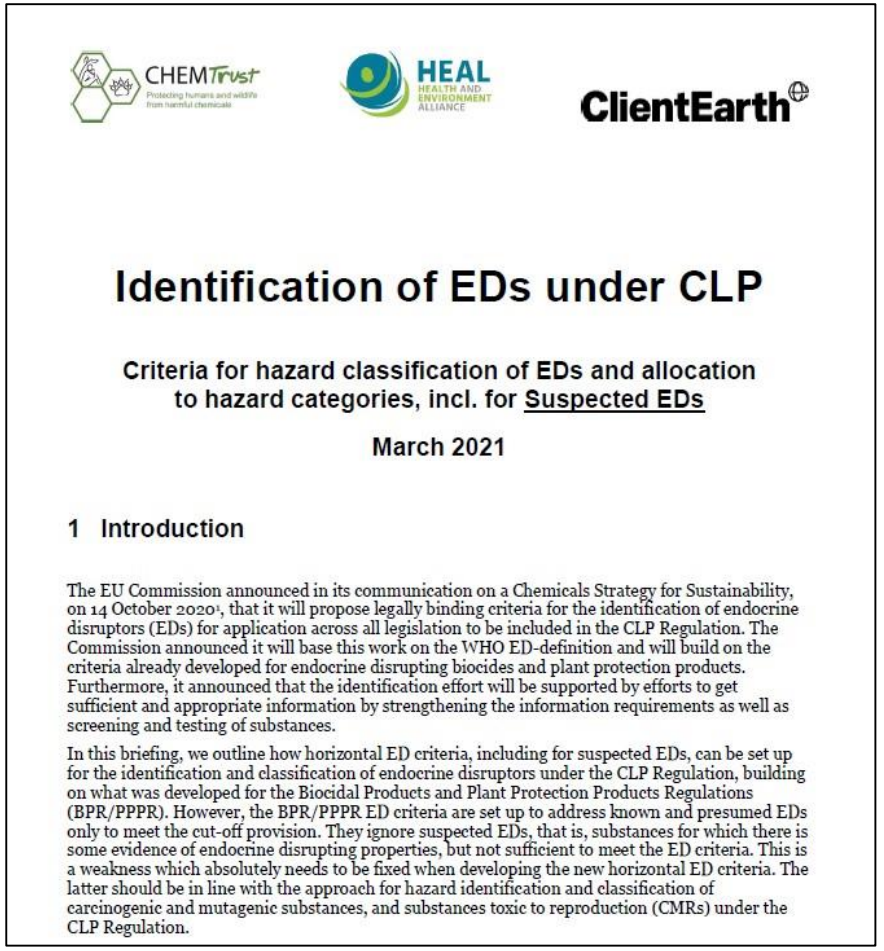
FUTURE:

- 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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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 2020[1], 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

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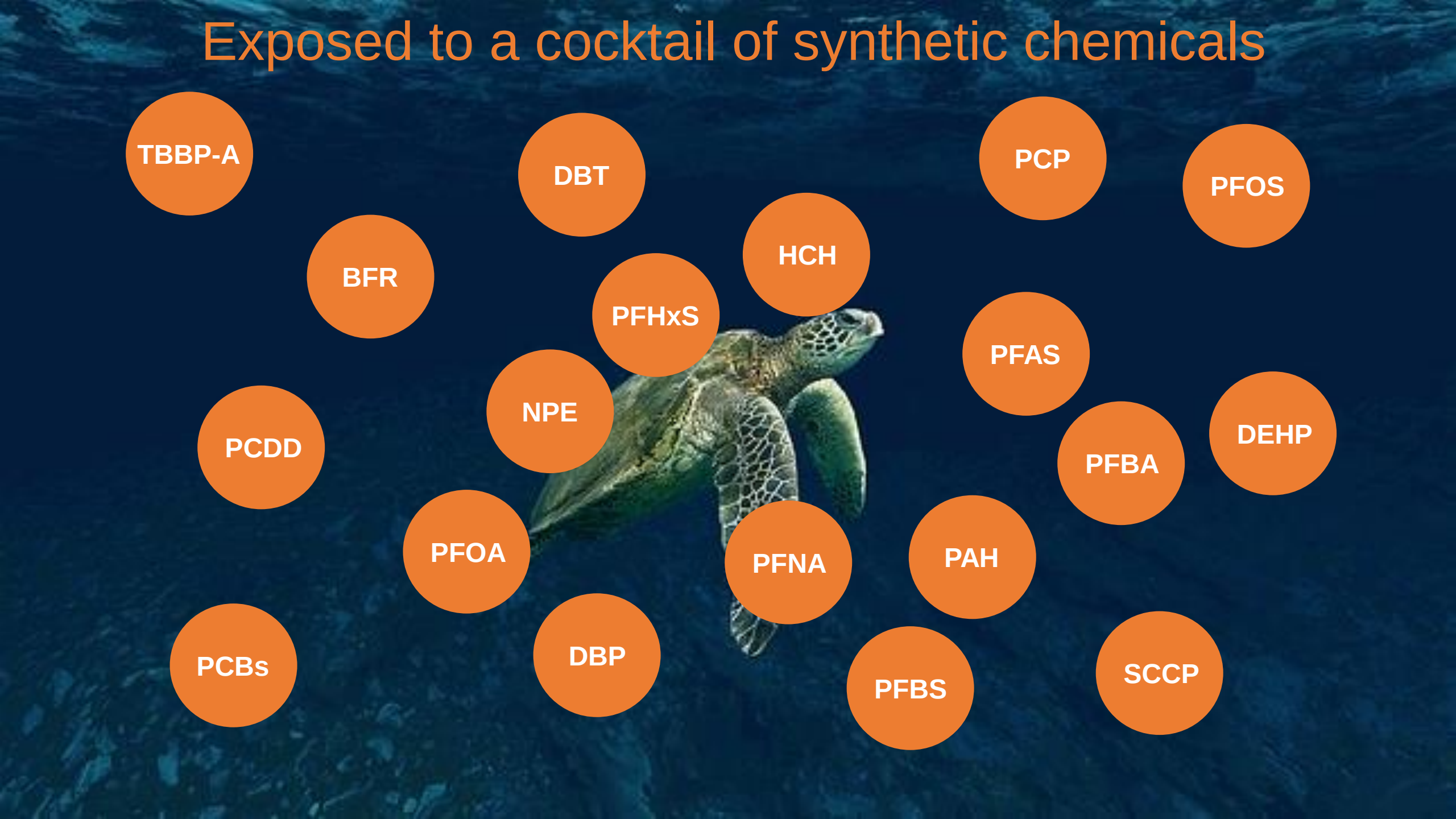
Key principles for achieving more protection

- Regulating groups of substsances
- 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



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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 adress mixtures
- Research needs resources for methods and (bio)monitoring
- EU Chemical Strategy has great potential to deliver on *´zero pollution ambition´*

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For more protection of environment and human health

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