



# Schaffen Beschränkungen ausreichende Sicherheit für den Verbraucher?

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# Outline

1. The Answer
2. Examples
3. 7<sup>th</sup> EAP – sets the vision and actions
4. Circular Economy
5. Conclusions





# 1. The Answer

*Jein*





## 1. The Answer

*Ja und nein*





## 2. Examples (Ja)

*Article 68(2):*

- Ban of CMRs Cat 1 as such or in mixtures for consumer use;*
- Ban of CMRs Cat 1 in an article (for certain article types)*





## 2. Examples (Ja)

*PAH restriction of 2015 based on a German Dossier according to Article 68(2)*



# PentaBDPE

5. Articles shall not be placed on the market for supply to the general public, if any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity, under normal or reasonably foreseeable conditions of use, contain more than 1 mg/kg (0,0001 % by weight of this component) of any of the listed PAHs.

Such articles include amongst others:

- sport equipment such as bicycles, golf clubs, racquets
- household utensils, trolleys, walking frames
- tools for domestic use
- clothing, footwear, gloves and sportswear
- watch-straps, wrist-bands, masks, head-bands

6. Toys, including activity toys, and childcare articles, shall not be placed on the market, if any of their rubber or plastic components that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity, under normal or reasonably foreseeable conditions of use, contain more than 0,5 mg/kg (0,00005 % by weight of this component) of any of the listed PAHs.

7. By way of derogation from paragraphs 5 and 6, these paragraphs shall not apply to articles placed on the market for the first time before 27 December 2015.

8. By 27 December 2017, the Commission shall review the limit values in paragraphs 5 and 6 in the light of new scientific information, including migration of PAHs from the articles referred to therein, and information on alternative raw materials and, if appropriate, modify these paragraphs accordingly.'

<p>'61. Dimethylfumarate (DMF) CAS No 624-49-7 EC 210-849-0</p>	<p>Shall not be used in articles or any parts thereof in concentrations greater than 0,1 mg/kg.</p> <p>Articles or any parts thereof containing DMF in concentrations greater than 0,1 mg/kg shall not be placed on the market.'</p>
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## 2. Examples (Ja)

*PentaBDPE banned in 2003 based among other considerations on the precautionary principle due to the exposure to new borns through breast milk.*





## 2. Examples (but)

*Restrictions does not work in a vacuum.*

- *There is registration*
- *There is the use of information in the supply chain*
- *There is product legislation*

*See Jack de Bruijn's Presentation!!!!*





## 2. Examples (but)

*Restrictions are after the fact.*

*The hazardous substance is in use, investments made, articles bought by consumers and exposures real.*

*Leading to an unacceptable risk at EU level*



## 2. Examples (but)

- *Annex XV Dossier prepared within 12 months*
- *ECHA opinion within 15 months*
- *Commission within 3 months*
- *Vote within 1.5 months*
- *Transition period*

### 3. The EU's 7<sup>th</sup> EAP - Chemicals

*REACH and CLP, as well as PPP and Biocides, provide baseline of protection*



*Increased efforts needed to meet the WSSD 2020 goal (the "minimisation of adverse effects" goal)*

*New challenges need to be met (Nano, Mixtures, EDs, Chemicals in Products)!*

### 3. The EU's 7<sup>th</sup> EAP - Chemicals

*The 7th EAP sets out to meet these challenges through the development of:*



*EU strategy for a non-toxic environment,  
supported by chemical knowledgebases*

*By 2018 (building on existing measures)*

### 3. The EU's 7<sup>th</sup> EAP - Chemicals

*Including the minimisation of exposure to chemicals in products, including, inter alia, imported products, with a view to promoting non-toxic material cycles and reducing indoor exposure to harmful substances;*









## 4. Circular Economy

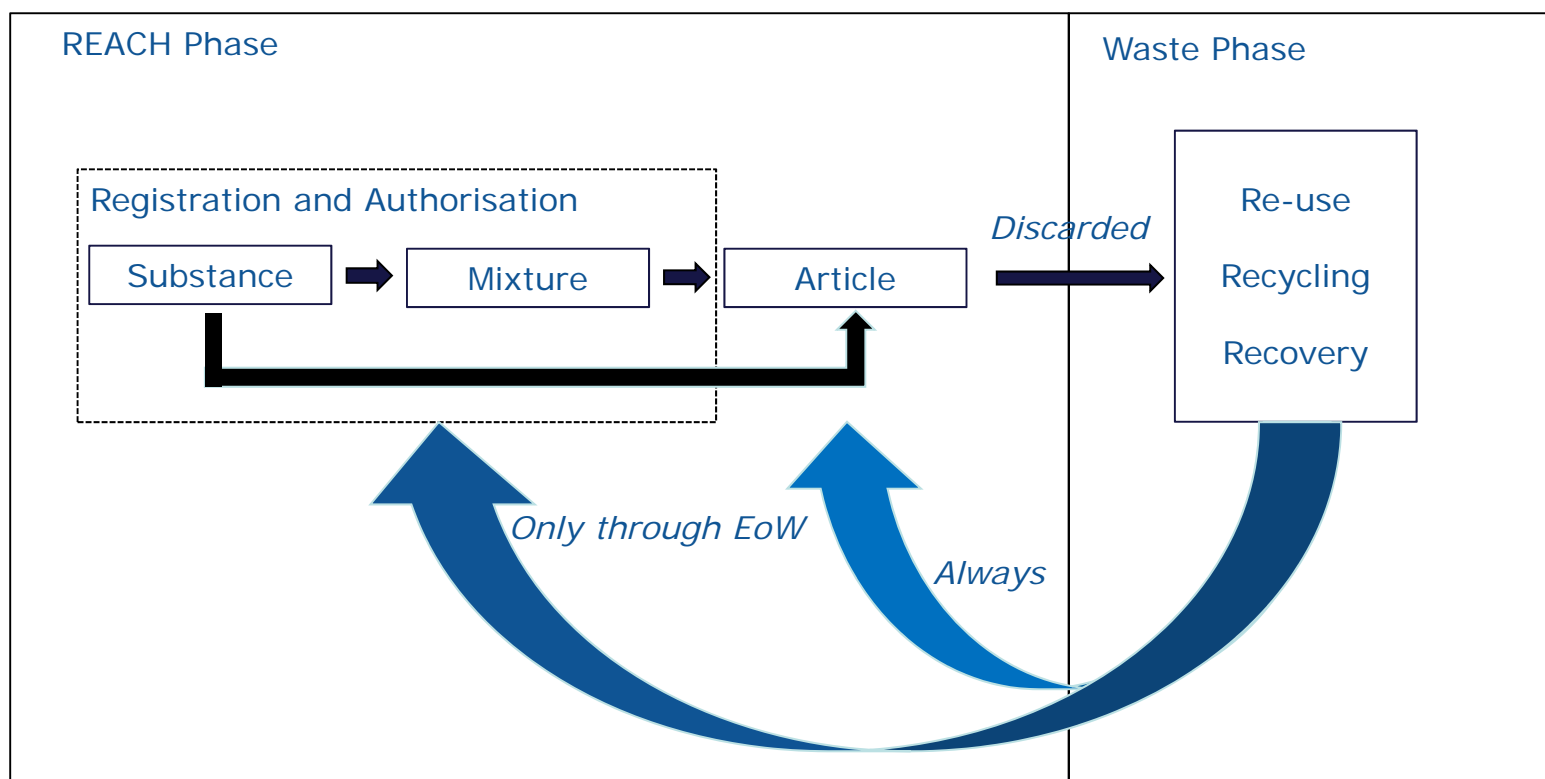
*Circular Economy Package with the following chemicals actions:*

- *Analyse and propose options on the interface between chemicals, products and waste legislation,*
- *Enable SMEs to have access to knowledge/techniques*

*To also be finished in 2017*



## 4. Circular Economy





## 5. Conclusions

- *We have a solid regulatory framework where increased implementation efforts will give increased benefits*
- *The 7<sup>th</sup> EAP identified areas needing further work, including substances in articles*
- *The non-toxic environment strategy is an opportunity to set the beyond 2020 chemicals agenda*





European  
Commission



**Thank you for your attention**

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