

First ECHA SVHC Candidate List Proposed

Companies will have 45 days to provide consumers with information on hazardous substances in their products. Are you ready?



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The European Chemicals Agency (ECHA) has proposed 16 Substances of Very High Concern (SVHC) for the first candidate list. The proposal is now out for public comment as per the table below. Interested parties have until 14 August 2008 to respond to ECHA.

Under the communication obligations covered in article 33(2) of the REACH regulation, retailers and manufacturers must upon request be able to provide consumers with information about what hazardous substances are in a product within 45 days. This will include all substances on the proposed candidate list that are present in a concentration above 0.1% (w/w). Companies will need to be prepared to meet this requirement in autumn 2008 when the first list is expected to be released.



CAS #	Substance	Formula	Possible applications
101-77-9	4,4'-Methylenedianilin	C13H14N2	Raw material to produce methylenediphenyl diisocyanate for PUR (main application). Hardener in epoxy resins, adhesives
56-35-9	bis(tributyltin) oxide, hexabutyl distannoxane (TBTO)	C24H54OSn2	Biocide in anti-fouling paint and other biocidal uses, also for industrial use
85-68-7	Benzylbutylphthalate (BBP)	C19H20O4	Plasticizer (mainly for PVC), adhesives, inks, lacquers, small use in package, cosmetics
120-12-7	anthracene	C14H10	From coal tar distillation. Raw material for other synthesis.
15606-95-8	triethyl arsenate	C6H15AsO4	Wood preservation (phased out), pesticide, glass goods, E&E products, PVC.
25637-99-4	hexabromocyclododecane, 1,3,5,7,9,11-hexabromocyclododecane (HBCDD)	C12H18Br6	Flame retardant (mainly in PS). In constructions, buildings also in flame-retardant textiles and E&E products
294-62-2	Cyclododecane	C12H24	Intermediate in production of HBCDD. In production for chemicals to produce polymers like polyamides, polyester, perfumes. Raw material for binding media for temporary sealing etc.
81-15-2	5-tert-butyl-2,4,6-trinitro-m-xylene	C12H15N3O6	Cosmetics
85535-84-8	Alkanes, C10-13, chloro (Short chain chlorinated paraffins)		Metal working lubricants, fat liquoring of leather, flame retardant in textiles, rubber, paint, sealants, adhesives
7646-79-9	cobalt(2+) dichloride	Cl2Co	Absorber for gases, humidity indicator, to produce vitamins B12, dye mordant for glass industry, solid lubricant, catalyst, invisible inks, drying agent, production of non-ferrous metals, electroplating, additive in rubber production....
7789-12-0	sodium dichromate, dihydrate	Na2Cr2O7 x 2H2O	Production of other Cr-product as chromate pigments, use for paints and plastic coloration, corrosive protection for metals, in vitamin K production, preparation of coloured glass and ceramic glazes, in wood preparation, in production of essential oils and perfumes
117-81-7	Di(2-ethylhexyl)phthalate DEHP	C24H38O4	Plasticizer in resins and polymers (mainly PVC)
7784-40-9	lead hydrogen arsenate	AsHO4Pb	Wood preservation (phased out), pesticide, glass goods, E&E products, PVC
1303-28-2	Diarsenic pentoxide	As2O5	Dyeing industry, metallurgy (harden copper, lead, gold), special glasses, wood preservation
1327-53-3	diarsenic trioxide	As2O3	Decolorizing agent for glass and enamels, application in glass and lead glass industry, wood preservation, to produce other chemicals
84-74-2	Dibutylphthalate	C16H22O4	Plasticizer in resins and polymers (mainly PVC). Also used in printing inks, adhesives (e.g. paper, package), sealant/grouting agents, nitrocellulose paints, film coatings, glass fibers. Consumer products

Frequently Asked Questions

What is REACH all about?

REACH compliance for consumer products is about knowledge management. The more you know about the substances in your products, and the better controls in your supply chain, the less you have to test, as product confidence is high.

Can Bureau Veritas offer a testing solution?

For many situations, screen testing your products for SVHC would be an appropriate strategy. Bureau Veritas' extensive global network of accredited laboratories are capable of providing SVHC chemical testing services for the 16 proposed chemicals and for other hazardous substances.

For which situations is testing applicable?

For many consumer products, such as textiles, garments, home accessories and seasonal items, the product cycle time from design to manufacturing to store shelf is extremely short, all happening within weeks. In these cases, it is unlikely that companies within the supply chain will be able complete a Bill of Substance that identifies all chemical substances and any SVHC used in a product. Testing is a method that can quickly identify if any SVHC exist in a product and if they are below the regulatory threshold of 0.1% as required by REACH.

What if SVHC are detected?

If SVHC are detected at levels higher than the permitted threshold, Bureau Veritas would recommend Target Quantification testing to clarify in which part of the product, and in what amount, the substance is present. Once that information is known, Bureau Veritas can work with you to reduce, eliminate or substitute another chemical for the SVHC.

How long does it take to perform a SVHC test?

Bureau Veritas can provide SVHC testing within 15 days, well within the 45 day communication period obligation.

Which locations provide SVHC testing?

Bureau Veritas can provide SVHC testing on finished products out of our Germany, Hong Kong or Shanghai labs. Targeted SVHC testing can be performed by all our analytical labs worldwide, with locations in Americas, Europe and Asia.

ADDITIONAL RESOURCES

- **REACH Guidelines for substances in Articles**
http://reach.jrc.it/docs/guidance_document/articles_en.htm
- **SVHC Consultation -**
http://echa.europa.eu/consultations/authorisation/svhc/svhc_cons_en.asp
- **EC REACH Website -**
http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm
- **ECHA REACH Website -**
<http://reach.jrc.it/>
- **Women in Europe for a Common Future (WECF) company's 45 days obligation -**
http://chemicalwatch.com/downloads/WECF_REACH_ShoppersGuide_Nov07.pdf

CHEMICAL MANAGEMENT SOLUTIONS:

- Compliance Assistance
 - Product Line Risk Profiling / Compliance Plan
 - Chemical Compliance Register
 - Product Safety Data Sheet
 - Training
 - Toxicology Assessment
 - Only Representative
- Testing & Analysis
 - SVHC Testing
 - Target Quantification Testing
- Inspection, Audit & Assessment
 - Factory Chemical Management System Audit

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