

DISFAVOURING COMPANIES THAT PRODUCE OR USE ALTERNATIVES RESTRICTS EU INNOVATION POTENTIAL

The following companies represent a sample of European corporations producing or using alternatives to Substances of Very High Concern (SVHC). We urge the Commission to take their statements into consideration and to respect their needs.

“The authorization process within REACH safeguards that the most hazardous substances will be phased-out over time.”

Skanska

“As part of our commitment to providing safer and more sustainable solutions for our customers, AkzoNobel phased out the use of lead compounds in paints some years ago. In 2011 we phased out the last remaining uses of lead chromate in all our industrial paints.

As safer and effective alternatives to lead chromate pigments are available for industrial paints and have been fully accepted in the marketplace, we are surprised that the EU looks set to grant an authorization for the continued use of lead chromate in these paints for at least 12 more years under REACH. AkzoNobel does not intend to re-introduce lead chromates in any of our products.”

AkzoNobel

“As investors in the European chemical industry we are concerned that authorisations for SVHCs will be given despite the existence of functioning alternatives on the European market. Recent proposals from the Commission to streamline and simplify the authorization process may have an unintended ‘chilling’ effect on efforts by the industry to invest in novel greener chemical products as substitutes.”

Aviva Investors, BNP-Paribas, Impax and WHEB

“Substances that are not sufficiently biodegradable and which are susceptible to pose a risk to aquatic ecosystems and drinking water resources should not be allowed to enter the water cycle. The processes in REACH are among the most important instruments to phase out substances of concern from the European waters. The authorisation process in REACH is the central legislative instrument to fulfil the requirements for good ecological and chemical status in the Water Framework Directive.”

EurEau

“With regard to chemicals and their safe use REACH is considered one of the most important European Community Regulations. The aim of REACH is to enhance the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances and by applying appropriate safety assessment and risk management for the use of those substances. DSM supports these important objectives of REACH.

At the heart of DSM’s mission is the core value of sustainability and a commitment to helping to create a more sustainable world.”

DSM

“H&M supports a strong chemical legislation and our Chemical management is based on prevention and the precautionary principle. We restrict the use of chemicals considered as hazardous in our production processes and define hazardous chemicals according to an intrinsic properties approach and consider properties such as persistence, bioaccumulation, toxicity, carcinogenicity, mutagenicity and toxicity to reproduction, endocrine disruption and equivalent risks when assessing the risks with certain substances.

When substances are listed on the REACH candidate list the demand for more innovation and finding better alternatives increases, which fuels the production of alternatives and finally increases the availability and decreases the prices for these alternatives. This process is fortunate for our business since we often are frontrunners, paying higher prices for the alternatives in the beginning and are committed to phase out substances of very high concern. “

H&M

“The EU REACH requirements are in line with how IKEA works with chemicals. The precautionary principle and substitution principle are the basis for how both REACH and IKEA works with chemicals.”

IKEA

“Gemini Adhesives Ltd see the management of hazardous chemicals as a key part of our business mission and strategy. We are committed to ensuring that our products are safe at all stages of manufacture, use and disposal. Knowledge of chemical hazards has advanced over time and we are now aware of potential risks that were unsuspected until fairly recently. The authorisation procedure is designed to drive innovation and it has played a key role for the development of our products. The work that the REACH authorities are undertaking is in our view essential to ensuring that we will have all of the information necessary to assess and manage the risks associated with all of the materials we work with and where necessary to substitute hazardous chemicals with safer alternatives.”

Gemini Adhesives Ltd

“Granting this Authorisation will cause an economic disadvantage to those companies who have invested resources in substituting HBCDD, such as the FR manufacturers due to idling of plant and EPS bead manufacturers, other than the Applicants, due to increased costs and cause confusion in the industry about the regulatory process. Finally, it will stifle innovation in the European industry to develop substances with improved toxicological profiles and run counter to the policy objectives underpinning the Authorization process.”

Response from Chemtura to the Public Consultation on application for authorisation of HBCDD.

“Whilst it may be practical to continue to regulate the controlled use of lead chromate containing paints in the EU this may perpetuate a global market in the trade in lead chromate pigments including in territories where regulation is less effective. We believe that the EU should be taking a lead on this issue and enforcing a prohibition on the use of lead chromate in paints.”

Response from British Coatings Federation to the Public Consultation on application for authorisation for lead chromate pigments.

“BASF says there will be a competitive advantage for the applicant as it can proceed with both lead chromate and non-lead chromate technologies, which are both part of its product portfolio. The company says that while economic feasibility of switching to alternatives must be taken into account, “being already able to sell non-lead chromate pigments raises some doubts about the adequacy of the substitution plan.”

“Non-applicants will encounter a competitive disadvantage, despite their investments in alternatives,” the company adds.”

BASF in Chemical Watch 12 March 2015

These quotes from companies stand on their own and represent only the providers; these companies do not necessarily agree on ChemSec’s position.