

Echa's priorities in the next five years

Bjørn Hansen has given a few clues about where the focus will be under his leadership of Echa



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Walking past Echa's offices in the seasonal slush in Helsinki, an introductory REACH presentation is running on a screen. It proclaims that by June 2018, all the main chemicals will be registered with the agency. Without the usual caveats, ifs and buts, this strikes me as a profound statement. There is no other chemicals agency in the world with such a comprehensive database as a foundation for further work.

A new page will be turned at the beginning of 2018 when the new executive director, Bjørn Hansen, starts his five year term of office. He has a long background as the head of the chemicals unit at DG Environment and has recently been working closely in shaping the European Commission's circular economy strategy for chemicals. His recent statements give some clues as to what Echa's future priorities might be.

First, improving dossier quality seems to remain a top priority. As around 70% of all dossiers submitted so far have been untouched ever since, many registrants clearly consider registration to be the end of the REACH process. In fact it is just the end of the beginning. Dossiers must not only contain sufficient scientific data when submitted, they must also be updated whenever there is a material change or where new information comes to light.

Under the new executive director, Echa is likely to increase the pressure and push registrants harder to improve dossier quality. He has stated that the agency "should view dossiers with inadequate data as non-compliant rather than being of poor quality and use its legal powers to bring them into compliance."

Second, after the 2018 registration deadline, Echa's focus will shift from collecting chemicals management data to regulatory

control of chemical risks. Echa will continue to identify more chemicals of concern and work to phase out those that are dangerous.

The next major goal will be to meet the targets set by the 2020 SVHC Roadmap. The expert decision making of Echa's scientific committees moves the processes of evaluation, authorisation and restriction forward, without necessarily having the first or final say. Mr Hansen has been very consistent in saying over the years that for Echa to be "scientifically respected", it will need to continue to make "the best science-based decisions".

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Third, Echa is likely to assume an active role in resolving issues related to the circular economy for chemicals and recycled materials. In his inaugural address, Mr Hansen referred to Echa's dual role of "supporting the understanding of hazardous properties of chemicals and uses of materials and on the other hand enabling the development of products and chemicals for a circular economy".

He added: "A balance will need to be found between materials that have value and need to be recycled and the hazardous substances in them that should be eliminated."

However, there is no easy solution to this balancing act. If you require recycled products to have zero impurity and zero chemical risk, a lot of materials that are in principle recyclable must remain unrecycled. Conversely, aiming for a high level of recycling inevitably means that in some cases, there will still be SVHCs present in a diluted form in the recycled product. Some sort of expert or even

political-level assessment still needs to be made on acceptable levels for each specific application.

Generally, Mr Hansen's approach seems to be rather pragmatic. He divides the raw materials on the market today into three categories. The first is harmless material that can clearly be recycled without restriction and used to produce new articles.

The second includes material so 'dirty' that it cannot be put back on the market, for example, persistent organic pollutants (POPs). These must be incinerated, with or without energy recovery, or landfilled.

"Material in the third category falls somewhere in between," he says. "There is a question mark over it. It can be physically recycled, but it may include harmful chemicals and, therefore, its use should be controlled and tracked."

It is the third category that causes regulatory complications, in Mr Hansen's view. "On the one hand, you could say that there are so many unknowns in the future that precaution tells us to get rid of as many substances as possible as soon as possible, to clean up the waste stream. This means that we would not let these substances be recycled and re-enter the production process. On the other hand, you could put more weight on the importance and value of the material and less on the potential dangerousness of the chemicals it contains."

Over the next five years, it is therefore likely that Echa will make its own active contribution towards establishing clear rules and processes for a range of recycled materials to be allowed to enter the EU market. This is essential for the recyclers and related industries to be able to move forward with confidence.

The views expressed in this article are those of the expert author and are not necessarily shared by Chemical Watch