

25 - 26.10.2023 | DAY 1
Chemical Regulations and
Sustainability Symposium 2023



Chemical
Business
Association

REACHLAW
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EU REACH Revision, a status overview

Polymer registration

New Registration information and Evaluation requirements

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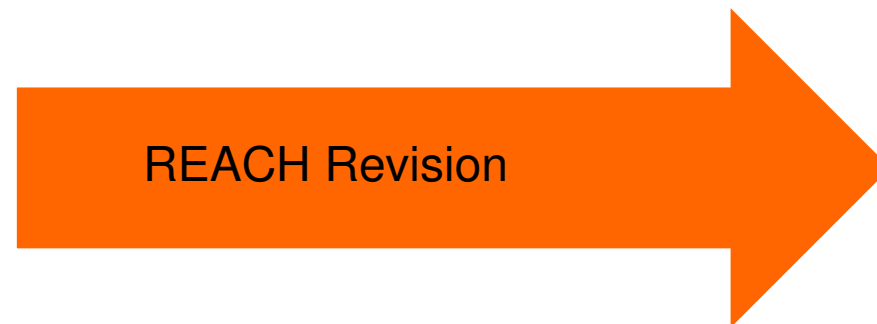
1. Overview of the plans
2. Notification requirement
3. Registration of polymers requiring registration (PRR)
4. Timelines and Conclusions
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Duration: 10 min

- 1. Overview of the plans**
- 2. Notification requirement**
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1. Overview of the plans

- Polymers are **currently exempt** from EU REACH Registration and Evaluation, but this will most likely soon change
- Currently only **monomers** of the polymers have to be registered (if tonnage above 1 tonne per year)
- However, **REACH Article 138(2)** gives an obligation to review the risks of polymers compared to other substances!



1. Overview of the plans

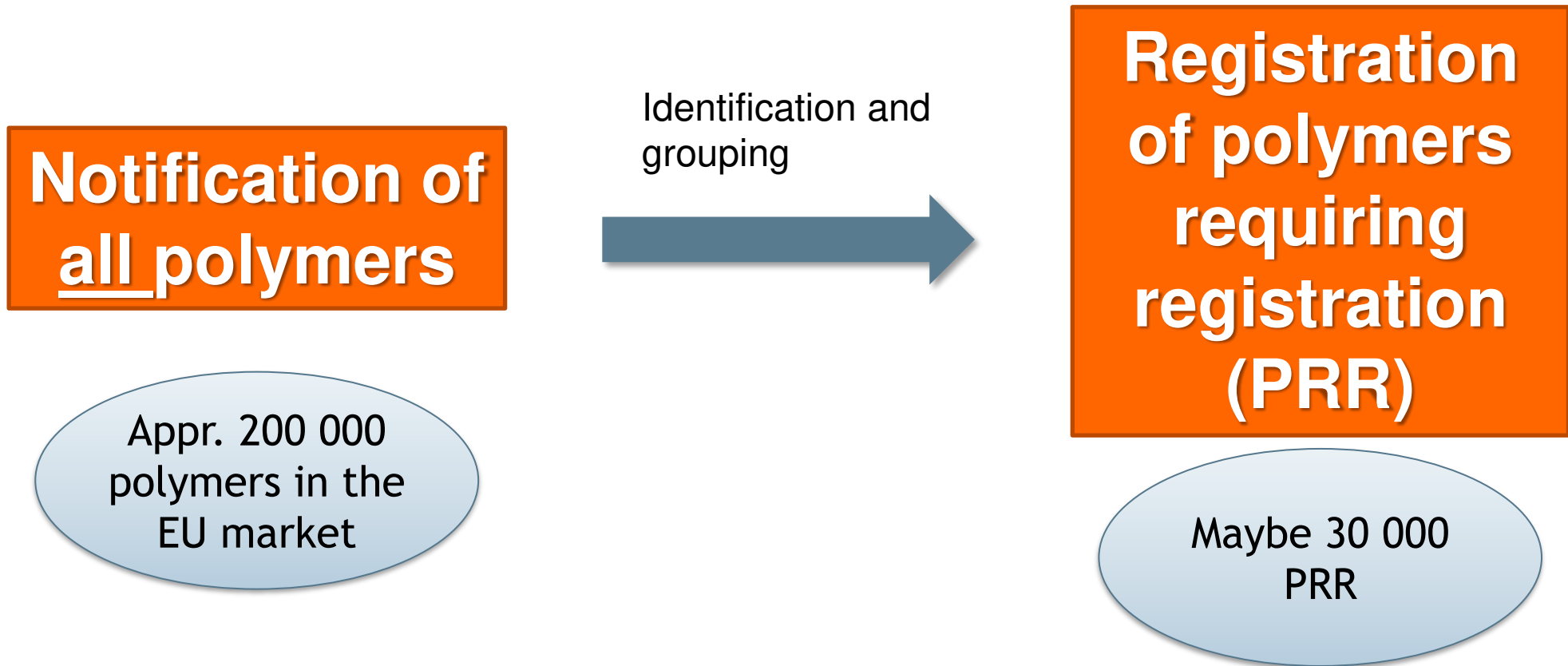
Why?

- Article 138(2) foresees a possible further review to extend the registration requirements to polymers
- Some of the pressure to start registering polymers comes from the tremendous amount of plastics present in our environment
- Purpose of the registration is to **collect critical hazard information** on polymers that are equally hazardous as other substances



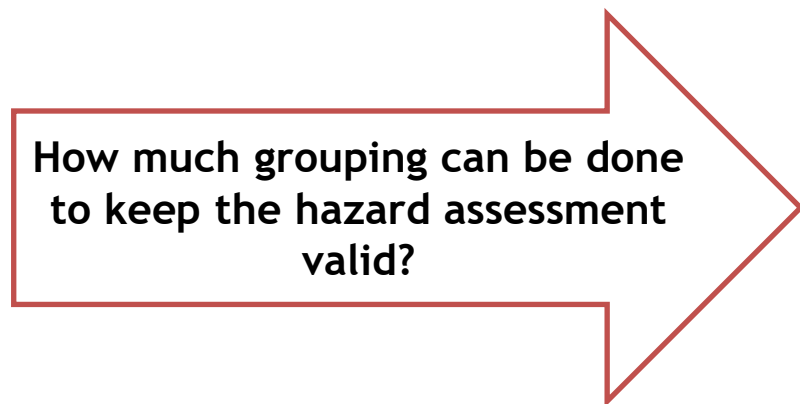
1. Overview of the plans

- There are still several options but the most likely option for the polymer registration process will be:



1. Overview of the plans

- First key step is to precisely identify the polymers in the market.
- Only after this can the group formation start for the registration phase
- Identification is the key challenge!
- Another key challenge is that there is not much hazard data available for polymers



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2. Notification requirement

PURPOSE:

- Map the polymer universe -what is out in the market?
- Define the grouping criteria
- Allow industry to form “SIEFs”

Something similar to REACH inquiry for substances

(possible) INFORMATION REQUIREMENTS:

- Identity information on polymers
- Bioavailability information and biodegradability
- Molecular Weight distribution
- Possibly toxic chemical groups in the polymer

Critique from industry: information requirements can't be too detailed at this stage

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3. Registration of polymers requiring registration (PRR)

Steps

“Joint Submissions”

Notification
and definition
of PRR criteria

Grouping of
PRRs

Registration of
PRRs

Evaluation,
authorisation
and restriction

**Registration requirement of course applies only to polymers
manufactured/imported >1 tonne per year!**

3. Registration of polymers requiring registration (PRR)

Data requirements

- Not known yet

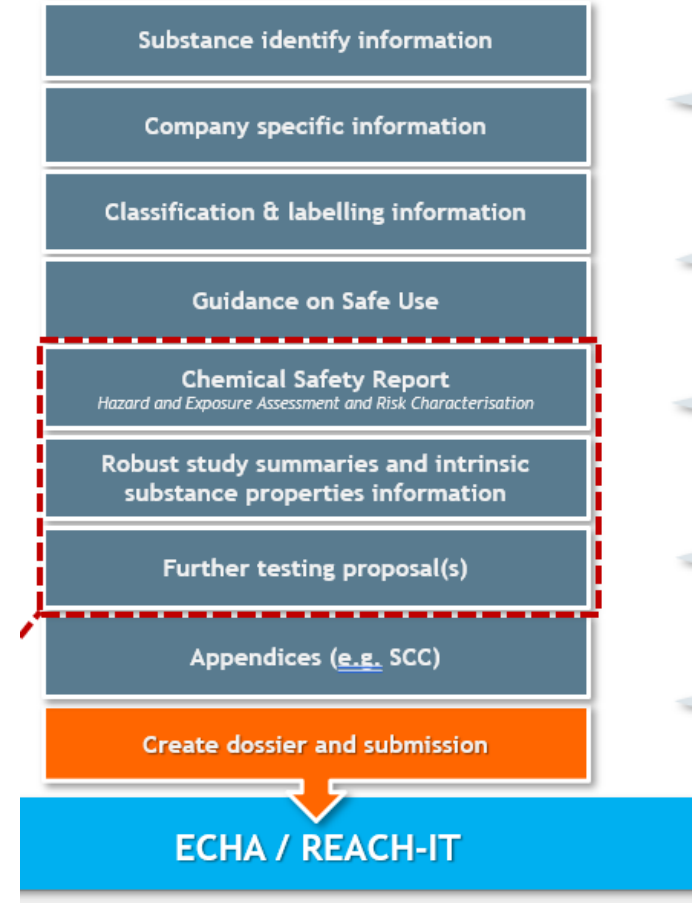
BUT

- Should be similar to EU REACH registration requirements for "normal" substances

→ Less data for less hazardous polymers, more data for more hazardous ones

MW!

1. Polymer identity
2. Volumes
3. Uses and Exposure
4. Hazard Assessment
5. Endpoint data



3. Registration of polymers requiring registration (PRR)

Challenges

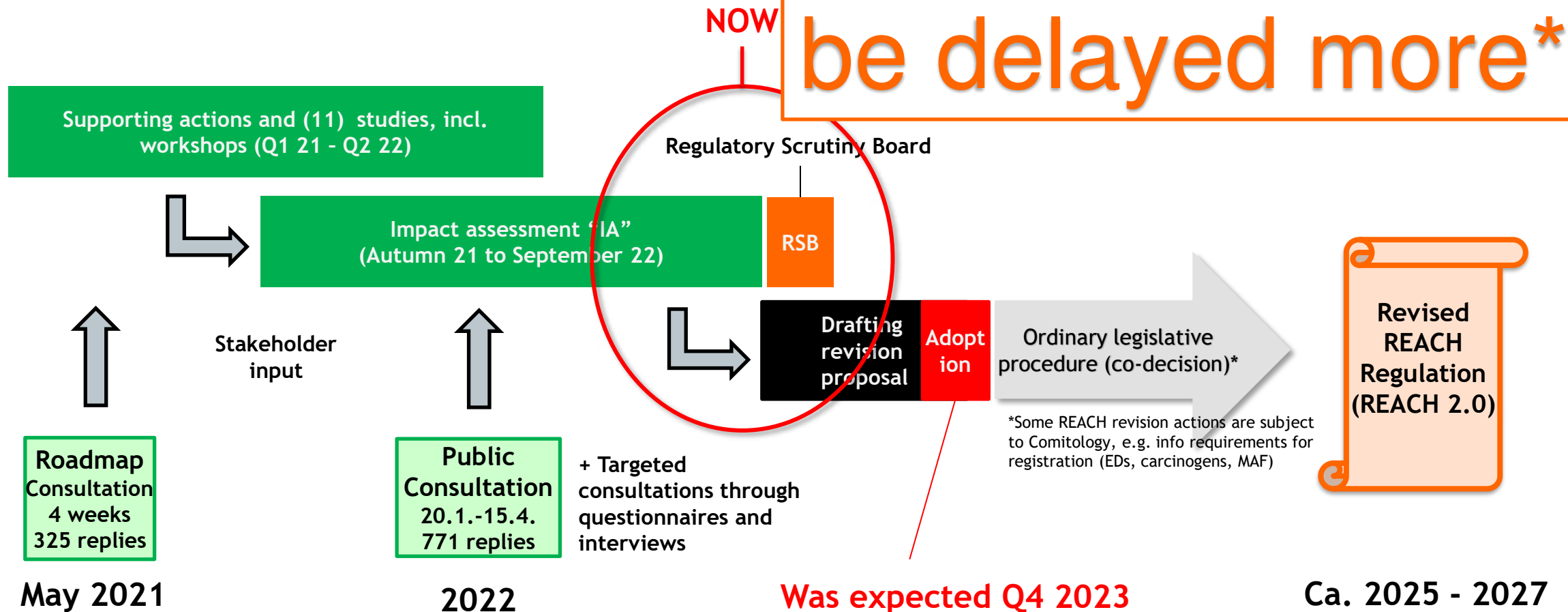
- Even polymers with same monomers and same name differ a lot in structure and in hazards
 - How to avoid excessive animal testing?
 - How to share data?
- Require different analysis techniques than “normal” substances
 - How to make sure companies analyse the polymers in a way that they are comparable
 - New methods needed?
 - Environmental and human health hazard testing also requires different approach than substances we have registered before
- Lot of downstream users will become registrants for the first time
 - Not necessarily a lot of knowledge on REACH processes

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4. Timelines and Conclusions

Timeline at a glance

Very likely to be delayed more*

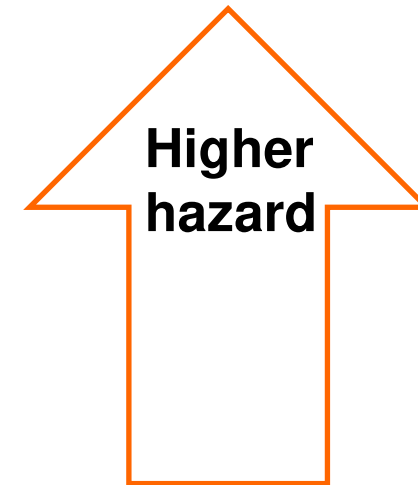


4. Timelines and Conclusions

Types of polymers

TYPE 1:

- Low Molecular Weight polymers (most similar with non-polymeric substances)
 - Higher data requirements



TYPE 2 (and 3):

- Medium & High Molecular Weight polymers
 - Lower data requirements

4. Timelines and Conclusions

IF the regulation would enter into force 2027

Notification: Earliest 3 years after the regulation enters into force

- ~2030

Registration: 8 years after the regulation enters into force (Type 1)

- ~2035

Registration: 12 years after the regulation enters into force for Type 2 and 3

- ~2039

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5. Summary

- We will know conclusively what will happen after the REACH Revision proposal is published
- And we of course have to wait for the adaptation of the final regulation
 - If the final legislation would come out sometime in 2025, it would enter into force 2027
 - Very likely takes longer than this
- For notifications, there is not that much time (3 years after entry into force)
- All polymers must be notified
- **START COLLECTING INFORMATION ON YOUR POLYMERS**
- **What you have in your portfolio?**
- **Can you identify and characterize the polymers**
- **Do you have information on the hazards?**

**Follow updates
from ECHA and
from us!**

Thank You for Your Attention!

Contact Details

REACHLaw

Aleksanterinkatu 19

FI-00100 Helsinki

Finland

www.reachlaw.fi

info@reachlaw.fi

sales@reachlaw.fi

SINI SUOMELA

Chief Operating Officer

Mobile: +358 50 375 3159

Office: +358 9 412 3055

sini.suomela@reachlaw.fi

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