

Getting On The SIN List

The European Union (EU) environmental NGOs, via The International Chemical Secretariat (otherwise known as ChemSec, an agency that provides chemical expertise to the EU), has published its infamous SIN list-or in other words, Substitute It Now-for identifying candidate substances of very high concern. This is a list of nearly 300 chemical substances the NGOs believe should be considered candidate substances of very high concern. The European Chemicals Agency (ECHA) has printed a proposed list of 16 substances thus far. The agency expects the first candidate list to be approved-barring dissent-on October 22, according to ECHA head Geert Dancet. Per Article 33 of the Registration, Evaluation and Authorisation of Chemicals (REACH) regulation, if any of these 16 substances are contained in your product in an amount over 0.1 percent weight-by-weight, you must disclose that and "safe use" information to your customer after that date. Dancet further indicates that we should expect the candidate list to be updated annually, but was reportedly noncommittal. Moreover, Dancet was concerned that it was unclear why individual substances were included on the SIN list; the ChemSec speaker was apparently unclear or unwilling to answer the question, but referenced that the Web-based database includes more information. Dancet says it is all very well to compile a list like this, but if it isn't clear why a substance was included, it isn't good enough. A quick look at the database does show that, for many substances, there is evidence that at least implies why they are on the list. [Design Chain Associates](#) [1], a service provider helping manufacturers to increase engineering, procurement and production efficiency, as well as product, operational and environmental performance, believes the NGOs are frustrated by the fact that only 16 substances were on the initial proposed candidate list. The EU has more than 1,000 substances already classified as PBTs, CMRs Categories 1 or 2, or of equivalent concern. ChemSec marshalled scientists from academia and elsewhere across the globe to help compile this list over the last several months. As has been noted in industry circles, while it may be easier to deal with a short list in the near term, getting a new list annually could result in a "death by a thousand (chemical) cuts" scenario. The implication for all manufacturing industries is to address the candidate substances of very high concern process, whether or not influenced by the SIN list, efficiently by greasing the skids for communication of chemical composition and process use information throughout the supply chain.

Source URL (retrieved on 01/28/2015 - 5:25pm):

http://www.chem.info/news/2008/09/getting-sin-list?qt-most_popular=0

Links:

[1] <http://www.DesignChainAssociates.com/>