

# REACH

Jornada informativa sobre la futura  
Legislación Europea en Materia de Químicos

***Costs, Society and Innovation, Risks and Chances***

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# Context EFBWW standpoint

**Risk assessment:** *chance on occurrences of incidents with negative effects*

**Lack of data:** *gaps and (large) uncertainties in risk assessment*

**Actual policy:** ***no data → no risk***

**REACH:** *initiative to improve and to increase the amount of data necessary for proper environmental and (occupational) health risk assessment*

**Future policy:** ***no data → no market***

# The Economic Discussion

## Cost and Benefits of REACH

### **Costs**

- RPA:** → **Direct € 2,3.10<sup>9</sup> (11 years)** (tests, registration)  
→ **Indirect extra: € 0,5 – 2,9.10<sup>9</sup> (11 yrs)**  
(downstream users)

### **Benefits**

- RPA :** → **Direct on OHS € 20 – 50.10<sup>9</sup> (30 yrs)**  
**WWF:** → **Indirect up to € 283.10<sup>9</sup> (15 years)** (health)  
(Environmental benefits not accounted for)

**Benefits:** → **mainly to insurance companies and governments**

**Costs:** → **mainly to industry** (tests, risk assessments, registration)

# Other fluctuations in cost factors

Cost Factor	Fluctuation in % of turnover
Energy costs 1996-2000	2.6 – 3.4%
Environmental Expenditure 1996-2000	1.9 – 2.9%
REACH October proposal	0.05%
Fluctuation in World Market Prices (Exchange Rate Fluctuation) 1999-2002	± 20 %

Source: [http://www.chemsec.org/reach/start\\_index1024.htm](http://www.chemsec.org/reach/start_index1024.htm)

# OHS Requirements

Risk inventory and evaluation *for all enterprises (over all products)*

$$\text{Risk} = \text{Hazard} \times \text{Exposure}$$

## **Nowadays:**

- Info on hazards from SDS

## **REACH:**

- Hazards from SDS, Exposure scenarios from SDS+CSR
- Risk characterisations on CSR  
*but not directly available for enduser!!*

**Advantages:** Risks characterisations (*OHS Dir.*) shift to producer/importer. Less double work

**Limitations:** Only for maximum of 10 000 substances (only for > 10 t/y/c) (90% not covered)

**EFBWW demand on direct availability of the CSR for the enduser**

**EFBWW demand info on reliable risk for the other 90%**

**RETURN OF THE DUTY OF CARE in REACH**

# EFBWW demands, some details

**R**

- Notification for all substances (REACH only > 1 t/y/c)
- Notification: In case of no R-phrase transparency in no / yes data
- No registration → yes registration *in case of suspected health effects*
- Include acute toxic health effects for 1-10 t/y/c (REACH: skin/eye irr+sens, mut)

**E**

- Info: SDS + exposure scenario + **risk characterisation (CSR)**
- **Articles** containing migrating + dangerous or authorized substances:  
*label + SDS*

**A**

- Allow no minimum quantity of substances in non-authorized products → stimulate substitution
- Within 6 years: include endocrine disruptors and respiratory and strong skin sensitizers

**C**

- European Chemical Agency: Must include **Workers representation**

**H**

- Inventory of classification and labelling:
  - Should include all R-phrases (as well as no-R phrase assigned)
  - Should be publicly accessible for all substances, preparations and articles

# EFBWW conclusion

**Illusion:** *Risks free society*

**At the same time:** *More data  $\neq$  automatically less uncertainties and/or lower risks*

Uncertainties and risks demand for *normative* choices

**Therefore:**

- Improvement of information supply on health risks
- Openness / transparency on what we know, and **not** know
- Revaluing of ethical values. Avoid economising all discussions
- Operationalisation of the precautionary principle

# Final Goal

**REACH  $\Rightarrow$  R 4 EACH**

Reliable risk information for each