

Hazardous Chemicals in Products

The need for enhanced EU regulations

The present specific European regulatory provisions for chemicals in (consumer) products are insufficient. They are either:

- inadequate because of serious restrictions - as in case of food contact materials where only plastics materials are comprehensively regulated; or missing clear limits (medical devices) or lack of a high level of protection (toys), or
- (almost) non-existent for many products consumers come into contact with, such as materials in contact with drinking water, products releasing emissions to the indoor air, clothing and other consumer textiles, child care articles, packaging, tattoo inks, personal protective equipment, furniture, sports and playground surfaces and equipment, car interiors...

REACH does not, and will not, compensate for these deficits because articles – particularly imported ones - are barely covered. Moreover, the process of restriction is laborious and related to (comprehensive) single substance risk assessments: for example, generic bans of all CMR (carcinogenic, mutagenic or toxic for reproduction) substances in articles cannot be established. An approval system for chemicals in articles - similar to the positive lists in cosmetics and food contact legislation - is not possible. Non-toxic effects or parameters cannot be addressed (e.g. organoleptic parameters, such as smell or taste).

A systematic approach to address chemicals in products relevant for consumers needs to be developed. It should cover overarching principles and basic strategies for all kinds of products, identify priorities, elaborate on product specific requirements including information provision as well as monitoring and market surveillance. Consideration also needs to be given to a horizontal framework to be complemented by product specific implementing measures.

As a matter of highest priority (enhanced) requirements for the following product groups must be adopted:

Materials in contact with food

Especially for materials not yet covered in specific implementing measures according to the framework regulation, including - as a minimum - printing inks, paper & board, metals & coatings, and strengthened requirements for ceramics



Based on the "The European acceptance scheme for construction products in contact with drinking water (EAS)", proposed in 2005, and the subsequent harmonisation work done by a group of 4 Member States (FR, GE, NL and UK) initiated in 2007

Materials in contact with drinking water

Products releasing emissions to the indoor air

Based on existing national legislation (particularly the German AgBB scheme) and the reports published under the "European Collaborative Action - Urban Air, Indoor Environment and Human Exposure"



Including generic exclusions of substances of high concern (such as CMR) as well as substance-specific provisions using existing specifications (such as the OEKOTEX® Standard 100 and the EU ecolabel criteria) and related research (e.g. by the Swedish Chemicals Agency, KEMI) as a departure point

Clothing and other consumer textiles

Toys

Aimed at a considerable strengthening of the inadequate chemical provisions of the Toy Safety Directive including e.g. a significant reduction of the CMR thresholds and addition of limits for substance categories not yet covered (such as colorants, monomers, nanomaterials, endocrine disrupting chemicals)

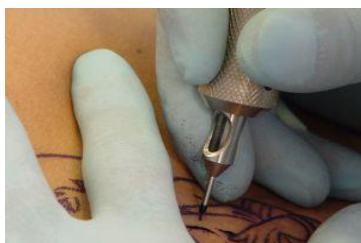


Based on (improved) requirements for toys adapted to the specific use and exposure situation of child use and care articles

Child care articles

Packaging

Complementing current requirements for lead, cadmium, mercury and hexavalent chromium by e.g. excluding CMR chemicals (all categories) or endocrine disrupters and including specific limits based on risk assessment



Using recommendations of the Council of Europe as a departure point to establish a stand-alone regulation or to broaden the Cosmetics Regulation

Tattoo inks

Nano

Specific provisions for nanomaterials to be implemented (nano specific product requirements, nano registry)



The need to set (additional) chemical requirements for other product groups - such as medical devices, electrical and electronic products, personal protective equipment, furniture, sports/playground surfaces and equipment or products made from leather or paper - needs to be investigated.

For more information about hazardous chemicals in EU regulations and resulting ANEC recommendations find the full position paper:

"Hazardous chemicals in products – The need for enhanced EU regulations"

June 2014

on the [ANEC website](#)

The studies commissioned by the ASI Consumer Council referred to in ANEC position paper on chemicals in consumer products can be accessed at the link:

<http://www.verbraucherrat.at/en/news>

About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 33 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.



Raising standards for consumers

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