



The SIN LIST

An NGO-driven project for toxic use reduction

Nardono Nimpuno, Senior Policy Advisor

Jerker Ligthart, Project Coordinator



ChemSec

The International Chemical Secretariat

- i) A coalition of environmental organisations**
- ii) serves as a forum for parties working for better chemical control**
- iii) monitors the development of Chemical policies in Europe and elsewhere**
- iv) seeks to strengthen support for progressive legislation, in particular among business actors**





NGO Advisory Committee

ChemSec's Business group

Established in 2003 with members such as:

- **Dell**
- **Boots the Chemist**
- **B&Q**
- **Sara Lee**
- **Skanska**
- **Sony Ericson**
- **L'Oreal**
- **Eureau**

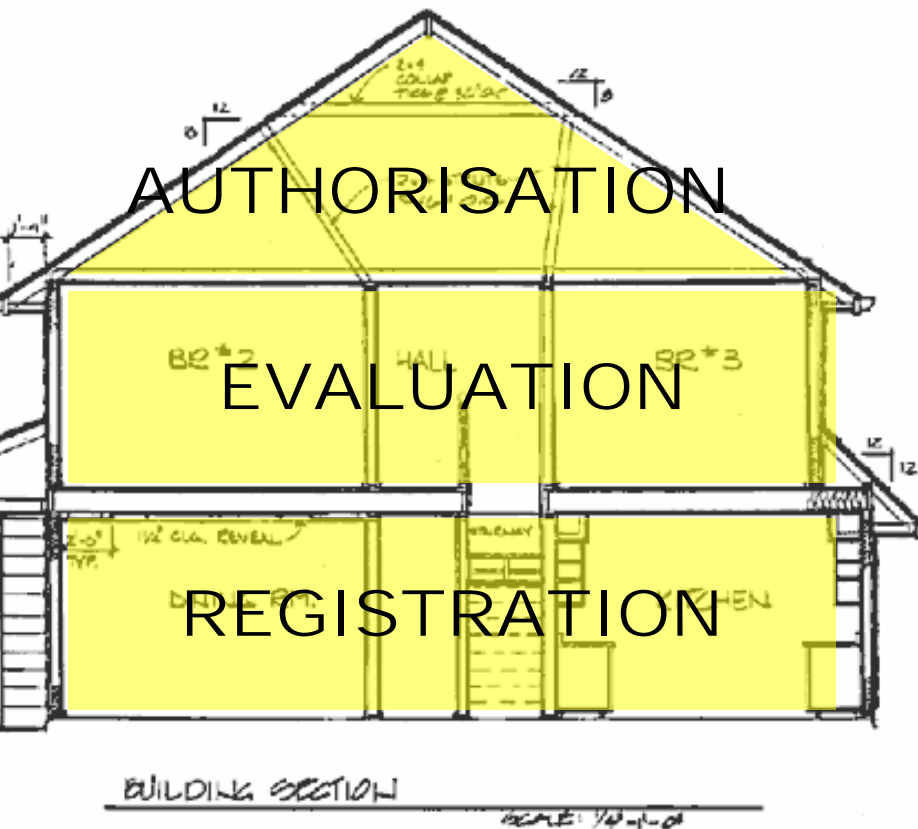
REACH: Back to Basics

- Lack of safety information on industrial chemicals
- Lack of action on identified hazardous substances
- Lack of coherent approach

What Environmental NGOs expect from REACH

- Improved flow of information among producers, downstream users, consumers, and authorities
- Shift the burden of proof to chemical makers
- Act promptly on priority chemicals
- Spur the development, adoption of safer alternatives

Building a new regulation in EU... REACH



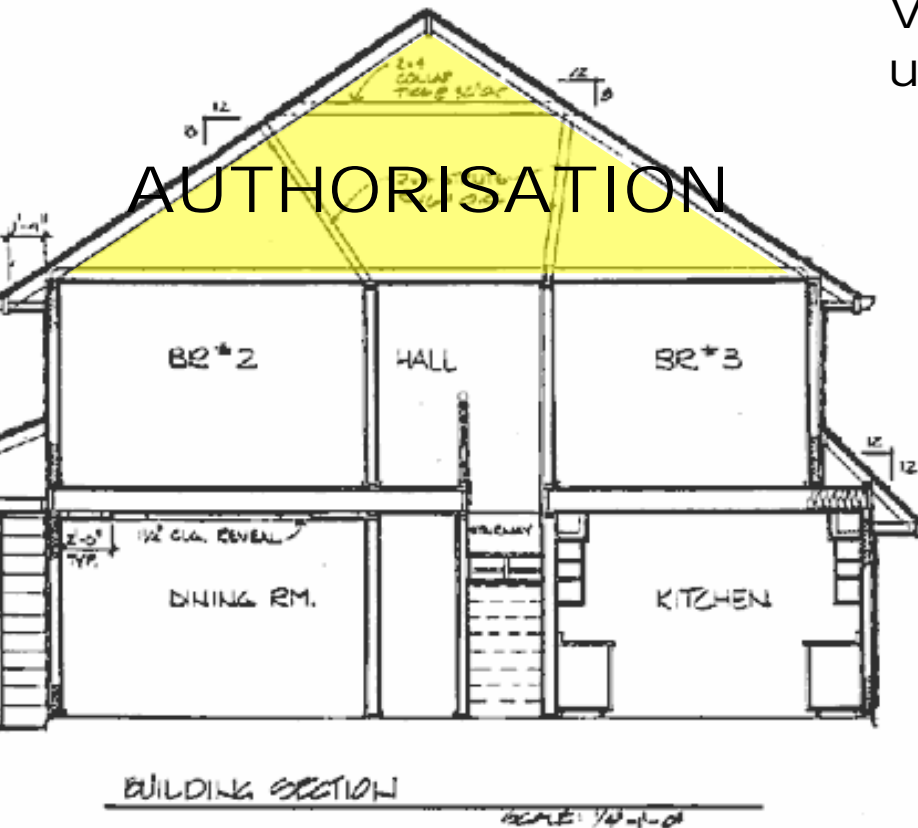
REACH regulates and gathers information on the chemicals on the market.

Substances of "very high concern" only allowed under authorisation

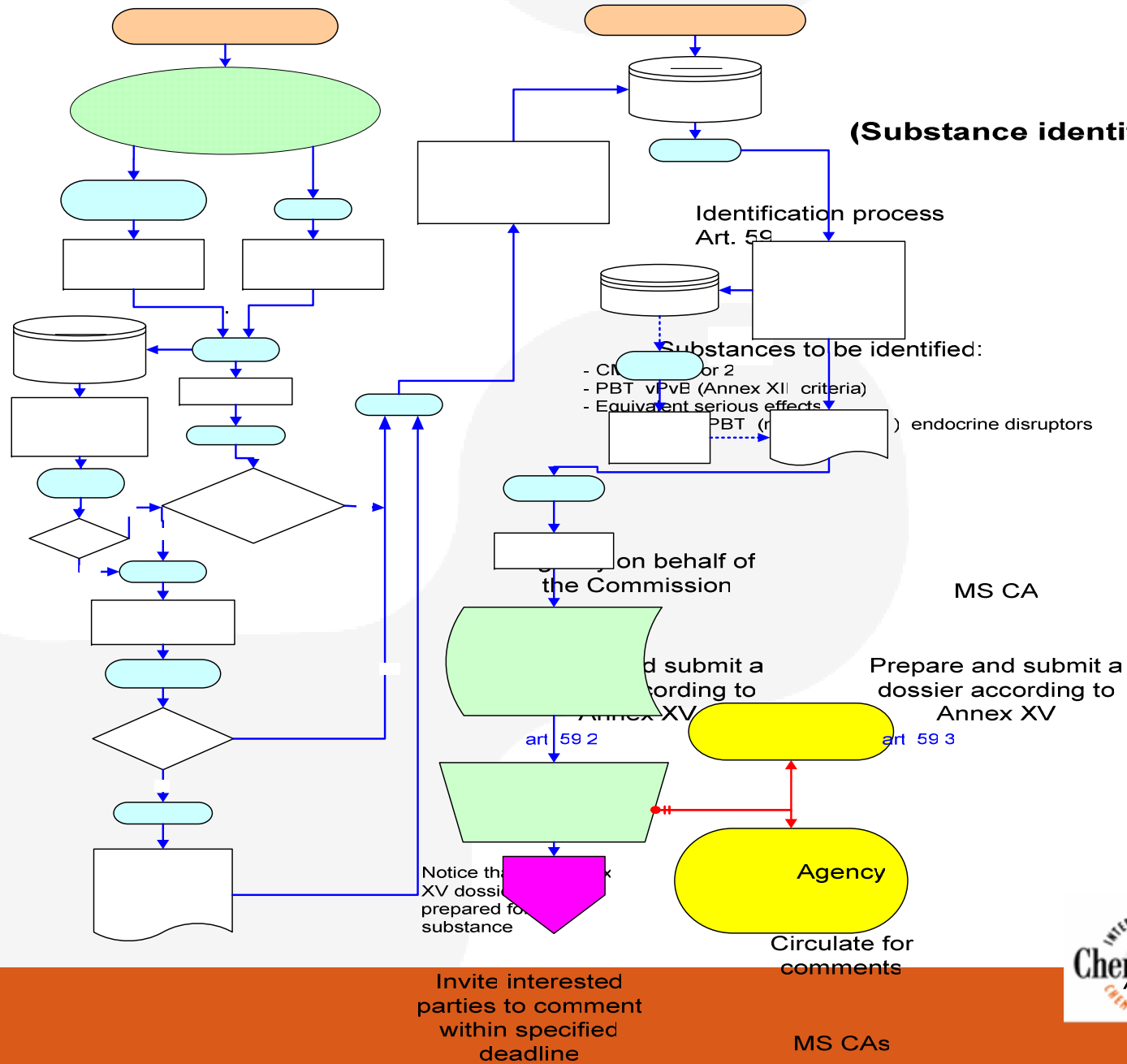
All substances > 1 t/a to be tested, information submitted to the European Chemicals Agency
"No data - No market"

AUTHORISATION

Production/Use of Substances of Very High Concern only allowed under Authorisation



Carcinogenic
Mutagenic
Toxic to reproduction
Persistent, Bioacc. & Toxic (PBT)
Very Persistent & very Bioaccumulative (vPvB)
Endocrine disruptors
"Substances of equivalent concern"

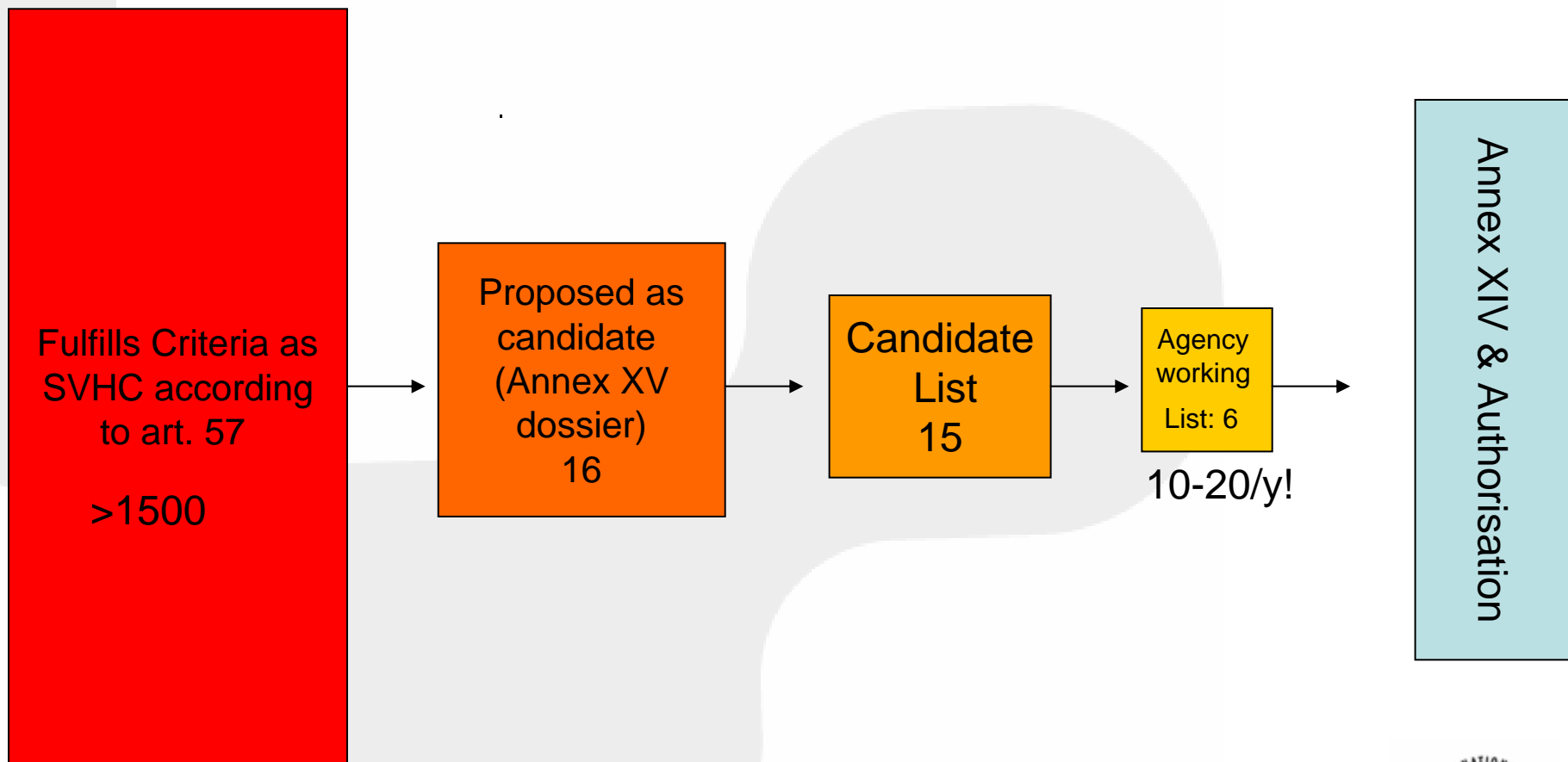


Auth
(Substance identification a

Est
ca
i
indic
the
art



Identification of Authorisation- substances



WWW.SINLIST.ORG
REACH
S.I.N.*
LIST
*SUBSTITUTE IT NOW!

Preparation of the REACH SIN List



**NGO Advisory
Group**

**Business
Reference Group**



The Objective

To identify chemicals that meet the REACH criteria for SVHC

- ...to assist Candidate List process
- ...to prioritize chemicals for phaseout
- ...to offer guidance to companies, consumers, regulators
- ...to promote safer alternatives

The List – The reaction of the Companies

- Positive to the development of the List
- Beneficial to have one single NGO list
- Beneficial to get early info on NGO priority substances



How the SIN list is used today

- SIN Communication
 - EDF Report “Across the pond” from the US point of view
 - Innovest report
 - San Francisco Department of the Environment – SIN Workshop
 - Houston conference REACH & USA
- Formal REACH regulatory process
- NGO Projects and campaigns
- Companies chemicals management



How the SIN list is used today

- Formal REACH regulatory process
 - Contact with Member States Chemicals Agencies
 - Dutch Ministry of Environment - SIN Symposium
- NGO Projects and campaigns
 - SIN chemicals in Toys
 - Information to consumers
- Companies using SIN List, e.g. to coordinate internal avoidance lists

WWW.SINLIST.ORG
REACH
S.I.N.*
LIST
*SUBSTITUTE IT NOW!



Selection of substances - Methodology

- Methodology used is based on REACH criteria
 - All substances are SVHCs
- Article 57, definition of SVHCs – Hazard only
- Official Guidance documents



Selection of substances - Methodology

Article 57 provides the definition of SVHCs

(a)-(c) substances meeting the criteria for classification as carcinogenic, mutagenic or toxic for reproduction category 1 or 2

(d) substances which are persistent, bioaccumulative and toxic

(e) substances which are very persistent and very bioaccumulative

(f) Substances which give rise to an equivalent level of concern



Selection of substances - Methodology

- Methodology used is based on REACH criteria - all substances are SVHCs
- Article 57, definition of SVHCs – Hazard only
- Official Guidance documents

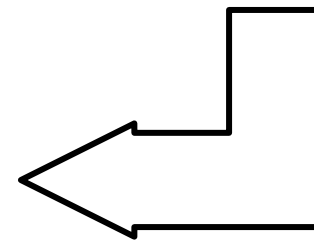
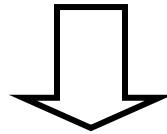
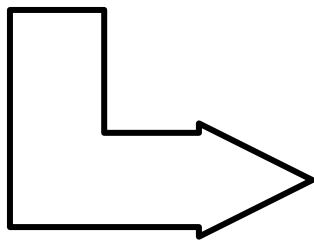
- Relevant but not restricted to REACH
- Can be used world wide

Selection of substances subject to REACH

**CMR
Substances**

**PBT/vPvB
substances**

**Equivalent
concern
substances**



SIN List



Selection Criteria – CMRs

Started with 905 classified substances

Removal of substances exempted from registration under REACH such as pesticides, chemical intermediates not viable for authorisation, etc, (e.g. Removal of Annex I series 648- and 649-)

Result: 220 CMR



Selection Criteria – PBT/vPvBs

Started with 27 substances (PBT working Group)

Removal of substances exempted from registration under REACH such as pesticides and chemical intermediates not viable for authorisation

Removal of substances already banned through other means (Stockholm Convention on POPs)

Result: 17 PBT/vPvBs



Selection Criteria – “Equivalent concern”

From a gross list with 4000 substances from 25 different lists, a selection was made taking into account:

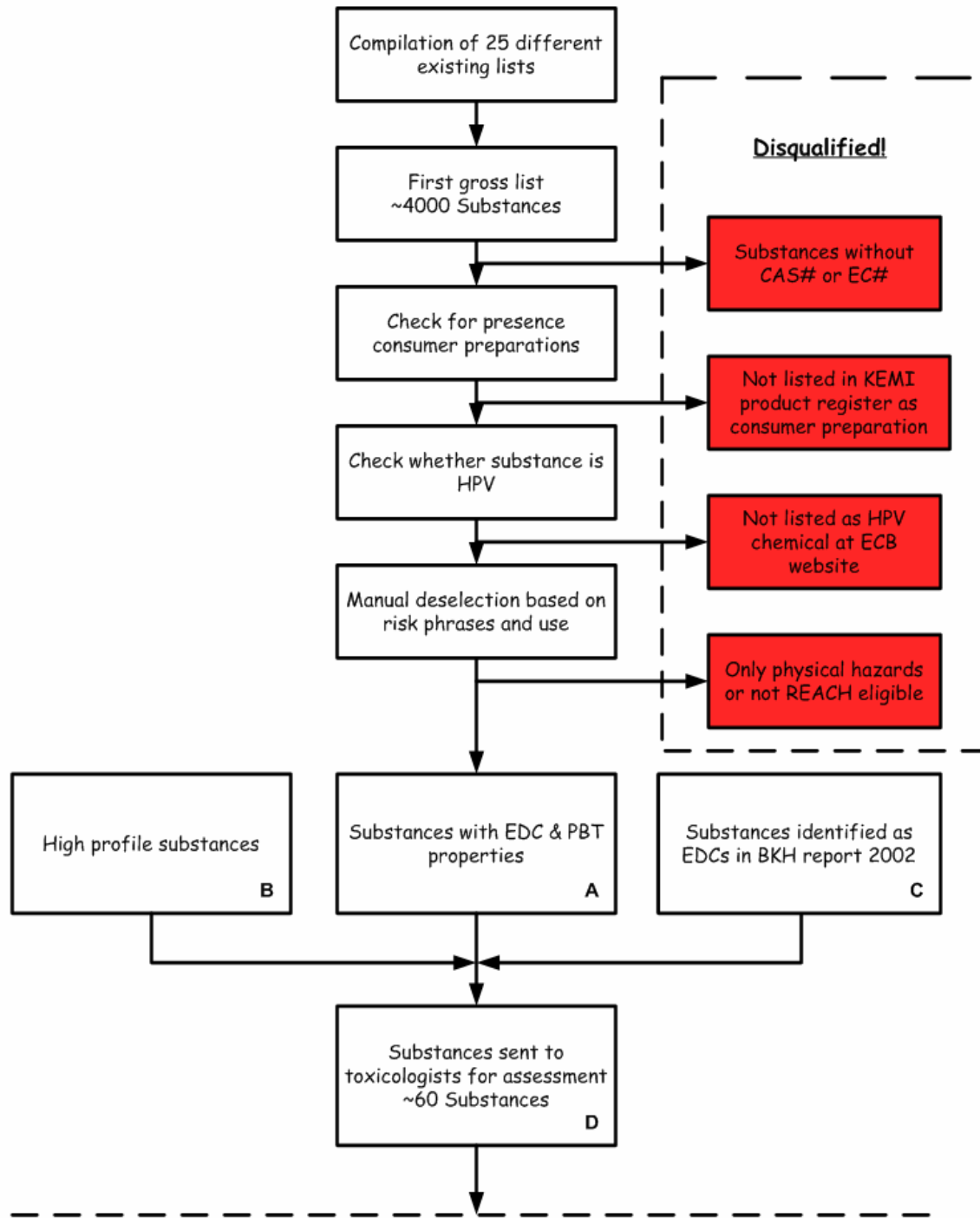
- Removal of exempted substances

- Taking into REACH prioritizations
e.g. Wide dispersive
use/HPV/EDC/PBT

- Hazard properties, with regard to the
Guidance for Annex XV (RIP 4.4)

- Toxicological assessment & review

Result: 30 subs

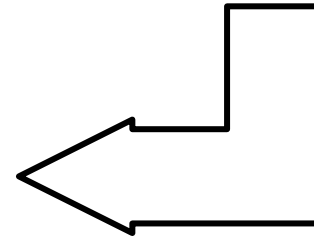
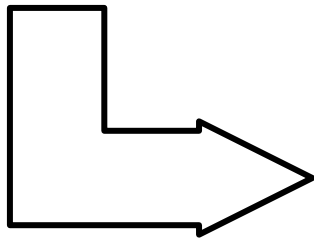


Selection of substances subject to REACH

**220
CMR
substances**

**17
PBT/vPvB
substances**

**30
Equivalent
concern
substances**



**SIN List
267 subst.**



Why a different number?

- ECHA restrictions
 - Member states barred from submitting dossiers
 - Short deadline requirements - June 2008
- NOT in REACH
- ECHAs primary interest, pre-registrations
- Resources demanded for data services



Example substances from the SIN List

Deca-BDE

Used as flame retardant in all kinds of electronic equipment. Also common in buildings and in textile.

**Developmentally toxic
Endocrine disrupting
& Persistent**

**Found in humans and the environment.
Found in human blood and breast milk**



Example substances from the SIN List

Bisphenol A

Used as stabilizer, Antioxidant and corrosion preventer in plastic materials.

Reprotoxic chemical
Endocrine disruptor

BPA is commonly detected in humans. Found in human urine, tissue and blood, including maternal and umbilical cord blood.



Example substances from the SIN List

- DEHP, DBP, BBP
 - HBCDD
 - TBBPA
 - PFOA, PFOS
 - Nonylphenol (etoxilates)
 - Formaldehyde
 - Musk Xylene
-



How to use the list

Businesses:

- As a tool in a Toxic Use Reduction strategy
- Look into the future what substances will be subject to regulation – be prepared!
- Make informed choices on hazards
- Reconsider which function is really necessary

Regulators & NGOs

- Use the SIN List to target unknown hazards
- Use the methodology to find additional substances of concern



How the SIN List is used today

“[The REACH SIN List] is a prime source of information about substances of concern that B&Q will use to ensure that it protects its customers, employees and the environment. In addition, it will provide an early warning system for substances that are likely to appear on the official REACH ‘candidate list’, enabling B&Q to move towards elimination/substitution of these chemicals in advance of legislation”

- Roy Miller, Chemicals Advisor, B&Q



The SIN List

Thank you for
Your attention

Questions?