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NEWSLETTER

## Newsletter RNI srl 29.01.2021

### **CANDIDATE LIST UPDATED WITH TWO CHEMICALS THAT ARE TOXIC FOR REPRODUCTION**

The European Commission has suggested changing the Wood–PFA proposal on polymers requiring registration (PRRs) under REACH to incorporate Canadian criteria for identification of polymers of low concern (PLCs). The document includes a fundamental change to the outcome for polymers that are not identified as requiring registration. Previously, no action was required. Following the change, companies would need to share with Echa their evidence that the polymer is not a PRR. The Commission is committed to proposing an approach for registering a subset of polymers by the end of 2022. To set a basis for discussion, it commissioned two consultancies – Wood and Peter Fisk Associates (PFA) – to review the options and develop an initial framework, which they provided in a report published last year. The Wood–PFA report said that PLCs should not be identified as PRRs but did not explicitly incorporate any existing system for identifying PLCs in its PRR criteria. The American Chemistry Council (ACC) urged the Commission to adopt a common approach to polymer registration based on exempting PLCs. It argued for an "aligned and streamlined" approach to exempting PLCs "so that resources are not spent on the assessment of a polymer in one country that would be otherwise exempted in another". "Polymers that are

PLC in other jurisdictions should not be PRR," the document says in a table marked "reasoning". "CAN [Canadian] PLC criteria can be the basis, but any polymer carrying a classification should also be evaluated through the flowchart. Australia excludes polymers with a GHS classification from being PLC." In 2014, the Canadian government published a system for identifying polymers requiring different levels of assessment under the Chemicals Management Plan. In 2018, it published a "second phase of polymer rapid screening" document, which provided explicit criteria for identifying PLCs. Other regulatory systems for identifying PLCs have been developed and implemented in South Korea, Australia, China, Taiwan, Japan and the US.

## **COMPLETENESS CHECKS ON CHEMICAL SAFETY REPORTS START ON 1 MARCH**



As of 1 March 2021, manual completeness checks performed by ECHA staff will be extended to chemical safety reports to ensure they contain all the elements required under REACH. The extended completeness check will apply to both new registrations and updates of existing ones. Registrants should, therefore, prepare for the changes, as registrations submitted before 1 March may no longer pass the completeness check.

The completeness check of chemical safety reports was originally scheduled to start in April 2020.

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## **REACH AND LEAD FOR GUNSHOTS**



Annex XVII to Regulation (EC) No 1907/2006 lays down restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Entry 63 of that Annex contains restrictions with respect to lead (CAS No 7439-92-1, EC No 231-100-4) and lead compounds. The Agency concluded that the use of lead in gunshot in wetland poses a risk to waterbirds that ingest spent lead gunshot leading to toxicological effects, including death but also risks for the environment and human health.

The Agency concluded that lead-free gunshot alternatives, such as steel and bismuth gunshot, are widely available, technically feasible and have better human health and environmental hazard and risk profiles than lead gunshot. Moreover, steel gunshot, the most likely alternative to be used, is available at a comparable price to that of lead gunshot.

The EU Regulation 2021/57, which will come into force in each of the Member States twenty days after its publication in the Official Journal of The European Union (February 15, 2021).

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**EBB: JOB OPPORTUNITY**



On behalf of our historical partner EBB, we would like to recommend this job opportunity for the position of Senior Technical & Regulatory Officer at the following link.

For more details on the open position click [here](#)

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**KKIDIK (TURKISH REACH): LATE PREREGISTRATION  
ACCEPTED BY TURKISH AUTHORITY ONLY EARLY  
2021**

**ACT NOW IF YOU LOST THE LAST DEADLINE**



In 2017, Turkey published and consolidated the text of the KKIDIK regulation regarding chemicals that can be placed on local national market. The scheme adopted follows the European REACH regulation in many prescriptions, so much so that it is often referred to as Turkey-REACH. One of the significant differences is that there is only one registration deadline for all tonnage bands, set for 31/12/2023.

**At this stage, the possibility is open to pre-register by 31/12/2020 but the Turkish government decided to accept late preregistration after the deadline.**

As for REACH EU, applicants must be Turkish legal entities. Non-Turkish companies that want to keep the market will have to appoint a local OR (only Representative). RNI srl can offer this service.

#### **SEA UPDATES:**

The SEA CLP like Regulation has been updated, adding 110 new substances to the Harmonized List of classification and labeling "and new hazard classifications. Furthermore, only polymers must be notified and not their ingredients.

For more information press the [here](#)

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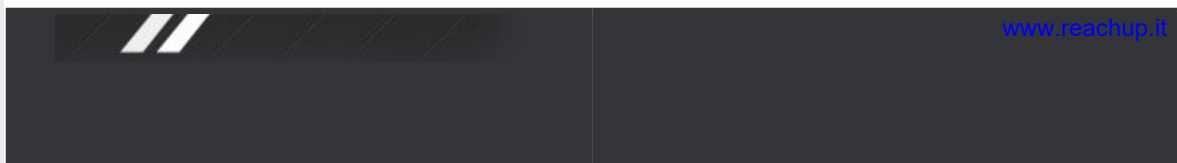


AssICC has signed an agreement with the associated company RNI (ReachUp Regulatory Network Italy) srl, which offers advice on product regulations for the European and extra-European markets.

Thanks to the stipulated agreement, for all the companies associated with AssICC will be reserved a 10% discount on the RNI srl services.

[For more info visit the webpage](#)

From this month, REACHUP offers import and export worldwide consultant services on TRADE ITALIAN AGENCY. You can access on the ICE online vetrina previous registration. The link of the page is reported [here](#)



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