

The SIN list

US Clients
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Alan Ritchie
Caleb Management Services
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What is the SIN list (1)

- Substitute It Now
- NGO initiative (ChemSec)
- REACH has a process for authorisation and restriction
- Member States have an input to this
- NGOs have an input to this
- NGO perception that REACH process too slow, too little activity

What is the SIN list (2)

- ChemSec created a list of 267 substances it wants substituted
 - ❖ Substitution = replacement, not restriction or authorisation
 - ❖ No SEA – get rid of them – i.e. manufacture or import of the substances would no longer be allowed... PERIOD

What would consequences be?

- List includes a number of monomers
- Downstream polymers from these would no longer be available, unless made outside EU
 - ❖ List includes urethane and styrene
 - ∴ no polyurethane or polystyrene
 - What would MacDonald's do?
 - ❖ List includes ethylene and propylene oxide
 - ∴ no ethoxylates
- Other interesting substances listed include:
 - ❖ Formaldehyde
 - ∴ no formaldehyde based preservatives
 - ❖ Benzene
 - No oil refineries in Europe
 - all cars would have to be diesel

What is the likely outcome

- Geert Dancet has said that the SIN list is “a worthwhile initiative”
- So... this will be considered as a legitimate NGO into the authorisation and restriction process
- The 267 substances will effectively become SVHCs
 - ❖ Will go into review process
 - ❖ A few will be rejected
 - ❖ Most will have to have SEAs conducted
 - ❖ Some will be authorised
 - ❖ Most will be restricted
 - ❖ Some will be forced to be substituted