

Revision of European chemicals legislation



With the Chemicals Strategy for Sustainability (CSS), the Commission is pursuing the goal of safe and sustainable use of chemical substances. To accomplish this, a disproportionate tightening of the current chemicals legislation (including REACH) which is considered the safest and most progressive in the world, was planned. Over 80 individual measures are to be implemented by 2024 and highly complex issues addressed. Even if not everything has been implemented so far, work is continuing on these measures, and some of the objectives affect the paints and coatings industry in particular.

Mixture Allocation Factor (MAF)

One measure that would particularly affect the paints and coatings industry as a formulating sector with many substances in the mixtures is the so-called MAF, the „Mixture Allocation Factor“. In all risk assessments of chemicals and mixtures under REACH, this additional safety factor would be applied to take into account so-called „cocktail effects“. This means that a very rare effect would be formally taken into account across the board and indiscriminately for a huge number of chemical substances. This is scientifically controversial and would either lead to excessive health and safety measures or the elimination of many relevant raw materials.

Hazard-based approach (GRA)

In addition, a general, hazard-based approach to risk management is to be introduced, which is not only less scientific than a risk-based assessment, but is also intended to abolish the important distinction between professional and private end use of chemical products. Many important reactive paint systems, e.g. for repairing wind turbines, would no longer be available even to professionals.

New hazard classes and essential uses

The introduction of new hazard classes and digitalization initiatives in the CLP Regulation, the introduction of the GRA and the definition of „essential uses“ of substances classified as hazardous are key elements of the CSS and have already found their way into chemicals legislation to some extent.

Conclusion

Overall, the various measures, some of which are scientifically controversial, are likely to result in a significantly reduced selection of chemical substances in the future. A broad range of raw materials is, nonetheless, a basic prerequisite for ensuring that paints, coatings and printing inks can deliver the required performance and fulfill their functionality. Due to the particularly high diversity of substances and formulations in the paint and printing ink industry, massive effects and complex adjustments to formulations are to be feared. It can therefore be assumed that the implementation of all CSS measures will lead to less sustainability.

**This is
what we
are calling
for**

Utilising the industry's innovation potential

The massive effort involved in replacing substances in colour formulations is lengthy and complex. This ties up resources and inhibits the industry's innovative strength. In order to achieve the objectives of the Green Deal, however, the full potential of the industry and a broad raw material base are required.

No equating of private end users and professional users under chemicals legislation

Due to the high level of vocational training and occupational health and safety in Germany, equal treatment under chemicals legislation does not make sense and would lead to the elimination of many important coating technologies. Deficits in the European harmonisation of occupational health and safety should be addressed directly and not compensated for by chemicals legislation.

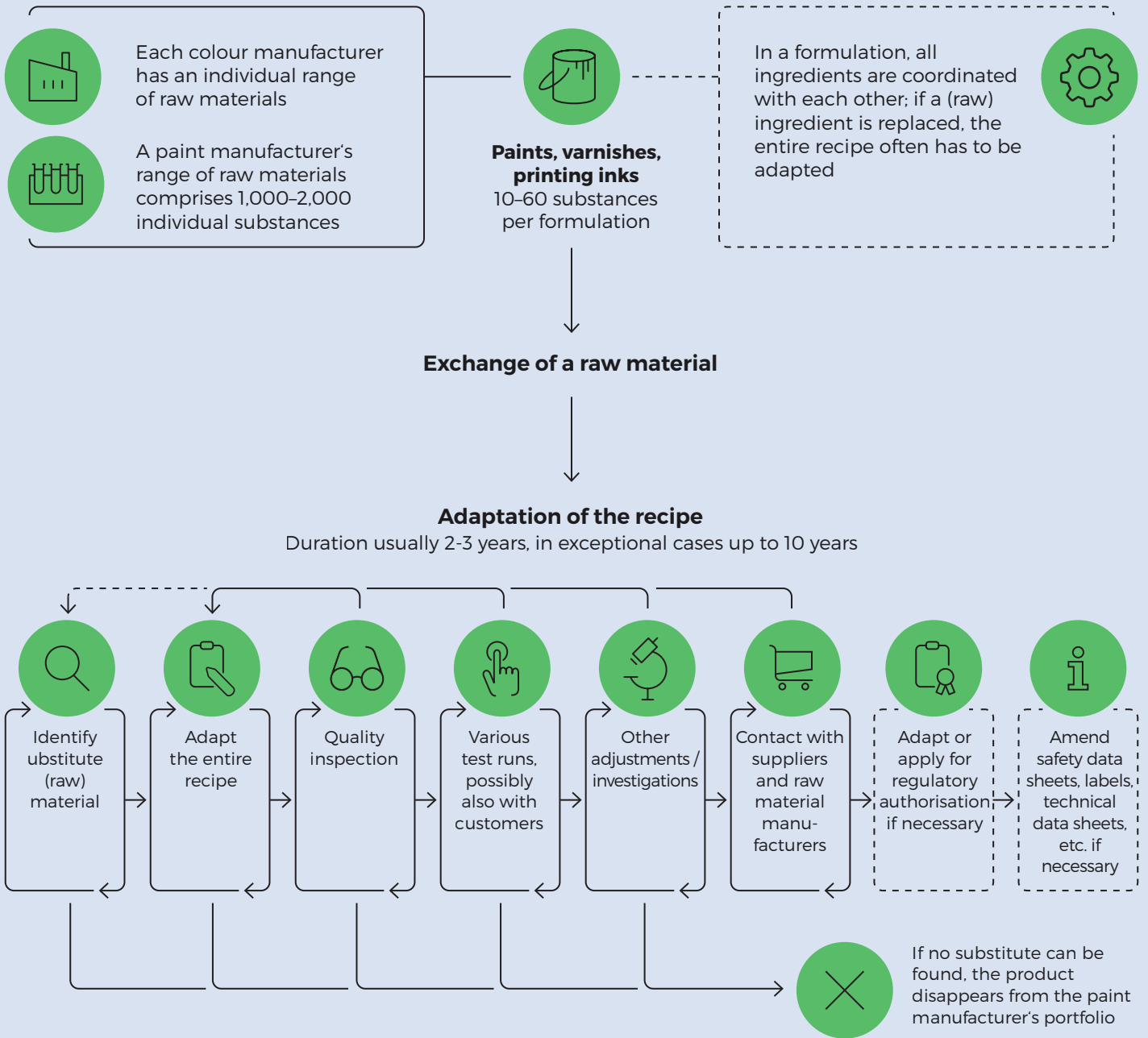
Examine the scientific necessity and effects of the „Mixture Allocation Factor“

When introducing the MAF, the critical voices from the scientific community should be taken into account and the massive impact carefully analysed. Furthermore, the focus should be placed on the most relevant substances (hazard classes, tonnage, etc.).



Replacement of substances in colour formulations

A complex and lengthy process



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