



SCHC Monthly Newsletter

Issue 1 | October 30, 2015



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REACH

European Court of Justice (ECJ) Issues Ruling on Substances in Articles

Following a case initiated in France the ECJ has issued its ruling on how the 0.1% threshold in Articles 7(2) and 33 of REACH should be interpreted; in particular, when considering ‘complex articles’. Such articles are those assembled or produced from smaller objects that are also articles. For example, a car is a complex article made from many smaller components.

The existing guidance on this aspect of REACH, indicated that the 0.1% threshold should be calculated on the basis of the whole article as supplied (e.g., the whole car). However, the ECJ has ruled that the individual components retain their status as distinct articles and therefore the 0.1% threshold applies individually to each component (e.g., the seats, steering wheel, carpets engine components, etc.). This will have implications on the level of information supplied to professional users of articles and the information that should be provided to consumers requesting it.

The full implications of the ruling are still being worked out and one of the first steps will be for ECHA to update the relevant guidance. The UK REACH CA will subsequently update its guidance.

The REACH CA enforcement team will continue to enforce REACH in a proportionate and pragmatic way, in line with its Enforcement Policy Statement and priorities. Our approach to enforcement will account for the pending update to the guidance and for the time needed to gather the additional information.

Miscellaneous

Risk Management Activity

Consultation of 7 Proposals to Identify New Substances of Very High Concern (SVHCs)

Draft Stage 1 Alternatives Analysis (AA) Guide

Risk Management Activity

Consultation on 7 Proposals to Identify New Substances of Very High Concern (SVHCs)

These are for the following substances [with the reason for inclusion indicated in]. Of particular note are the two substances being proposed on the grounds of equivalent level of concern. Comments on these are welcomed. The consultation is open until 15 October 2015.

- Hexamethylene diacrylate (Equivalent level of concern: Skin Sensitiser)
- Dicyclohexyl phthalate (Toxic for reproduction & Equivalent level of concern: endocrine disruptor)
- UV-327 and UV-350 (vPvB)
- Perfluorononan-1-oic acid and its sodium and ammonium salts (group entry) (Toxic for reproduction & PBT)
- 1,3-Propanesultone (Carcinogen)
- Nitrobenzene (Toxic for reproduction)

Draft Stage 1 Alternatives Analysis (AA) Guide

The Safer Consumer Products program (SCP) is pleased to release the Draft Stage 1 Alternatives Analysis Guide (AA Guide), now available for comments and questions. The AA Guide provides useful approaches, methods, resources, tools and examples of how to fulfill SCP's regulatory requirements. This Draft of the AA Guide only covers the first stage AA required by the SCP regulations. A draft including the second stage AA is scheduled to be released in the first quarter of 2016. The two stages of the AA process are:

- **First Stage AA:** The first stage involves an initial screening of alternatives with a preliminary analysis to identify the legal, functional, and performance requirements of the Priority Product and Chemical of Concern. See table on [page 16 of the AA Guide for more details](#).
- **Second Stage AA:** The second stage is an in-depth analysis of the relevant factors, life cycle, and economic impacts. See table on [page 17 of the AA Guide for more details](#).

You may download and comment on the Draft Stage 1 Alternatives Analysis Guide through the [Safer Consumer Products Information Management System \(CalSAFER\)](#).

Join one of our webinars on October 7, 2015 or October 21, 2015 to learn about and discuss the guide. Visit SCP's [Alternatives Analysis Guide web page for information on upcoming webinars](#).

If you are interested in employment opportunities with Safer Consumer Products, check out the new [SCP jobs page](#).

Miscellaneous

California OEHHA News

California Agency Issues Draft Alternatives Analysis Guidance

Senate TSCA Reform Bill Gains Filibuster-Proof Support

Brazil Plans to Implement New Industrial Chemicals Law

California OEHHA News

[Lead Agency Website](#)

[Clear and Reasonable Warnings Proposal](#)

[Naturally-Occurring Background Levels for Certain Chemicals Found in Un-Processed Foods](#)

[Level of Exposure to Chemicals Causing Reproductive Toxicity](#)

[Level of Exposure to Chemicals Causing Reproductive Toxicity](#)

[Requesting Repeal or Amendment of the Safe Harbor Level for Lead](#)

California Agency Issues Draft Alternatives Analysis Guidance

[Click Here for More Info](#)

Senate TSCA Reform Bill Gains Filibuster-Proof Support

Text changes win backing of two more Democrats

5 October 2015 / United States, Substance registration & inventories

[Click Here for More Info](#)

Brazil Plans to Implement New Industrial Chemicals Law

October 16, 2015

Did you know?

Brazil's Ministry of Environment (MMA) has plans to draft a law to control industrial chemicals in Brazil, which is expected to be completed by the end of this year. A national chemical inventory will be required by the new legislation. The new legislation will likely incorporate the Globally Harmonized System of Classification and Labelling for Chemicals (GHS) for hazardous industrial chemicals in Brazil. There are plans to also identify high risk chemicals for which further risk management measures may be implemented.

In Brazil, classification, labelling and safety data sheets (SDSs) of hazardous chemicals are already required to comply with GHS through Brazil's national standards. ABNT NBR 14725-2:2009, ABNT NBR 14725-3:2012 and ABNT NBR 14725-4:2014 respectively.

Along with Brazil, Ecuador and Uruguay have also implemented GHS in their classification, labelling and SDS's of hazardous chemicals. Meanwhile, Chile has plans to move towards GHS implementation as well.

At this time, there is no official timeline in place for the implementation of the industrial chemicals law in Brazil.

Miscellaneous

Mexico Enacts and Publishes New Mandatory Standard Adopting Fifth Revision of GHS

OSHA Hazard Communication Webpage Update

Future Events in the Global Chemicals Regulation Series

California Meeting Notice: Biomonitoring

Meeting Notice for American College of Toxicology

Mexico Enacts and Publishes New Mandatory Standard Adopting Fifth Revision of GHS

[Click Here for More Info](#)

OSHA Hazard Communication Webpage Update

OSHA has just announced that it has updated its Hazard Communication webpage by organizing its content into categories such as Labeling, Pictograms, Interpretations, etc. that are accessed via a tab approach.

[Click Here for More Info](#)

Future Events in the Global Chemicals Regulation Series

The Global Chemicals Regulation series from Chemical Watch is an annual programme of events providing regulatory, compliance and EHS professionals, government regulators, product registration managers, toxicologists, risk assessment managers and lawyers with the up-to-date intelligence they need to stay one step ahead in the complex field of chemicals regulation around the world. Future events in this series include:

- **Enforcement Summit Europe**
21-22 October 2015, Brussels, Belgium: [Book Here](#)
- **Global Supply Chain Summit USA**
7-8 December 2015, Washington DC: [Book Here](#)

California Meeting Notice: Biomonitoring

Biomonitoring California will hold the next Scientific Guidance Panel Meeting on November 18, 2015: 10:00 am – 5:00 pm (PST) at the California Department of Public Health Richmond Campus Auditorium in 850 Marina Bay Parkway, Richmond, CA.

The meeting will be webcast: [Click Here for More Info](#)

Meeting Notice for American College of Toxicology

The 36th Annual American College of Toxicology meeting is at Red Rock Resort in Summerlin, Nevada on November 8-11, 2015.

[Click Here for More Info](#)

The SCHC Newsletter is a monthly publication of the Society for Chemical Hazard Communication. SCHC Members are encouraged to submit a title or short statement on any topic in the HazCom field along with a link to: design@m2columbus.com.

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