

七种物质将被提议加入 REACH限制清单

根据REACH法规的规定，欧盟各成员国、欧盟委员会以及欧洲化学品管理局都有权提出提案和建议，向REACH法规限制列表当中添加新的管控物质。最近，欧洲化学品管理局、法国政府和挪威政府公布了计划在2010年提交审议的7项限制物质管控提案。这7项提案的具体情况是：

No.	提案方	物质名称	CAS号码	预计提案提交时间	限制情况
			/ EC号码		
1	欧盟委员会委派欧洲化学品管理局 (ECHA)	汞	7439-97-6 / 231-106-7	2010-6-15	限制在血压计以及用于医疗和其他专业工业用途的测量设备中使用汞
2	挪威	辛酸苯汞	13864-38-5 / Not Listed	2010-6-15	不得在聚氨酯弹性体中使用该物质，并且禁止销售任何包含该物质的物品。
3	挪威	乙酸苯汞	62-38-4 / 200-532-5	2010-6-15	不得在聚氨酯弹性体中使用该物质，并且禁止销售任何包含该物质的物品。
4	挪威	(新癸酸根合-O)苯基汞	26545-49-3 / 247-783-7	2010-6-15	不得在聚氨酯弹性体中使用该物质，并且禁止销售任何包含该物质的物品。
5	挪威	丙酸苯汞	103-27-5 / 203-094-3	2010-6-15	不得在聚氨酯弹性体中使用该物质，并且禁止销售任何包含该物质的物品。
6	法国	富马酸二甲酯	624-49-7 / 210-849-0	2010-4-15	限制在加工过的物品中存在
7	法国	铅及其化合物	-----	2010-4-15	限制珠宝中铅及铅的化合物

当这些建议提案的卷宗提交后，仍需要经过许多审议程序，包括公开评议、社会经济效益分析 (SEAC)、风险评估 (RAC) 等。此后，欧洲化学品管理局 (ECHA) 将把针对社会经济效益分析、风险评估以及其他相关的背景资料提交给欧盟委员会。在收到ECHA反馈意见的三个月内，欧盟委员会将起草对于REACH法规限制列表的修订草案。

REACH法规限制程序

REACH法规针对那些可能对人体健康或环境存在不可接受的风险的物质，预先规定了限制的程序，来管控这些物质的生产、销售以及使用。如果某种物质的风险性被证明需要在整个欧洲范围内进行控制，那么这种物质本身或者在混合物以及物品中的使用，都有可能被提议加入REACH法规限制列表进行管控。任何提议向REACH限制列表中添加限制物质的提案卷宗，都需要证明这些限制措施是针对潜在风险的最为合理有效的管理方式。当这些提案中的限制要求经过投票通过后，生产商和进口商都必须清楚了解这些规定，以保证他们在欧盟市场正常贸易的延续。

CTI建议

面对REACH法规的限制管控要求，企业应找出最适合自身情况的解决方式。首先应清楚了解限制要求的具体规定，特别是针对各项物质的具体限制条件。然后从中筛选出与自身关系最为密切的部分，并对这些项目进行重点关注和深入分析。在此基础上，企业可通过安全数据表 (SDS)、物质清单 (BOS)、符合性评估报告 (CAR) 以及测试报告等方式，进行供应链信息调查。经过对法规管控要求、企业自身产品及供应链构成情况的综合深入了解，开展更为高效的应对活动。

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SEVEN INTENTIONS FOR REACH RESTRICTION PROPOSALS

According to REACH regulation, more restriction requirements are to be expected as a new procedural process is implemented for which EU Member States, the European Commission, or the European Chemicals Agency (ECHA) can propose a new restriction. Recently, ECHA, France and Norway are going to propose seven chemicals in 2010 for restrictions under the listed conditions. The seven chemicals are:

No.	Dossier by	Substance	CAS No. / EC No.	Expected date of submission	Conditions of restriction
1	ECHA on request of the Commission	Mercury	7439-97-6 / 231-106-7	15/06/2010	Placing on the market and use of mercury for sphygmomanometers and other measuring devices in healthcare and in other professional and industrial uses
2	Norway	phenylmercuric octanoate	13864-38-5 / Not Listed	15/06/2010	use of the substance in polyurethane elastomers and placing on the market of articles containing the substance
3	Norway	phenylmercury acetate	62-38-4 / 200-532-5	15/06/2010	use of the substance in polyurethane elastomers and placing on the market of articles containing the substance
4	Norway	phenylmercury neodecanoate	26545-49-3 / 247-783-7	15/06/2010	use of the substance in polyurethane elastomers and placing on the market of articles containing the substance
5	Norway	phenylmercury propionate	103-27-5 / 203-094-3	15/06/2010	use of the substance in polyurethane elastomers and placing on the market of articles containing the substance
6	France	dimethylfumarate	624-49-7 / 210-849-0	15/04/2010	dimethylfumarate in treated articles
7	France	lead and its compounds	---	15/04/2010	lead and its compounds in jewellery

After the dossiers were submitted, the adoption of a new restriction still involves many steps, including Public consultation, Socio-economic analysis (SEAC), Risk assessment (RAC) and so on, then ECHA will send the opinions of SEAC and RAC along with relevant background documents to the European Commission. Within three months of receipt of the ECHA's opinion, the Commission will prepare a draft amendment of the list of restrictions.

Restriction process of REACH

REACH foresees a restriction process to regulate the manufacture, placing on the market or use of certain substances if they pose an unacceptable risk to health or the environment. Any substance on its own, in a mixture or in an article may be subject to a restriction if it is demonstrated that risks need to be addressed on a Community-wide basis. A restriction dossier needs to justify that the proposed restriction is the most appropriate risk management measure to address these risks. Manufacturers and importers shall be aware of all these restriction requirements when they were voted through in order to sustain business in the EU market.

CTI Suggestion

Find out the suitable solution. Enterprises should deeply understand the restriction requirements, especially for the restriction conditions of the substances. Then find out the most relevant ones and pay more attention to them. To ensure the conformity of the regulation, enterprises should collect information in the supply chain by SDS, BOS (Bill of Substance), CAR (Compliance Assessment Report), testing report and so on. After a comprehensive and in-depth learn, you can make the action more efficient.

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