

Trade Union Priority List

Frequently asked questions

- What is REACH?**
- What is the Authorisation procedure?**
- What are SVHCs?**
- What does CMR mean?**
- What does PBT/vPvB mean?**
- What does ‘equivalent level of concern’ mean?**
- What is ECHA?**
- What is an Annex XV dossier?**
- What is the Candidate list?**
- How will the Candidate list be compiled?**
- What is Annex XIV?**
- Why is it important to have a comprehensive Candidate list?**
- What is the purpose of this Trade Union list?**
- Why have Trade Unions developed their own list of SVHCs?**
- Who do you want to influence with the list?**
- Will this list undermine the credibility of the official list?**
- Will this list compete with the official list?**
- What's the difference between the Trade Union list and the SIN list?**
- What's the SIN list?**
- Are there substances concurrently on the Trade Union list and the SIN list?**
- Will the Trade Union list compete with the SIN list?**
- How can we use the Trade Union list and the SIN list in our company?**
- Should our company use the Trade Union list, the SIN list or the official list?**
- Are all other substances OK to use then?**
- Can companies be sure they are sustainable if they just follow this list?**
- Do you guarantee all conclusions and data in your list?**
- What if you are wrong, what will you do?**
- What substances should we use instead of the one listed?**
- What will happen with the Trade Union list in the future?**
- What is the history of ETUC?**
- What is so original about your list?**



European Trade Union Confederation (ETUC)
Confédération européenne des syndicats (CES)

What is REACH?

REACH is the acronym for the new European chemicals regulation, and it stands for Registration, Evaluation, Authorisation and Restriction of Chemicals.

What is the Authorisation procedure?

Authorisation is a REACH procedure designed to identify the most harmful chemicals (so called SVHCs) currently on the EU market, control the risk arising from their use and replace them with safer alternatives.

What are SVHCs?

Substances of Very High Concern (SVHCs) are chemicals with the most harmful effect on human health and the environment that need to be progressively substituted with safer alternatives. Article 57 of the REACH regulation defines SVHCs as CMR (category 1 or 2), PBT, vPvB and substances of 'equivalent level of concern'

What does CMR (category 1 or 2) mean?

Carcinogenic category 1 or 2 (causes cancer in humans or animals)

Mutagenic category 1 or 2 (changes DNA in humans or animals)

Toxic for Reproduction category 1 or 2 (damages fertility or the foetus in humans or animals)

What does PBT/vPvB mean?

Persistent, Bio-accumulative and Toxic (resists breaking down in the environment, can build up in the body and is toxic). Very Persistent and Very Bio-accumulative (vPvB)

What does 'equivalent level of concern' mean?

These are other chemicals for which scientific evidence of probable serious effect on the human health and environment exists e.g: Endocrine disruptors are to be considered substances of equivalent concern.

What is ECHA?

ECHA is the European Chemicals Agency based in Helsinki, Finland. ECHA is responsible for implementing the provisions of REACH, including setting up the Candidate list and recommending substances for inclusion in the Authorisation list.

What is an Annex XV dossier?

An Annex XV dossier is a file with information about a potential substance of very high concern (SVHC). It has to be prepared either by a Member State or by ECHA to start certain control processes under REACH, including authorisation.

What is the Candidate list?

The Candidate list is a list with hazardous substances that the Member State Committee of ECHA has agreed fulfill the criteria of being SVHCs. The candidate list is published on ECHA's website. Chemicals from this list may be prioritised for the Authorisation procedure. The Candidate list has two key functions. One is to be a gateway for possible inclusion in the Authorisation list. The other is to provide better information to everyone in the supply chain from workers to consumers who will be using these SVHCs or articles that contain them. Therefore, the European Trade Union Confederation is calling for a comprehensive Candidate list.

How will the Candidate list be compiled?

Any Member State or ECHA (upon instruction from the European Commission) can prepare an Annex XV dossier for a substance they consider fulfills the criteria as a SVHC. ECHA then holds a public consultation on each chemical, to which anyone can contribute. The Member State Committee of ECHA subsequently decides if it fulfills the SVHC criteria. If all members of the Committee agree, the substance is placed on the Candidate list. If a unanimous decision can not be reached, the European Commission will make the final decision.

What is Annex XIV?

Annex XIV (also called the Authorisation list) is the list of substances which can only be used if a company has obtained an authorization for a particular use. Any non-authorized uses after a given date will be prohibited. The chemicals on this list will be drawn from the Candidate List.

Why is it important to have a comprehensive Candidate list?

Because substances on this list are covered by legal guarantees to information for consumers and for all companies in the supply chain, and their workers. The supplier of any substance on the Candidate list must provide the professional user of the substance with a Safety Data Sheet (see REACH article 31). In order to get as much information as possible to workers about the presence of hazardous substances at the workplace (including in the preparations they handle), the Candidate list should be as comprehensive as possible.

What is the purpose of this Trade Union list?

Influence official Candidate list by ECHA; give companies a tool for toxic use reduction and help inform workers on harmful substances widely used at workplaces. Ultimately the Trade Union list aims to help cut the incidence of chemical-related occupational diseases suffered by workers.

Why have Trade Unions developed their own list of SVHCs?

The first edition of the Candidate list published by ECHA in October 2008 only contains 15 chemicals, while it has been estimated that around 1,500 to 2,000 chemicals could be eligible. The Trade Unions believe that this very low-key start for REACH Authorisation could put the entire procedure's credibility on the line and undermine REACH's substitution aims. The Candidate list is currently expected to grow by 25 chemicals a year, and at this rate, the list could take around 100 years to complete. The Trade Unions want to influence and support companies, legislators, ECHA and workers to accelerate the substitution of these priority chemicals by safer alternatives.

Who do you want to influence with the list?

Legislators, ECHA, companies and workers.

Will this list undermine the credibility of the official list ?

No. The Trade Union Priority List will provide guidance for legislators and companies and be a powerful tool for them to use. However, only the official Candidate list will trigger any regulatory actions, and guarantee access to information for workers, employers and consumers.

What's the difference between the Trade Union list and the SIN list?

The TU list is to a large extent based on the REACH methodology just as the SIN list is. The main difference is that the TU list also takes into account the specific issues concerning workers' health at the workplace, it applies a more precautionary approach towards chemicals 'suspected' of harmful effects, and it includes a ranking of its priority chemicals. The Trade Union List also includes CMRs

classified in Category 3 (suspected CMRs); chemicals which are toxic to the nervous system; and chemicals which can cause allergic reactions (sensitizers).

What's the SIN list?

The SIN* List (*Substitute It Now!) was published in September 2008 by ChemSec in collaboration with a group of environmental, health, women's, and consumers' NGOs. It contains 267 chemicals that meet the official REACH definition for SVHCs. For more information please see: www.sinlist.org

Are there substances concurrently on the Trade Union list and the SIN list?

Yes, the Trade Union list has 89 substances in common with the SIN list. Thus, these 89 substances are jointly of very high concern for workers, consumers and the environment and should be urgently included, along with all the other SIN and TU chemicals, on the REACH Candidate list.

Will the Trade Union list compete with the SIN list?

No, they work in synergy. The TU list comprises 306 chemicals with potential to cause health issues to workers, and partially overlaps with the SIN list which is based on the official REACH criteria definitions. Both lists consist of substances that are indeed of high concern for human health and the environment, and should consequently be replaced by safer alternatives or phased out as soon as possible. The sum of substances identified as SVHC in the Trade Union list and in the SIN list amounts to 484 (306+267-89). Trade Unions and public interest groups would like to see these 484 chemicals placed on the Candidate list as soon as possible.

How can we use the Trade Union list and the SIN list in our company?

You can use the lists to identify very hazardous substances that need to be replaced by safer alternatives or processes as quickly as possible. The Trade Union list and the SIN list each provide very good knowledge about the substances on them. Presence on the Trade Union list or the SIN list is a good indication that regulatory action might be taken on these substances at some point during the EU REACH Authorisation process. Using the lists will give you time to remove these very hazardous substances from your products and processes well ahead of any legal demands, reducing risks to workers' health and creating a market benefit for your company.

Should our company use the Trade Union list, the SIN list or the official list?

Your company is already responsible for using and passing on the information available for chemicals on the Candidate List (REACH Articles 31 and 33). We recommend that you also use both the Trade Union and the SIN Lists (see above). Future updates of the lists will give you a warning which chemicals might come under legislative scrutiny next.

Are all other substances OK to use then?

No, not necessarily. This first version of the Trade Union list has only a subset of several thousands of chemicals which are very hazardous to human health and the environment. Many chemicals remain very dangerous even if they are not yet included. With more knowledge becoming available under REACH, more chemicals will be included in the list later.

Can companies be sure they are sustainable if they just follow those lists?

Even if it is a very good starting point, making a company sustainable is a much larger task beyond chemicals use, including all areas of the company and the management

Do you guarantee all conclusions and data in your list?

We can guarantee that we have used the best information publicly available.

If new independent and credible information would surface showing contradictory information, the presence of a substance and its ranking will be reassessed.

What substances should we use instead of the ones listed?

It depends on the area of use and the specific function of the substance you want to remove. Substitution to safer alternatives can also involve moving to different manufacturing processes or redesigning the product, or using different components/materials. It is very important that you do not change from one SVHC to another SVHC included in the Candidate List, the Trade Union list, the SIN list, or in other regulatory lists. Also note that absence of proof of harm does not equal proof of safety.

What will happen with the Trade Union list in the future?

This list is merely the first list and it will be further developed, adding additional substances as more information emerges. Please feel free to check this website from time to time to receive the latest updates on the development.

What is the history of ETUC?

The ETUC exists to speak with a single voice, on behalf of the common interests of workers, at European level. Founded in 1973, it now represents 82 trade union organisations in 36 European countries, plus 12 industry-based federations. All in all, the ETUC represents the interests of 60 million trade unionists at European level. For more information about us please see www.etuc.org

What is so original about your list?

The ETUC is convinced that including the union-listed chemicals in the REACH Candidate list would cut the incidence of chemical-related occupational diseases and the attendant costs for the entire society, workers and industry itself.