

Brussels, 25/05/2018

Subject: Unique Identifiers for (potential) SVHCs

To whom it may concern,

The European Automotive Industry wishes to highlight its concern regarding the identification of Substances of Very High Concern (SVHCs). Vehicle manufacturers, as well as their partners in the supply chain, would like to draw your attention to the increasing number of (potential) SVHCs included in the Public Activities Coordination Tool (PACT), the Registry of Intentions or the following authorisation or restriction processes. The naming of some of these chemicals is highly variable. Even if rules for a common naming exist, chemical substances may have names which even specialists have difficulties in deciphering, particularly for substances with more than only one nomenclature. Evidence for this has been found during the past registration phases, when even chemical manufacturers have struggled to agree on common substance identities. The difficulty in agreeing on a nomenclature for diverse substances now also impedes the industry's ability to comply with its communication and notification obligations under REACH articles 33 and 7(2).

The automotive industry, as well as other industry sectors, have been using for many years well-known and well established international identification systems of chemicals like CAS or EINECS to name and identify substances. Company and sector specific substance tools and processes need these unique identifiers to operate and to simplify the exact identification of substances.

There are however more and more substance entries in the above-mentioned REACH processes and lists without a comprehensive provision of their substance identifiers, without which it becomes difficult for industry to do the necessary preparation for supporting the different legislative steps under the REACH Titles of Authorisation and Restriction.

Unfortunately, certain statements from the German government are increasing the risk of incompliance even more. According to Germany, e.g. the Candidate List references on the ECHA webpage are only a non-exhaustive and exemplary listing of relevant SVHCs and thus do not lead to full compliance when only considering these CAS numbers in the fulfillment e.g. of Art 33 or 7.2. There are additional references provided in the accompanying documentations (i.e. the Annex XV Dossiers) which, according to Germany, will have to be taken into consideration as well. This challenge however will be minor compared to the one that substances listed on Annex XIV would fall under the same principle, because of the burden of Authorisation for these additional substances.

A major part of our REACH duties is relying on an accurate communication of substance information throughout our complex automotive supply chain. The quality of this communication and thus the level of compliance strongly depends on the competence of larger suppliers as well as SMEs, which are playing a very important role in our industry. Most SMEs however do not have sufficient chemical knowledge and capacities to investigate and communicate all relevant substances without a clear guidance from legislation, which unfortunately is not available. Again, this stresses that the access to information on unique identifiers is of utmost importance.



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To improve the quality of information, the Automotive Industry Task Force REACH has reviewed the documents published on the ECHA webpage, in order to get a clearer understanding of those CAS or EC numbers that are directly or indirectly included in the Candidate List and other lists.

Based on this approach, we tried to find out CAS or EC numbers for those entries without any identifiers, or, where not all identifiers were mentioned compared to the Annex XV dossiers, substances which might have multiple CAS numbers for e.g. Isomers. In addition, we searched for CAS numbers for entries of so called chemicals of unknown or variable composition (UVCB).

Please find the outcome of this exercise under the following link:

<http://www.acea.be/news/article/reach-substances-without-unique-identifier>

The Automotive Industry Task Force REACH would like to recommend to its sector this list as the complete and comprehensive source for any surveys, queries and communications regarding the above-mentioned obligations of the REACH legislation. We furthermore already have started related discussions with other sectors, in order to make this approach a cross industry initiative.

The members of the Automotive Task Force REACH highly appreciate any notes or suggestions to improve that list.

With best regards
