



EEB
European
Environmental
Bureau



To: Members of the REACH Committee

Brussels, 18 October 2018

Dear Sir/Madam,

We are writing to you regarding the REACH Committee Meeting that will take place next week (25 October 2018). At this meeting crucial discussions and tentative vote are planned on the authorisation for several uses of carcinogenic chromate substances, uses for which safer alternatives, marketed by EU companies, are already available:

- 6. Draft Commission Implementing Decision concerning certain uses of sodium dichromate under the REACH Regulation (EC) No 1907/2006 (Ilario Ormezzano Sai S.R.L.)**
- 8. Draft Commission Implementing Decision concerning certain uses of Implementing chromium trioxide under the Decision REACH Regulation (EC) No 1907/2006 (Hansgrohe SE)**
- 9. Draft Commission Decision concerning uses of chromium trioxide under the REACH Regulation (EC) No 1907/2006 ("REACH") (Lanxess Deutschland GmbH)**
- 14. Draft Commission Implementing Decision concerning certain uses of chromium trioxide under the REACH Regulation (EC) No 1907/2006 (REACHLaw Ltd)**

Granting these authorisations will fuel a growing problem of toxic chemical exposure, the leading cause of occupational cancers. 85% of occupational cancer cases come from exposure to only ten chemical agents, including chromium¹. With more than 100 000 deaths per year, occupational cancers are the leading cause of death in the EU.²

We would like to highlight the fact that chromium hexavalent is a non-threshold substance for which adequate control is not possible.

The undersigned NGOs are very concerned with these authorisations being granted while societal benefits to these uses, especially the decorative uses, are highly questionable and alternatives are clearly available on the market as alternative providers have stated.

¹<https://www.etui.org/Publications2/Working-Papers/Eliminating-occupational-cancer-in-Europe-and-globally>.

²<https://www.etui.org/Topics/Health-Safety-working-conditions/Occupational-cancers>

Alternatives for decorative plating (Hansgrohe, ReachLaw and Lanxess applications) are already available and have been economically and technically feasible for at least the last two years, according to the manifesto of the Alliance of PVD Providers submitted to the REACH Committee members last September.³

Ilario Ormezzano Sai S.R.L. has applied for authorisation to use sodium dichromate in wool dyeing. As already shown last year, during the discussion of a similar application for authorisation submitted by Gruppa Colle⁴, safer alternatives made by Huntsman⁵ and Dystar are available on the market.

The applications for authorisation (AfA) submitted by the applicants do not demonstrate that alternatives are unavailable, and therefore, do not comply with the requirements to be granted an authorisation as established by the REACH Regulation.

As already highlighted in numerous occasions, the assessment of alternatives performed by ECHA's Socio Economic Assessment Committee (SEAC) needs to be improved urgently in order to ensure a level playing field for companies providing safer alternatives.^{6,7}

We therefore ask you to reject the authorisation of these applications or at least shorten the review period to maximum 4 years so the availability of alternatives is properly assessed as soon as possible based on REACH Article 61(2) under b).

Yours faithfully,



Tatiana Santos Otero
Policy manager - Chemicals and nanotechnology

On behalf of:

ClientEarth

The Danish Ecological Council (EcoCouncil)

Ecologistas en acción

European Environmental Bureau (EEB)

Federation SEPANSO Aquitaine

Global 2000

Health and Environment Alliance (HEAL)

In view of the public interest in this matter, we intend to make this letter publicly available.

³ <https://fipra.com/wp-content/uploads/2018/10/A-sustainable-alternative-to-CrVI-Letter-from-the-Alliance-of-PVD-Providers-APP10.pdf>

⁴ <https://chemicalwatch.com/66076/italian-textiles-company-supports-ngo-authorisation-recommendations>

⁵ <https://marketplace.chemsec.org/Alternative/LANASOL-CE-pioneering-replacement-of-chrome-dyes-since-20-years-44>

⁶ <https://eeb.org/publications/31/chemicals/2349/roadmap-to-revitalise-reach-2.pdf>

⁷ <http://chemsec.org/publication/authorisation-process/reach/how-to-find-and-analyse-alternatives-in-the-authorisation-process/>