

# Substances in articles Enforcement Pilot project

Webinar: Communicating on  
substances in articles: what you  
need to know

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## Background

- low number of notifications received by ECHA, NGOs and MSs reports indicates non-compliance with the REACH substances in articles provisions
- the ruling from the European Court of Justice have clarified the obligations in relation to substances in articles and ECHA has recently published an updated of the Guidance aligned with its conclusions to support industry

## Scope

- check compliance with notification and communication obligations on substances in articles
- an effective supply chain communication (Art. 33(1)) is a prerequisite;
- some MSs may however also investigate the implementation of Art. 33(2)

## Objectives

- get a better estimation of the actual level of compliance and identify the reasons for non-compliance
- contribute to increase the level of awareness/understanding, and compliance
- gathering experience and establishing enforcement

# Timelines

- Inspections: Oct 2017- June 2018
- Analysis of the results
- Report by the end of November 2018

# Target groups

## Companies

- all types of suppliers of articles (including e-commerce), but focussing more on producers and importers of articles.

## Articles

- consumers articles
- where CL substances are likely to be found
- that contains CL substances with potential for exposure

# Target articles - examples

- **Consumer products**
- **Electrical products**
- **Building, interior articles**
- **Others**

# Target Candidate List substances - examples

## Substances

Brominated flame retardants

Phosphorous flame retardants

Short-chain chloroparaffins

Phthalates

Aprotic polar solvents

Perfluorinated substances

Phenolic benzotriazoles

**Other Candidate List substances could also be targeted**



# Inspections

- On site or desktop inspections
- Questionnaire
- Taking samples
- Chemical Analyses

## Conclusion

Results of the project may provide

- a better picture of where difficulties lie in the implementation and enforcement of the SiA-related obligations in REACH.
- These results could help ECHA, Commission and national authorities in deciding on whether and where to invest additional resources to support duty-holders.