EUROPEAN COMMISSION
ENVIRONMENT

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Proposal for selection of substances under REACH for the Impact Assessment

The selection should secure that all possible scenarios are covered to assess the impact of the various options for criteria at least on a qualitative basis. Availability of data is a crucial issue for assessment of ED properties and therefore, substances for which there already have been gathered data that goes beyond requirements of the registration dossier or have been selected for REACH processes should be selected. However, as data on ED are inadequate for most of the REACH substances, the screening should also reflect this situation.

We suggest modifying the proposed procedure. We do not see the need to select first all substances that fulfil classification as C2 or R2 since the assessment of the interim criteria from PPP and BP Regulation makes little sense under REACH. We suggest the following procedure for selection of substances:

1. All substances on the Candidate List already identified as SVHCs because of ED concerns under Art. 57(f) or agreed by RAC to be endocrine disruptors according to the WHO/IPCS definition.
2. All substances placed on CoRAP due to ED concern
3. All substances listed Annex XVII for Restrictions and with ED concern
4. All substances discussed in the Endocrine Disruptor Expert Group
5. Substances flagged as SIN list substances because of ED concerns excluding those which are pesticides, biocides and non-registered substances;
6. Substances flagged as Category 1 and 2 in the Commission's priority list of substances for further testing of their role in endocrine disruption (EASIS) excluding pesticides, biocides and non-registered substances;
7. Substances flagged at TEDX list excluding pesticides, biocides and non-registered substances.
8. If the number of required substances has not been reached: Select randomly further substances with indication of ED properties from the ToxCast databases, excluding pesticides, biocides and non-registered substances.
9. If the number of required substances exceeds the limitations after step 8 then reduce the list by securing that all scenarios are covered.