

Call for evidence on the use of cadmium and cadmium compounds in plastics

Background

On 19 September 2012, Commission Regulation (EU) No 835/2012 amending Regulation (EC) No 1907/2006 (REACH) regarding entry 23 of Annex XVII (cadmium) entered into force. The Annex to this Commission Regulation lists specific plastic materials, in which cadmium and cadmium compounds shall not be used or placed on the market if the concentration of cadmium is equal to, or greater than, 0.01% by weight of the plastic material. Moreover, the Annex includes an additional subparagraph referring to a Commission request to ECHA to assess whether the use of cadmium and its compounds in plastic materials, other than those listed in paragraph 1 of entry 23 of Annex XVII, should be restricted.

The plastic materials in which the use of cadmium and its compounds are currently restricted¹ are as follows:

- polymers or copolymers of vinyl chloride (PVC) [3904 10] [3904 21]
- polyurethane (PUR) [3909 50]
- low-density polyethylene (LDPE), with the exception of low-density polyethylene used for the production of coloured masterbatch [3901 10]
- cellulose acetate (CA) [3912 11]
- cellulose acetate butyrate (CAB) [3912 11]
- epoxy resins [3907 30]
- melamine-formaldehyde (MF) resins [3909 20]
- urea-formaldehyde (UF) resins [3909 10]
- unsaturated polyesters (UP) [3907 91]
- polyethylene terephthalate (PET) [3907 60]
- polybutylene terephthalate (PBT)
- transparent/general-purpose polystyrene [3903 11]
- acrylonitrile methylmethacrylate (AMMA)
- cross-linked polyethylene (VPE)
- high-impact polystyrene
- polypropylene (PP) [3902 10]

Mixtures and articles produced from these plastic materials can not be placed on the market if the concentration of cadmium (expressed as Cd metal) is equal to, or greater than, 0.01% by weight of the plastic material. The limit on the concentration of cadmium equally applies to imported articles as well as mixtures and articles which contain cadmium with no specific function (i.e. cadmium impurities not associated with a specific intentional use of a cadmium substance).

The expansion of the scope of the current restriction, from the plastic materials listed above to all plastic materials, would be introduced through an ECHA prepared dossier conforming to the requirements of REACH Annex XV. The expansion would not revoke or affect the existing derogation to articles coloured with mixtures containing cadmium for safety reasons.

In the preparation of the Annex XV dossier, ECHA must identify plastic materials (other than

¹ According to paragraph 1 of entry 23 of Annex XVII of REACH as amended by Commission Regulation (EU) No 835/2012

those listed above) which use cadmium compounds, or contain them as an impurity, and assess the risks posed by such compounds. The identification of possible alternatives, and the assessment of the potential risks of these alternatives for human health and the environment, will also be addressed in the Annex XV dossier, as well as the socio-economic aspects of expanding the scope of the current restriction. Where technically and economically feasible alternatives are not available, derogations will be considered.

ECHA has launched this call for evidence in order to gather information from as many relevant parties as possible for the preparation of the aforementioned Annex XV dossier and will be supported by the independent consultants Risk and Policy Analyst (RPA). RPA is currently collecting more in depth information on the use of cadmium compounds in plastic materials and may have already approached you or your organisation on this subject. If you have already submitted information in the context of this work there is no need to resubmit it by answering this call for evidence.

Additional information regarding the RPA's work on this subject can be obtained at: <http://www.rpaltd.co.uk/news-cadmium.shtml> or by contacting Panos.Zarogiannis@rpaltd.co.uk