



**CHEM***Trust*

Protecting humans and wildlife  
from harmful chemicals

# - Grouping of substances -

## How to avoid regrettable substitution

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# Key elements

1. Regulatory controls of groups needed to avoid `regrettable` substitution
2. Grouping based on similar structure/effect, and/or same use/function
3. Responsibility on companies:
  - a. Data to demonstrate if substance does not have the same properties
  - b. Inform supply chains about potentially similar hazards



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## Grouping...

# ...for more protection from harmful chemicals

- CHEM Trust “Toxic Soup” report, on regrettable substitution of one bisphenol by another
- EU bans BPA in thermal paper; use of BPS increases
- Swedish Chemicals Agency identified 37 bisphenols as potential hormone disruptors

The image shows the cover of a CHEM Trust report titled "From BPA to BPZ: a toxic soup?". The cover features the CHEM Trust logo at the top left, with the tagline "Protecting humans and wildlife from harmful chemicals". The title is in large green letters, and the subtitle below it reads "How companies switch from a known hazardous chemical to one with similar properties, and how regulators could stop them". The central part of the cover is a collage of images: a baby, a child vacuuming, a woman drinking from a pink water bottle, and various chemical structures and warning symbols. At the bottom, it says "A CHEM Trust Report" on the left and "March 2018" on the right.

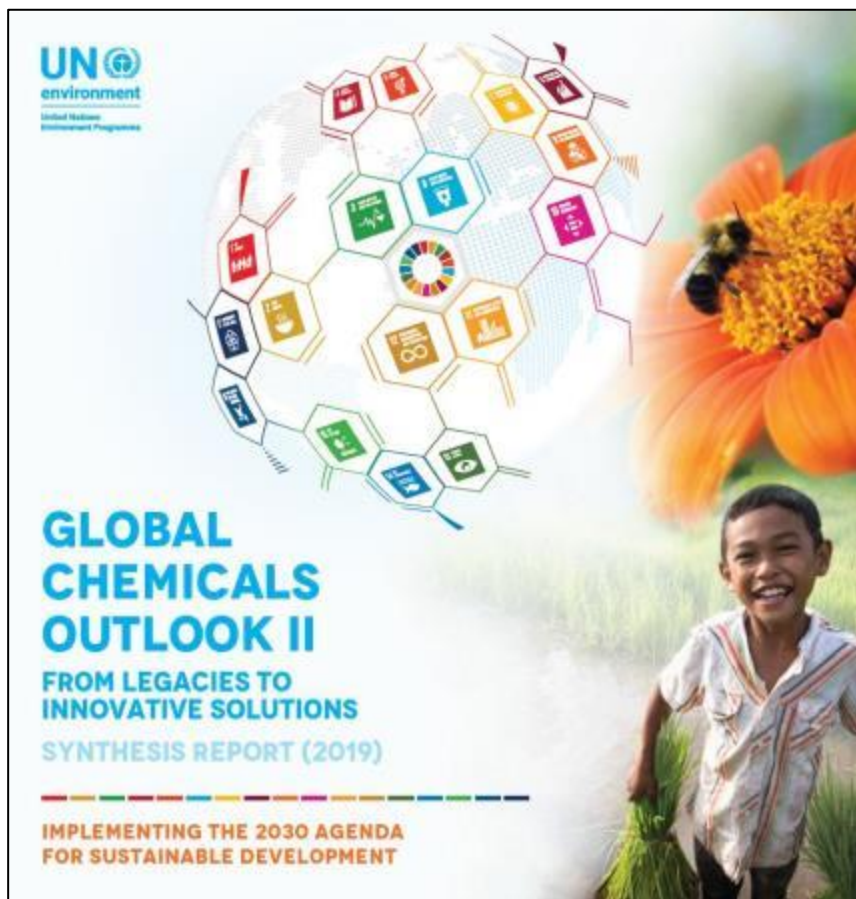
[www.chemtrust.org/toxicsoup](http://www.chemtrust.org/toxicsoup)



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## Why is it needed?



- Rising trends of chemical production
- Lack of data on hazards, uses and exposures
- Regrettable substitution is a wider problem (BFRs, PFAS,...)

***'Business as usual is not an option'***



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## What could it look like?

- Start group-based REACH restrictions, e.g. on a wide group of e.g. bisphenols
  - The only way out of this Restriction is for registrants to provide strong data that a substance does not have the properties of concern
- Result
  - Avoid moving to similar substances of concern
  - removal of chemicals of concern from the market, probably including some with poor registration dossiers
  - Increased safety data on any substances that are claimed to not have the substances of concern.



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## Conclusions

- Regulating groups of similar structure/effect will lead to more efficiency
- More transparency and `thinking in groups` will help supply chains to prevent regrettable substitution
- Need approaches fit for regulatory purpose
- Ultimate aim is protection of human health and environment and development of safer chemicals/uses