



EUROPEAN COMMISSION
Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Ecosystems I: Chemicals, food, retail
Directorate-General for Environment
Circular Economy and Green Growth

Directors

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**NOTE FOR THE ATTENTION OF
MR B. HANSEN, EXECUTIVE DIRECTOR, ECHA**

Subject: Request to the European Chemicals Agency to prepare an Annex XV restriction dossier on medium-chain chlorinated paraffins (MCCP¹) conforming to the requirements of Annex XV to REACH

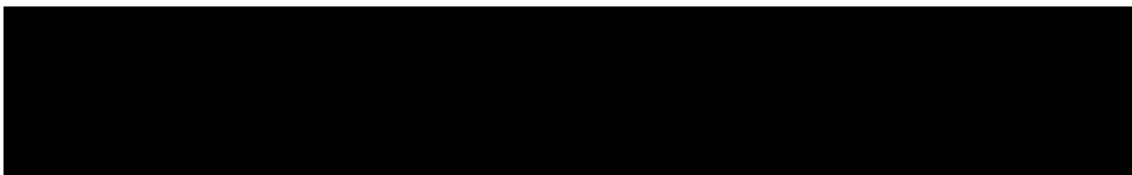
The Member State Committee agreed on 15 June 2021 on the identification of medium-chain chlorinated paraffins (MCCP¹) as substance of very high concern (SVHC) due to being persistent, bioaccumulative and toxic (PBT) and very persistent and very bioaccumulative (vPvB).

Moreover, the United Kingdom submitted a proposal for listing MCCP in the Annexes to the Stockholm Convention on Persistent Organic Pollutants (POPs), which might lead to an elimination or a restriction of the production and use of MCCP under the Convention. The proposal will be discussed at the next meeting of the POPs Review Committee.

Considering the concern those properties of MCCP raise and the developments under the Stockholm Convention, we would like to request ECHA to assess the potential risks to human health or the environment arising from the manufacture, use or placing on the market of MCCP and to prepare a restriction dossier which conforms to the requirements of Annex XV of REACH. ECHA shall keep the Commission regularly informed on the progress of the development of the restriction dossier.

The Commission notes that information provided in the consultations in the context of the preparation of the dossier for SVHC identification claimed that for certain uses alternative substances or techniques are not available or that due to socio-economic reasons uses should be derogated.

¹ Medium-chain chlorinated paraffins [UVCB substances consisting of more than or equal to 80% linear chloroalkanes with carbon chain lengths within the range from C₁₄ to C₁₇]



In addition, past assessments of short-chain chlorinated paraffin under EU legislation or the Stockholm Convention concluded that MCCP was the only alternative for certain uses (e.g. as a flame retardant in conveyor belts or as a plasticizer in dam sealants). ECHA is therefore requested to assess the need for derogations from any proposed restriction taking into account the information from previous assessments, the consultation on the SVHC proposal or information gathered as part of the development of the restriction dossier (e.g. a further call for evidence).

Furthermore, according to information received in consultations in the context of the preparation of the dossier for SVHC identification, MCCP has been used in PVC cable sheathing and jacketing and can hence be present in recycled PVC. The Commission intends to request ECHA to prepare a restriction dossier on substances in PVC. Due to that, the use of MCCP in PVC should not be part of the Annex XV restriction dossier. Nevertheless, ECHA shall gather relevant information on the use of MCCPs in PVC to inform the future restriction dossier on substances in PVC.

Timing

We would appreciate to receive, as soon as possible, a confirmatory letter from ECHA that our request has been accepted. The intention should be entered in the Registry of Intentions as soon as practicable and no later than 07 October 2021.

(e-sign)
Kristin Schreiber
DG GROW

(e-sign)
Kestutis Sadauskas
DG ENV