



European Electrical Insulation Manufacturers

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Position Paper: Status of HHPA and MHHPA within the REACH Authorisation Process

Within the framework of the REACH Regulation, substances with the following properties are identified as Substances of Very High Concern (SVHC) and as such will be subject to the REACH Authorisation process:

1. Carcinogenic, mutagenic or toxic to reproduction (CMR)
2. Persistent, bioaccumulative and toxic (PBT), or very persistent and very bioaccumulative (vPvB)
3. Substances of an “equivalent level of concern” to those above based on scientific evidence which can show serious effects to human health or the environment.

The Netherlands proposed both Hexahydrophthalic anhydride (HHPA) and Methyl Hexahydrophthalic anhydride (MHHPA), on the basis of their known respiratory sensitizing properties, as being potential SVHC substances, falling into category 3 above. This proposal has led to the entry of the two substances on the REACH Candidate List for Authorisation as from 17 December 2012.

The European Chemicals Agency (ECHA), together with representatives of national governments, are now considering whether to prioritise the substances with a view to their entry on the REACH Authorisation Annex. If it is agreed by regulators that the substances enter the Annex, producers and users will have to apply for an authorisation or permit to continue to produce or use these substances in the future. In a worst case scenario such an authorisation would be required from around 2018 onwards.

Based on information concerning use, exposure and risk, EEIM believes that these substances should not be prioritised for authorisation. HHPA and MHHPA are used exclusively in industrial processes and are already subject to a clear regulatory framework. They are safe for handling and use. In our view they should not have been considered as SVHC chemicals nor included in the REACH Authorisation process.

We are convinced and have evidence that users of said anhydrides have, through the Material Safety Data Sheets, all relevant information concerning necessary exposure controls and safe handling of those products.

EEIM, as representative of the industry using HHPA and MHHPA as hardeners for epoxy resins, is committed to working with suppliers of the substances and regulators to manage this process in the coming years.

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