

# SAFEGUARDS

## CONSUMER GOODS AND RETAIL

CONSUMER PRODUCTS

NO. 137/13 JULY 2013

## EU PROPOSES TO STRENGTHEN RESTRICTION OF PAHS IN CONSUMER ARTICLES UNDER REACH

In December 2012, we informed you that the EU was proposing to expand the scope of restriction for polycyclic aromatic hydrocarbons (PAHs) under entry 50 of ANNEX XVII of REACH<sup>1</sup>. Under the proposal, the requirement was no more than 0.1 mg/kg for each of the 8 PAHs in rubber or plastic components in articles that come into direct and prolonged contact with the human skin or oral cavity.

In June 2013, favourable support for the latest modified proposal was received from the meeting of the REACH Committee<sup>2</sup>. The latest modified proposal revealed that the limit requirements for toys (including activity toys) and childcare articles are more stringent relative to the requirements for other consumer products. The modified proposal is proposed to take effect on the twentieth day following its publication in the Official Journal of the European Union (OJEU) and proposed to be enforced 2 years thereafter.

Highlights of the modified draft Regulation are summarised in Table 1.



<sup>1</sup> [SGS-SafeguardS 199/12](#)

<sup>2</sup> [Meeting of the REACH Committee, 16-17 June 2013, Comitology Register](#), and references therein

<sup>3</sup> [SGS-SafeguardS 210/11](#)

TABLE 1.

PROPOSED REGULATION TO EXPAND ENTRY 50 ON PAHS UNDER ANNEX XVII OF REACH			
PAH (Acronym) [CAS]	Scope (rubber or plastic components in articles that come into direct and prolonged or	Requirement	Enforcement Date
<ul style="list-style-type: none"> <li>Benzo[a]pyrene (BaP) [50-32-8]</li> <li>Benzo[e]pyrene (BeP) [192-97-2]</li> <li>Benzo[a]anthracene (BaA) [56-55-3]</li> <li>Chrysen (CHR) [218-01-9]</li> <li>Benzo[b]fluoranthene (BbFA) [205-99-2]</li> <li>Benzo[j]fluoranthene (BjFA) [205-82-3]</li> <li>Benzo[k]fluoranthene (BkFA) [207-08-9]</li> <li>Dibenzo[a,h]anthracene (DBAhA) [53-70-3]</li> </ul>	<ul style="list-style-type: none"> <li>Articles including amongst others:</li> <li>sport equipment such as bicycles, golf clubs, racquets</li> <li>house-hold utensils, trolleys, walking frames</li> <li>tools for domestic use</li> <li>clothing, footwear, gloves and sportswear</li> <li>watch-straps, wrist-bands, masks, head-bands</li> </ul>	≤1 mg/kg (each PAH)	2 Years after date of entry into force
	<ul style="list-style-type: none"> <li>Toys, including activity toys</li> <li>Childcare articles</li> </ul>	≤ 0.5 mg/kg (each PAH)	
<b>Exemption</b>			
<ul style="list-style-type: none"> <li>Articles placed on the market for the first time before enforcement date</li> </ul>			

The regulation indicates that the restriction should only apply to those parts of articles that come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use. Articles or parts thereof which are only in short and infrequent contact with the skin or oral cavity should not be included within the scope of the restriction as the resulting exposure to PAHs would be insignificant.

It is important to notice that this new regulation under REACH is independent from the more stringent PAH requirements introduced by the voluntary German GS ("Safety Tested") mark. The GS mark currently covers 18 PAHs with more demanding limits e.g. of ≤0.2 mg/kg for toys with intended skin contact for children under the age of 3 years<sup>3</sup>.

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy for PAHs and other restricted substances in consumer products for the EU and international markets. Please do not hesitate to contact us for further information.

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