

Name of the organization: ChemSec

Type of stakeholder: XBRL experts

Country: Sweden

Q9:

There should be an addition of a concentration limit. To ensure an equal reporting standard among all companies regarding volumes of, and revenues coming from products of, or containing SoC and SVHCs in chemicals, products and articles by hazard class, we propose to add a standard concentration limit for all covered chemicals (SoC and SVHCs). If any of those chemicals are present above that concentration, the volume and revenue from that chemical/product/article must be included in the reporting. For simplicity and workability, the limit value should be set as low as reasonably achievable. – For intentionally added substances, no concentration limit should apply, instead all chemicals/products/articles should be included. – For unintentionally added substances and contaminants, our suggestion would be a maximum concentration limit of 10 ppm (parts per million), OR when the classification data in CLP has a lower concentration limit, that lower limit should prevail. Setting a protective concentration limit is extremely important from both human health and environmental perspective since non-threshold CMRs act as genotoxic agents already from the first molecule and highly persistent chemicals (like PFAS) will accumulate in nature over time, no matter how low the concentration limit is set. In addition to this, please see our comments on the reporting template in the attached document.