

CA SCP vs REACH

	California Requirements	REACH	Gaps
Adverse Impacts	<p>Adverse environmental impacts (see list)</p> <p>AB 1879 Criteria: E: Water quality F: Air emissions I: GHG J: Waste and end-of-life L: Environmental</p>	<p><u>Environmental Endpoints:</u></p> <ul style="list-style-type: none"> • Aquatic toxicity • Sediment toxicity • Toxicity to sewage treatment plant micro-organisms • Degradation/biodegradation • Aquatic bioconcentration and bioaccumulation • Terrestrial bioaccumulation • Long-term toxicity to birds • Terrestrial toxicity 	<ul style="list-style-type: none"> • Adverse soil quality impacts not mentioned in REACH? • SCP has specific criteria on water quality impacts. Are these addressed by REACH's aquatic toxicity, aquatic bioconcentration and bioaccumulation, sediment toxicity, or sewage impacts? • Adverse air quality impacts not directly addressed?
	<p>Adverse public health impacts (see list)</p> <p>AB 1879 Criteria: K: Public health</p>	<p><u>Human health endpoints</u></p> <ul style="list-style-type: none"> • Irritation and corrosion • Skin and respiratory sensitization • Acute toxicity • Repeated dose toxicity • Reproductive and developmental toxicity • Mutagenicity • Carcinogenicity 	<p>REACH's acute toxicity and repeated dose toxicity cover broad impacts on organs and tissues. Do these endpoints cover SCP's cardiovascular toxicity, endocrine toxicity, hematotoxicity, hepatotoxicity and digestive system toxicity, immunotoxicity, musculoskeletal toxicity, nephrotoxicity and other urinary system toxicity, neurodevelopmental toxicity, neurotoxicity, ototoxicity, reactivity in biological systems?</p>

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		<u>Identification/Derivation of:</u> <ul style="list-style-type: none"> • DNEL • PNEC 	
	Environmental fate	<ul style="list-style-type: none"> • Degradation • Environmental distribution • Bioaccumulation • Secondary Poisoning 	Covered
	Materials and resource consumption impacts AB 1879: C: Materials and resource consumption D: Water conservation G: Energy inputs H: Energy Efficiency		??
	Physical chemical hazards	<ul style="list-style-type: none"> • Flammability • Explosivity • Oxidizing properties 	Covered
	Physico- chemical properties	Physico-chemical properties: all relevant and available info on intrinsic properties of a substance ¹ <ul style="list-style-type: none"> • Boiling point, vapor pressure, water solubility, Kow, 	Covered

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Exposure Pathway	Market presence (sales, intended use)	Covered under exposure assessment process – developing exposure scenarios	Covered
	Household and workplace presence	Covered under exposure assessment process and derivation of PNECs/DNELs – exposure scenarios	Covered
	Potential exposure (types of uses, frequency...)	Covered under exposure scenarios	Covered
Life Cycle Segments	Raw material extraction, Production, transportation, etc.	Requires that exposure assessment considers all life cycle stages	Starts at production stage?
Technical	<ul style="list-style-type: none"> Product function and performance AB 1879 Criteria A and B		Covered
Economic	<ul style="list-style-type: none"> Public health/ environmental cost Government and non-profit organization cost AB 1879 Criteria M	Socio-economic	Covered? Government and non-profit organization cost addressed?