GSC Opposes EU Authorization Recommendation for D4, D5, and D6

Potential ban on silicone substances in EU “inconsistent with sound science”

WASHINGTON (April 3, 2020) – Members of the Global Silicones Council (GSC) oppose the European Union’s (EU) recent draft recommendation to prioritize three essential silicone substances, D4, D5, and D6 for authorization. If a substance is subject to authorization under the EU’s Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulation, some uses will be banned in the EU unless explicit permission from the government is granted.

“The EU recommendation to prioritize D4, D5, and D6 for authorization is inconsistent with sound science and out of step with regulatory outcomes for the substances in Australia and Canada,” said Karluss Thomas, Executive Director of the GSC. “To date, regulatory authorities on three continents, including North America, Europe, and Australia, have evaluated the risk associated with D4, D5, and D6. Two of those regulatory evaluations, and the associated risk management measures identified for the substances, have been remarkably similar, with the EU being the notable outlier. It is noteworthy that outside of the EU no regulatory authority has imposed any restriction on the use of these substances in commerce, nor have they considered adopting such restrictive measures as requiring permission from the government to use these substances. D4, D5, and D6 are widely considered safe for human health and the environment when used as intended.

The GSC firmly believes that requiring authorization for D4, D5, and D6 would unnecessarily malign products that have numerous societal benefits and have been used safely in commerce for decades. To ban some uses of the substances in the EU would also pose practical challenges for the use of the substances in global supply chains that would likely create barriers to trade and complicate the effective implementation of risk-based science policy in regions that are developing chemicals management systems.

“The EU proposal to prioritize D4, D5, and D6 for authorization is an unfortunate consequence of a flawed regulatory evaluation for these silicone substances,” said Thomas. “The EU’s assessment of these silicone substances did not consider all available evidence and ignored technical input from leading academic experts. Similar to the regulatory restrictions and the substance of very high concern (SVHC) designation imposed on the substances in the EU, authorization of D4, D5, and D6 would not provide any meaningful environmental benefit and would needlessly jeopardize innovation and economic growth.”

To learn more, view these frequently asked questions or visit http://globalsilicones.org/.
The Global Silicones Council (GSC) is a not-for-profit, international organization representing companies that produce and sell silicone products around the world. The GSC brings together all the major global manufactures via the three Regional Silicone Industry Associations in North America (Silicones Environmental, Health, and Safety Center – SEHSC), Europe (Silicones Europe – CES), and Japan (Silicones Industry Association of Japan – SIAJ) and encourages their cooperation and collaboration.

The GSC’s objective is to promote the safe use and stewardship of silicones globally. To accomplish its mission, the GSC undertakes the following activities:

- Monitor the environmental, health, and safety activities of the three Regional Silicones Industry Associations (RSIAs) and coordinate such activities on a global basis.
- Proactively promote industry communication with regulatory bodies around the world and with international environmental, health, and safety organizations, such as the World Health Organization, the Organization of Economic Cooperation and Development, and the United Nations.
- Through the RSIAs, identify and anticipate opportunities to enhance environmental, health, and safety research relating to silicones and engage in global projects to communicate the industry’s product stewardship commitment.
- Through the RSIAs, sponsor projects to improve the public’s understanding of the benefits and safety of silicones.