

DICIDA-UK

DICIDA-UK is the Development Initiative for Chemical Industry Dependent Areas in the United Kingdom. The DICIDA-UK network provides a forum where all Local Authorities and public sector agencies in areas with a concentration of employment in the chemicals industry can join forces in the work to secure a safe future for their communities. Membership includes local authorities in, Cheshire, Falkirk, Kingston-upon-Hull, North East Lincolnshire and the Tees Valley.

The aims of DICIDA-UK are to: (a) ensure that national government and European Union policies and programmes assist the continued growth of the chemicals industry in and across the Member States; and, (b) enable local regions to cope with the economic, social and environmental problems created by the restructuring of the chemicals industry. Further details are available from the DICIDA-UK website: www.teesvalley-jsu.gov.uk/DICIDA.

DICIDA members welcome most of the changes that have already been made since the first draft of the proposed Registration Evaluation and Authorisation of Chemicals Regulation (REACH); but there are some remaining concerns that we consider need to be addressed for the industry located in our regions to remain competitive. We would welcome your support to address the remaining issues of concern, to ensure that the industry in our area remains able to compete in the global marketplace that it operates in.

- **Mandatory Substitution**

DICIDA members would support continuing innovation to improve the sustainability of chemicals, but are concerned that mandatory substitution could be an unworkable solution for many uses and products. Substitution affects the whole of a complex supply chain covering a multitude of uses and performance requisites. It is therefore not easy to find a substitute that meets all the needs of every product within the long business chain. Finding and proving the suitability of a substitute for every function it is used for would be extremely difficult.

Small businesses will be disproportionately penalised by mandatory substitution. It can be very difficult to discuss alternatives with downstream users without breaking competition laws and difficult for downstream users to provide full details on quantities and context of use without compromising their companies competitiveness. It will not be possible to substitute every product. Production in non EU countries will still be able to use substances that will be imported in products, so long as they don't leech. If substances are adequately controlled then there should be no need for mandatory substitution.

- **Authorisations of Limited Duration**

DICIDA supports increased innovation and tight controls on substances of high concern, but time limits on the use of authorised substances needs to be decided on a case by case basis, when their use is controlled, there are no known substitutes and use can be justified on socio-economic reasons. Their use needs to be properly controlled, but placing a time limit for substitution is unrealistic. The utility of their intended function is likely to be lost even though use is strictly controlled.

- **Duty of Care**

All local Authority members of DICIDA fully support the safe and responsible production and use of chemicals and the protection of our workforce and residents. However, we do have some concerns over the legal uncertainties of the inclusion of a Duty of Care within the proposed REACH Regulation.