

CANADIAN FINDINGS ON THE PHENOLIC RESINS GROUP GIVE GUIDANCE ON THE HANDLING OF THESE POLYMERS UNDER EU REACH

As the European Commission and the European Chemicals Agency (ECHA) continue to review the criteria for Polymers Requiring Registration (PRRs) under REACH, the latest screening assessment from the Canadian authorities¹ on the 'phenolic resins group' of polymers published in March 2019 has provided further evidence that these resins should not be considered as PRRs.

While the average molecular weight (M_w) of phenolic resins will vary depending on the degree of polymerization of the resin which in turn is impacted by the process requirements for the manufacture of ultimate phenolic articles (e.g. brake pads, abrasive wheels etc.), the Canadian assessment confirms that the Reactive Functional Groups (ortho and para sites on the phenol ring) which might lead to hazard profiles meeting the PRR criteria are 'no longer available'. In addition, the assessment goes on to state that 'The reactive polymer is chemically stable under normal environmental conditions and cannot regenerate its monomers'. The assessment therefore concludes that 'the polymer is not expected to pose a health risk as a result of direct exposure'. The full text of the assessment can be found at:

https://www.canada.ca/en/environment-climate-change/services/evaluating-existing-substances/draft-screening-assessment-phenol-formaldehyde-resins-group.html

....with the relevant conclusions being set out in Section 2.5.3 on page 7.

Since the Canadian experience is being leveraged to assist the European Commission in reaching a conclusion on how to handle the potential registration of polymers of concern via its current Advisory Panel, this input is seen to be very relevant and timely and underpins the EPRA view that phenolic resins in their cross-linked form do not meet the proposed PRR criteria.

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