Chemical Regulation: The Need for a Holistic Approach

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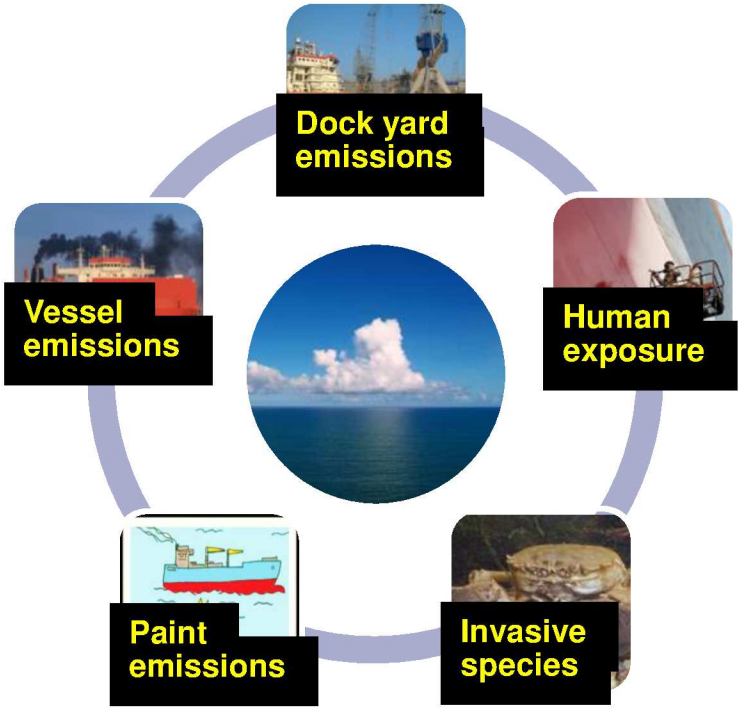
25 September 2017

Agenda

- Introduction
- The regulatory environment
- An Example
- What should we protect?
- Conclusions

Introduction

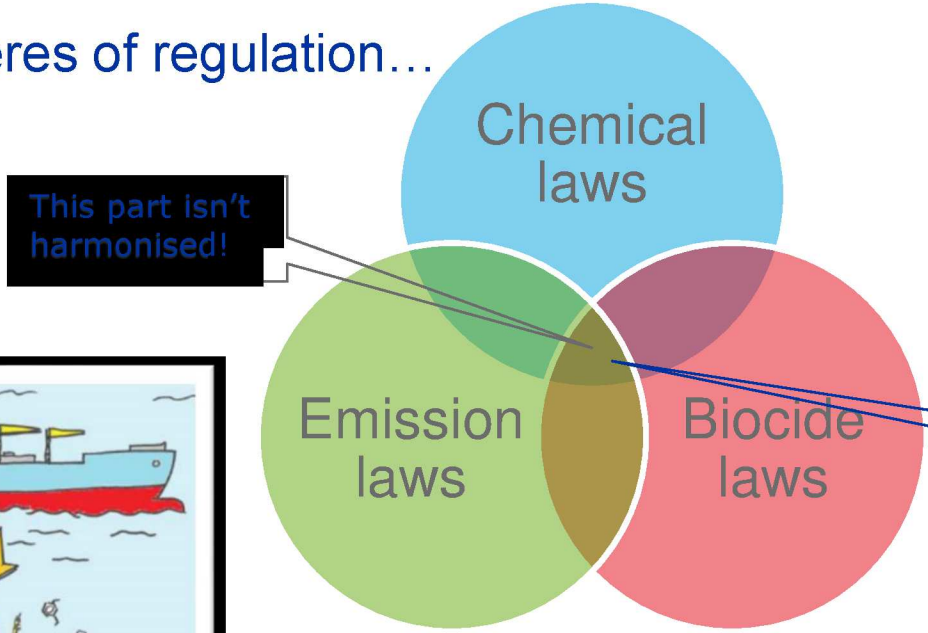


- Managing hazardous chemicals is a key ambition globally
- Environmental issues and public awareness of chemicals are well established
- Government policy reflects this
- Ultimate ambition is to minimise impact on environment and humans alike
- Antifouling Paint: A case in point

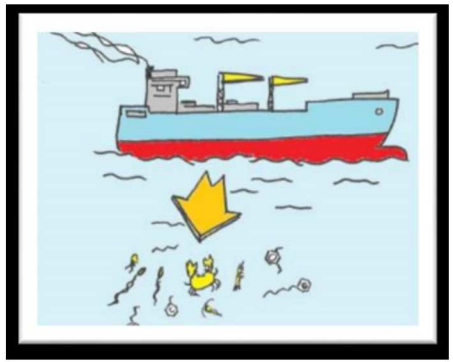
The Regulatory Environment: An Industrial Perspective

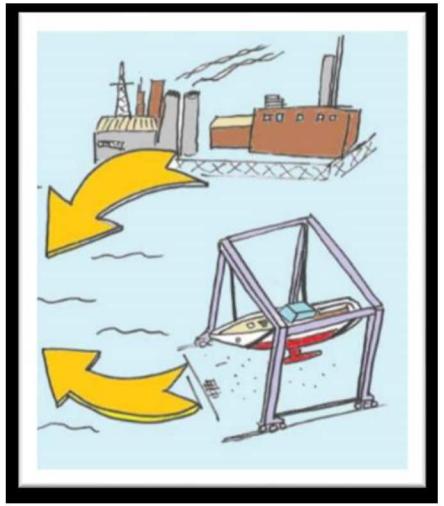
Regulatory Environment

3 Spheres of regulation…



This part isn't harmonised!

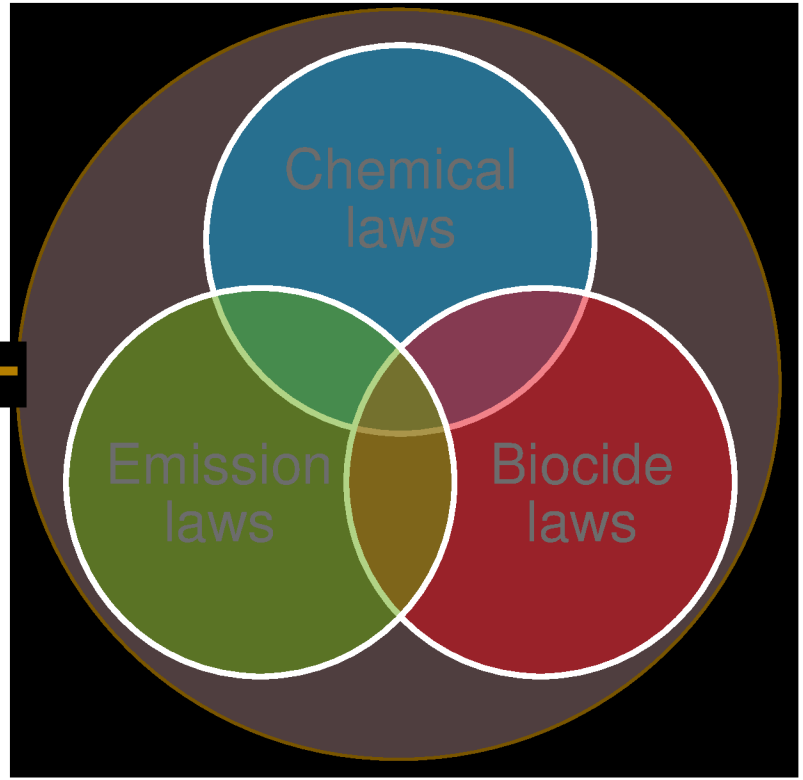




It's also where paint tends to get 'caught'

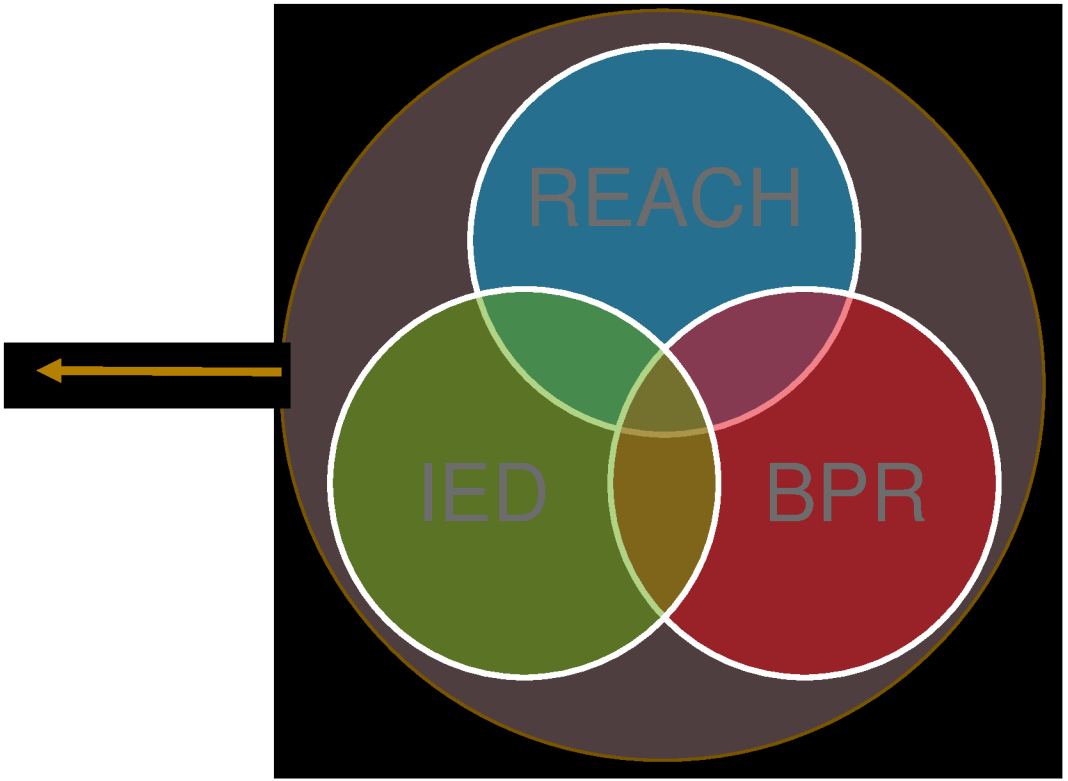
An extra focus

- Societal concerns
- Sustainability agenda



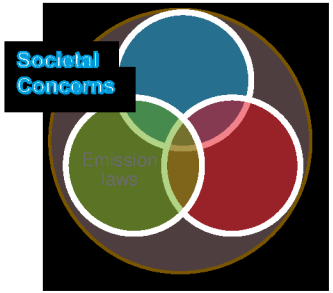
Regulatory Framework

- CoRAP / SVHC
- Sustainable use of Biocides Regulation
- Microplastics
- BPA
- Invasive Species
- Vessel GHG
- Etc



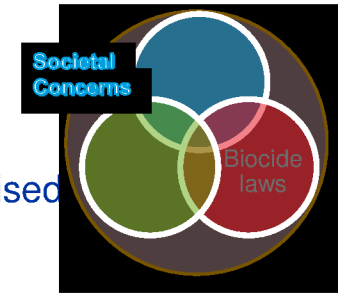
An Example: Antifouling Paints

Why Antifoulings?



Products **support** Global and Regional regulatory ambitions:

- Current best technology to minimise ship and yacht hull fouling
- Critical to reduce hydrodynamic drag minimising fuel consumption
  - Reducing Vessel Green House Gas emissions
  - World fleet accounts for approximately 3% of world green house gas emissions alone
- Critical to minimise risk of invasive species
  - Hull fouling accounts for majority of invasive species introductions
  - Increasing evidence that Yacht and costal fleet 'vector' invasive species

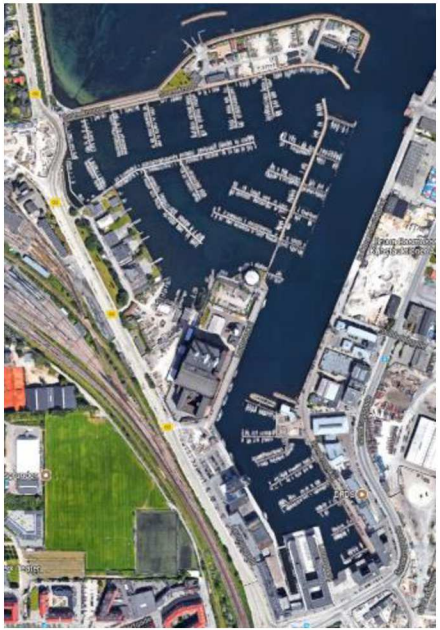


BPR will restrict innovation of new products and sale of current effective products

- Precautionary principle, conservatism throughout risk assessment, lack of harmonised protections goals…
- All prevent approval of products especially Yacht coatings

Regulatory ambition?

- Environmental Protection?



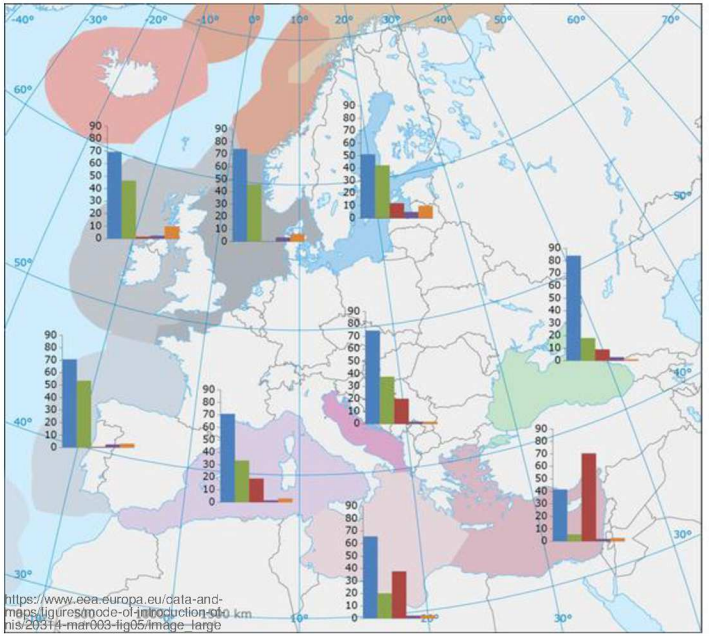
BPR

Vs

Invasive species

Vs

GHG

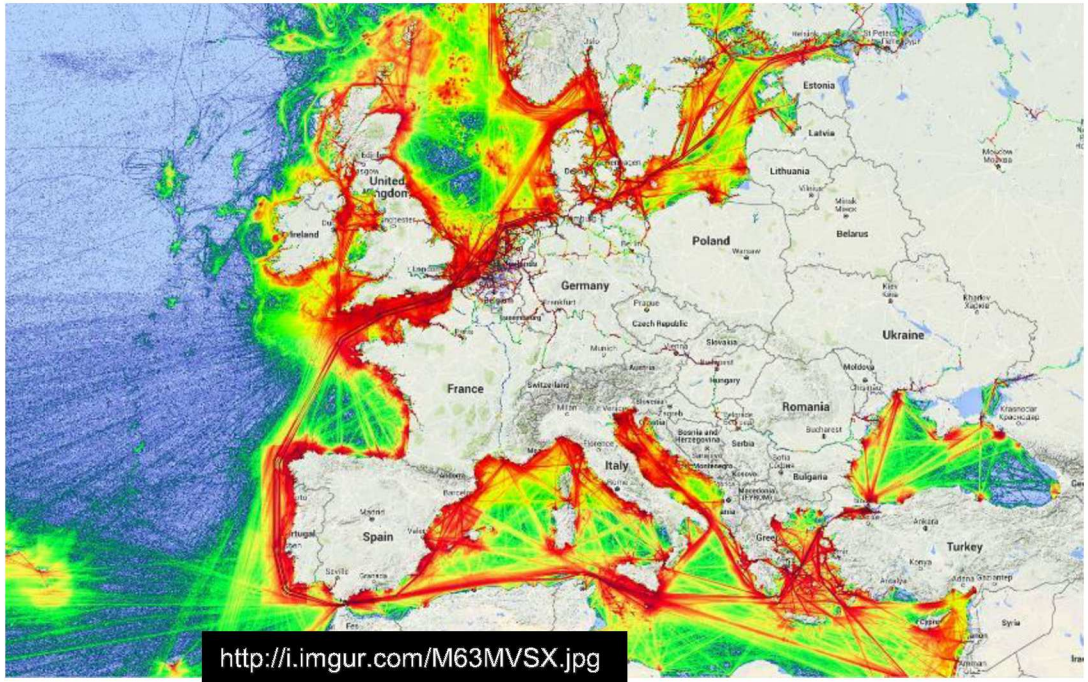


European Shipping Routes

BPR

Vs

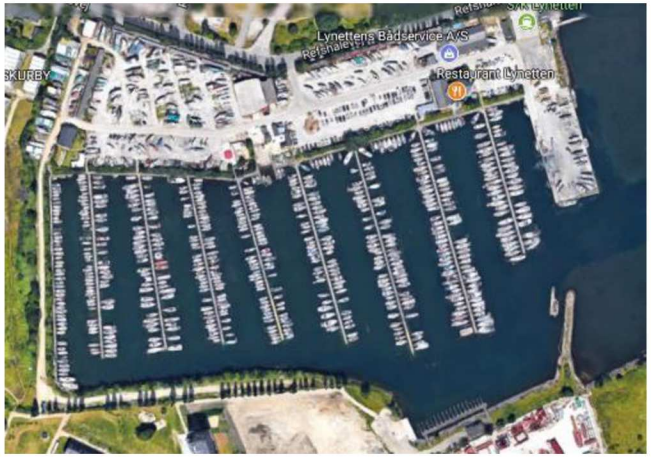
GHG?



What should we protect?

How do we align Protection goals?

This? Or This?



This?

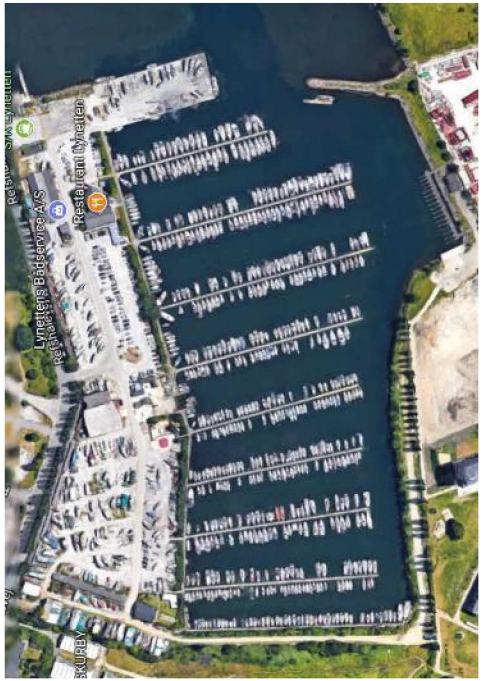
Or

This?

This? *and* This?

Do we ever consider what's most important?

What's the *Ecological* Value?



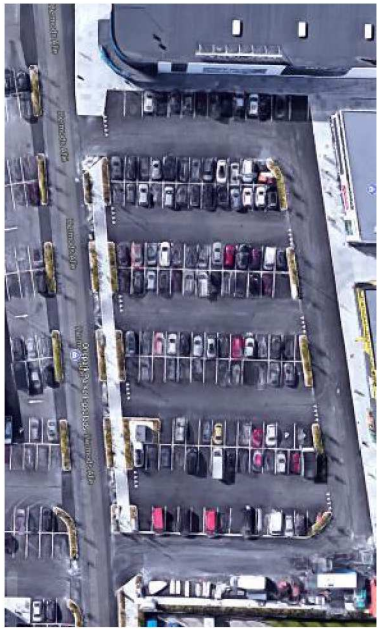
This?

vs

This?

HEMPEL

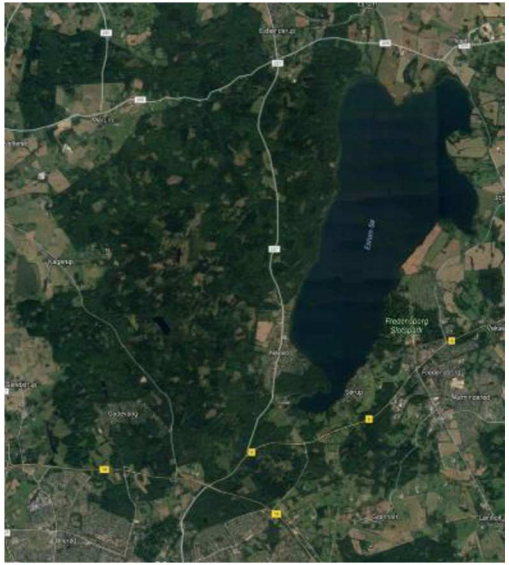
What's the *Ecological* Value?



This?

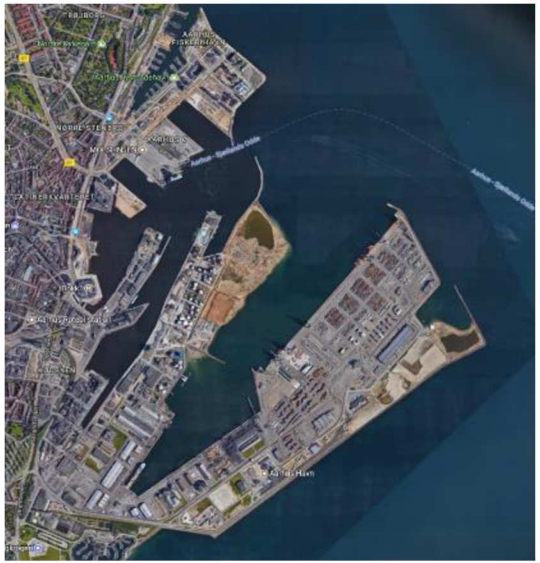
vs

This?



HEMPEL

What's the relative *Ecological impact*?

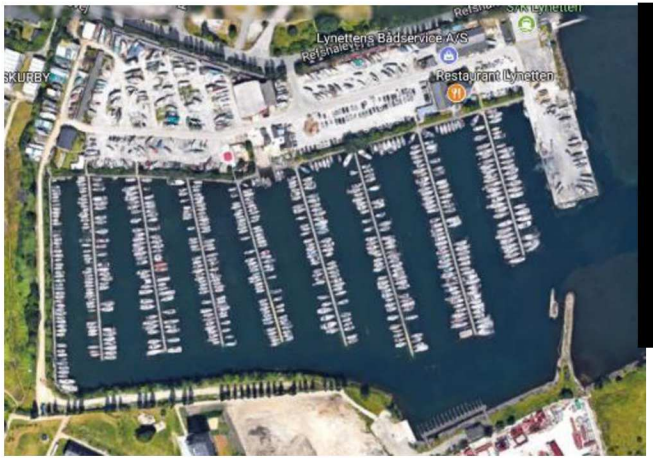


GHG there?

Biocides here? Or

HEMPEL

What's the relative *Ecological impact*?



More invasive species?


Platorchestia platensis


Neanthes succinea

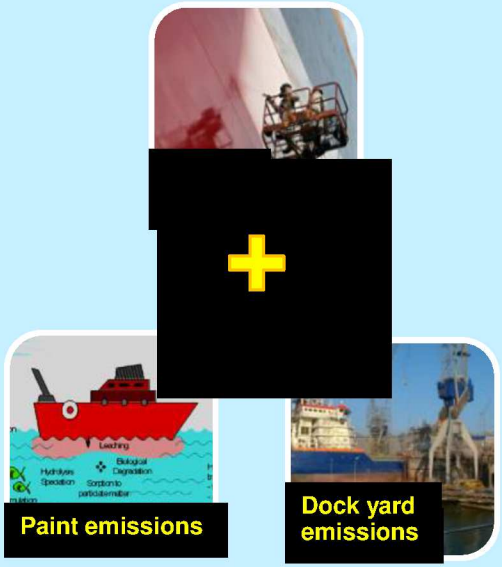
Biocides here? Or

https://www.marylandbiodiversity.com/viewSpecies.php?species=15995
http://naturfoto-hecker.photoshelter.com/gallery/Schiffsbohrwurm-Teredo-navalis/G00004cq.4OqJiBk/
https://en.wikipedia.org/wiki/Alitta_succinea

HEMPEL

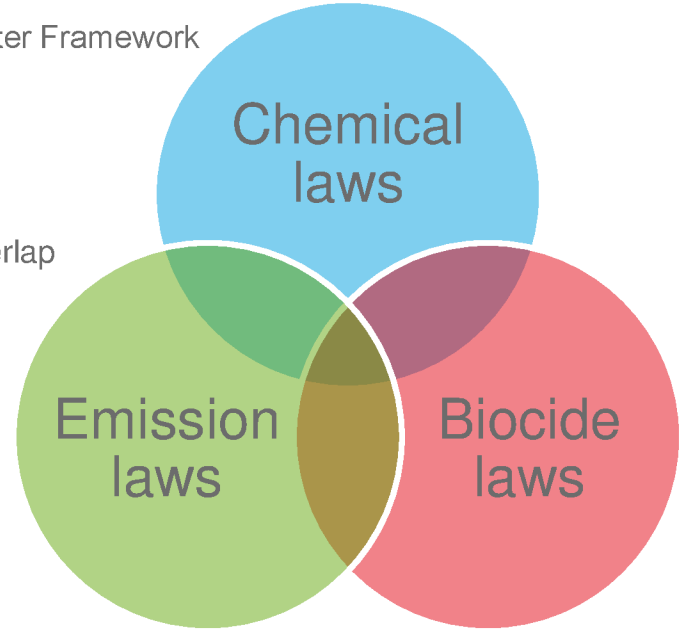
Conclusions

Regulations need to work together



Conclusions

- Protection goals and government policy needs to be aligned across regulatory frameworks
  - E.g Designate marinas as ‘heavily-modified water body’ under the Water Framework Directive
  - Allows for a different approach to be taken in BPR
  - Ensures we have effective control over invasive species
- Competent authorities should be encouraged to work together
  - Avoid ‘Silo’ thinking – recognise where department responsibilities overlap
- Use risk assessments effectively
  - Avoid excessive worst case assumptions
  - Gather data to inform validity of models
- Be consistent
  - Use the same tools across all legislation
  - Prevent contradictions and conflict with decision making



Questions?

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