

Cefic's sector groups MSG, EBAM and UV EB on ECHA's ARN

On the 3rd April 2023 ECHA published an Assessment of Regulatory Needs (ARN) report on Esters from acrylic and methacrylic acid with linear and branched aliphatic alcohols, simple acids and salts, aliphatic cyclic alcohols, polyols and ether alcohols (other than methanol and ethanol). The group was identified on the basis of structural similarity and the presence of the acrylate and methacrylate moieties and comprises 50 acrylates and 52 methacrylates.

The ARN claims that the substances are “potent skin sensitisers” and that “methacrylates are furthermore suspected respiratory sensitisers”, such hazard claims that are currently under discussion within the EU Commission in consultation with the Member States. Further the report proposes widespread restrictions of these substances in consumer, professional and industrial sectors may be required as future regulatory risk management action at EU level.

Cefic sector groups MSG¹, EBAM² and UVEB³ recognise that these 102 substances cover a wide range of chemistry and that for those substances under the stewardship of the involved sector groups, the basis for their grouping and identification for restriction by ECHA is not consistent with the current state of scientific knowledge and the available toxicology data contained within the REACH registrations.

As recently described by Natsch et al (2023⁴), ECHA has published a high number of ARN over the past 2 years as part of the EU chemical strategy for sustainability (CSS) plan and the prioritisation of selected chemical groups for targeted risk reduction measures. These authors also raised concerns as to the lack of due regulatory processes and that in five examples selected, the ARN do not follow ECHA guidance on grouping and do not take into consideration mode of action and the toxicological information on the chemicals. The ARN for acrylates and methacrylates appears to suffer from the same shortcomings.

Cefic MSG, EBAM and UVEB are concerned that whilst ARN documents are not legally binding they present an impression of a conclusion about the need for restrictions without these substances having formally undergone assessment. The report produced and published is done so without consultation with Stakeholders and as such lacks in principles of accountability, inclusivity and appropriate oversight. CEFIC is committed to protecting the health of its workers and its customers and will continue to work with ECHA to ensure that any regulatory conclusions drawn on its chemistry are based upon sound science.

¹ [Methacrylate sector group \(MSG\)](#)

² [European Basic Acrylic Monomers group \(EBAM SG\)](#)

³ [UV/EB – Acrylates Resins Sector Group \(UV EB SG\)](#)

⁴ Natsch, A., Adamsson, G., & Rocha, V. (2023). ECHA ARN documents: chemical grouping without a toxicological rationale. Archives of toxicology, 97(5), 1433–1437. <https://doi.org/10.1007/s00204-023-03479-3>

