

Session 3 speaker:

## Downstream user perspective on the use of NAMs in a regulatory and sustainable context

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### Short abstract

Paints protect property/ objects from deterioration (house cladding/ masonry, corrosion), and reduce fuel consumption and risk of invasive species (antifouling). As such these products are positive contributors to sustainability. The European Green Deal supports and promotes the use of NAMs for regulatory purposes. Once a substance is defined as hazardous several regulations apply. In turn, the industry will look for sustainable and less hazardous alternatives. This task may be very resourceful. We recognise that use of NAMs are important as useful screening tools for further prioritisation and for closing data gaps. We also recognise that there is no one-to-one replacements of animal tests for systemic endpoints. In this respect there is a concern that use of NAMs for regulatory purposes may give increased risk of false results with regard to hazard classifications for an unpredictable number of substance groups without allowing sufficient time to do the necessary product reformulations and – testing. Another concern is that there will be increased use of the precautionary principle in the weight of evidence (WoE) evaluations. Assessment factors are meant to account for the unknowns. Additional assessment factors from the WoE evaluations upon already large assessment factors used in risk assessments may make demonstrating safe use of any chemical extremely difficult. Having these possible consequences in mind, NAMs should first be adopted by the OECD, and their use for hazard determination be approved via the UN GHS procedure, to ensure a harmonised approach and global alignment.