

## Cefic's response to the Roadmap on the Chemicals Strategy for Sustainability

Cefic calls for a Chemicals Strategy for Sustainability (CSS) that recognises the essential role of chemicals to deliver climate ambitions, ensures a high level of safety and integrates **holistically the multiple dimensions of the Green Deal** - climate neutrality, materials circularity and resource efficiency - while boosting **competitiveness and innovation** to serve Europe's strategic interests. An 'industry of industries', we produce the building blocks and high-tech materials on which a modern, low-carbon, resource-efficient society is built; 96% of all manufactured goods rely on chemistry. We believe the CSS should:

### Consolidate and promote a solid foundation already built via better implementation and enforcement

The European Chemical industry is highly committed to implement REACH, which is a significant asset in demonstrating safety of many existing chemicals. Europe has the most comprehensive database on chemical hazards and risks; thus, REACH is the foundation to achieving the CSS objectives. **The first priority of the future CSS should be to work on the improvements identified in recent Reviews/Fitness Checks and increase regulatory predictability:** streamline to achieve consistency and eliminate duplication, step up enforcement (on imported products), ensure enforceability of regulatory measures and solve implementation issues: improving registration dossiers where needed, clarifying some of the most complex data requirements towards minimising animal testing, effective and digitalised communication of safe use conditions for substances/mixtures (as such and in articles), enhancing the Risk Management Options Analysis tool and communicating more positively about chemicals.

### Adopt a proportionate and robust approach for managing complex issues

**Science, proportionality and robustness** must be at the heart of decision-making for **managing scientifically complex issues** such as endocrine disruptors, combination effects of chemicals and chemicals that may build up in the environment. The problem and risks should be clearly defined. Where there is scientific uncertainty, a stepwise regulatory approach should be taken: first step should focus on main releases/risks based on existing data, followed by reviews in a second stage when more data are generated. Realistic exposure assessments should be at the core of risk assessment and management.

### Enable the development of sustainable and competitive European solutions

The CSS should consider sectoral partnerships, incentives and digital technologies to **boost innovation towards safe and sustainable products needed for climate neutrality** (materials for wind turbines, solar panels, batteries, building insulation, low carbon mobility) and to support the **Circular Economy Action Plan**.

Specifically, we need:

- a widely accepted framework and reference methodology(ies) for product sustainability performance assessment at design stage
- a central place compiling sustainability information (chemical dataspace)
- tools to accelerate chemical safety testing while avoiding animal testing

- practical solutions to track and trace 'legacy substances' and enable the production of high-quality recycled materials, incl enabling policies for the uptake of advanced technologies, such as chemical recycling, as a possibility to capture and separate, or destroy contaminants, as appropriate.

#### Data on hazardous substances need perspective

The Roadmap says that in 2018 hazardous chemicals *“still represented 74% of the total chemical production in Europe”*. More and more substances are classified as hazardous under CLP and these volumes cover large amounts of basic chemicals that are inherently hazardous but reacted (i.e. not released). As such, this number used in isolation to illustrate that *“chemical pollution causes direct harm”* is misleading. We are ready to work with the Commission on alternative indicators of progress and call on the Commission to present a refined problem definition.