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Overview of BeST's positions

Introduction

In the frame of its objective to serve as an expert resource for the international community on the benefits and criticality of beryllium applications, the Beryllium Science and Technology (BeST) has provided feedback and data to EU policymakers on several policy proposals of relevance to the beryllium industry and beryllium applications.

The present paper reflects BeST's most recent positions in the following policy areas:

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1. Chemicals Strategy for Sustainability

BeST has submitted feedback to several of the regulatory proposals currently under discussion, stemming from the Chemicals Strategy for Sustainability.

Essential Use Concept

In the frame of the discussions on the essential use concept, BeST stressed:

- The need for a holistic assessment of the essential use concept in line with the overall reform of the EU chemicals framework, including the review of REACH.
- The importance of preferring a risk-based approach instead of a hazard-based approach.
- The pivotal role of the safe use concept to ensure that uses already proven to be safe do not undergo the essentiality assessment.
- The need for clear and consistent criteria to define essentiality.

BeST's most recent position paper on the essential use concept is available [here](#).

Generic Risk Management Approach

On the proposed introduction of the Generic Risk Management Approach (GRA), BeST has put forward the following key messages:

- A risk-based approach constitutes a more efficient streaming tool where both hazard and exposure are considered: Risk = Hazard x Exposure
- The safe use concept should also be included in the frame of the generic risk management approach to avoid duplication of workload. A use already proven to be safe should therefore not fall in the scope of the GRA.
- A scientific and transparent validation process is needed.

BeST's most recent position paper on the GRA is available [here](#).

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2. REACH review

In the frame of the REACH review, BeST has stressed the following key messages:

- The safe use concept should be reflected in the frame of the REACH review. A substance proven to be safe should not be object of any further regulatory targeting (i.e. GRA and essentiality assessment).
- The risk-based approach must be preferred to a hazard-based approach.
- The introduction of new obligations for low tonnage substances will entail disproportionate administration and information requirements for small and highly specialised sectors.
- The implementation of simplistic approaches based on phasing out of hazardous substances solely based on their intrinsic properties will deprive the EU of the materials necessary to achieve the objectives of the EU Green Deal.

BeST's position paper on the REACH review is available [here](#).

3. CLP review

4. RoHS review

5. Review of the Waste Framework Directive

About BeST

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications. It is also the objective of BeST to promote good practices in the workplace to protect workers handling beryllium containing materials.