

Meeting with CEFIC – 24 November 2022, 11-12
Brussels, Commission premises (Breydel 2)

List of participants

Cefic: [REDACTED]
[REDACTED]

[Cefic transparency register number: 64879142323-90]

DG ENV: Aurel Ciobanu-Dordea (Director B), [REDACTED] Unit B2), [REDACTED]
[REDACTED] Unit B2), [REDACTED] Unit B2)

DG GROW: Kristin Schreiber (Director F), [REDACTED]
[REDACTED] Unit F1), [REDACTED] Unit F1), [REDACTED]
[REDACTED] Unit F1), [REDACTED] Unit F1)

Cefic highlighted the importance of **SMEs and competitiveness** in the context of the REACH revision. As the Commission's preferred options are not known yet, there is a lot of uncertainty for industry stakeholders. The question is how the REACH revision can support competitiveness and innovation. SMEs will need help and assistance, e.g. for the implementation of Safe and Sustainable by Design (SSbD). SSbD should be seen as complementary to regulatory action.

Cefic also recalled the long product cycle for chemicals: it usually takes 10-15 years from step one to the final production of new chemicals. This implies that companies need to plan in advance and predictability is key. Therefore, it is important that companies know which substances will be tackled under the REACH Revision.

In summary, Cefic called for transparency and clarity of the REACH Revision that should be demystified, focusing on the important issues, ensuring consistency across policy areas, and providing enough time to develop alternatives. They also stressed the importance of increasing enforcement and ensuring more efficient processes, e.g. for authorisations.

DG ENV agreed on the need for simplification and on the need to be more transparent in the REACH revision process. DG GROW noted the importance of giving predictability also via the scope of GRA.

Generic Risk management Approach (GRA)

Cefic noted that there is a clear link between CLP and GRA. The most important thing is to set clear priorities in a work plan and that EU and Member States transition pathways should be aligned. They also highlighted that, according to their study, the largest impacts of GRA would be from restricting professional uses (60% of impacts). GRA restrictions of professional uses would affect construction chemicals, paints, adhesives, sealants with large volumes. In relation to workers' protection, Cefic also stressed that the interface between OSH and REACH should be improved.

DG GROW explained that the GRA priorities will be set in a work plan, with a similar process as for the restrictions roadmap. A first discussion on a working paper for GRA prioritization in CARACAL could take

place already in March 2023, but this is yet to be confirmed. There is a common interest to have clarity ASAP, nonetheless it seems clear that ED and PBT substances are a priority.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]