



EUROPEAN COMMISSION

ENVIRONMENT DIRECTORATE-GENERAL
Circular Economy and Green Growth

Meeting with CEFIC – 24 November 2022, 11:00 -12:00

List of participants

CEFIC: [REDACTED]

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

[REDACTED] Unit B2)

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

[REDACTED] Unit F1)

Follow-up: it was agreed between Cefic, DG ENV and DG GROW to continue the discussions on 12 January to continue exchanges on MAF, polymers and alignment of Member State / EU priorities and 18 January 2023 on other key issues.

- **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 reminded of 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 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 State 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. CEFIC also emphasized.
- 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 (TBC). There is a common interest to have clarity ASAP, nonetheless it seems clear that ED and PBT substances are a priority.

Authorisation

- CEFIC noted that it is clear that the authorization system applicant by applicant does not work and there is a need to simplify the procedures. It was suggested to first identify which uses are an issue, and then check what is the best regulatory tool.

Registration of polymers

- CEFIC explained that, in their view, the registration of polymers needs to be different as these are different materials. It is estimated that there are 150,000 polymers from chemical manufacturers only, plus there are more produced by downstream users. They stressed the importance of a first notification step and of registration in groups.
- DG ENV clarified that not every detail will be fixed in the legislative proposal for the REACH revision, e.g. it is too early to develop data requirements. The aim of the notification step is to gather enough information to develop grouping criteria.

Mixture Assessment Factor (MAF)

- CEFIC expects that MAF will have an impact on the market, and on the availability of chemicals, and suggested to have a review clause to ensure that evolving scientific evidence is taken into account.