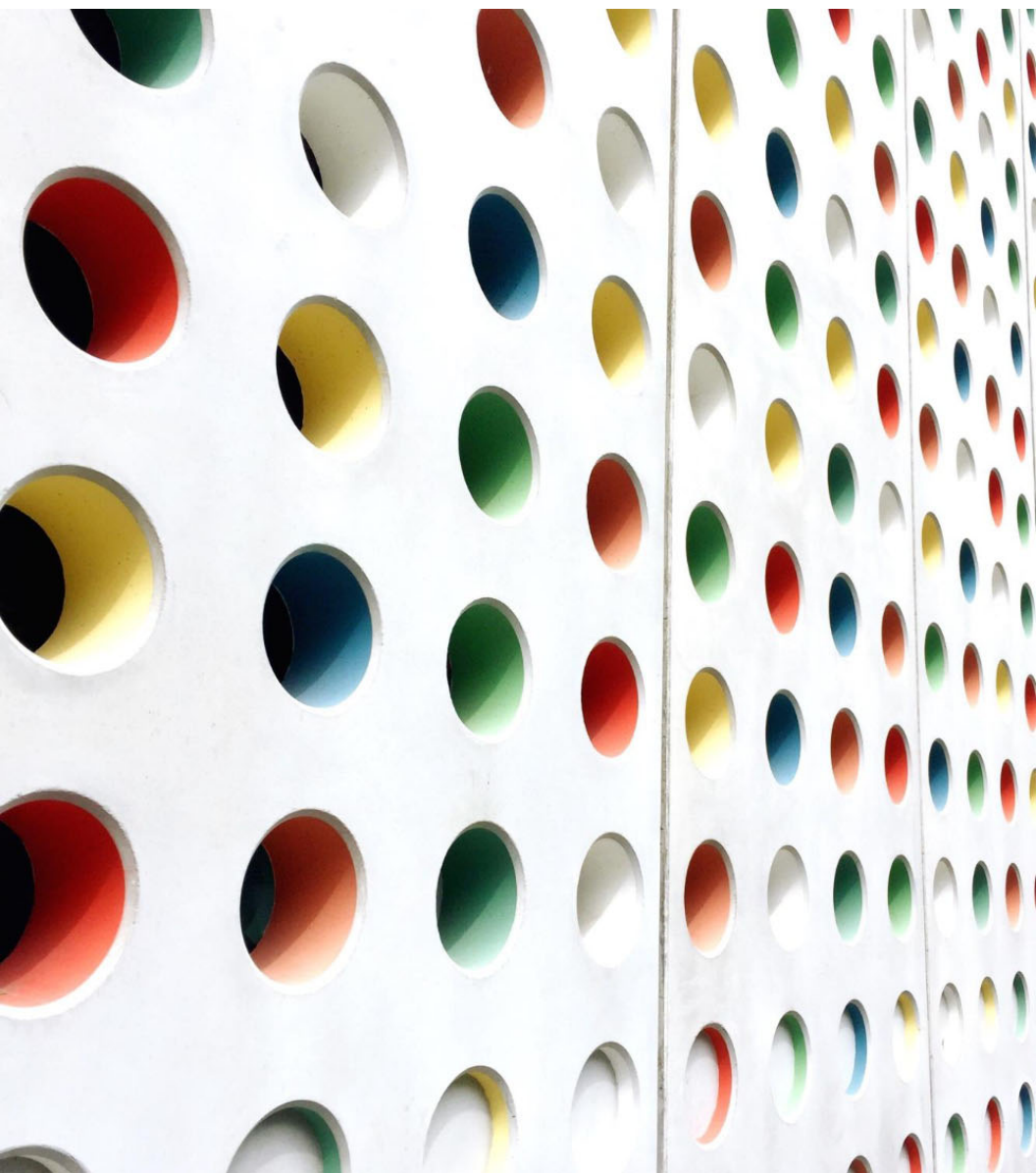




Essential Use Concept

MEETING WITH DG GROW AND
DG ENV

3 JUNE 2021

Agenda

- Introduction and Tour de Table
- Key principles
- Examples
- Impact on regulatory objectives
- Key messages

Introduction and Tour de Table



Our co-signatories



European
Automobile
Manufacturers
Association



Key principles

The mere presence of a hazardous substance in a process or product should not be associated with the default occurrence of a risk threatening human health or the environment.

Banning the use of a hazardous substance means reducing the technological toolkit available to EU manufacturers, and would in many cases lead to a gap of performance of EU manufactured products, reducing their attractiveness and value on markets outside the EU.

Banning the use of a hazardous substance, especially when there is no demonstrated risk, would also hinder the innovative capacity of EU companies and thus put them at a disadvantage compared to non-EU companies.

The EUC framework needs to be clear and the process for decision making must be transparent and subject to consultation of, and appeal by, industry stakeholders.

Any EUC framework will need to account for the fact that essentiality is dynamic and subjective, and its impact not limited to the EU.

Examples



Stainless
steel in
kitchen
appliances

Batteries in
consumer
and
professional
articles



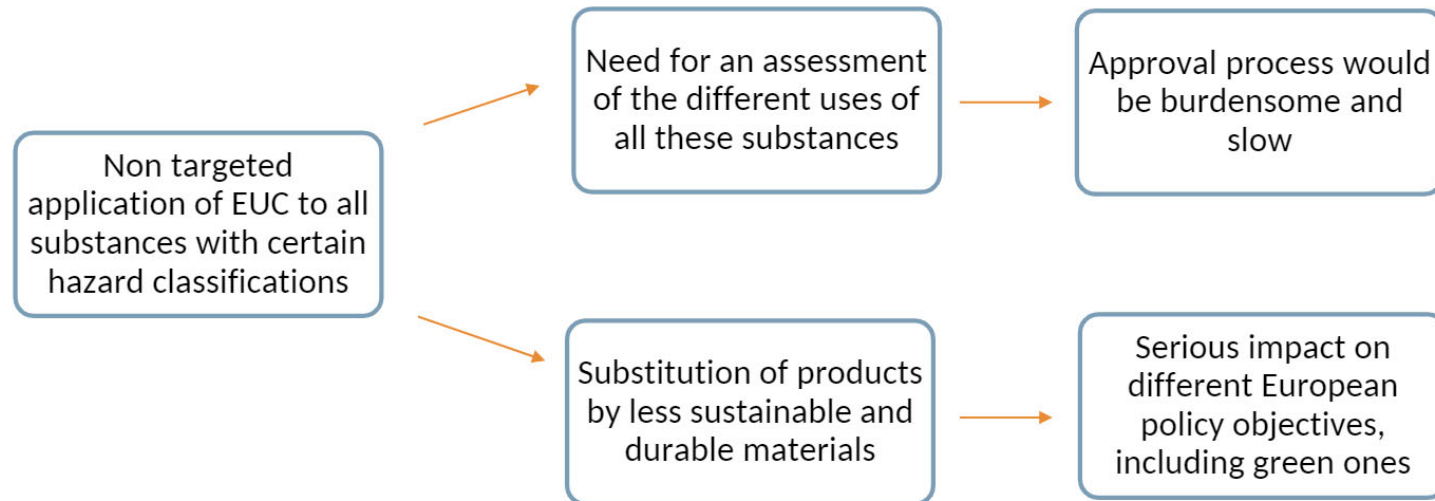
Plating in
beneficial
articles



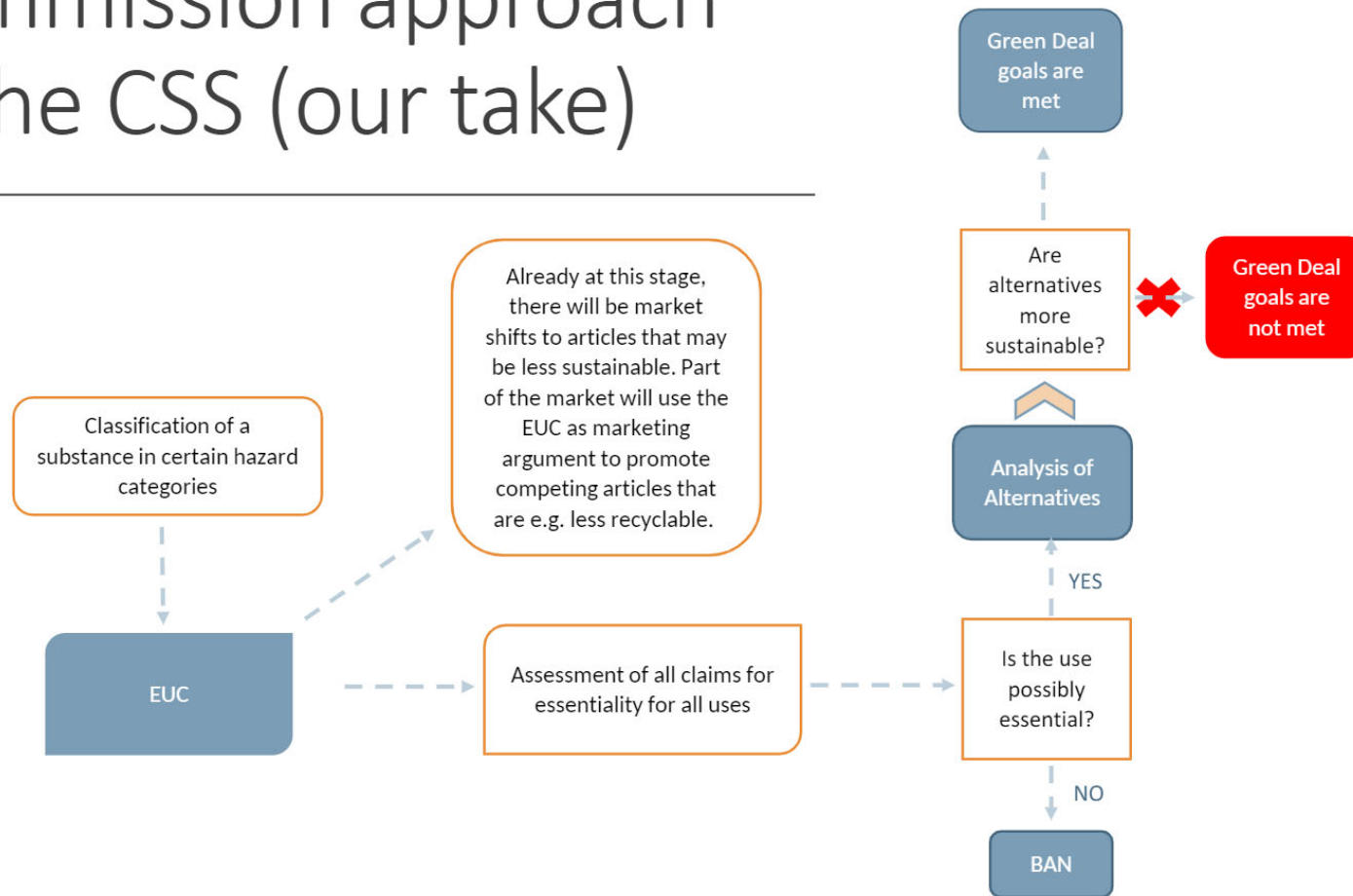
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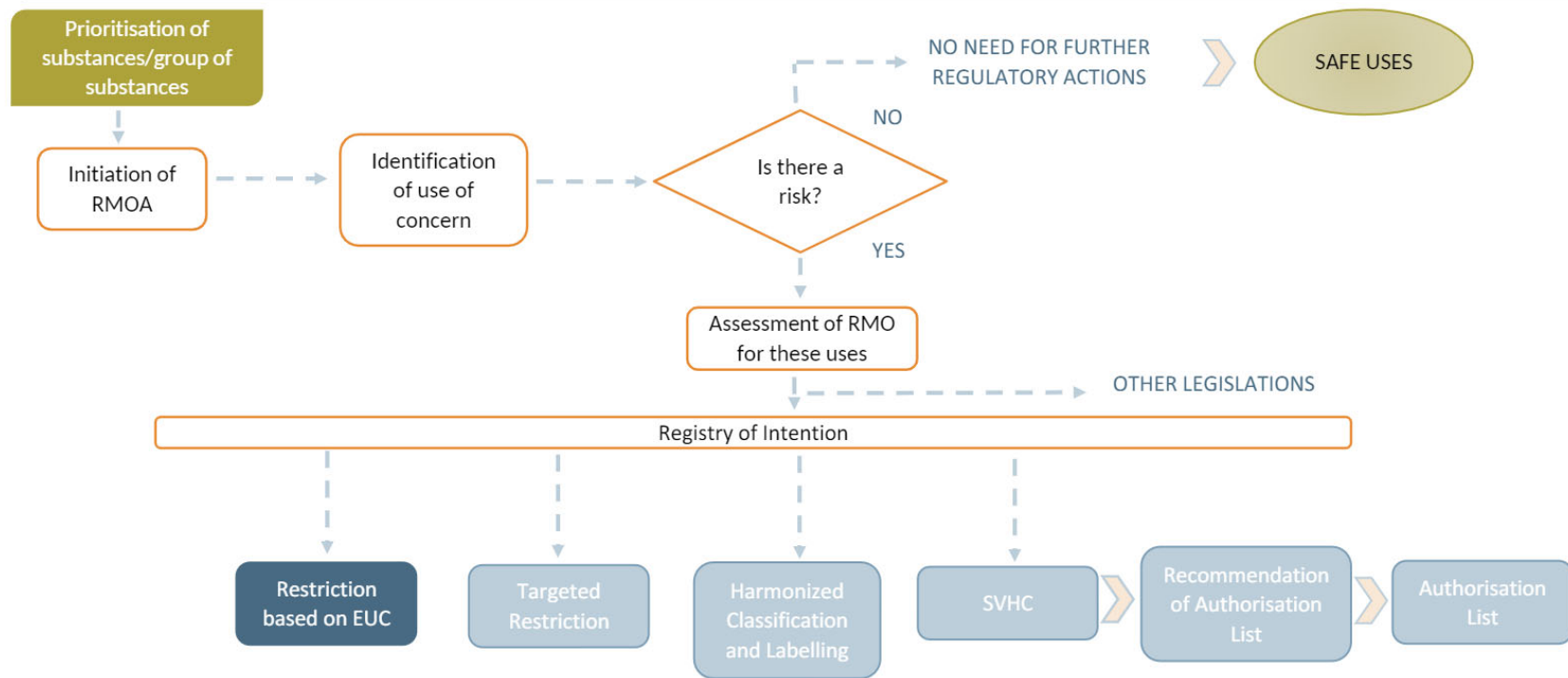
Impact on regulatory objectives



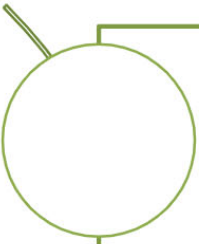
Commission approach in the CSS (our take)



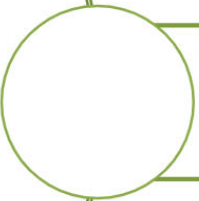
Our proposed approach



Key messages



The assessment should not be limited to a pure chemicals management perspective, but needs to better integrate with other policy objectives (including others in the frame of the Green Deal). All changes which will be made in the CSS on the EUC should be fully reflected in other relevant Commission initiatives, including those already published recently (e.g. Taxonomy).



The EUC should not be automatically linked to hazard classifications, but only be applied in a targeted manner.



We encourage authorities to consider very seriously the role of Risk Management Options Analyses (RMOAs)

Thank you
