



EUROPEAN COMMISSION
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL

Food and Feed Safety, Innovation
Directorate E

Brussels, 19 June 2020

MEETING WITH CEFIC ON THE CHEMICALS STRATEGY

COUNTERPART	(Cefic) and
SANTE	,
WHERE, WHEN	Via online video-audio connection, 19 June 2020
SUBJECT	Chemicals Strategy for Sustainability
OBJECTIVE OF THE MEETING	On request of CEFIC to outline their position(s) to SANTE
RESULT	- Concerning the Chemicals Strategy communication document, CEFIC emphasised a need for consistency as regards the balance of success and what is still lacking in EU chemicals legislation. They consider that the document should also ensure understandable terminology. - The main points concerning SANTE were discussed: ➤ On APIs, CEFIC has a meeting planned with Commissioner Kyriakides on 8 July. They agreed they would provide a 2-pager outlining their position to Directorate B colleagues. SANTE indicated that this would stay mainly under the Pharma strategy and not have significant substance under the Chemicals Strategy. ➤ EDs will feature prominently. CEFIC agrees with having horizontal criteria, using the PPP and BP criteria. They indicated that in discussions, ECHA [informally] favours this. They would anticipate that criteria would first be developed under the GHS although SANTE indicated that EU may prefer to lead first on the issue. SANTE supports PPP and BP criteria but cautioned that the issue of ‘suspected EDs’ would need to be discussed and ideas on how to address it are welcomed. A category of suspected ED rather than ‘yes / no’ classification is a big concern to the chemicals industry. ➤ Concerning one substance-one assessment, SANTE indicated that it is in favour of streamlining the process but clarification of what the process entails is needed. CEFIC emphasised the need to ensure that expertise and resources are available in Member States, who are responsible for a lot of the assessment work and sometimes struggle with their current resources. They consider that following work on hazard, risk assessment is largely specific to sectorial legislation and cannot be fully achieved by one assessment and one agency. SANTE cited the need for data sharing and the recent achievements under the GFL on transparency as the way forwards. CEFIC indicated that they support the general direction and would be able to get their companies on board but referred to issues on confidentiality and mistrust of experts by other stakeholders. ➤ CEFIC underlined the need for regulatory predictability for businesses. They also emphasised the need for appropriate use of information (e.g. use of peer reviewed studies), ensuring expertise and skills (e.g. on polymer knowledge). Agencies also need sufficient resources [financing].

	➤ CEFIC considers that extra attention needs paying to imports for a level playing field but problems with enforcement were acknowledged e.g. internet sales. Strategic value chains and sourcing more chemicals from EU also need considering but taking into account the need to maintain a certain proportion of chemicals from third countries. Additional tools to help enforcement are desirable such as digital tools. The role of industry themselves in driving forward levels of compliance was also touched on. • Around 3 – 4 weeks is left for input into the strategy.
FOLLOW-UP	CEFIC will send SANTE some 2-pagers on the above issues, setting out their position.