

Minutes ASMOR meeting – 28/11/2022

Parties present:

ASMOR :

- [REDACTED] Nickel Institute
- [REDACTED] FEICA
- [REDACTED] ETRMA
- [REDACTED] SMEUnited
- [REDACTED] ZVO

European Commission :

- [REDACTED] (ENV)
- [REDACTED] (GROW)
- [REDACTED] (GROW)
- [REDACTED] (GROW)
- [REDACTED] (GROW)

Discussed:

- GRA:

ASMOR is concerned that GRA is based on hazard and that this could lead to disproportionate decisions or regrettable substitution. Using alternatives with a less hazardous profile may lead to increased environmental risks during the use/ end-of-life phase. COM clarified that GRA is risk driven since it is based on generic exposure considerations. COM will prepare a workplan to clarify the scope and prioritise the sectors with highest exposure.

- ESU:

ASMOR would like upfront exemptions (based on a pre-screening) and two different procedures, one for safe uses and another for ESU. COM agreed with industry that a pre-screening phase would be useful to focus the work on areas that require more detailed analysis. Discussions on the need for minimal exposure exemptions are not yet concluded.

- Assessment of Alternatives:

ASMOR proposed to include environmental impacts beyond chemical impacts (such as sustainability) and other trade-offs (such as loss of strategic autonomy).

- Candidate List:

