

From:



Subject:

Chemicals Strategy for Sustainability: Replicating the CAFE model for chemicals

Date:

lundi 15 juin 2020 22:48:17

Attachments:

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Dear Commission colleagues,

As you are aware, Cefic is highly interested in the Chemicals Strategy for Sustainability. We trust this major initiative will provide a solid framework for a strong European chemical industry that thrives and invests in Europe, is competitive on the global scene, produces modern and sustainable products to deliver the EU Green Deal, generates high-quality jobs in Europe and ensure a high level of protection of EU citizens' health and of the environment.

We realise that achieving these multiple objectives is a complex endeavour. We also realise that it involves multiple stakeholders who need to work together towards the same goals.

Therefore, we looked into possible models for further development and future implementation of the strategy, and came up with the following suggestion:

Developing recommendations for a new policy through a structured dialogue is a tried and tested model that works. The European Commission developed this approach through air pollution. First through a structured dialogue that led to Auto-Oil I and II, and most recently the **Clean Air For Europe (CAFE)** programme. This framework is an appropriate model to use for the formulation of the new chemicals strategy.

As with the CAFE Steering Group, this is composed of representatives of the Member States, the staff of the European Parliament, Agencies, industry and NGO stakeholders and relevant international organisations. They would meet two or three times a year to advise the Commission on the strategic direction of the preparation and implementation of the preparation of the Chemicals Strategy for Sustainability. Smaller working groups can focus on complex issues.

Today's framework for chemicals / substance regulation is complex. There are many actors, agencies, approaches, and legal instruments. Deep thinking is needed to make the system clearer, simpler and more effective. We see five key problems as needing solutions to make the system to work better and could be tackled in a CAFÉ-like platform:

1. Safe and Sustainable by design
2. One Substance, one assessment
3. Simplification of EU Chemicals legislation
4. Enabling circular economy - safe recycled materials
5. Better implementation and enforcement of REACH and other chemicals legislation

These five problems do not necessarily constitute an exhaustive list. They all have in common that they are complex and need time and consultation to be successful. They can be examined by five working groups. These Working Groups would be led by the Commission, with Member State experts, Agencies, industry, NGOs and other experts. As with CAFÉ, each working group would prepare common positions and recommendations. Such an approach ensures bringing together best-in-class experts to agree the best-in-class

solutions.

The time spent preparing the common recommendations is offset by speedier legislative adoption.

We remain at your disposal for further input or exchange, should you find this useful.

Best regards,

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