Re: Meeting request - the opportunities of the Chemicals Strategy for Sustainability (CSS) and REACH revision on EU occupational safety and health legislation

Dear Commissioner,

On behalf the European Chemical Industry Council – Cefic - and industriAll, we are writing to kindly request a meeting with you.

As representatives of the European chemical industry and trade unions, we would be delighted to discuss with you the potential impact of the upcoming REACH revision on employment and safe use of chemicals by workers in the EU and explore opportunities to enhance occupational safety and health legislation to enhance workers’ protection against exposure to hazardous chemicals.

As an employer of more than 1.2 million workers in EU-27, the chemical industry supports the EU Green Deal and the goals the Chemicals Strategy for Sustainability (CSS): to ensure that chemicals are produced and used in a way that maximizes their contribution to society, while avoiding harm to the planet and people. We are working closely with the European Commission and other European decision makers to deliver on these policy goals, just like we are already working on our industry’s climate transition.

One of the measures foreseen under the CSS and upcoming REACH revision includes the European Commission’s plan to extend the generic approach to risk management (GRA) to the professional users of chemicals. Many professionals need to handle hazardous chemicals to do their job and they need to be well protected. However, substitution of these substances with less hazardous alternatives in many cases may be impossible without losing important properties and functionalities. Generic bans for professional uses may therefore impair the quality of materials and solutions and thereby prevent professionals from delivering the quality of work expected from their contractors.

A recent study on economic impacts of the CSS – commissioned by Cefic and independently conducted by Ricardo Energy & Environment – showed that important market losses could be expected from implementation of specific regulatory measures related to CLP and REACH regulations. Up to 28% of the chemical industry’s sectoral turnover could be impacted by 2040. Even after substitution of the most harmful chemicals (assuming substitutes are accepted by the market) and granting of derogations in case substitution is not possible, a net annual turnover loss of 12% was estimated (equivalent to €70 billion of the 2019 market). Importantly, 60% of this impact relates to professional uses of chemicals (paints, cleaning, adhesives, lubricants, construction).

Therefore, a careful and more nuanced approach than generic bans is needed, where the existing dedicated EU worker protection legislation is regarded as preferred way to address professional and industrial workers.
We would highly appreciate the possibility to discuss this with you in person.

Looking forward to hearing from you,

Yours sincerely,

Martin Brudermüller
President Cefic

Michael Vassiliadis
President industriAll