

**From:** [REIG RODRIGO Roberto \(CAB-KYRIAKIDES\)](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]; [REDACTED] [ROSSIDES Giorgos \(CAB-KYRIAKIDES\)](#); [OJALA Annukka \(CAB-KYRIAKIDES\)](#);  
**Subject:** Re: Chemical Strategy for Sustainability  
**Date:** lundi 14 septembre 2020 09:16:00  
**Attachments:** [image001.png](#)  
[image002.gif](#)

---

Dear [REDACTED],

Thank you very much for your message and interest in a meeting. We will have the occasion of discussing the Chemicals Strategy on Wednesday as part of the inter-CAB meeting organised by the Cabinet of Executive Vice-President Timmermans.

I can already confirm that the Commission is committed to develop and adopt an ambitious Chemicals Strategy. Many of the issues you describe below already feature in a way or another in our discussions and it will be a pleasure to hear your views later this week.

Kind regards,  
Roberto

**Roberto REIG RODRIGO**

Member of Cabinet for Stella Kyriakides



European Commission  
Cabinet of Commissioner Stella Kyriakides  
Health and Food Safety  
Rue de la Loi 200, BERL [REDACTED]  
B-1049 Brussels/Belgium  
+32 229 [REDACTED]  
[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)

---

**From:** [REDACTED] >  
**Sent:** 09 September 2020 11:16  
**To:** ROSSIDES Giorgos (CAB-KYRIAKIDES); OJALA Annukka (CAB-KYRIAKIDES); REIG RODRIGO Roberto (CAB-KYRIAKIDES)  
**Cc:** [REDACTED]  
**Subject:** Chemical Strategy for Sustainability

Dear Mr. Rossides, Ms. Ojala and Mr. Rodrigo,

With this mail we would like to request a meeting to discuss the upcoming Chemical

Strategy. We had a meeting with Mr. Mr Moutarlier and [REDACTED] at Commissioner Bretons cabinet last week and understand that our perspective and concrete suggestions could also be of interest to you.

There is an urgency to **protect the health of EU citizens** from chemicals of concern. The Green deal aims to improved protection of EU citizens and encourage innovation for the development of safe and sustainable alternatives. EU industries are well prepared but need the support from regulators to be able to move towards phase out of chemicals of concern.

Given we are an environmental organisation in contact with many **European companies**, both producers and users of chemicals, we hope to be able to provide you with an interesting perspective. We are certain stricter regulation does not contradict innovation, we believe it facilitates for the chemical industry to be able to focus its innovation resources in the right direction.

Moreover, if industry is given **clear limits** and frames most of them are able to adapt to strict regulation. Many internationally well-known brands, users of chemicals, are actually asking for stricter regulation. One example related to this is the [ChemSec PFAS movement](#) where more than 20 companies urge regulators to restrict PFAS as a group in the EU.

We hope to be able to provide you with more insights and example supporting our view that regulation drives innovation in a meeting at your convenience.

We would also like to bring our perspective on a number of more specific issues we know are up for discussion within the Commission in connection to the upcoming Chemical Strategy. We have listed them below with a short description of our concerns.

The '**toxic-free hierarchy**' introduced by DG ENV is in line with the Green Deal's pollution prevention goal. The toxic-free hierarchy prioritizes avoiding toxic chemicals all together, rather than control of chemicals. The hierarchy is inspired by the existing EU hierarchies for waste and occupational health risk management that prioritizes elimination and prevention over control measures. To effectively protect people from hazardous chemicals the toxic-free hierarchy is the most effective method.

#### **Hazard vs risk approach** (or the Generic risk assessment vs Specific risk assessment)

Hazard refers to the intrinsic properties of a chemical, its potential to do harm. The risk is the combination of hazard and exposure (risk = hazard x exposure). Hazard assessments are complex, but exposure assessments add even more levels of complexity to the equation. Both elements are used in REACH and have their pros and cons but when identifying if a chemical is hazardous or not it is crucial to use the hazard approach exclusively. We have written more in detail about this here: <https://chemsec.org/policy-and-positions/hazard-risk/>

The definition “**Non-essential uses**” of toxic chemicals is a part of the Montreal Protocol to the Geneva Convention, to which the EU is a signatory and are therefore sufficient to add also in EU regulation.

The “**Mixture assessment factor**” (MAF) is a concrete way to consider combined exposures from unintended mixtures during risk assessment and management activities. MAF is an efficient way to reduce the risk from the cocktail of chemicals of concern we are exposed to in our daily life.

A **Risk management option analysis (RMOA)** system as a prerequisite to be performed by the authorities before any restriction or ban could take place would place the burden of proof back to the authorities, and would in turn risk crippling the legislation through bureaucracy, making the process of banning harmful chemicals more inefficient. This is what we call paralysis by analysis.

## Conclusion

There is an urgency to protect EU citizen from chemicals of concern. EU industries are well prepared for this but need the support from regulators to be able to move towards the phase out of hazardous chemicals.

We look forward to take part of an ambitious Chemical strategy in line with Green deal. We hope you have time for a meeting with us in which we can support you with information and examples related to our arguments above. Looking forward to hear back from you.

Kind regards,

[REDACTED]

[REDACTED]

