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From:	▮▮▮▮▮▮▮ @cefic.be>
Sent:	vendredi 19 juin 2020 11:27
To:	▮▮▮▮▮▮ (SANTE); ▮▮▮▮▮▮ (SANTE)
Cc:	▮▮▮▮▮▮
Subject:	Chemicals Strategy for Sustainability
Attachments:	CSS level Playing Field June 2020.docx; CSS chemicals value chains and recovery June 2020.docx; CSS enforcement proposals PCPS May 2020.docx; CSS ED issue and way forward PCPS May 2020.docx; CSS OSOA June 2020 (2).docx

▮▮▮, ▮▮▮▮,

Many thanks for your time and open exchange today.
Please find attached the 'discussion papers' we have referred to. These are deliberately not 'position paper', they are meant to openly share ideas/suggestions in the spirit of an open dialogue.
Topics covered are:

- Level-playing field for the EU chemical industry
- Strategic value chains / industrial ecosystems for the Recovery (we will also submit this one as an attachment to our contribution on the Roadmap)
- Enforcement and enforceability
- Endocrine Disruptors
- One Substance, One Assessment

In relation to how to manage 'suspected EDs': that would be under the Substance Evaluation of REACH for general chemicals (CoRAP), or similar Evaluation procedures for pesticides and biocides actives. ECHA has a screening approach for all REACH registered chemicals, they could come up with a list of substances to be further evaluated for ED properties.
However, we would also argue that a biocide or pesticide co-formulant that is registered under REACH should be managed under REACH (we see Biocides authorities running their own ED assessment on REACH substances) as a matter of one substance-one assessment.

On the EFSA Transparency Regulation, I understand from colleagues that they key is to find the right balance between transparency and "duly justified commercial data that could significantly harm our competitiveness". For that, they asked EFSA to better and more involve stakeholders in the discussion.

If you have questions, let us know.

Best regards,

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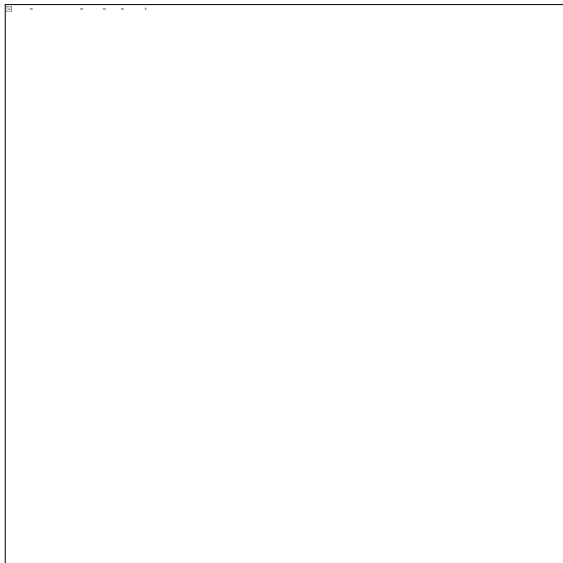Mobile ▮▮▮▮▮▮
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EU Transparency Register n° 64879142323-90

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