

Date and venue:  
BREY 10/264 – 6 March 2020

Participants:

COM:

ChemTrust / EEB delegation:

Summary of the discussion:

- Chemicals strategy

ChemTrust/EEB representatives described their expectations for the forthcoming chemicals strategy. They consider that there is a new political context supporting the push towards greener products and a transformation of the use of chemicals. They proposed a mix of instruments fostering the move towards greener chemistry (carrot) and penalising laggards (stick), considering also innovative approaches such as a fee-based system for industry to fund innovation centres.

GROW acknowledged that the Green Deal reflects the level of ambition of the new Commission, including for the chemicals strategy. GROW is focusing on promoting innovation and support measures that will facilitate the transformation of the chemical industry and its competitiveness in the global context. COM also intends to profit from digitalisation and to improve enforcement. Legislation is an important instrument to meet the objectives outlined in the Green Deal for the chemical strategy; in that respect, the possible re-opening of REACH is a key question still under discussion. Work will build on the recent evaluations of REACH and the chemical legislation (fitness check).

Other concepts related to chemicals policy were briefly discussed, such as the “one-substance, one-assessment”, essential/non-essential uses, REACH authorisation process.

- Circular Economy

ChemTrust/EEB representatives explained that transparency, traceability and avoid toxic recycling are key issues to be addressed under the Circular Economy. They favour a staggered but ambitious plan to make all substances of concern traceable by 2025 and eventually all chemicals in products by 2030 (via a full material declaration).

GROW shared the general objectives of transparency and traceability but cautioned against practical problems that still need to be overcome (administrative burden, technology development, confidential business information, energy use of blockchain technology etc.). A case-by-case assessment of substances is needed to address their possible recirculation via recycled materials.

- Restriction of lead in PVC (links with Circular Economy)

ChemTrust/EEB representatives firmly supported the need to ensure no legacy toxic substances, in particular lead, are present in recycled PVC. Thus, they would favour other waste management options for PVC containing lead. In their view, secure-landfilling was not assessed by ECHA. This is a case that would set an important precedent on how to address legacy substances in recycled materials.

GROW explained that COM is considering different options after the EP resolution against the restriction. If major adjustments are to be proposed, then time is needed to assess the consequences.