

EU Chemicals Strategy for Sustainability

Overall framework and 2022 key actions

Daniel Torans, Regulatory Advisor, GPC
Email: compliance@gpcregulatory.com



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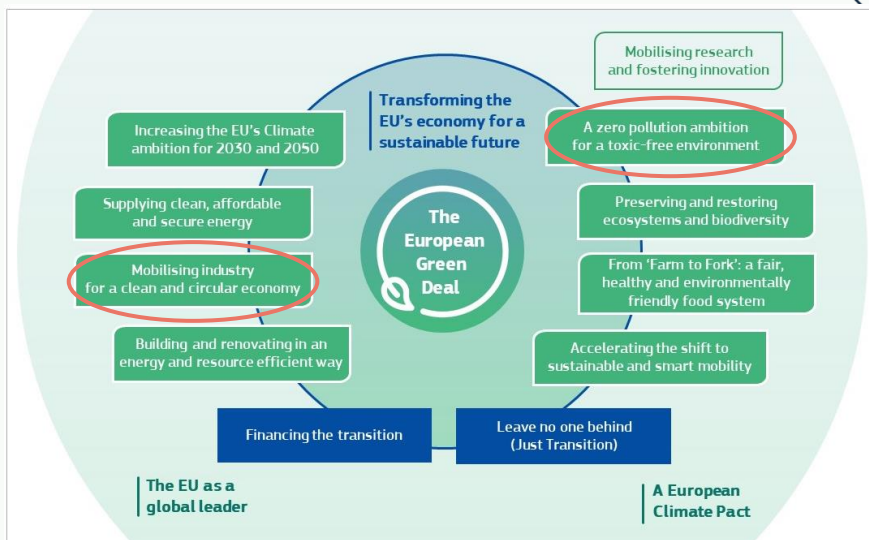
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Redefinition of EU environmental goals



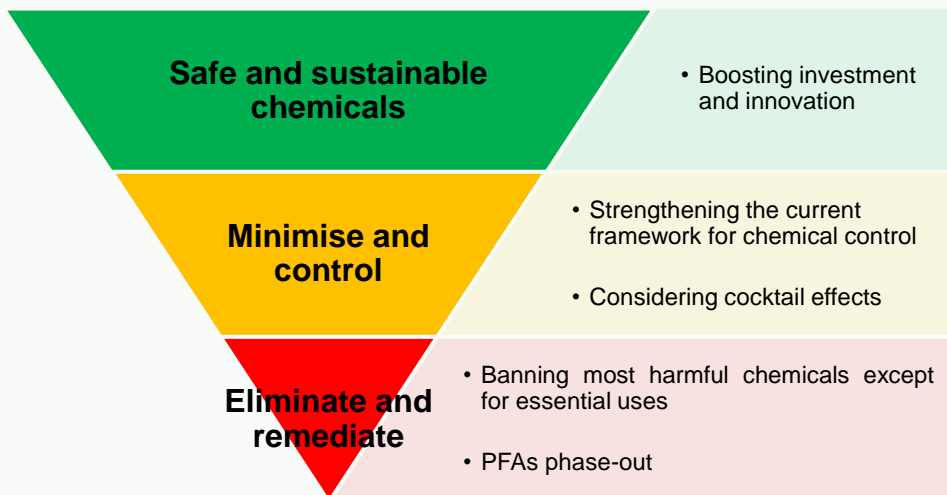
Source: COM(2019) 640 final – The European Green Deal



Timeline of key initiatives



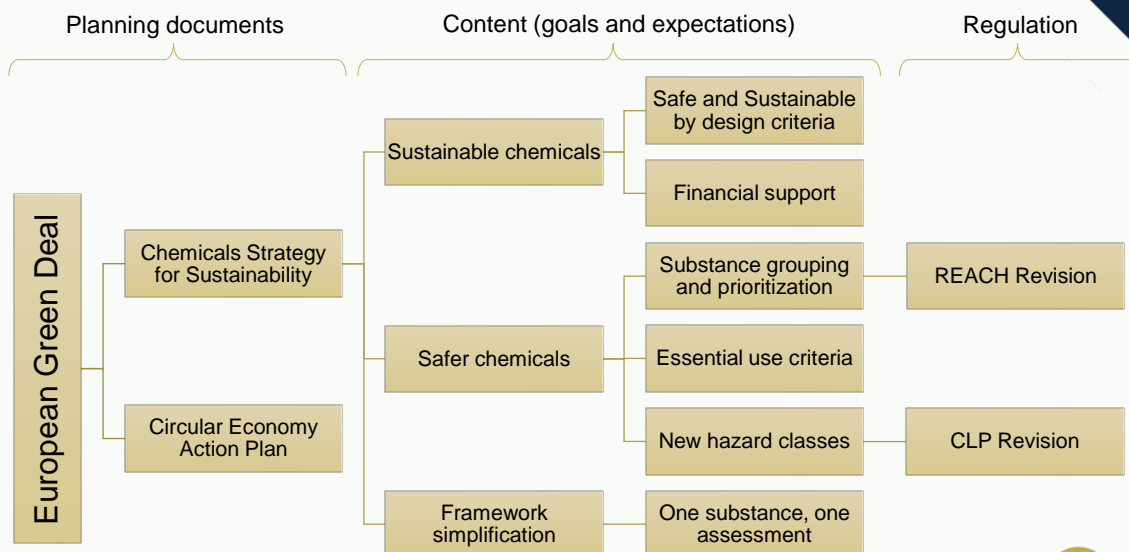
Chemicals Strategy for Sustainability Overview



Source: COM(2020) 667 final – Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment (adapted)



Redefinition of EU environmental goals



Chemicals Strategy for Sustainability REACH Revision

Shortcomings	Proposed Solution
Lacking compliance on information requirements	Revisions of provisions for dossier and substance evaluation
Lack of supply-chain communication	Improvement of safety data sheets (harmonized electronic formats)
Lack of assessment of the risk from unintentional mixtures	Introduction of a Mixtures Assessment Factor in the substance assessment
Slow and inflexible authorisation procedure	Clarifying, removing or merging with restriction
Restriction procedure: too slow and case-by-case; evaluation too complex	Extension of generic risk approach beyond CRM Essential use criteria (including for derogations)

Source: Ares(2021)2962933 – REACH Regulation Revision Inception Impact Assessment



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Chemicals Strategy for Sustainability CLP Revision

Problem	Proposed Solution
Incomplete information about hazards to human health and the environment	Introduction of new hazard classes (PBTs/vPvB)
	Assessing the need for specific neurotoxicity and immunotoxicity criteria
	Expansion of CLP scope (new products covered)
	Clarifications of the rules on mixture classifications

Source: Ares(2021)2969734 – CLP Regulation Revision Inception Impact Assessment



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Chemicals Strategy for Sustainability Implementation criteria – SSbD

Development of Safe and Sustainable by Design (SSbD) criteria for chemicals:

Preliminary definition in the Chemicals Strategy for Sustainability:

“[A] pre-market approach to chemicals that focuses on providing a function (or service), while **avoiding volumes and chemical properties that may be harmful** to human health or the environment, in particular groups of chemicals likely to be (eco) toxic, persistent, bio-accumulative or mobile.

Overall sustainability should be ensured by **minimising the environmental footprint** of chemicals in particular on climate change, resource use, ecosystems and biodiversity from a **lifecycle perspective**.”

Source: COM(2020) 667 final – Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment



Chemicals Strategy for Sustainability Implementation criteria – Essential use

Under the Strategy, provision to develop essential use criteria:

“[D]efine criteria for essential uses to ensure that the most harmful chemicals are only allowed if their use is **necessary for health, safety or is critical for the functioning of society** and if there are **no alternatives** that are acceptable from the standpoint of environment and health.

These criteria will guide the application of essential uses in all relevant EU legislation for both generic and specific risk assessments”

Source: COM(2020) 667 final – Chemicals Strategy for Sustainability: Towards a Toxic-Free Environment



Key initiatives in 2022

Initiative	Status
Discussions on essential uses at CARACAL	Ongoing (not public)
Discussions on SSbD criteria	Ongoing (stakeholder workshops on March 2021, March 2022, and Q3 2022)
REACH Revision	Commission proposal to be published in the second half of 2022
CLP Revision	Commission proposal to be published in the second half of 2022
PFA's restriction under REACH	Proposal submission by Denmark, Germany, the Netherlands, Norway and Sweden expected July 2022



Preparing for upcoming changes

- Improving compliance with existing regulations
- Keeping track of ongoing discussions and proposals
- Working towards substitution of hazardous substances
- Exploring ways to bring circularity into company operations



Conclusions

- Regulation development is still in its early stages, but is evolving rapidly
- There is high pressure to phase out the most hazardous chemicals
- Chemical sustainability assessment under the emerging framework might include value chain circularity
- There are important opportunities for manufacturers who can meet rising demand for more sustainable chemicals



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Global Product Compliance (GPC)



compliance@gpcregulatory.com



+46 46 2114615



IDEON, Beta 5, Scheelevägen 17, 22363
LUND, SWEDEN



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