

# CSS High Level Round Table

1<sup>st</sup> meeting – 5 May 2021

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This document contains Eurometaux's answers to the questions that the European Commission poses to the participants of the High Level Round Table on the Chemicals Strategy for Sustainability, in view of the first meeting of the group.

## Background document 1 - Role of the High Level Roundtable and state of the implementation of the Chemicals Strategy for Sustainability.

### Operations of the Roundtable

#### Given the mandate of the Roundtable, what are your main expectations?

Eurometaux welcomes the establishment of the Roundtable.

Effective, pragmatic, and proportionate implementation of the CSS will lay important foundations for achieving the goals of European Green Deal, which the metals industry fully supports.

#### What are the topics that you would like to discuss?

- **Consistency and coherence** with other EU Green Deal objectives and policies, particularly climate, circularity, and strategic autonomy (and tools / approaches to strike the right balance).
- **Predictable regulatory Framework** – increased predictability, with sequence of actions and communication, in particular on risk management, to further encourage investments and innovation.
- **Enforcement** – focus on stronger measures to implement and enforce, particularly risk management, to guarantee a level playing field.
- **Better Regulation** processes underpinning the choice of policy options aiming at preventing harm on people & environment, including impact assessments and supporting studies, review of efficiency and efficacy.
- **Global dimension** - impact on trade and international chemicals management frameworks.
- **Innovation** – improvements towards sustainability and accelerating alternatives to animal testing.
- **Implementing the Essential Use Concept (EUC)** – better understanding and clarification of the intended objectives of the EUC, and an open debate on the added value of the concept and how it could help achieve other EU policy objectives<sup>1</sup>.

#### How can the Roundtable members act best as group of ambassadors to promote the objectives of the Strategy in the society and economy?

Eurometaux is committed to serve as an effective “ambassador” of the metals and inorganics sector and play its part in encouraging the transition towards safer and more sustainable chemicals in the EU. We all share the same goals as the Commission, for a system that protects people and the environment and ensures the safe and sustainable use of the

<sup>1</sup> We note that changes are already being made to the taxonomy that will impact the metals industry, before the EUC is fully clarified (Annex I and II to the Taxonomy Delegated Acts Appendix C: GENERIC CRITERIA FOR DNSH TO POLLUTION PREVENTION AND CONTROL REGARDING USE AND PRESENCE OF CHEMICALS).



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metals and inorganics required for the Green Deal and society's wider needs. Here Eurometaux brings the unique and special perspective of the (high volume) metals and inorganics sectors.

Eurometaux would like to introduce its **Safe and Sustainable Metal** concept which considers all aspects of sustainability relevant for metals and most inorganics. In addition to climate and chemicals management dimensions, it adds the societal, innovation and cost effectiveness aspects as they are key policy objectives in the Green Deal. A final and critical consideration is that all of the requirements outlined in the concept need to be considered from a full lifetime perspective of the substance and its use in a mixture, article, or complex product - to prevent potentially short-sighted assessments.

## Background document 2 - The industrial transition to safe and sustainable chemicals

### What are the main investment needs for the industrial transition to safe and sustainable chemicals?

Safe "closed loop" systems (both for high volume metals used e.g., in construction and infrastructure, and lower volume metals used in special applications such as batteries) so that metals are continually recycled in the EU. This includes cases where "carrier" metals are used to recycle other metals.

New mining projects operated to the highest sustainability standards.

Investments in capacity expansions in areas which may otherwise become bottlenecks for the Green Deal objectives – growth in demand for battery materials; technologies and capacities for recycling.

### Can you share examples of successful transition to safe and sustainable production and use of chemicals? How can those best practices be better promoted and become mainstream?

The development of the closed loop application for batteries. The extensive voluntary work done on various Responsible Sourcing frameworks for metals and minerals, in anticipation of future needs throughout the supply chain.

### What are the main policy tools which can support the overall transition to safe and sustainable chemicals?

- Many **useful and valuable policy tools exist already** and have been in use for many years (REACH, OHS, GHS/CLP) and need to be fine-tuned, adjusted and better-enforced - based on the extensive experience gained during the past 10-15 years.
- Clear, timely **definitions and impact assessments of the concepts** introduced by the CSS (e.g., Safe and Sustainable-by-Design, essential uses, 'most harmful chemicals', 'non-toxic material cycles', 'substances of concern'). Some terms relating to hazard are being used almost interchangeably, which is causing confusion and uncertainty.
- **Sectorial approach** which aligns the Strategy with other policies to deliver on the Green Deal objectives and is flexible and results driven – to build on the positive properties of materials and take into account sector specificities.
- Adopt a **value chain approach** aligned to the 14 industrial ecosystems in Europe.
- **Policy and funding support** for digitalization tools to improve traceability through the value chain, and recyclability.
- **A new, independent policy tool** to monitor and measure coherence with other major EU initiatives as the CSS is implemented. Global alignment is also important to maintain a level playing field (e.g. WTO issues, coordination of UN GHS and CLP).

