

Eurometaux high-level messages

9 actions for REACH simplification & efficient risk management

The following paper includes 5 high-level recommendations, accompanied by 9 specific actions, to ensure that REACH remains fit for purpose for a competitive and safe European metals industry.

Focus on uncontrolled risks and avoid scattered, overlapping regulatory actions to increase predictability of risk management

1. Set up a clear, agreed **EU regulatory plan** to address uses of substances that need to be risk managed (i.e. uncontrolled emissions/exposures). An upfront analysis of the best regulatory path to control the risks (RMOA type analysis) will allow the best use of scattered resources and the existing toolkit of EU legislations (see also short paper on RMOA and spaghetti slide). For metals, this analysis also allows to bring in the criticality, climate action, circularity, and substitution dimensions in addition to the chemicals management aspects
2. Additional testing and information requirements for low-volume substances should be related to their potential for exposure to workers, consumers, or the environment

Ensure communication along the value chain and have the right information on substances' hazards, uses, exposure, functionality & alternatives for adequate RMO* selection

3. Collect the data needed to feed the RMOA early in the process by **giving a signal to the value chain** when a substance is considered for regulatory action. Set up proper, user-friendly systems with targeted questions (like the calls for evidence) to collect data early in the process

Make the risk management process fit for purpose, covering the whole life cycle

4. **Redesign the Authorisation** system for very specific cases and adjust the prioritisation criteria to consider aspects like exposure (better proxy than volumes for metals)
5. Ensure targeted and implementable **Restrictions based on unacceptable EU risk** and covering the whole lifecycle. Ensure coherence between regulatory objectives (Circularity, Climate, Chemicals, Criticality) when deciding on control measures as well as substitution
6. Avoid automatic consequences in downstream legislation and make it clear when concerns have been addressed (by upgrading PACT) to prevent duplication and unnecessary impacts on legislation (EU Taxonomy and CSRD)

Better consider metal sector specificities in REACH

7. **Follow materials and their emissions from cradle to cradle**, covering their whole life cycle and especially end-of-life, working on consistency and coherence with end-of-life, waste and recycling
8. **Avoid the integration of a default MAF** in REACH for naturally occurring substances

Make sure REACH is enforceable for a level playing field

9. Weigh the enforceability reality of the proposed REACH and non-REACH measures throughout all stages of decision-making

*RMOA: Risk Management Option Analysis



Zero Pollution Ambition: interrelations with other EU policies

