

From:



Subject:

Notes on meeting today AISE / GROW.D2 Chemicals strategy for sustainability

Date:

jeudi 28 mai 2020 18:01:12

Attachments:

[image001.jpg](#)

Pls for Ares registration, with an info task to all the colleagues in cc. Many thanks!

AISE ([REDACTED])

Chemicals Strategy for Sustainability

- AISE is surprised by the language in the Roadmap: “Toxic free” is misleading, does that include e.g. toxic mushrooms in the environment?! The debate should be more scientific.
- In terms of outcome of the strategy:
 - AISE would welcome a simpler and more coherent system for chemicals risk management, in line with the Commission’s Better Regulation agenda.
 - The strategy should respond to the COVID-19 crisis, which made some problems evident, in particular with the Biocides Regulation.
 - Servitisation can be interesting, but the biodegradability requirements for detergents puts a limitation to of e.g. chemicals leasing in the form of recycling.
- AISE will react to the Roadmap with concrete proposals for action. They value the good collaboration with DG GROW, and will also continue the dialogue with DG ENV.

Annex VIII to the CLP Regulation

- Many Members will not be ready in time for the first compliance date 1 January 2021. AISE will send the Commission a request at high level, asking for postponement.

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GROW D2 ([REDACTED])

Chemicals Strategy for Sustainability

- The public consultation on the Roadmap is open until 20 June, and we expect the Strategy for Q3 2020, probably in September.
- We do not exclude legislative changes to be announced, both for strengthening environmental protection and achieving simplification, e.g. by moving to digital labelling, or increasing transparency and predictability in the chemicals risk management process.
- We should, however, also focus on the economic aspect. We are reflecting intensively on how to promote sustainable competitiveness, e.g. by encouraging innovation, investments, new business models (such as servitisation?), greening, and digitalisation.
- We welcome AISE’s input on those topics, and look forward to their concrete ideas. The strategy is a rare opportunity to boost the competitiveness of the EU chemicals industry.

Annex VIII to the CLP Regulation

- We take note of your plans to request postponement of the first compliance date, and will consider it and consult our Hierarchy. At the same time, we firmly encourage your members to be prepared that the first compliance date will remain 1 January 2021.

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