

**From:** [REDACTED]  
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**Subject:** Minutes of meeting with Eurometaux on chemicals strategy 16/06  
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## Minutes of meeting with Eurometaux on chemicals strategy 16/06

Present:

- [REDACTED] (Eurometaux)
- [REDACTED] (DG GROW D1/D2)

After introduction of the sector (metals are used i.a. in batteries, wind turbines and solar panels), Eurometaux touched upon a number of elements that in their view are of particular relevance in a chemicals strategy for sustainability:

- **value chain approach:** materials of the metals sector are needed for the key value chains
- link between chemicals strategy and other elements of Green Deal such as the **circular economy**
- concern that the chemicals strategy is drafted towards organic chemicals without taking into account the **specificities of metals** ('toxic-free environment' for metals does not exist because they are always present in the background)
- many of the sector's materials are hazardous and given the difficulty to substitute them **risk management** is essential.
- given the dependence on availability in the earth, in the inorganics sector it is difficult to find suitable **substitutes**. In that sense, there is an important role to play for the chemicals strategy to ensure that conditions of use for metals are supportive (lead/nickel/cobalt)
- suggestion to build on further **understanding of exposure and risks** as well as to involve the supply chain instead of focusing mainly on the manufacturing level. Involving the supply chain will be particularly relevant in the context of a circular economy
- concern about the fact that in scientific committees **expertise** on the specificities of metals is sometimes lacking and the chances of aggravating this issue through establishing a 'super scientific body'
- Eurometaux indicated to be working on concrete proposals on **regulatory management option analysis** and **combined exposure**

DG GROW D1/D2 recalled that the chemicals strategy is currently being discussed internally within the Commission, and stated that they can at this stage therefore only express the views they hold at Unit level.

DG GROW D1/D2 confirmed the importance of considering value chains, and of taking into

account also the industrial and recovery aspect in a chemicals strategy, in addition to the health and environment aspects. It also agreed that the chemicals strategy should not go against other initiatives such as the circular economy action plan. In this respect, better and more up-front discussion before action is engaged in is considered necessary. Furthermore, DG GROW D1/D2 stated that the EU industry should remain competitive globally to tackle the challenges of the future.

As regards the hazards of metals and the difficulty to substitute them, DG GROW D1/D2 advocated a risk based approach. On the establishment of a 'super scientific body', DG GROW D1/D2 claimed that this fits in a one substance, one assessment approach and rationalization of work should be supported but this should of course not go to the detriment of the quality of the assessments and the expertise of the people in such committee(s).

DG GROW D1/D2 concluded the meeting by recapitulating further steps and timelines for the chemicals strategy.



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