CSS

Our proposals to reach CSS objectives while remaining competitive

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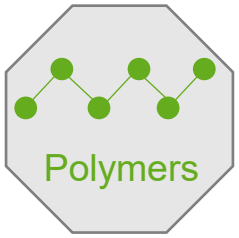
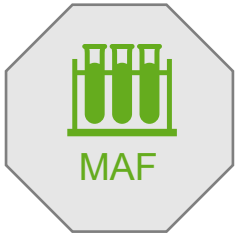
REACH revision
Our main issues

Limit the GRA extension to SVHCs for consumer uses
- No generic restrictions for professional uses, but strengthening of OSH
- Prioritization and sequencing of measures with adequate timelines allowing for innovation and substitution
- Improve exposure assessment as basis for risk assessment for all other hazard classes



Develop a pragmatic, reasonable registration scheme for polymers
- Limit requirements for notification to purposeful, proportionate and value-adding data also considering lab capacities
- Apply a similarity and grouping concept with risk-based specific testing requirements
- Grant sufficient time to develop analytical methods and agree on suitable registration scheme



Limit the MAF to identified risk drivers in the environment
- Apply a decision tree on environmental uses to identify substances for which a MAF is appropriate
- Enhance research on human health through bio-monitoring studies
- Exclude occupational uses and active ingredients as they are covered by respective regulation

Apply the essential use concept as derogation mechanism during Authorization & Restriction
- Avoid further complexity of the system and delays in decision making
- Complement existing processes using safe-use concept with essential use derogations
- Implement a dedicated Committee to evaluate essential use on a use-by-use basis, no fast-track process

CLP revision
Our main concerns

Any new hazard class should be implemented at GHS first
- Align criteria globally before implementing in Europe
- Accepting dis-harmonization globally may lead to loss of trust in the GHS system
- No urgency as existing regulations like REACH Article 57 (f) are available to mange the hazards

Do not use *in vitro* test results in isolation as basis for classification as Endocrine Disruptor
- Currently, New Approach Methodologies (NAMs) are not ready to fully evaluate EDs for classification
- Use WHO definition for classification, including ED activity, adverse effects and a plausible link in an intact organism
- Provide clear guidance for the classification as Category 1 and 2 before Delegated Act is implemented

Use a Weight of Evidence approach for the identification of PMT substances
- Accept all appropriate and valid data in a weight of evidence approach to determine whether “M” criteria is met

Transition Pathway for the Chemical Industry
Our asks

Transition Pathway must include a robust regulatory roadmap until 2030 and beyond and be committal

- Including realistic **sequencing of the CSS measures with sufficient details** re. GRA, polymer registration…
- Industry needs clarity and predictability to invest in Europe: what/how/when
- No policy U-turns, but practical implementation and realistic timelines as innovation takes time e.g. for developing alternatives to restricted products
- **Engaging the Commission** hence format is important as well; expect EC staff working document

Ensure proper implementation of the Transition Pathway

- Co-implementation process and governance structure in place
- Adjustments where needed e.g. energy crisis

Complement pan-European pathway by national Transition Pathways

- In all key Member States with sizeable domestic chemical industry
- Cefic President meetings with EU Heads of State

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