GD GROW
Meeting between Director K. Schreiber and the German Chemical Industry Association Brussels, 29 June 2022
Chemicals Strategy (CSS), REACH, CLP
Chemical Transition Pathways
Pharmaceuticals

Information note *(internal)*

Scene setter/context of the session:

The face-to-face meeting of the Political Committee of the German Chemical Industry Association (VCI) on 29 June 2022 in Brussels. The Political Committee is composed of policy makers and key representatives of the VCI member companies represented in Brussels and Berlin.

Aim of the session:

The aim of the meeting is to discuss current European policy initiatives such as CSS implementation, Chemical Transition Pathways and pharmaceutical legislation.

Key messages

- The implementation of the CSS is going quite well. The latest timelines for the main initiatives are:
    - Targeted revision of the REACH Regulation:
        - Currently the RSB meeting is scheduled for 14 September, but this could be postponed until 12 October or 23 November;
        - The revision proposal is currently scheduled for the end of 2022, but could go back to the first quarter of 2023;
    - Targeted revision of the CLP Regulation:

- The CLP impact assessment received a positive opinion with some reservations from the Regulatory Scrutiny Board (RSB);

- Adoption by the Commission is expected by the end of Q3/2022 or Q4/2022;

- This revision includes the introduction of new hazard classes for endocrine disruptors, persistent, mobile and toxic substances, as well as bioaccumulative, persistent and toxic substances;

- Investment predictability is crucial, which brings me directly to the next topic.

- Chemical Transition Pathways:

  - The Chemical Transition Pathway will be the first sectoral transition pathway published under the Energy Intensive Industries (EII) Ecosystem.

  - Following the stakeholder meeting on 25 April, the Commission assessed the comments received and prepared a second draft of the transition pathway, which was sent to stakeholders on 21 June.

  - The next stakeholder meeting will be held on 21 September to finalise the document.

- Medicines Strategy

  - We have no legislative competence in GROW in the field of medicines.

  - We are still actively involved in the structured dialogue and act as mediators, coordinate

contributions and participate in the various DGs involved and ensure that Member States' work on the IPCEI is actively promoted and coordinated and that we ensure transparency and inclusiveness of the process.

Line to take

For CSS (REACH and CLP):

- I am very aware that the **ambitious goals of** the chemicals strategy pose **major challenges for** the chemicals industry and the entire supply chain.
- The ambition of the strategy **follows the overall ambition of the current EU Commission,** but also has broad support in the member states and the European Parliament. Therefore, at this stage, we do **not expect** any **major shifts in the timetable.**
- We should also assume that the **essential elements** announced in the chemicals strategy **will actually come.**
- However, it is not only a question of *which* elements will come. The **question is** rather how **these elements will be shaped**. This is the subject of the ongoing work on the planned revisions of EU legislation, including **REACH and CLP**.
- We have also seen here the **CEFIC study** on the effects of the chemicals strategy. We **take** the **figures very seriously**, even if they reflect many things that the Commission does not intend to do, or perhaps only in the distant future.
- In particular, we will focus on **substances with confirmed hazard classifications**, i.e. mainly **category 1,** and only on **certain professional applications** and **certain articles.**
- Nevertheless, we know that even this **still presents enough challenges** brings.
- To manage this, we need to make the process plannable. To do this, we will draw up a work plan. This work plan will be published in the

The concept should follow the recently published Restrictions Roadmap.

- We must also seize the opportunity to simplify procedures and make them more pragmatic.
- This is precisely why we are in the process of reforming the authorisation and restriction processes, and precisely why it is important that industry takes an active role in revising these processes and especially in shaping the concept of essential uses.
- CLP: thank you for the comments at the different stages; as you know, after adoption by the Commission, the proposal goes to the Council and the Parliament (except for the hazard classes, which are adopted by delegated act).

Out of scope

[redacted]

Contact: [redacted] GROW F3, [redacted]

Background information

CLP (not required)

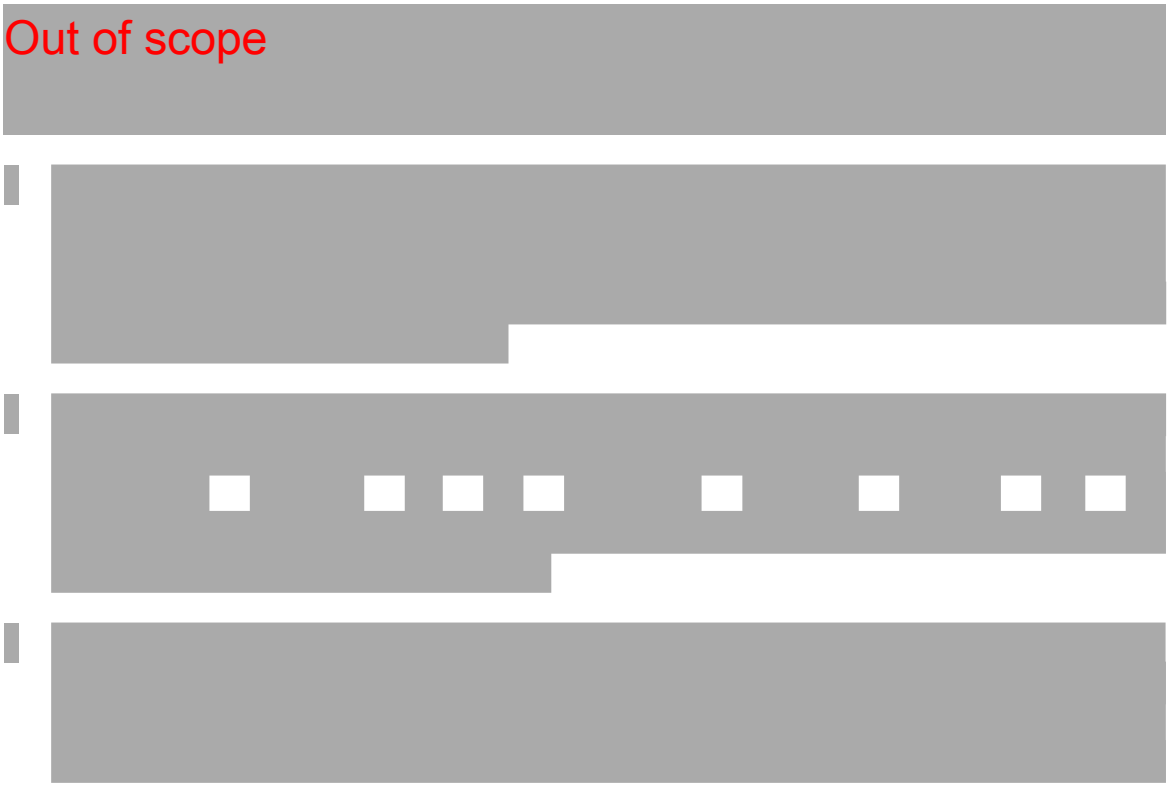
REACH

Key numbers

- So far, we have had **117 applications for authorisation of chromium VI substances under REACH**. Under the revised REACH Regulation, we could have replaced all these applications with 5-10 broad exemptions. This can save a lot of administrative work for everyone, focus discussions on the most relevant issue and avoid delays and court cases that we face with the existing REACH authorisation system.

- The Industrial Strategy 2020 update identified 137 products in vulnerable ecosystems for which the EU is **highly dependent** on **foreign suppliers.** Of these 137 products, **61 are chemicals**. Therefore, strategic foresight is needed;

- According to CEFIC figures, **80% of non-compliant products with REACH/CLP regulation** originate from **outside the EEA,** which is why the Commission needs to step up enforcement and ensure competitiveness;



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