

TOWARDS A TOXIC FREE ENVIRONMENT

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PANEL 2 – Green chemical policy

- ✓ Ambition
- √ Fast action



- ✓ Banning hazardous chemicals in consumer products
- ✓ Transition towards safer substances and technologies
- ✓ Zero tolerance for non-compliance
- ✓ Clean recycling as a rule
- ✓ Stop double standards

Preferred regulatory tools

- ✓ The EU already has a good chemical regulatory framework
- ✓ CSS proposals to revise REACH and CLP welcomed
- ✓ Revise sectoral and environmental legislations to regulate toxics
- ✓ New framework for product regulation to address toxics in materials and goods
- ✓ Need to strengthen precautionary and polluter pays principles and ensure safety testing by independent labs

Generic vs specific risk approaches

- ✓ Both approaches already in use
- ✓ Generic best approach to ensure high level of protection and should be extended to all consumer goods
- ✓ Specific and comprehensive RA needed to justify exemptions to a ban

How to speed-up protection

- ✓ Extending use and scope of Generic approach
- ✓ Grouping and Generic Mixture Assessment Factor
- ✓ Simplifying and streamlining regulatory procedures
- ✓ Establishing strict timelines (e.g. for Commission decisions)
- ✓ Supporting DU transition to safer alternatives: Substitution Action Plans
- ✓ Disincentivising the use of hazardous chemicals (fees, enforcement, fines)

Role of the essential use concept

- ✓ Simplification of the decision-making process under REACH and others
- ✓ Filtering the legitimate candidates for authorisation and restriction derogations
- ✓ Tool to limit the number of situations where a full analysis has to be made, when systematically facing data gaps

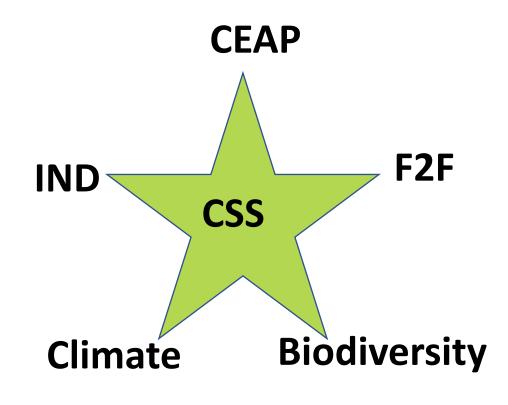
(ClientEarth, 2020)



Role under the European Green Deal

CSS central strategy of the Green Deal, its concepts should be incorporated in all Green Deal strategies:

- ✓ Toxic-free hierarchy
- ✓ Safe and sustainable by design
- ✓ Essential use
- ✓ Non-toxic material cycles
- ✓ Protection against most harmful chemicals



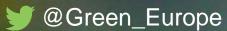
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Thanks for listening!

Keep in touch





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