

Defining the Non-Toxic Environment

4 PILLARS OF A RISK-CONTROLLED EUROPE

The EU will finalise its strategy for a Non-Toxic Environment by 2018, as part of delivering on 2020 international goals for sustainable chemicals management.

The European non-ferrous metals industry has a shared objective to minimise problematic uses of essential hazardous substances. Our vision is of a fully risk-controlled Europe, where hazardous substances are used only when certain they will not harm human health or the environment.

A Non-Toxic Environment Strategy solely aiming to 'replace dangerous substances' is a missed opportunity. Wherever possible, we should instead secure the safe management of essential hazardous substances across their lifecycle, by reducing the risk from exposure to humans and the environment.

By taking a risk-management approach to the Non-Toxic Environment, the EU will achieve its sustainability objectives at the same time as safeguarding jobs and competitiveness.

A risk-controlled Europe is a safe and competitive Europe. Here are 4 pillars to make it a reality:

1 More efficient REACH Regulation

The European Commission is reviewing the REACH Regulation in 2017. Their review is an opportunity to take stock after 10 years of practical experience with chemicals management.

Upgrading the REACH Regulation will provide the toolkit for achieving a risk-controlled Europe.

We've identified five key recommendations for the REACH Regulation. This will lead to more effective management risks from the manufacturing and the use of essential hazardous substances.

2 Make REACH data the EU reference

Information on more than 120,000 chemicals is now available from the European Chemicals Agency; a major triumph from the REACH process.

Industry datasets offer the most robust available information on non-ferrous metals. Too often, they are overlooked in other European and national legislation, leading to unfair stigmatisation and inconsistencies.

We encourage cooperation from authorities and industry to keep their REACH data state-of-the art, and to make sure it is used as the starting point for all risk assessments.

3 Control risks by using the RMOA

For many hazardous substances, various risk management measures can prevent unsafe exposure to humans or the environment. The EU should evaluate these measures thoroughly before resorting to a substance ban or restriction.

The REACH Regulation's Risk Management Option analysis (RMOa) tool allows regulators and industry to review all possible measures, and their effectiveness in controlling risk.

The RMOA contributes to Better Regulation and to a more effective Risk Controlled Environment. We recommend to give it legal standing as a requirement for all REACH substance assessments and elsewhere.

4 Coherence between Chemicals and Circular Economy Policy

EU Chemicals and Circular Economy policies have specific focuses, which should complement each other.

Metals are critical for achieving Circular Economy targets and are compliant with Chemicals Policy: they are treated safely, they can be recycled multiple times without losing their properties and they have a long-life time. The European metals recycling industry ensure a high-quality treatment of its materials.

To achieve a risk-controlled Europe, EU chemicals and Circular Economy policies should work coherently to keep materials in the loop, and to make sure they are handled safely across their full lifecycle.