



To:
Mr Virginijus Sinkevičius, Commissioner for the Environment,
Oceans and Fisheries

29 March, 2023

TO THE EUROPEAN COMMISSION CONCERNING THE EU CHEMICALS STRATEGY FOR SUSTAINABILITY

Using chemical substances underpin all production and is an integral part of everyday life in modern societies. Consideration for human health, the environment and working environment therefore requires sustainable production and innovation as well as a responsible approach to all aspects of using chemical substances and compounds.

The public, the business community, NGOs and the authorities have a common interest in using certain chemical substances so that we obtain the benefits intended from the properties of the chemical substances in our products and in our everyday routines. It is vital though to ensure that chemicals of concern are phased out and substituted with sustainable alternatives, including new technology, in order to reduce harm to people and the environment and in the working environment to a minimum.

The Chemicals Forum includes all stakeholders in the chemicals area in Denmark — the business community, consumers, NGOs, employers, research institutes and environmental authorities, occupational safety and health (OSH) authorities, and health authorities. The Chemicals Forum was established by the Danish Minister for the Environment with the object of ensuring knowledge-sharing, dialogue and co-operation in the chemicals area.

The Danish Government and the parties to the agreement on Chemicals Initiatives 2022-25 have agreed on the following vision: to work towards a toxic-free environment, where chemicals are produced and used in a way that protects the environment, biodiversity, and current and future generations from harmful chemicals, and where the transition to production and use of safe and sustainable chemicals is supported. The Chemicals Forum agrees with this vision and supports the European Commission's Chemicals Strategy for Sustainability as being both ambitious and future-proof.

EU chemicals legislation REACH is the most ambitious chemicals legislation in the world, but 15 years after its entry into force, it is clear that there are a number of areas where the legislation needs to be optimised in order to meet the vision of both the Chemicals Strategy for Sustainability and the Danish political agreement on Chemicals Initiatives 2022-25.

In this context, the Chemicals Forum supports implementation of the Chemicals Strategy for Sustainability in accordance with the action plan and would like to emphasize the importance of including the following elements in connection with the revision of the EU legislation on chemicals:

- In order to ensure a high level of protection for human health and the environment, there is a need to phase out the use of the most harmful chemicals (including endocrine disruptors and the most environmentally harmful substances) in consumer products. In the political agreement on Chemicals Initiatives 2022-25, all parties in the Danish Parliament agree to work for decisions to be taken by 2025 on the definition of safe and sustainable chemicals and for the most harmful chemicals to be phased out in consumer products, as part of the implementation of the EU Chemicals Strategy for Sustainability. Against this background, the Chemicals Forum calls on the Commission for a ban on the most harmful chemicals in consumer products with the exception of essential uses.
- A solid data base is the foundation for protecting people and the environment in the best possible way. Therefore, the Chemicals Forum supports the Commission's proposals on "no data, no market" and "polluter pays" and supports improving the data requirements for registered substances to improve and speed up the identification of harmful substances and eliminate the uncertainty as to when and how to test. This will also provide the best prerequisite for taking into account combination effects and will support the implementation of new hazard classes for endocrine disruptors and the most environmentally harmful substances under CLP.
- The Chemicals Forum supports a wide-ranging effort to ban the use of all PFAS in the EU and globally where possible. In this context, we call for the EU to define and implement the concept of "essential use" as soon as possible.
- The Chemicals Forum supports the Commission's ambition for a comprehensive effort to strengthen the protection of consumers, vulnerable groups and workers from the most harmful chemicals. The Chemicals Forum calls on the Commission to pay particular attention to the variety of types of health effects and exposures to the different population groups.
- An essential part of the Chemicals Strategy is to ensure the competitiveness of EU industry while revising chemicals legislation. The Chemicals Forum therefore calls on the Commission to provide good frameworks and incentives for the development and implementation of suitable alternatives to harmful chemicals, which can be the focal point of the Chemicals Strategy's sustainability concept. In order to achieve a toxic-free environment and at the same time live up to the ambition for a circular economy, it is important to work towards a future where chemicals are used safely and sustainably in products and processes. Therefore, it must be ensured that a possible content of harmful substances in both new and recycled materials can be sorted out; That the limit values are the same for both types of materials, but can be sector specific
- The Chemicals Forum calls for a revision of the definition of nanomaterials and to ensure that nanomaterials are regulated equally across legislation.

- The Chemicals Forum welcomes the Commission's Restrictions Road Map, which transparently informs all stakeholders about upcoming restriction proposals, including of groups of chemicals, that provides predictability for both consumers and businesses.
- The Chemicals Forum supports the Commission's ambition to ensure the availability of information on the content of the most harmful chemicals and safe use by introducing information requirements in the context of the Sustainable Product Policy Initiative, including tracking the presence of substances of concern or substances that hinder the sustainability of products in their entire life cycle, e.g. in the form of a product passport.
- The Chemicals Forum supports the Commission's ambition to "empower consumers". Concerning increased knowledge of the content of harmful chemicals in consumer products, for a start the focus should be on chemicals in toys that are chemical products and mixtures, as it is from such products the highest exposure can be expected within this product group. In addition, consumers' access to information on SVHC substances should be made more accessible.
- The Chemicals Forum would like to draw the Commission's attention to the ever-growing problem of e-commerce and calls for action on EU community level to ensure that consumers are protected at the same level as for physical purchases. This will also ensure that the competitiveness of European companies that meet the high European requirements for health and the environment is not impaired.

The Chemicals Forum strongly encourages the Commission to include these elements in the implementation the Chemicals Strategy for Sustainability during the revision of the EU legislation on chemicals.

Finally, The Chemicals Forum will call on the Commission to present the revised REACH proposal before the summer of 2023, so that the legislative process can be reached within the current term of The European Parliament.

Furthermore The Chemicals Forum wants to draw the attention to the fact that allergy to chemical substances is a widespread problem in Europe. Allergen-causing substances are found in many different types of products. We therefore call on the Commission to draw up a strategy to reduce the number of Europeans with allergies to chemical substances and, as a first step, to take the initiative for more transparency regarding the content of these substances in all types of products where there is a risk of skin contact.

Yours faithfully

The following members of The Chemicals Forum:

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