EU CHEMICALS STRATEGY FOR SUSTAINABILITY

A.I.S.E. comments to the Roadmap

19 June 2020

A.I.S.E., representing the European industry for household care and professional cleaning and hygiene products, strongly supports an EU strategy for chemicals that aims to protect human health and the environment while recognising the need for a strong, competitive and innovative industry to achieve this.

A valuable and innovative sector in Europe

Our sector provides **fundamental benefits and solutions** in terms of **public health and well-being**, which are **essential** for society as proven by the recent crisis that led to **unprecedented demand for disinfectants and other cleaning products**. The availability of these products will remain essential, an aspect to be integrated into the chemical strategy.

A.I.S.E. and its member companies have a long track record of investments in **innovation** to offer **efficient products** that are **safe and sustainable**. Examples include advances in low-temperature washing, controlled/unit dosing, compaction of household laundry detergents and **biodegradability** of ingredients to minimise impact on the environment. A.I.S.E.'s flagship initiative, the Charter for Sustainable Cleaning, has shown how voluntary industry programmes can facilitate continual improvements in sustainability.

> **To continue business and innovate, A.I.S.E. calls for a chemical strategy** that
> - provides **transparency, regulatory predictability and consistency;**
> - **fosters future innovation**, e.g. by extending exemptions on product-/process-orientated research and avoiding disproportionate regulatory burden on low-volume substances or on the many millions of mixtures;
> - undertakes for all regulatory proposals, including CLP classifications, a robust **impact assessment**, incl. consulting relevant stakeholders;
> - includes **Risk Management Options Analysis** before proposing a regulatory measure or completes substance evaluations under REACH prior to proposing new harmonised classifications.
> - secures a **future for biocidal products by improving existing implementation issues in the Biocidal Products Regulation** (EU) 528/2012) and providing for **faster and more agile processes for assessment and approval of biocides**.

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A proportionate, coherent and science-based regulatory framework

The EU has a regulatory framework for chemicals reflecting the world's highest safety standards, and this should remain the basis for the new strategy.

A.I.S.E. calls for
- **proper enforcement of existing legislation** in a harmonised way across the EU, taking into account also the recent findings of the reviews and Fitness Checks;
- **consistency and coherence** between the different existing and new legislation, incl. all new initiatives of the CSS, and other parts of the Green Deal such as Circular Economy, Industrial Strategy, etc.
- **chemical regulation to be based on sound science and on risk assessment**, i.e. not only hazard but also the **uses of and exposures** to chemicals, a fundamental principle of REACH, taking also **socio-economic benefits** into account.

Clarity and communication

The language of the strategy should be appropriate to its goal, i.e. protect human health and the environment while fostering a competitive and innovative industry, rather than speaking about "toxic-free environment", which scientifically speaking is not correct. The reference to the unchanged percentage of hazardous chemicals in the EU since 2004 does not take into account that the classification system has changed, leading to greater identification of hazards than in the past, nor that through REACH more data on substances have been generated.

A.I.S.E. calls for
- **a hazard classification that remains aligned with the Globally Harmonised System,**
- **a better visual differentiation** between products which can cause eye damage (such as hand dishwashing liquid) and severe corrosives such as drain cleaners,
- **leveraging the digital agenda**, by enabling greater use of digital means to communicate information for consumers on potential hazard and safe use of chemicals.