

HIGH LEVEL ROUND TABLE ON THE IMPLEMENTATION OF THE CSS

A.I.S.E. input for first meeting, 5 May 2021

A.I.S.E. shares the goals of the Chemicals Strategy for Sustainability (CSS) to prioritise the **protection of human health and the environment**. Cleaning products and disinfectants are key to the health of EU citizens – as highlighted by the recent pandemic – and a **strong and innovative future for industry** is crucial, at a time of unprecedented disruption to every aspect of the European economy. A.I.S.E. welcomes the opportunity to support the Commission in the implementation of the CSS and expects the first meeting to establish real partnerships with industry and other stakeholders to realise and promote this goal.

A.I.S.E. recognises the political commitments made in the CSS on protection of human health and the environment. In parallel with these legitimate goals however, to be globally competitive – another important objective of the CSS - the EU industry needs to operate in a well-functioning **Single Market**. In this context A.I.S.E. calls on the Commission to ensure good coordination between the CSS and the forthcoming [update of the Industrial Strategy for Europe](#).

Ambitious policy goals need to be supported by **robust legislation**, providing a coherent and predictable framework to drive investment in innovation and ensure harmonised enforcement across the EU, and a **sound process** to enable the transition. Businesses and authorities need realistic transition periods to implement changes, and core elements of legislation such as definitions and scope need to be agreed during the ordinary legislative procedure, not left open to be completed or amended through additional provisions such as implementing acts or through guidance. The Single-Use Plastics Directive, and the severe delays in the adoption of its implementing acts and guidelines, have set a concerning precedent in this regard.

A.I.S.E. therefore urges the Commission **not to rush** decision-making processes for REACH, CLP or any other legislation in order to meet unrealistic deadlines set in the Strategy, but to ensure that these are conducted properly in line with the principles of Better Regulation. The impact of all changes for industry must also be robustly assessed; A.I.S.E. is working to provide high-quality input to relevant assessments. Agreement on process should be a key goal for initial meetings.

A.I.S.E.'s other priorities for discussion in the round table are as follows:

1. Retaining the principles of REACH, chemicals should be regulated on the basis of **sound science** reflecting both hazard and exposure (i.e. **safe use**). The rationale for any change to this approach should be properly discussed and justified, and subject to proper analysis and impact assessment. The 'generic risk management' approach (based on hazard) should be applied in a targeted rather than blanket way, to substances and/or uses where adequate control of risk has not been demonstrated. The consequences for society of unduly broad implementation could be severe, including a lack of products on the market to address public health crises.



2. Establishing criteria for 'Safe and Sustainable by Design' should be a priority to **foster innovation**, ahead of applying hazard-based approaches as above. These criteria should allow the contribution of chemicals to delivering other objectives of the Green Deal (e.g. climate neutrality) to be taken into account, as well as their safety in use. A.I.S.E.'s [Charter for Sustainable Cleaning](#) and Advanced Sustainability Profiles for products are examples of success in driving such progress, as are initiatives by individual member companies.
3. A more consistent and joined-up approach to **enforcement controls**, especially on e-commerce and imports, should be established. Exchange between inspectorates and competent authorities should be further facilitated (beyond existing Forum discussions) in order to establish harmonised interpretations and enforcement practices, thus reinforcing the Single Market.
4. On **hazard communication**, the EU should set the right example on the world stage by proposing hazard classes and criteria first at the UN GHS, rather than undermining harmonisation through unilateral deviation.
5. More ambitious steps should be taken to leverage the benefits of **digital communication**, in the interests of clearer and simpler labels for consumers. A.I.S.E. is supporting and providing input to the Commission's study on label simplification and e-labelling (as well as its study on the Detergents Regulation), and encourages the Commission to make the most of the opportunities offered by technology to differentiate the communication needs of consumers/end users from those for enforcement.
6. New demands in regulatory toxicology and classification & labelling could potentially increase the need for new animal testing. Now more than ever it is paramount to make safety decisions on ingredients using state-of-the-art methodologies, considering all available existing toxicology data **without new animal testing**. A.I.S.E. fully supports the project by [EPAA](#) [European Partnership for Alternative Approaches to Animal Testing] on New Methodology Approaches.

