

## Priorities - Environment

### Future of the EU's chemicals policy



#### ISSUE

Over the past few years the implementation of REACH has improved and to some extent become more predictable. Nevertheless, more needs to be done to guarantee that the regulation protects human health and the environment.



#### RECOMMENDATION

A highly efficient REACH should not come at the cost of innovation and competitiveness. Several things could be done to improve effectiveness and reduce the burden on industry:

- **Clarification of timelines** for different REACH processes;
- **Avoidance of unequal treatment** by Member State authorities for substance evaluations;
- **'No data for data's sake'**;
- **Prevention of overlaps** between the various REACH processes and sectoral policies; and
- **Streamlining the authorisation** and formalisation of the Risk Management Option Analysis (RMOA).

### Circular Economy



#### ISSUE

European initiatives should create a single EU circular economy and not multiple different national ones.



#### RECOMMENDATION

- **Consistent implementation** across Member States and development of the necessary infrastructure;
- **Clarification of regulatory frameworks** to circumnavigate conflicts between different objectives;
- **Creation of an effective single market** for secondary raw material will be critical in providing sufficient scale for the development of new business models;
- **A proportionate sharing of costs** and responsibility along the value chain and waste management chain will be essential for a successful circular economy; and
- **A sectoral approach** to further promote the circular economy.

### The Restriction of Hazardous Substance (RoHS)



#### ISSUE

The RoHS Directive has been successful in the prevention of substances used in electrical and electronic equipment from entering the environment as a result of waste management practices. While it has met its policy objectives in many regards, some parts of the law would benefit from a review.



#### RECOMMENDATION

- **Recognise the global responsibilities** of RoHS as a global reference with similar systems in 40 jurisdictions outside the EEA;
- **Remedy exemption process uncertainties** with best available scientific evidence and the limitations of political considerations;
- **Provide a more transparent exemption process approach**, with clearer dates and predictable timeframes;
- **Inconsistencies and overlaps** between RoHS and other EU laws need to be prevented and clarified; and
- **Revised substance methodology** should not alter the directive scope and address remaining uncertainties.