

Brussels, 10 October 2022

BeST position statement on a basic regulation for the European Chemicals Agency

Introduction

BeST submits the present position statement in the frame of the call for evidence on the proposal for a basic regulation of the European Chemicals Agency (ECHA).

BeST Comments

As mentioned in the call for evidence, over the last decade, the tasks assigned to ECHA have increased substantially and, with the new regulatory frameworks stemming from the Chemicals Strategy for Sustainability, the number of tasks will continue to intensify. For this reason, the proposed basic regulation of ECHA must:

- **Clearly define ECHA's role, objectives and processes:** To ensure regulatory consistency, certainty, and transparency, it is fundamental that the proposed basic regulation clearly defines ECHA's roles and objectives to allow the Agency to operate in a consistent and transparent manner while avoiding overburden and duplication. ECHA's technical assessments processes should also be clearly defined.
- **Coherence between the different EU regulatory frameworks:** BeST welcomes measures to improve the effectiveness, efficiency and consistency of safety assessments through the "One Substance One Assessment" approach. Substances that are not SVHC under REACH Regulation should not be considered for further restrictions under the RoHS Directive. Substances that feature a risk limited in the workplace and controlled by Risk Management Measures and Occupational Exposure levels under the CMRD Directive should not be considered for further restrictions.
- **Adequate resources:** The proposed basic regulation should address the resource challenge represented by the substantial increase of tasks assigned to ECHA. This includes both financial and human resources. Indeed, the numerous tasks require different scientific and technical expertise. It is therefore fundamental that ECHA has the necessary scientific and technical personnel to deliver scientifically sound assessments, supported by the most relevant and up to date data.
- **Consideration of industry data:** Industry data and input has, in many instances, been disregarded by authorities and industry stakeholders have been de facto excluded from contributing to substance/chemical assessments. Industry engagement and consideration of industry data and input by ECHA should therefore be improved. Indeed, industry is best equipped to provide important, relevant and necessary data and information to policymakers. The proposed basic regulation should address this issue.

BeST

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications. It is also the objective of BeST to promote good practices in the workplace to protect workers handling beryllium containing materials.

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