

Brussels, 03 May 2023

**BeST statement on Taxonomy – Technical screening criteria – Transition to circular economy****Introduction**

With the present statement, BeST shares its views and recommendations on the European Commission's proposed technical screening criteria for the transition to circular economy in the frame of the Taxonomy Regulation.

**Views and recommendations****- Risk instead of hazard**

Screening criteria targeting substances in based on their sole hazardous classification must be avoided. Indeed, while many raw materials have hazardous classifications, their unique and unmatched properties make them the best suited materials to achieve the desired performance and longevity of products. When considering regulatory measures applicable to these materials, a risk-based approach is the efficient screening tool to use where both hazard and exposure are considered: Risk = Hazard x Exposure. On the contrary, the use of a hazard-based approach would jeopardise the performance of the products by promoting the phasing out of materials that are used safely based solely on their hazardous classification.

**- Understanding the link between raw materials, the durability of products and recycling opportunities**

When introducing regulatory measures impacting the use of raw materials in products, a clear understanding of the properties of these materials and their contribution to the performance and durability of the products that contain them is of vital importance. In absence of this, regulatory measures will produce unintended and regrettable consequences with potential substitution of safe materials with less-performing materials and higher negative impact on the environment and human health.

Indeed, circularity is a broad concept that is not only limited to the end of use and waste phases of the value chains of and/or products but also covers use and longevity of products. In the case of beryllium, its addition at 2% maximum in copper considerably increases the performances and durability of copper as conductive material in Electrical and Electronic Equipment.

While BeST agrees that further action should be taken to increase the re-use and recycling of raw materials, in the case of beryllium where very small amounts of the material are present in end-applications, mostly as alloying element in copper, these actions are not technically nor economically feasible. On the other hand, beryllium has a key role in allowing the recycling of other raw materials. Indeed, the addition of a few ppm of beryllium prevents molten magnesium alloys from catching fire during the recycling stage. Without the addition of a few ppm of beryllium, there would be no production or recycling of aluminium-magnesium alloys and magnesium alloys in Europe.

Additionally, the use of beryllium in end use applications increases product longevity as well as product performance and reliability. Beryllium therefore substantially contributes to the circularity of products while avoiding obsolescence.

**- Supporting industry**

The proposed screening criteria should not disproportionately overburden industry by introducing excessive reporting obligations. Most of the beryllium industry in the EU is composed by SMEs working with a variety of different metals. These companies often have limited resources to collect and provide high amounts of data to authorities. Reporting obligations should therefore be proportionate and consider both economic and technical feasibility.

**Conclusions**

BeST encourages EU policymakers to coordinate and develop regulatory and non-regulatory frameworks able to support industry to allow the EU to remain competitive at international level while guaranteeing EU societal well-being.

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Beryllium Science & Technology Association

### **About 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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