

Overview of BeST's positions

Introduction

In the frame of its objective to serve as an expert resource for the international community on the benefits and criticality of beryllium applications, the Beryllium Science and Technology (BeST) has provided feedback and data to EU policymakers on several policy proposals of relevance to the beryllium industry and beryllium applications.

The present paper reflects BeST's most recent positions in the following policy areas:

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1. Chemicals Strategy for Sustainability

BeST has submitted feedback to several of the regulatory proposals currently under discussion, stemming from the Chemicals Strategy for Sustainability.

Essential Use Concept

In the frame of the discussions on the essential use concept, BeST stressed:

- The need for a holistic assessment of the essential use concept in line with the overall reform of the EU chemicals framework, including the review of REACH.
- The importance of preferring a risk-based approach instead of a hazard-based approach.
- The pivotal role of the safe use concept to ensure that uses already proven to be safe do not undergo the essentiality assessment.
- The need for clear and consistent criteria to define essentiality.

BeST's most recent position paper on the essential use concept is available [here](#).

Generic Risk Management Approach

On the proposed introduction of the Generic Risk Management Approach (GRA), BeST has put forward the following key messages:

- A risk-based approach constitutes a more efficient streaming tool where both hazard and exposure are considered: Risk = Hazard x Exposure
- The safe use concept should also be included in the frame of the generic risk management approach to avoid duplication of workload. A use already proven to be safe should therefore not fall in the scope of the GRA.
- A scientific and transparent validation process is needed.

BeST's most recent position paper on the GRA is available [here](#).

Safe and Sustainable by Design

On the topic of safe and sustainable by design criteria, BeST has highlighted the following key points:

- A risk-based approach should be preferred to a cut-off approach, confirming that a substance proven to be safe is also by default safe and sustainable by design, regardless of its hazardous classification.
- The framework developed should be feasible and realistic.

BeST's position paper on Safe and Sustainable by Design is available [here](#).

2. REACH review

In the frame of the REACH review, BeST has stressed the following key messages:

- The safe use concept should be reflected in the frame of the REACH review. A substance proven to be safe should not be object of any further regulatory targeting (i.e. GRA and essentiality assessment).
- The risk-based approach must be preferred to a hazard-based approach.
- The introduction of new obligations for low tonnage substances will entail disproportionate administration and information requirements for small and highly specialised sectors.
- The implementation of simplistic approaches based on phasing out of hazardous substances solely based on their intrinsic properties will deprive the EU of the materials necessary to achieve the objectives of the EU Green Deal.

BeST's position paper on the REACH review is available [here](#).

3. CLP review

In the frame of the ongoing review of the Classification, Labelling and Packaging Regulation (CLP), BeST has highlighted:

- The benefits of allowing industry to introduce reclassification processes to obtain up to date CLP classifications based on the most recent evidence-based scientific findings.
- The importance of differentiating between the different forms of the same basic substance, i.e. soluble and insoluble forms. The dissemination of the correct information according to the form of a substance is of pivotal importance, for example, at the workplace to effectively protect workers.
- The procedure to allow industry reclassification should be clearly defined to assure certainty and predictability.

BeST's position paper on CLP review is available [here](#).

4. RoHS review

Beryllium has been assessed several times in the past decade under the Directive for the restriction of certain hazardous substances in electrical and electronic equipment (RoHS). Each assessment confirmed that beryllium does not fulfil the criteria for restriction under RoHS.

In the frame of the RoHS review, BeST has stressed the following key points:

- One regulatory framework for the assessment of substances should be preferred in line with the "one substance one assessment approach".
- The periodic review of same substance under RoHS should be avoided to avoid unjustified burden and uncertainty for the EU industry.



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- The RoHS exemption procedure is overly complex and should be simplified.

BeST's position paper on the RoHS review is available [here](#).

5. Review of the Waste Framework Directive

In the context of the review of the waste framework directive, BeST has provided the following key messages:

- A new, revised and flexible definition of waste, acknowledged as a resource, should be developed and implemented.
- The presence of hazardous materials, which do not per se prevent the re-use, refurbishment and/or recycle of products and materials, should not be penalised due to their hazardous classification.
- Considering the heterogeneity of waste streams and of the products and substances contained therein, ad hoc solutions should be preferred to a one size fits all approach.
- Targets on collection of waste, recycling, recycling efficiencies, recycled content, etc. must be feasible and implementable based on adequate socio-economic impacts assessments.

BeST's position paper on the review of the Waste Framework Directive is available [here](#).

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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