

Brussels, 20 February 2023

BeST contribution to call for evidence on the environmental impact of imaging equipment

Introduction

The European Commission is considering action to address the environmental impact of imaging equipment by possibly introducing regulatory measures in the frame of the Ecodesign for Sustainable Products Regulation.

BeST's comments

Considering the above, BeST submits the following observations concerning the raw materials used to produce imaging equipment and related products:

- Risk instead of hazard

The raw materials used to produce innovative, efficient, and high-tech imaging equipment and related products feature unique and unmatched properties which make them the best suited materials to achieve the desired performance and longevity of the product. When considering regulatory measures applicable to these materials, a risk-based approach is the efficient streaming 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 and the performance of products

When introducing regulatory measures impacting the use of raw materials in specific product categories, a clear understanding of the properties of these materials and their contribution to the performance and longevity of the products that contain them is of vital importance. Indeed, in absence of this, regulatory measures will produce unintended and regrettable consequences with potential substitution of materials with less-performing materials and higher negative environmental impact.

- Supporting industry

The regulatory frameworks put in place should avoid overburdening industry. Non-regulatory measures should therefore be preferred. Only when this is not possible, regulatory measures that are consistent and coordinated should be implemented.

Conclusions

BeST encourages EU policymakers to coordinate and develop regulatory and non-regulatory frameworks able to secure the raw materials necessary for all relevant industrial sectors, including the imaging equipment sector, to allow the EU to remain competitive at international level while guaranteeing EU societal well-being.

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.