

**Statement on proposals for
"Better Access to chemicals data for safety assessments"
"Re-attribution of scientific and technical tasks to the agencies"**

Introduction

With the present statement, BeST responds to the public online consultations by the European Commission of 8 December 2023 - 4 April 2024.

BeST welcomes the Commission's current initiative. It should be in the interest of all parties involved to have improved access to, and use of data for safety assessments. The proposals will impact the entire metals, minerals and chemicals sectors and we rely on Eurometaux and Cefic to address the issues at stake for all. Below, we point out the key concerns for the Beryllium sector.

Views and recommendations

- Central database and use of data

We welcome the proposal for a central database. We believe the following conditions should be respected with its use:

- The database should include both data and assessments. Assessments should be coherent and predictable, and the database should not contain conflicting assessments.
- There should not be a substance reassessment under the same legislation (e.g. reviews) if the database does not include substantial new data since the last assessment under that legislation.
- There should be an alert in the database if an assessment is in process under EU regulation. This can avoid duplication of work and conflicting results.
- Data is produced in a certain context, which should be recognised when used in assessments for different types of regulation.
- There should be indicators to avoid unnecessary assessments. Assessments for similar risks should be avoided.

- Inclusion of industry studies

We welcome the proposal that scientific data produced by industry be included in the central database. We believe the following conditions should be respected:

- Authorities that carry out safety assessments should be obliged to consider the industry data in the central database and motivate the extend of its use.
- Industry cannot be obliged to submit studies or data if it would violate rights of confidentiality, intellectual property rights or competition law.
- Submission of data should be simple and follow international formatting standards.

- Re-attribution of scientific and technical tasks to the agencies

We welcome the proposed re-attribution. More important than creating assessment efficiencies, we believe that:

- Attention should be given to the composition of the assessing body. It should be composed of experts in the substance which it is assessing and include experts representing the industry.
- In addition to scientific assessments, Socio-Economic Impact Assessments are essential to balanced management of chemicals. Pragmatic regulatory approaches based on risk rather than solely hazard, taking into account the exposure factor (risk = hazard * exposure), are key factors to develop EU sustainable competitiveness.

Conclusion

BeST welcome the European Commission's initiative but underline that as much of its success depends on its execution.



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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