

FuelsEurope welcomes the aims of the Chemicals Strategy for Sustainability and is ready to contribute to make it work for EU citizens, industry and economy

Brussels, 15 October 2020: FuelsEurope strongly supports the EU's Chemicals Strategy objectives to better protect citizens and the environment and welcomes the recognition that REACH is a comprehensive regulatory framework, and believes it has to be preserved by avoiding a full reopening. We regret the narrow focus on substitution of hazardous substances and the shift towards the broader use of generic risk management. FuelsEurope furthermore doesn't support the inclusion of new hazard classes in the Classification, Labelling and Packaging (CLP) Regulation only as that would defeat the purpose of the UN Globally Harmonised System for Classification and Labelling of Chemicals. We are ready to keep contributing to the REACH process by providing robust science and a long practical experience in safe manufacturing and handling of products, regulatory uptake of methods suitable to test and assess complex petroleum substances and to participate in the *high-level roundtable* the Commission will establish.

FuelsEurope strongly supports the EU's Chemicals Strategy objectives to better protect citizens and the environment, as well as triggering innovation for the production of safe and sustainable chemicals.

We also welcome **the recognition that REACH is a comprehensive regulatory framework** supported by the most advanced knowledge base at global level. REACH provides an opportunity for global leadership in chemicals legislation to reduce potential risks to humans and the environment from exposure to hazardous chemicals.

Yet, this advanced regulatory framework has to be preserved by **avoiding a full reopening of REACH** and continued attention for consistent enforcement. In addition, a thorough socio-economic impact assessment of any proposed measure is indispensable.

We, however, regret the narrow focus on substitution of hazardous substances and the shift towards the broader use of generic risk management in REACH. This approach disregards the central role of real life exposure and releases

into the environment in **specific risk assessment and risk management** resulting in safe and sustainable use of chemicals.

In view of this risk management of chemicals, one important new element in the strategy is the attention for unintentional combined exposures. Our sector is committed to move forward and wants to **contribute to the discussion on how to address exposure to unintentional mixtures** where negative impacts have been identified. Applying a one-size-fits all solution, as the introduction of a uniform mixture assessment factor, is undermining the fact that for the majority of the uses or registered substances, a mixture assessment factor is not justified and will have unwarranted impacts on our economy and availability of products.

Moreover, our industry does **not support the inclusion of new hazard classes in the Classification, Labelling and Packaging (CLP) Regulation only** as that would defeat the purpose of the UN Globally Harmonised System for

Classification and Labelling of Chemicals. Any modification should be aligned at UN level to avoid diverging classification systems in different regions of the world.

As part of our engagement to ***move the testing and regulatory assessment of complex petroleum substances forward***, the refining industry is ready to further support the development and regulatory uptake of appropriate assessment and testing methods for petroleum substance UVCBs¹ by providing robust science and a long practical experience in safe manufacturing and handling of products. Informed testing strategies and new approach methodologies which use testing in vertebrate animals only as a last resort, are

internationally recognised and will ensure that unnecessary animal tests are avoided.

The refining industry as a key component of the EU industrial value chain and a provider of basic building blocks for the chemical industry, will continue to collaborate with the authorities to deliver the objectives of the Green Deal and maintain a high level protection of the human health and environment. FuelsEurope is ready to participate in the ***high-level roundtable*** the Commission will establish among industry, science and civil society to realise the Chemical Strategy's objectives in dialogue with the stakeholders concerned.

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FuelsEurope, the voice of the European petroleum refining industry

FuelsEurope represents with the EU institutions the interest of 40 companies operating refineries in the EU. Members account for almost 100% of EU petroleum refining capacity and more than 75% of EU motor fuel retail sales.

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¹ Unknown or Variable composition, Complex reaction products or Biological materials