



# EPMF Position Paper

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31 May 2021

## **Inception Impact Assessment – Revision of the EU legislation on hazard classification, labelling and packaging of chemicals**

The European Precious Metals Federation (EPMF) supports the ambition of the European Green Deal and the objectives of the Chemicals Strategy for Sustainability. To achieve them, a targeted revision of the CLP Regulation was launched.

We carefully reviewed the Inception Impact Assessment and fully support the comments submitted by Eurometaux. In addition, the EPMF would like to provide more specific comments on the following regulatory measures:

- **Introduction of new hazard classes** (such as EDs) and corresponding criteria: the EPMF is highly concerned about the potential inconsistency with the GHS and the impact on the global playing field for our member companies, posing a competitiveness issue. Our member companies operate at international level and require alignment between regulations. The introduction of new hazard classes without introducing them at GHS level will be counter-productive and will increase complexity considerably for the EU industry.
- **Introduction of the possibility to submit proposals and set harmonized environmental and safety values:** the EPMF is deeply concerned about the consistency between different regulations. There is an interest of having harmonized environmental and safety values. However, we are questioning whether the CLP is the right process to do so. REACH is already providing the ground for deriving these limit values. In the context of deriving limit values themselves, other legislations are already in place e.g. OHS or the Water Framework Directive. The EPMF believes that the OSOA concept promoted in the Chemicals Strategy for Sustainability must be used to ensure consistency between these different legislations and avoid duplication of work without any need to concentrate all the actions at CLP level.
- **Introduction of a prioritisation mechanism** for harmonizing the classification of certain chemicals: this proposal could have a positive impact on the overall risk management system, focusing on what matters and ensuring that all the data are available before starting the process. This could also bring some predictability to the current system which is not always the case and not necessarily transparent.
- **Introduction of a mandate for Commission** to request ECHA to develop new CLH proposals: if based on a prioritisation mechanism, this could be a good way to implement the OSOA concept and ensure an efficient mechanism of harmonized classification. However, in this case, it is crucial to ensure adequate resources at ECHA level and also the availability of the relevant expertise especially for metals specific issues. It is worth to clarify in this proposal that the mandate for the Commission should also be for a change in an existing classification.



## ABOUT THE EPMF

*Since 2007, the European Precious Metals Federation has supported European companies working with gold, silver, rhenium, and the six metals referred to as the Platinum Group including platinum, palladium, osmium, rhodium, ruthenium, and iridium.*

*Our 35 Member Companies and 3 national associations include world leaders in extraction, refining, and recycling of precious metals. They also include a highly diverse range of companies involved in consumer and industrial applications that touch the lives of European citizens from jewelry to financial investments to the mobile phones in their pockets to the catalytic converters in their vehicles to the solar panels and rapid chargers at their homes.*

*As the European body for advocacy, the EPMF facilitates the interface between policy makers, regulatory authorities, and the precious metals industry on a wide range of issues.*