Input to the ECHA Substitution Workshop

5 Messages from the Non-Ferrous Metals Industry

Helsinki, 9-10 October 2017
1 – Need for a cross-policy holistic approach

- A **holistic approach** is required to maximise the combined strengths of different policy areas: REACH, resource efficiency, circular economy, climate and energy objectives...

- **Cross-policy debate** and **multi-stakeholders dialogue** are key to ensure a sustainable approach to substitution
2 – Efforts should focus on identification and minimization of actual risks

- **Risk based approach** helps to set priorities and to define efficient policies towards 2020 chemicals management objectives

- Focus on what matters: identification and minimization of actual risks
3 – Risk Management Option Analysis: the starting point for substitution

- Substitution must be sustainable and efficient: risks and benefits of the different alternatives should encompass multi-policy objectives

- Well-performed and comprehensive RMOA is key to avoid regrettable substitutions
4 – The metals industry is committed to controlling risks

- Eurometaux promotes the concept of a “risk-controlled environment”
- Eurometaux promotes RMOAs conducted by industry on a voluntary basis as a self reflection to identify necessary and efficient Risk Management Measures, including questions on substitution.

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5 – Eurometaux supports capacity building through supply chain interaction

- Eurometaux gave its availability to organise a workshop in 2018 to further enhance the link between substitution and life cycle thinking.

- Supply chain dialogue and tools like materials flow and diffuse source mapping could help to define priorities and to identify solutions.
THANK YOU

Promise me you'll never change!

Promise!

No matter how much they recycle me!

... Non-ferrous metal romance ...

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