



# 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.

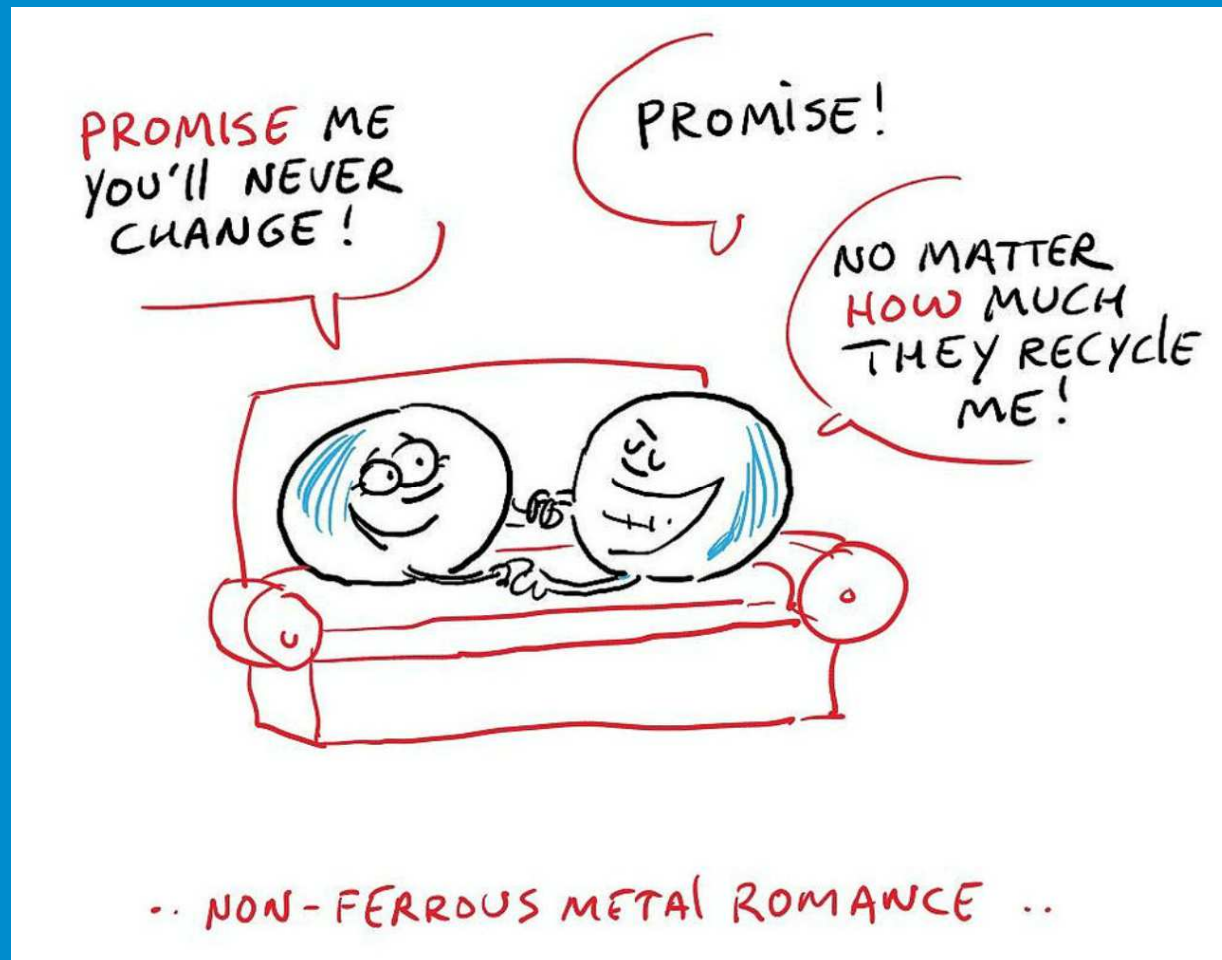
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## 5 – Eurometaux supports capacity building through supply chain interaction

- 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



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[www.eurometaux.eu](http://www.eurometaux.eu)

Avenue de Broqueville 12 | B-1150 Brussels | Tel: +32 (2) 775 63 11 | [eurometaux@eurometaux.be](mailto:eurometaux@eurometaux.be)

