



Dear Reader,

Welcome to the EPMF newsletter! Now that EPMF is fully reorganized, we can turn our attention to keeping in touch with you, whilst highlighting our political interests and keeping you informed about precious metals in general. Our first edition focuses on the upcoming Chemicals Strategy. Why Chemicals Strategy? Just look around and you will find the need for chemicals all around you: mobile phones, laptops, cars, toys... they are present everywhere. Precious metals and metals in general make up the highest volume of registered substances under REACH being used in Europe every year. In some instances metals can be hazardous, but they remain essential for certain applications within Europe's green technologies, e.g. solar panels, electric cars, microelectronics, batteries etc. However, they can be safely managed across their full lifecycle by controlling their exposure to both humans and the environment. Hence, we believe that the substitution of 'substances of very high concern' should only be pursued when a sustainable alternative is available which fulfills the same technical function, is economically feasible and does not hamper other EU environmental policy, such as circular economy and climate neutrality. On this note, I invite you to learn more about precious metals and the upcoming Chemicals Strategy.

Happy reading!

France Capon, Secretary-General of EPMF

## The upcoming Chemicals Strategy: an opportunity for regulatory consistency?

By EPMF

The long awaited European Green Deal was published in December 2019. It sets out a number of actions that the European Commission is planning to implement in order to tackle climate and environmental-related challenges. The Chemicals Strategy for Sustainability being one of them, is presented as the first deliverable of European Green Deal and is expected to be adopted in September 2020. It aims to ensure a toxic-free environment and helps to better protect citizens and the environment against hazardous chemicals whilst encouraging innovation for the development of safe and sustainable alternatives. Is it realistic though? Can this be achieved?

Keywords that are flowing around this strategy: « substances of concern », hazardous substances, « one substance – one assessment », toxicity. For a moment we could forget that the use and recycling of substances, sometimes hazardous ones, are essential for achieving Green Deal objectives. EPMF strongly believes that the Chemicals Strategy for Sustainability should introduce a Sustainable Chemicals Management approach that is built on twin pillars. Firstly - by bringing together both industry and regulators in order to understand and minimize exposure to hazardous substances throughout their lifecycle. This is the basis by which to shape and strengthen strategic value chains for the future. EPMF supports the concept of « one substance – one hazard assessment » (OSOA) which increases efficiency, transparency, and predictability of assessments. A comprehensive dataset that is accessible in a single template will ensure consistency between different policies and at the same time avoid duplication. To do so, authorities must coordinate their efforts across different services allowing the use of pertinent expertise (including adequate knowledge on metals specific issues) but also the involvement of the relevant stakeholders. It is important to consider OSOA in a stepwise way, from hazard data accessibility and harmonisation of methodologies onto the next step, risk assessment. The latter depends on exposures/emissions patterns and operational conditions and must be addressed in a specific use context. The last step is the risk management phase; exploring several options to control risk and running as Risk Management Option analysis. The Second pillar - introduction of an integrated approach to risk management, selects the most effective and sustainable measures for chemicals management, climate and circularity, combined. We see a strong need for strengthening the Risk Management option analysis to ensure consistency amongst the different EU policies and to ensure a level playing field at the EU level.

The upcoming Chemicals Strategy for Sustainability is indeed a great opportunity to achieve the goals of European Green Deal. It is vital not to work in silos and to encourage active collaboration between the authorities and industry throughout the entire supply chain to ensure our lives are greener and safer. EPMF is engaged in an active dialogue with the European Commission, the European Parliament, ECHA and is concentrated on building strong critical value chains for the EU. When it comes to join forces – EPMF is always ready to do so.



## Guest corner: Chemicals Strategy for Sustainability – setting the new standards, by Maria Spyra, Member of European Parliament

In this report, it is of crucial importance for us to prioritise the elements making up the Chemicals Strategy for Sustainability. In this regard, we call on the Commission to establish a fully connected and interoperable EU chemical safety database to facilitate seamless sharing of data between authorities and provide public access to researchers, regulators, industry and citizens at large. This is a proposal initiated by ECHA which is endorsed and fully supported by us. The scope of this report is to provide in advance to the Commission the main elements on Chemicals Strategy for Sustainability, which amongst others are: increasing safety for the consumers and the environment, eliminating burdens for the industry by using taxonomy of chemical substances and substitutes taking into account the new Industrial Strategy, encouraging Member States to increase the enforceability of the existing legislation, avoiding overlapping between EU agencies ECHA, EFSA, EMA. In addition, Chemicals Strategy for Sustainability must be aligned with circular economy action plan 2, and supportive to EU beat cancer plan. One of our priorities is the reduction of animal testing. It is now time for the Commission to facilitate the establishment of a level playing field by developing EU criteria for sustainable chemicals based on a scientific proposal by ECHA.

## Good practice: Carving the Upcoming Chemicals Strategy for Sustainability with Precision, by Noam El Mrabet, Chemicals Management Manager at Eurometaux

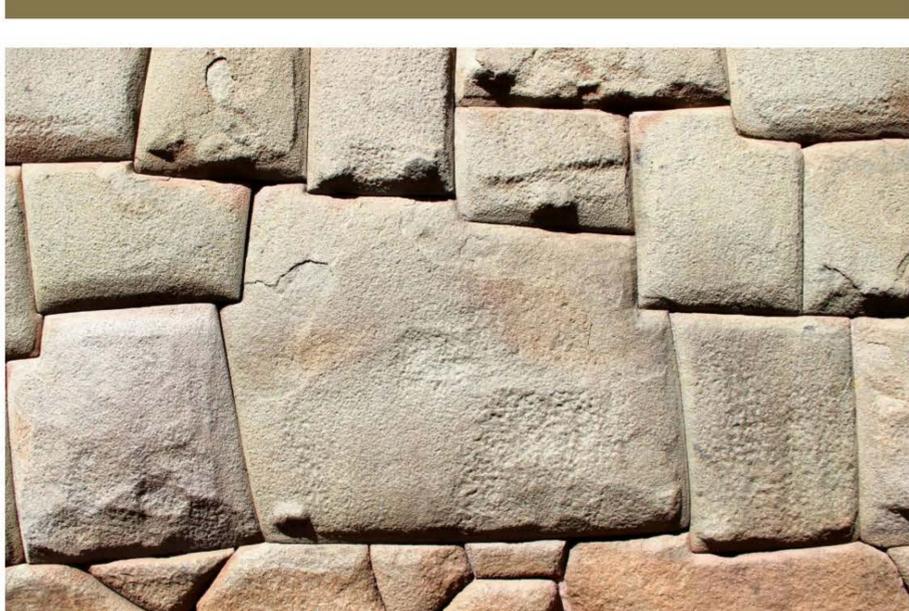
The construction of the Chemicals Strategy for Sustainability, one of many projects of the European Green Deal, is no small task. DG Environment is leading and currently smoothing out the terrain, but other Commission services already want to have their say. In the meantime, the European Parliament is conceiving its own blueprint. Eurometaux and EPMF are at present on-site, ensuring metals fit in this 'twelve-angled' Strategy.

The European Commission is expected to release its Chemicals Strategy for Sustainability in September. This fundamental text will introduce drastic changes to the EU Chemicals Framework, from defining Substances of Concern, to tackling combined toxicity, or introducing the novel "one substance – one hazard assessment".

DG Environment is holding the pen in consultation with DG GROW. The Parliament, although it has no binding say in such strategies, still decided to draft a motion for a resolution setting its expectations. Eurometaux has therefore been working with Commission officials and with Members of the European Parliament (MEPs) to ensure that the specificities of metals are considered when tackling the many issues covered by the Chemicals Strategy for Sustainability.

Our idea of a successful Strategy, especially when it comes to improving synergies and coherence between chemicals management, climate and circularity, is to break the silos between authorities, and as I write these words, meetings with different Commission services are happening. Meanwhile, MEPs finally adopted their text on Monday 29 June, after months engaging with several of them. Thanks to our efforts, and especially to the support of France Capon, the final text is now more balanced, recognising for instance that substituting hazardous substances isn't always feasible.

As Eurometaux, we now want to bring our value chains together to work towards minimising exposure, better managing processes and maximising social welfare. For more information you can find our position [here](#) or [contact us](#) directly.



The twelve-angled stone in Cuzco, Peru, recognised for its fine finishing, is an example of perfectionism and precision. Photo taken by Noam in 2013.



## #PMFacts: Silver and its use in medicine

Silver metal and silver nitrate are widely used in medical sector. Silver acts as an antimicrobial agent in an ancillary manner and is active at low levels. A small amount of silver is enough for use in medical applications, such as medical devices and in vitro diagnostic (IVD) medical devices. In such medical devices silver has several uses: surgical tools, medical implants, antimicrobial uses (e.g. wound dressings, coated catheters, or secondary bandage to cover primary dressings) as well as within electronic devices (e.g. as an electrical conductor). Silver can also be embedded into polymers to stop bacteria from growing on the devices. Silver uses in IVD medical devices can be found in IVD reagents, diabetes test strips, as a silver braze used to join spaces and prevent the ingress of fluids, especially in scopes and probes for endoscopic procedures (containing up to 50% silver); and in electronics (as an electrical conductor). For many specific applications there is simply no alternative that provides the same value as silver.