

Briefing Note

Conclusions from Eurometaux's REACH Survey

21 October 2014 – Eurometaux, the European non-ferrous metals association, has carried out a survey to gather opinions from the metals sector and key players of its supply chains, regarding the perceived and experienced impact of the REACH Regulation, and how the sector has organised itself to tackle REACH challenges now and in the future.

The survey outcomes provide useful background for Eurometaux's strategic reflection on REACH Chemicals Management, culminating in the 21-22 October Seminar. The main conclusions were as follows:

Metal sector's extensive REACH experience is valuable for further compliance and anticipation

- The non-ferrous metals sector now has extensive experience with almost all steps of the REACH process. Companies confirmed that REACH has been useful to increase the available knowledge on their materials, as well as to improve supply chain interaction for chemicals management. However, these benefits have come at a high cost.
- Looking ahead, consortia and companies are well-aligned on the organisation that will be required to ensure further compliance and anticipation of REACH evaluation and risk management options.

Companies have prepared for wider impacts of risk management measures

- The majority of surveyed companies have put strategies in place to anticipate the impact of different risk management measures at business or corporate level.
- Authorisations under REACH remain an issue, with many surveyed companies not considering them as an efficient risk management option for potential workers exposure.
- It is expected that risk management options such as restrictions or authorisations would also impact the recycling sector, potentially more than primary production, with negative consequences for other EU priorities (e.g. resource efficiency and climate policies)

Active engagement with downstream users remains essential

- The sector engages actively with downstream sectors on the safe use of metals and the different steps of the authorisation and restriction process.
- In general, the sector expects a significant change in behaviour from downstream users when risk management measures are implemented. However, surveyed companies felt that supply-chain communication with downstream users on the implementation of the recommended REACH exposure scenarios needs further improvement.

Sector's experience with REACH is applied on a global level

- Many of the surveyed companies and a growing number of consortia already use their experience with the REACH Regulation to comply with equivalent chemicals management policies outside of the EU. However, this experience is not yet seen as a competitive advantage for EU companies.
- The sector encourages Eurometaux to further leverage metals hazard and risk assessment concepts at OECD to promote a level playing field.

About Eurometaux

Eurometaux, the European non-ferrous metals association, represents the enterprises and organisations that make up the broad non-ferrous metals supply chain – from mining and refining to processing, fabrication and recycling – contributing 2% of EU GDP and creating 500,000 direct jobs in Europe.

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