

## JBCE'S POSITION ON THE PROPOSAL FOR 'CHEMICALS – MAKING BEST USE OF EU AGENCIES TO STREAMLINE SCIENTIFIC ASSESSMENTS'

### INTRODUCTION

Being a cross-sector association with member companies operating in different industries and stages in the supply chain (electronics, chemicals, polymers, automotive, machinery, semiconductors, wholesale trade, precision instruments, pharmaceutical, steel, nonferrous metal, textiles, ceramics, and glass products), JBCE welcomes the opportunity to contribute to the discussion regarding the proposal for 'Chemicals – making best use of EU agencies to streamline scientific assessments'.

### KEY MESSAGES

On a general note, JBCE understands that this proposal is part of the 'one substance – one assessment' approach to improve the efficiency, effectiveness, coherence and transparency of issuing safety assessments of chemicals across different pieces of EU legislation, as proposed in the "Chemicals Strategy for Sustainability (CSS)" under the European Green Deal. However, despite agreeing with and supporting its concept and proposal to achieve CSS, we would like to point out the importance of balanced risk assessments.

JBCE understands that the reattribution of certain existing scientific and technical tasks to the European Chemicals Agency (ECHA) aims to improve quality and coherence of safety assessments across Union legislation. However, the 'One Substance, One Assessment' principle presents additional challenges which complicate the straightforward application of unified assessments, due to diverse regulatory criteria across various related legislations, encompassing grouping approaches, substance concerns, varying restrictions, certain thresholds etc. In addition, balanced chemical substances management will be more important under the EU Green Deal. In particular, regarding Union legislation listed in Annex I, not only ECHA's safety assessment but also the risk assessment and the socio-economic assessment are key factors.

JBCE urges the European Parliament and the Council to continue maintaining opportunities for broad and flexible exchanges of opinion between ECHA, the European Parliament, the Council, European agencies, registrants, stakeholders, and others.

### ABOUT JBCE

Founded in 1999, Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of 100 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and

communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles, and glass products.

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