

**Brussels, 1<sup>st</sup> June 2021**

## **PU Europe contribution to the consultation on the inception impact assessment (IIA) for the revision of the CLP Regulation**

PU Europe, the European Federation of PUR/PIR rigid polyurethane insulation manufacturers, appreciates the opportunity to contribute to the inception impact assessment for the revision of the CLP Regulation. PU Europe supports the objectives of the Chemicals Strategy for Sustainability (CSS) aiming at achieving a higher level of protection of citizens and the environment against hazardous chemicals and encouraging innovation for the development of safe and sustainable alternatives.

### **Our industry fully supports a clear and effective CLP legislation and would like to comment on some of the proposals listed in the IIA:**

- Global alignment must be kept: in already complex regulatory frameworks for raw material suppliers and supply chains, aiming for bringing improvements/changes to the UN GHS regulatory shall be pursued first rather than amending the CLP and creating a de facto diverging system;
- Introducing some new hazard classes and corresponding criteria via CLP: our industry stand the view that the REACH framework already allows for such approach (like annex XIII for PBT's) and we thus do not recommend following that policy option;
- Relationship between the CLP and REACH regulations: we urge decision-makers to properly assess the impact that a change of hazard classification and criteria in the CLP will have on value chain/downstream users. Because of the "automatic" ban in REACH, and even more so if REACH is amended to introduced more "generic restrictions", that derives from certain CLP classifications, users of substances/mixtures will be confronted with a wave of new legal restrictions whose benefits will not have been assessed and might not materialise. The implementation of any new hazard identification and criteria in REACH shall be done in a relevant way for the downstream sectors (risk management ensures safe use for workers/consumers and the environment);
- Moving to a hazard based system solely: PU Europe members believes that the removal of hazardous chemicals merely based on their hazards and not on the risk they pose to society could harm some key objectives of the European Green Deal. A risk management approach is central to protecting health and the environment while meeting other societal challenges;
- Timeline consideration for the CLP review: due to the sheer structure of the European economy, any change to the CLP regulation will have consequences for raw material suppliers but also for all their customers (including formulators). Therefore realistic transition periods (and cascading them in the supply chain)) shall be agreed with industry (also to carry out proper impact assessments).

**Polyurethane thermal insulation products** are made out of a cellular polymer material in which chemical substances are therefore fully reacted (with the exception of gas trapped into the rigid matrix). Our products are urgently needed to curb GHG emissions from the European building sector, from dwellings to industrial facilities, and reach Climate Neutrality by 2050.

#### **About us:**

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO2 emissions of the

European Union (more information about us via [www.pu-europe.eu](http://www.pu-europe.eu) and lobbying transparency register ID number 27993486325-38).

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