

ACTION	CEFIC'S ASKS EXPLAINED	EGD/ CSS CHECK	IMPACT	CEFIC ASKS INCLUDED IN COMMISSION'S PROPOSALS SHARED DURING CARACAL 54 MEETING
<b>1</b>	Increase its influence Stall CSS initiatives Voluntary schemes vs regulation	NO	DEREGULATION	YES The Commission is considering stalling their initiatives to extend information obligations (e.g. for chemicals produced in less than 1t/y and for polymers), to address impacts of exposure to mixtures of chemicals or to ban all of the most hazardous substances in consumer and professional products. See CARACAL slides on <a href="#">registration</a> and on <a href="#">restriction</a>
<b>2</b>	Add an additional process to influence, stop or delay regulatory processes.	NO	DEREGULATION	Yes The Commission is now proposing to include an upfront RMOA analysis before deciding on regulatory actions. See CARACAL slides on <a href="#">authorisation</a> and on <a href="#">restriction</a>
<b>3</b>	Weaken regulation, by reducing the number and uses of highly hazardous chemicals that would be phased out and introducing voluntary schemes.	NO	DEREGULATION	Yes The Commission is proposing to reduce the scope of the authorisation process. See CARACAL slides on <a href="#">authorisation</a>
<b>4</b>	Stall the phase-out of most hazardous substances in consumer and professional uses.	NO	TO STOP REGULATORY PROGRESS	See CARACAL slides on authorisation and on <a href="#">restriction</a>
<b>5</b>	Further delay the generation of information on the hazards (registration) of polymers, the building block of plastics.	NO	TO STOP REGULATORY PROGRESS	Yes The Commission is still considering if polymers should be registered, backtracking on their CSS commitment. See CARACAL slides on <a href="#">registration</a>

<b>6</b>	Stall the proposal to address impacts on health and the environment due to the exposure to mixtures.	NO	TO STOP REGULATORY PROGRESS	Yes The Commission is still considering if they will address the real-life exposure to mixtures of chemicals and only for substances produced in very high volumes, backtracking on their CSS commitment to introduce a Mixture Assessment Factor (MAF). See CARACAL slides on <a href="#">registration</a>
<b>7</b>	Further delay complying with their obligation to provide updated and reliable information on the hazards of the chemicals they market.	NO	DEREGULATION	NO The Commission has maintained its commitment to address industry high level of non-compliance, however, the proposed measures are weak and will not solve the problem See CARACAL slides on <a href="#">evaluation</a>
<b>8</b>	Stop using animal tests that are needed to identify if chemicals are hazardous.	NO	DEREGULATION	In part The Commission's proposal to identify EDC does not include tests needed to identify these substances See proposal on information requirements for EDC
<b>9</b>	Less legal data requirements, making the identification of harmful chemicals even more difficult.	NO	DEREGULATION	NO The Commission has maintained its commitment to address industry not providing updated information, however their proposal to allow industry to only update the information every 10 years is very weak. See CARACAL slides on registration and evaluation
<b>10</b>	To stop regulating chemicals by making enforceability a decisive criterion. To target enforcement of imports and set aside enforcement of EU companies	Partly	DEREGULATION	YES The Commission will focus on enforcement of imported goods and give more weight to enforceability of restrictions. <a href="#">See CARACAL slides on enforcement</a>