		EGD/		
ACTION	CEFIC'S ASKS EXPLAINED	CSS	IMPACT	CEFIC ASKS INCLUDED IN COMMISSION'S PROPOSALS
		CHECK		SHARED DURING CARACAL 54 MEETING
1	Increase its influence	NO	DEREGULATION	YES
	Stall CSS initiatives			The Commission is considering stalling their initiatives to extend
	Voluntary schemes vs regulation			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 registration and on restriction
2	Add an additional process to	NO	DEREGULATION	Yes
	influence, stop or delay regulatory			The Commission is now proposing to include an upfront RMOA
	processes.			analysis before deciding on regulatory actions.
				See CARACAL slides on authorisation and on restriction
3	Weaken regulation, by reducing the	NO	DEREGULATION	Yes
	number and uses of highly			The Commission is proposing to reduce the scope of the
	hazardous chemicals that would be			authorisation process.
	phased out and introducing			See CARACAL slides on <u>authorisation</u>
	voluntary schemes.			
4	Stall the phase-out of most	NO	TO STOP	See CARACAL slides on authorisation and on restriction
	hazardous substances in consumer		REGULATORY	
	and professional uses.		PROGRESS	
5	Further delay the generation of	NO	TO STOP	Yes
	information on the hazards		REGULATORY	The Commission is still considering if polymers should be
	(registration) of polymers, the		PROGRESS	registered, backtracking on their CSS commitment.
	building block of plastics.			See CARACAL slides on registration

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