

Generic Approach to Risk Management (GRA) explained

Context

The Chemicals Strategy for Sustainability is part of the EU's zero pollution ambition – a key commitment of the European Green Deal – and aims to better protect citizens and the environment from harmful chemicals, and at the same time, boost innovation by promoting the use of safer and more sustainable chemicals.



The European Green Deal



The extension of the generic approach to risk management (GRA) proposal

The Generic Approach to Risk Management (GRA) is an accelerated process to ban certain chemicals based on their hazardous characteristics, regardless of whether there is any actual risk present.

This accelerated process is already in place for CMRs (Carcinogenic, Mutagenic and Reprotoxic chemicals) in consumer mixtures; however, with the revision of REACH, the European Commission would like to extend the scope of application to additional hazard classes, and from consumers to professional users.

PROFESSIONAL USERS OF ADHESIVES AND SEALANTS SUPPORT THE CLIMATE AND ENERGY, AND GREEN DEAL OBJECTIVES, INCLUDING THE DEVELOPMENT OF A CIRCULAR ECONOMY.

Impact of the proposed extension of the GRA

Professional workers need chemical products to perform tasks that are important for society and the circular economy. Thanks to the chemistry of professional adhesives and sealants, high-performing, durable products can be manufactured in many industries.

The application of the generic approach would adversely affect the availability of certain substances and products. Construction workers or workers in repair shops, for instance, would have to work with consumer products that do not have the technical functionalities required for professional applications. The range of potentially affected uses is enormous, and the extension to additional hazard classes exacerbates the problem.

Furthermore, many adhesives and sealants are enablers of the European Green Deal's Circular Economy Action Plan. The extension of the generic approach to risk management could limit the realisation of the circular economy where professional uses of adhesives and sealants provided solutions easy to recycle.

FEICA proposal

FEICA considers the extension of the generic approach to risk management to professional uses inappropriate and disproportionate. The use of chemical products by professional workers differs considerably from that by consumers and should, therefore, not be subject to the same restrictions or prohibitions. In fact, professional users have more characteristics in common with industrial users than with consumers.

FEICA promotes the development of a European platform for information and training of professional users securing the safe handling of all chemicals. This initiative would be more proportionate than the generic ban of substances for professionals.



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