

## ASMoR Recommendations on the Substitution Planning and the Options presented during the 2nd Workshop on substituting targeted hazardous chemicals

28 October 2024

Different options for a substitution framework were introduced at the Second Workshop on substituting targeted hazardous chemicals on October 1<sup>st</sup>.

As a follow-up of the discussions and in view of the next steps, the Alliance for Sustainable Management of Chemical Risk ([ASMoR](https://www.asmor.eu)), would like to point out the following:

- **One solution fits all does not exist**

With the *“Overall objectives [...] to **accelerate safe substitution** and enable **efficient use of industry and authority resources within a simplified regulatory system which supports EU innovation and investment.**”*, we are happy to see that the background document recognises that *“Substitution planning seeks to address a specific set of problems”* for complex regulatory cases, on a case-by-case basis. The different options should co-exist, and the most appropriate option should be implemented case-by-case.

**Voluntary measures should remain the default starting point.** This current practice is typically initiated based on market needs/demand and the innate wish of companies to be front-runners in their sector. Such a voluntary initiative could be complemented with economic incentives and/or other relevant measures.

- **Safe uses should continue to be permitted and should not undergo further regulatory scrutiny unless new evidence identifies an unacceptable level of risk**

We understand that identifying the targeted substances is based on the substance’s hazard properties. However, in line with the overall objectives quoted above, analysis of alternatives and substitution planning with any degree of scrutiny (option 2 or 3) should only be implemented where:

- an unacceptable risk of the substance/use combination has been identified and cannot be controlled (e.g. by Risk Management Options, OEL or other concentration limits as relevant) and
- companies enrolling in the Substitution Journey need additional support for one or several steps, e.g. from the official substitution centres (if such are established in the future).

## About us:

The Alliance for Sustainable Management of Chemical Risk (ASMoR) is an alliance of more than 30 organisations. It covers a wide variety of critical sectors throughout the European value chain and represents 20 million companies through the membership of its members, with a vast majority of SMEs. The common goal of ASMoR's members is to ensure that safe uses of substances remain permitted.

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For more information, please consult [www.asmor.eu](http://www.asmor.eu)

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