

Globally minimum transparency standard GMTS

Disclaimer:

This presentation represents my views and does not necessarily express the actual position of my employer.

Building the case for GMTS

When something is done well, the answer to these questions is always at the top of it.

- **WHY?** – Why did they do this?
- **HOW?** – How to do it, how to make it work well?
- **WHAT?** – What is the outcome's added value? We learn through experience and evolution, and as a result, we learn to improve things (feedback loops).

The answers to those questions *must be simple but not simplistic*; they must be **plausible**, **coherent**, and **relevant**!

In this presentation, we're mostly going to talk about WHY.

Why - GMTS

In the EU, we have a Green Deal that embodies our commitment to sustainability and includes the following:

- *climate neutrality;*
- *circular economy;*
- *biodiversity protection and*
- *toxic-free environment with the whole life cycle from production, use until end-of-life.*

To support this goal in EU, the following changes are taking place:

- revision of the main chemical legislations (REACH, CLP, etc),
- introducing the essential use concept, MAF factor/ceiling, SSBD/safe and sustainable by design concept,
- EFP (environmental footprint),
- digital product passports (under Ecodesign for Sustainable Products Regulation).

Scientists conclude in the journal "Environmental Science and Technology" that humanity has crossed the planetary boundary.

WHY not have a global AIM for a toxic-free environment, in the sense of a global standard like GMTS, so that everyone can live in a clean environment?

We must be **circular** in order to have a **toxic - free environment** (Green Deal, EU circular economy action plan, Chemical Strategy for Sustainability).

Areas covered by the circular economy are: chemical, product and waste.

It all starts with the way chemicals are manufactured, incorporated or transformed into a material, supplied on the market, used, disposed of, and recovered/re-entered the market.

From a legal perspective in the EU we have:

- **Chemical legislation** – REACH, CLP (Classification, Labelling and Packaging), POPs, PIC is for substance, mixture, article and chemicals;
- **Product legislation** – GPSD (General Product Safety Directive), specific product regulations (e.g toys, packaging, energy-related products), RoHS, etc, that refers on products rather than the dangers posed by chemicals. When a material is made available to the EU market, it becomes a product within the meaning of a legal framework;
- **Waste legislation** – Managing waste in a sustainable way to protect, maintain, and improve quality is the goal of the Waste Framework Directive (WFD), which lays out the general rules, the specific rules for each waste stream (like packaging, WEEE, batteries, end-of-life vehicles, and so on) comes in separate directives. The WFD is a guide for how to do this. Making sure that natural resources are used wisely, efficiently, and effectively, as well as promoting the principles of the circular economy, are all important goals.

The obligation under REACH and CLP do not apply to waste.

Exception:

REACH for the waste stage has to be considered in the chemical safety report in the registration dossier for substances manufactured/imported in the EU in quantity above 10 t/y.

CLP criteria are considered for hazardous properties of waste.

[Ref: Commission notice on technical guidance on the classification of waste \(europa.eu\)](#)

The state of play – now

Overlaps in legislation governing interface substances/chemicals, products, and waste

CLP makes no distinction between substances derived from virgin or recovered materials, so substances are classified according to their hazards, whereas WFD (Water Frame Directive) requires that waste, regardless of its form, be classified as hazardous or non-hazardous, based on its origin and the presence or absence of hazardous properties, even if it contains a substance classified as hazardous under CLP. So there are distinctions e.g *a textile material derived from household waste, for example, will not be classified as hazardous, even if it contains hazardous substances such as flame retardants.*

REACH obligation/requirements for substance in article

Guidance on requirements for
substance in articles, v4 – june 2017

Obligation:	Registration of substances in articles (chapter 4)	Notification of substances in articles (chapter 3)	Communication of information on substances in articles (chapter 3)
legal basis in REACH Regulation	Article 7(1)	Article 7(2)	Article 33
actors concerned	article producers and article importers	article producers and article importers	article suppliers
substances concerned	substances intended to be released from articles	substances included in Candidate List of Substances of Very High Concern for authorisation	substances included in Candidate List of Substances of Very High Concern for authorisation
tonnage threshold	1 tonne per year	1 tonne per year	-
concentration in article threshold	-	0.1% (w/w)	0.1% (w/w)
exemption from obligation possible on the basis of:			
substance already registered for that use (Art. 7(6)) (subchapters 3.3.1 and 4.3.2)	yes	yes	no
based on "exclusion of exposure" (Art. 7(3)) (subchapter 3.3.2)	no	yes	no

Conclusion:

- It is time to end the chemical secrecy and make it possible for a toxic-free global economy;
- A global certification scheme will increase the transparency and enable companies to benchmark their performance;
- A transparent market can be a catalyst for change, a motivator for a company/frontrunners to innovate and actively try to go for an extra mile when it comes to chemicals management, a market activator a force for phasing out/substituting the hazardous chemicals;
- There must be a common / global language vision for hazardous chemicals, e.g mine green must be understood the same globally;
- Sustainably should have a common understanding for business, and consumers because at the end of the day we all want to feel good about what and how we do our work/role;

Thank you for your attention!

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