

NAMC-Eurometaux Joint Statement on EU-U.S. Transatlantic Trade and Investment Partnership

August 2013

Eurometaux and NAMC welcome the negotiations on an ambitious, deep and comprehensive European Union (EU)–United States (U.S.) Transatlantic Trade and Investment Partnership.

Eurometaux and NAMC encourage the EU and U.S. to consider the adverse impact that differences in regulatory chemical management approaches has on trade opportunities. While the main objectives of chemicals management legislation in both jurisdictions are comparable, there are intrinsic differences between the EU and U.S. approaches to chemicals management, whether in respect of design, development, or implementation.

Enhanced regulatory cooperation between the EU and U.S. may help achieve a better understanding of existing differences and identify opportunities for future compatibility. Eliminating future regulatory inconsistencies would reduce industry burden, thereby enhancing the competitiveness of the EU and U.S. manufacturing industries, boosting trade between the regions, and promoting high standards for human health and environmental protection.

Exchange and sharing of information

Information about the hazards of chemicals is a basic building block for chemicals management. It appears essential to reflect on practical approaches that would facilitate the appropriate sharing of information among agencies involved in chemicals management (U.S. Environmental Protection Agency (EPA) and the European Chemicals Agency (ECHA)), without jeopardizing the value of these data, or imposing the burden of information protection entirely on the private sector. Ensuring that agencies tasked with chemical assessment and safety regulations can have equal access to the same data under both systems is critical.

Principles for the identification and prioritisation of substances for future review/evaluation

Understanding the systems used to prioritise substances for future assessment actions as well as the concerns and the nature of the information supporting the prioritisation may allow avoiding a duplication of efforts, sharing the burden and increasing the efficiency of reviews. The development of

common science- and risk-based principles, to both identify the substances and the concerns requiring prioritisation may further increase the efficiency of their actual risk management.

Harmonisation and coherence in legislations and regulations directly affecting circulation of chemicals between the EU and U.S.

Ensuring consistency in transport rules and striving for common classification and labelling rules, principles, and data will further help to improve safety for workers and the environment through harmonised communication on hazard and practices while also facilitating international trade.

NAMC and Eurometaux are open to a dialogue with the authorities in order to further refine these concepts and to address the challenges together.

NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American “metals industry”) on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations and individual companies that engage in the global operations of mining, processing, shipping and selling ores, concentrates, and metal products worldwide.

Eurometaux represents the European non-ferrous metals industry

- **Non-ferrous metals contribute to the European creation of wealth and jobs:** they represent 2% of EU GDP and create **450,000 direct jobs and over 1 million indirect** jobs in Europe. Their use in high-tech and high added-value activities makes them very valuable to the EU’s economy and competitiveness.
- **The non-ferrous metals industry is indispensable for modern society.** Thanks to their intrinsic properties – including durability and recyclability - non-ferrous metals are vital in order to meet essential societal needs and to build a low-carbon economy.