

JBCE'S POSITION ON THE PROPOSAL FOR 'CHEMICAL SAFETY – BETTER ACCESS TO CHEMICALS DATA FOR SAFETY ASSESSMENTS'

INTRODUCTION

Being a cross-sector association with member companies operating in different industries and stages in the supply chain (electronics, chemicals, polymers, automotive, machinery, semiconductors, wholesale trade, precision instruments, pharmaceutical, steel, nonferrous metal, textiles, ceramics, and glass products), JBCE welcomes the opportunity to contribute to the discussion regarding the proposal for 'Chemicals safety – better access to chemicals data for safety assessments'.

KEY MESSAGES

On a general note, JBCE understands that the common data platform is as part of the 'one substance – one assessment' approach to improve the efficiency, effectiveness, coherence and transparency of issuing safety assessments of chemicals across different pieces of EU legislation, as proposed in the "Chemicals Strategy for Sustainability (CSS)" under the European Green Deal. However, despite agreeing with and supporting this proposal to achieve CSS, we would like to point out that this proposal has an issue for registrants and stakeholders that needs clarification to guarantee the confidentiality of information.

The data required for registration under Union legislation listed in Annex I differs depending on each legislation, and the data submitted by notifiers and registrants may include information considered as trade secrets under EU competition law. Such information must also be kept private on common data platforms. If trade secrets were unintentionally disclosed, it would cause significant damage not only to registrants but also to the EU's economy and development. JBCE urges to introduce a mechanism to avoid unintentional disclosure of registrants' information, such as providing advance notice of information disclosure to each registrant and data holder before information is disclosed on the common data platform.

ABOUT JBCE

Founded in 1999, Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of 100 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles, and glass products.

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