

The Green Deal is one of the EU's most ambitious policies for reducing the impact of human activities on the environment, while making the European economy more circular. Paired with an Industrial Deal based on the same approach, with no backtracking on zero-pollution ambitions, the sustainable competitiveness of the economy would be strengthened, and citizens would benefit from a non-toxic environment and production cycles.



The economy and public health need decisive action from the EU to complete the Green Deal

1

The REACH regulation is the cornerstone of European substance policy and should be revised to improve procedures such as eco-design, traceability and assessment per substance family.

2

Emerging pollutants must be taken into account today to avoid contamination tomorrow. The case of PFAS serves as a test of how a particular group of problematic substances can be taken into account in a substance-specific regulation, like the one on Persistent Organic Pollutants.

The management of hazardous and industrial waste is a significant decarbonization opportunity for European industry.

1

Hazardous waste treatment activities avoid GHG emissions for industrial sectors whose waste is treated, but these avoided emissions are neither acknowledged nor assigned value. The regulatory framework needs to be reviewed so that industry may use this driver to reduce its emissions.

2

Our sector is willing to contribute to emission reduction targets by improving energy efficiency, diverting plastics from incineration and developing disruptive technologies, but current rules need to be adjusted to foster technologies with a low environmental footprint.

2024 Manifesto for a toxic-free EU

The current logic underpinning industrial emissions needs to evolve towards a logic of global environmental performance for emissions into the air, water and soil

1

The 'Seville process' needs to be better structured to make it more effective. The exchange of data should be better supervised, and prepared in advance of the BREF revision phase, to make the process smoother and enable more detailed analysis of data transmitted, including their reliability.

2

To protect the environment and public health, the current concentration-based approach to emissions needs to be paired with the notion of global environmental performance. This concept implies limiting the total quantity of pollutants, thus enabling competent authorities to define a mass flow limit and focus efforts on the activities that contribute most to protecting the environment.

Re-industrializing the EU means better managing polluted sites and soils, so companies can expand their land footprints without adversely affecting healthy soils.

1

The EU needs a concrete action plan and the means to ensure healthy soils. Objectives and milestones should be set up, as well as a clear EU roadmap to give substance to these ambitions.

2

The decontamination of polluted sites helps reduce the land footprint of economic activities while ensuring their development. In addition, land management and reclamation practices in the EU need to be better defined, and strengthened for specific pollutants (priority substances).

The strategic autonomy and competitiveness of the European economy call for easy, cost-effective access to critical, strategic or sensitive materials.

1

Hazardous waste streams represent a potential mine of critical and strategic materials yet to be recovered. Investments in decontamination and recovery technologies will enable a European recycling industry to flourish, provided that waste flows containing these materials remain in the EU for treatment, and are not exported to countries where the quality of treatment is not guaranteed.

2

Industrial wastewater reuse has a role to play in combating water scarcity. It represents a significant potential that can be realized so long as uses are well defined and a clear system of responsibility between treatment operators and downstream water users exists.