

TotalEnergies response to public consultation on Chemical Strategy for Sustainability (2020-06-16)

As a responsible company, TOTAL places safety and the environment at the heart of its ambition. Total complies with regulatory requirements and seeks to limit risks throughout the life cycle of its products for the benefit of the safety of its employees, sub-contractors, nearby communities, consumers, as well as the environment.

TOTAL welcomes the opportunity to comment on the EU roadmap for a sustainable chemical strategy. To be successful, Europe's sustainable chemical strategy must be pragmatic and based on three fundamental pillars:

1. TOTAL expects that the European sustainable chemical strategy will advance the circular economy and strengthen the competitiveness of the European chemical industry. As an example, TOTAL favors sustainable use of plastics by supporting banning of single use plastics and developing recycling projects, collaborating with users and innovative actors with the common objective to bring out new technological solutions likely to satisfy the highest requirements such as in food contact applications.

Given the European plastic recycling ambitions and considering the challenge to tackle those most stringent requirements, chemical recycling technologies will prove necessary to address the large portion of mixed plastic wastes that cannot be efficiently recycled mechanically.

The development of viable projects will require a stable legislative framework supporting innovation as well as a strong financial support. This will strengthen the European chemical industry, essential link in the European economy, as demonstrated in the fight against the covid-19 pandemic.

2. The role of REACH and CLP as the cornerstones of chemical risk assessment and hazard communication needs to be further strengthened. With this unique, constantly updated database of almost 22,000 chemical substances, REACH fulfills its objective to ensure a high level of protection of human health and the environment.

Adaptations and simplifications could further enhance its implementation. TOTAL is engaged alongside many other European chemicals and refining companies to improve its registration dossiers quality. Moreover, as there are still breaches with most non-REACH compliant products being of non-European origin, the European chemical industry as well as the general public would benefit from better regulatory enforcements.

3. The identification of hazardous properties of the substances and the evaluation of realistic exposures to these hazards for safe uses – the risk-based approach - should always be made on sound and robust science, while adapting to the evolution of scientific knowledge.

The rules for assessing the hazardous properties of substances, in particular for emerging topics, should therefore be clear and established in a participatory and transparent manner, based on scientifically recognized and validated test methods. Furthermore, the status of UVCB is perfectly suited to complex substances such as petroleum substances. The concepts of grouping of substances and read-across approach allow their safe use while minimizing animal testing.

Acronyms:

CLP : Classification, Labelling, Packaging

REACH : Registration, Evaluation and Authorisation of CHemicals

UVCB :Unknown or Variable composition, Complex reaction products or Biological materials