

# HAZBREF



EUROPEAN  
REGIONAL  
DEVELOPMENT  
FUND

## Summing up of the first day and preparation of the Day 2

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# Some ideas taken from Day 1

- BAT conclusions are key for permitting and important for the industry as a whole
- BAT on the use of chemicals and release of hazardous substances are part of it
- Sections on chemicals lack behind compared to the rest of the BAT conclusions and also permits are often weak in this respect
- HAZBREF should produce some concrete results
- Different regulations live their own life's in silos → they should more interact
- Integrated permitting taking into account all relevant aspects is still a challenge
- Safety data sheets are an important tool for chemical management and should be complete → interpretation of SDS content is not self-evident and needs to be organized
- Are we in a position to propose necessary minimum contents of SDS so that they allow operators chemical management? What is missing? Could we develop a model SDS including some support for interpretation?
- Who is in charge of making this happen?

# Some ideas taken from Day 1

- HAZBREF is not something additional to be implemented but is intended to enrich the Seville-process concerning the topic use of hazardous substances and may feed into BREF reviews of some selected sectors
- Sector guidance is supposed to support main actors on national level in the implementation of appropriate measures regarding chemical management, substitution and emission prevention, no extra-provisions intended, rather make life easier; can inspire implementation
- It is difficult to assess the impact of the 2003 Textile BREF; it has not the same weight as the new IED BAT conclusions; there are other driving forces
- BREFs are also perceived and used beyond Europe → can inform globally what BAT is
- It may be positive to strengthen chemical management in BAT conclusions but without creating redundant requirements
- Consider the limits and scope of BAT conclusions within the IED context
- Consider companies that work on behalf of third parties; no full control

# Some ideas taken from Day 1

- BAT conclusions could concretize some of the risk reduction measures aimed at under REACH; how to better consider SDS “recommendations”?
- BAT conclusions may support implementation and compliance
- Integrated approach of the IED leaves room for integration of aspects from neighboring regulations → but where to draw the line?
- textile industry is a global activity, not overload European companies
- more innovation potential in Asia, textile auxiliaries are cheap
- Textile auxiliaries are a mixture of active substances, supporting media and impurities
- Simplified supply chain consists mainly of chemical suppliers, manufacturers and brands
- Recycling of chemicals is important: separation for re-use or treatment for other purposes
- Knowledge and data are key for moving towards circular economy considering the entire supply chain
- Brain drain in textile finishing

# Some ideas taken from Day 1

- Impact of the foundation of initiative “Zero Discharge of Hazardous Chemicals (ZDHC)” made that we talk again about chemicals
- A number of activities that all go into the same direction
- Biodegradability/elimination together with (fish) toxicity is key considering at the same time the “black list” of a number of chemicals (candidate list)
- Differentiate technical textiles and fashion products, different market demands
- Positive list of chemicals works for fashion products
- How to address the global perspective?
- Zero liquid discharge technique in a few applications in Asia → (candidate) BAT in Europe?
- Revised BREF should deliver and added value, a step forward, binding
- Apply all legislative provisions in a more consistent way
- Potential for improvements of chemical management in permits (systematic)

# Some ideas taken from Day 1

- Many low-hanging fruit. Eat them
- I have a dream.... Maybe in the near future we will have “Clean factories”. This means suppliers that produce chemicals in a clean manner (remove impurities), live responsible care, and are able to provide a “good” SDS

**Thank You for  
your attention!**



# IMPROVING THE MANAGEMENT OF CHEMICALS IN INDUSTRY

PREVENTING EMISSIONS OF  
HAZARDOUS SUBSTANCES

TO THE  
*Baltic Sea*

**DURATION**  
OCT 2017—SEP 2020

**FUNDED BY**  
EU INTERREG  
BALTIC SEA REGION  
PROGRAMME

**TOTAL BUDGET**  
EUR 1.99 MILLION

**EUROPEAN  
REGIONAL DEVELOPMENT  
FUND: EUR 1.534 MILLION**

[www.syke.fi/projects/hazbref](http://www.syke.fi/projects/hazbref)