A 10-POINT ACTION PLAN TO SIMPLIFY REACH

Europe's chemicals industry is under severe pressure, with closures rising sharply since 2022 due to high energy costs, weak economic recovery, global distortions and an increasingly complex regulatory environment. As Professor Draghi has emphasised, reducing regulatory burden is essential to strengthen Europe's resilience and competitiveness. Recent EU initiatives, including the Chemical Industry Action Plan, the Competitiveness Compass and the 2025 Work Programme, signal the intention to simplify REACH while maintaining high levels of protection.

REACH remains a cornerstone of EU chemicals policy. It is a well-designed, fit-for-purpose framework that ensures a high level of protection for human health and the environment. Most current challenges arise from implementation and enforcement, rather than from deficiencies in the legislation itself. Simplification should therefore focus on smarter, more efficient application of the existing framework - cutting complexity, reducing costs and uncertainty (especially for SMEs), and avoiding regulatory fragmentation - without reopening the legal text.

The objective must be a clear, predictable and effective REACH that supports investment, strengthens Europe's industrial base and strategic resilience, and maintains high standards of protection for people and the environment

Below are actions that can deliver these objectives, all of which can be applied immediately by improving the implementation and enforcement of the current framework. Read more about Cefic's work on REACH.

Action 1: Ensure simplified rules that align with Europe's political guidelines and competitiveness objectives

The issue: A simplified REACH must serve a dual purpose: send clear signals to drive investments and innovation in Europe and improve the protection of human health and environment. This can only work if industry needs are mapped out, the initiatives actually bring simplification on the ground, and their impacts are measured against both objectives.

The solution:

- Engage in dialogue with industry to understand its needs.
- Improve the implementation of the current system by updating annexes, guidance and existing practices.
- Explore additional options for simplification within other EU legislations governing chemicals.

The result:

- A simplified regulatory framework that is aligned with the European Commission's political guidelines.
- Retainment of the current, robust legal framework.
- A regulatory system based on reality checks, trust and incentives rather than "detailed control".

Action 2: Increase predictability for regulatory risk management

The issue: The EU regulatory system includes 40+ regulations and directives governing chemicals. The result is a maze of overlapping rules. Once a chemical enters the system, it becomes unclear if, when, or how it will be regulated. This also includes redundant and overlapping rules, which can be a result of fragmentation across Member States. This lack of clarity creates inefficiencies and uncertainty, while also contradicting the objectives of the Single Market.

The solution:

An upfront analysis of available data on chemicals would help to identify priority substances and uses for which regulatory control is needed. The result would be a clear regulatory plan which enables authorities to align actions under REACH or other legal frameworks, maximises resources across the EU and Member States, and facilitates discussions on strategic applications of chemicals.

The result:

- Clear identification of "problematic uses of substances" and appropriate regulatory tools to control identified risks.
- Greater clarity for industry, enabling smarter investment and prioritisation of resources for substitution.
- Enable authorities to prioritise resources where it matters the most.
- Enhance the Single Market by predictable, harmonised and coordinated actions in line with the spirit of One Substance One Assessment (OSOA).

The European Chemical Industry Council, AISBL
Belliard, 40 - 1040 Brussels - Belgium
Transparency Register n°64879142323-90

A 10-POINT ACTION PLAN TO SIMPLIFY REACH

Action 3: Improve the Authorisation and Restriction Processes

The issue: Since REACH was introduced, the regulatory risk management of chemicals has expanded significantly, covering more substances and uses than authorities can handle. Over the past few years, the restriction route has increasingly used broad scope bans combined with time-limited derogations. This has led to issues like "policy by derogation", enforcement gaps, and inefficiencies e.g. the ongoing PFAS and skin sensitisers restrictions, and the microplastics restriction. The current authorisation system cannot cope with the number of applications, causing a significant backlog of work for the authorities and uncertainty for industry.

The solution:

- Have a strategic discussion at EU level before restriction proposals are submitted to the system (see action 2).
- Factor in elements, such as impact on competitiveness, critical value chains, alternative regulatory tools, and workload for authorities when recommending substances for authorisation and when preparing restriction proposals.
- Clarify and tailor the required information submitted in the application for authorisation.
- Go back to the original intent of the restriction process i.e. take action when unacceptable risk is identified and restriction is the most suitable approach (see action 2).
- Implement more flexible derogations, with review periods to account for timing of alternative development.
- Have a robust and transparent framework for grouping chemicals that require regulatory action.

The result:

- Greater clarity, predictability and feasibility for restriction proposals.
- Keep critical value chains operating in Europe.
- Adopt a more agile system that accommodates company and sector specific needs.
- Limit excess workload for authorisations.

Action 4: Avoid Overly Simplistic Assessments - Use Targeted Restrictions instead

The issue: Simplified assessment does not always lead to faster decision-making. Overly simplified restrictions, based on generic risk considerations and hazard classifications, risk overregulating substances without adequately assessing exposure and alternatives. This can prolong discussions on derogations and cause disruptions and uncertainties over (un)availability of chemicals for the value chains. Already today, under the current rules, many existing products could be automatically and unnecessarily removed despite safe use, for instance, hand sanitisers, if ethanol were to be classified as “Reprotox 1B”.

The solution:

Do not include additional semi-automatic links between hazard classification and regulatory measures. Regular restrictions, including full-fledged risk and socio-economic assessments, ensure a balanced as well as evidence and science-based approach to regulate the most severe hazards (SVHCs). This would provide a more targeted response, while also addressing the regulatory and societal needs without overregulating.

The result:

- Avoid retroactively fixing issues caused by an overly simplified approach.
- A balanced, evidence and science-based framework for managing harmful substances.
- Improve regulatory coherence and credibility through targeted, well-designed restrictions.
- Prevent banning of critical applications through the hazard classification route.

A 10-POINT ACTION PLAN TO SIMPLIFY REACH

Action 5: Avoid Additional Requirements for Polymers - Develop a Holistic Strategy First

The issue: Polymers differ from traditional substances due to their unique properties, with an estimated 200,000–400,000 on the EU market. Under REACH, polymers are indirectly addressed through managing their monomers used in their production and additives used in their application. The current registration, tailored for individual substances, is not suitable for polymers. According to Ricardo study, introducing new notifications and/or registration requirements for polymers under REACH would create unnecessary complexity, redundancy and inefficiencies in the chemicals management. It would require significant additional resources both for the industry and ECHA, significantly increasing administrative workload and placing particular strain on SMEs. ECHA would also need to add new expertise and resources to handle the vast amount of notifications and registrations. Current fragmented attempts to address polymers across multiple frameworks risk creating redundancies and inefficiencies, i.e. Packaging and Packaging Waste Regulation (PPWR), End-of-Life Vehicles Regulation (ELVR) and product regulations.

The solution:
Before taking any action on polymers, a clear problem definition for polymers resulting in a coherent, holistic strategy is needed to streamline the regulatory approach for polymers, ensuring alignment with simplification and burden-reduction goals, while also tackling the identified problems.

The result:
- A unified, efficient policy for polymers.
- Eliminate unnecessary notifications, testing for polymers and administrative complexity.

Action 6: Avoid integrating MAF in REACH

The issue: Industry studies e.g. the Ricardo case study and examples from downstream users, reveal that a generic Mixture Allocation Factor (MAF) would impose significant administrative burdens without effectively addressing combined exposures. Evidence suggests that a blanket MAF applied to all chemicals is not the right solution since the majority of unintentional mixtures of chemicals present no concern.

The solution:
Existing measures seeking to reduce emissions to the environment i.e. Industrial Emissions Directive, Urban Waste Water Treatment Directive, or assess real-life combined exposures i.e. Water Framework Directive and Chemicals Agents Directive, offer more targeted and impactful ways to address harmful combined exposures.

The result:
- A more focused, meaningful and effective approach to managing combined exposure.
- Greater alignment with existing legislation, improving efficiency and environmental outcomes.

Action 7: Ensure a continuous dialogue between industry and ECHA during dossier evaluation process

The issue: Generating necessary safety data and filling REACH registration dossiers can be a difficult and time-consuming process (some safety studies take 3-4 years to complete) and information requirements may vary from case to case.

The solution:
An open dialogue and agreeing with ECHA in advance are key for the smooth updating or development of new registration dossiers.

The result:
- Safety data is generated faster.
- Clearer expectations on what is required from the industry.
- Dossiers fulfill the expectations of authorities.

A 10-POINT ACTION PLAN TO SIMPLIFY REACH

Action 8: Introduce a new safety assessment scheme that supports an increased uptake of reliable animal-free safety assessment methods (New Approach Methodologies or 'NAMs')

The issue: Current data requirements under REACH still heavily rely on animal testing. The European Commission has ambition to phase out animal testing in chemical safety assessments.

The solution:

- Reduce the hazard focus of REACH, allowing more flexibility in achieving a high degree of safety.
- Remove default requirements for animal testing wherever possible.
- Regulators should justify why concerns cannot be addressed using exposure-based approaches or NAMs, such as when rejecting proposals for read-across, grouping, or NAMs to avoid animal tests.
- Adapt data requirements to utilise NAMs together with exposure considerations: a chemical can only cause harm if it can reach a target and interact with it.

The result:

- More targeted data requirements leading to reduced use of animal testing.

Action 9: Smoothen the registration process

The issue: Data requirements are too often applied as a tick-box exercise, and waiving tests based on Annex XI is almost impossible. The added value of certain tests for assessing safety of chemicals is questionable. Each time a dossier is updated with new data, the entire dossier must be revised in line with the latest ECHA IT software (IUCLID) to pass a technical completeness check. This creates significant workload and delays in keeping dossiers up to date. Additional operational issues include poor coordination of updates across regulatory tools (e.g. IUCLID, CHESAR), leading to misalignment and duplication, as well as limited coordination with industry on digital tools, despite the growing need to operate across multiple systems (e.g. Industry Platform, REACH-IT).

The solution:

- Simplify data requirements by improving the use and effectiveness of adaptations to the standard information requirements and allowing data waiving under Annex XI.
- Enable smoother, more targeted updates of dossiers.
- Set up regular exchanges between industry and ECHA to identify and resolve day-to-day operational challenges.

The result:

- Reduce redundant administrative workload for companies.
- Facilitate uptake of latest science and data in dossiers.
- Reduce the use of animals in chemical safety assessment.

Action 10: Ensure rules are enforced and enforceable

The issue: Evidence of enforcement of EU chemical laws shows a high rate of non-compliance, particularly in imported goods/products and online sales. The advice on enforceability developed by the ECHA Enforcement Forum is not fully considered in the final decision-making. The growing complexity of legislation and simplistic assessments mentioned in Action 4, make it difficult for enforcement authorities to target inspections where needed the most especially when faced with significant number of imports. Weak enforcement risks jeopardising human health and environment protection, as well as competitiveness of EU companies that are investing in compliance but are facing unfair competition.

The solution:

Enforcement and enforceability must be considered at the very beginning and throughout all stages of the decision-making process. The European Commission should seriously consider the advice from the ECHA Enforcement Forum on enforceability: if enforceability gaps are identified, the European Commission should find a solution. For instance, submitting a request to the European Committee for Standardisation (CEN) to develop harmonised test methods, and ensuring that laboratories have the capacity to check imported products.

The result:

- Enhanced protection of human health, environment and EU competitiveness.
- Strengthen the effectiveness of the EU Single Market.

The European Chemical Industry Council, AISBL
Belliard, 40 - 1040 Brussels - Belgium
Transparency Register n°64879142323-90