

Joint Statement

NGO and industry call on the European Commission to include animal testing in REACH Impact Assessment and to do more to support non-animal methods

12 July 2021: Whilst the Chemicals Strategy is key to delivering the European Union's Green Deal goal of a toxic-free environment, it fails to demonstrate to Europe's citizens how it will do this whilst upholding the principles of animal testing as a last resort, the promotion of alternative methods and the ultimate replacement of animal testing.

Animal testing can be unreliable, slow and costly. Added information requirements that are dependent on animal tests will create an additional, unnecessary burden on industry, results will not come fast enough to ensure rapid regulatory action, and importantly, due to their inherent unreliability and lack of validity, the results will be inconclusive, potentially leaving harmful chemicals on the market or harmless chemicals being restricted.

Continuing to rely on animal tests rather than cutting-edge scientific advances will hold back achievement of the aims of the Chemicals Strategy for Sustainability and the overarching goals of the EU Green Deal to better protect people and the environment from exposure to hazardous chemicals and to encourage the development of safe and sustainable alternatives.

Currently, the Strategy acknowledges that multidisciplinary research, digital innovations and innovative international risk assessment tools are needed to reduce dependency on animal testing and improve the quality, efficiency and speed of safety testing but there is no new actions foreseen in the Strategy Action Plan to bring this into motion. The Commission should actively support industry to use non-animal methods (NAMs). A clear plan to fund the development of NAMs and promote their use to provide high-quality, rapid-turnaround safety data is needed if the strategy is to deliver.

The public favour the use of animal-free methods for the safety assessment of products and the substances contained in them. In a 2020 poll conducted by Savanta Com Res for Cruelty Free Europe, 70% of adults agree that replacing animal tests with non-animal methods should be an EU priority.

Furthermore, the proposal to permit authorities to commission new tests to obtain hazard information needs cautious assessment, from the legal angle to the effectiveness of such an approach and the potential for an increase in animal testing. Without appropriate controls in place, this could lead to unchecked, disproportionate animal testing.

Actions on chemicals should reflect the EU's commitment to reduce and replace animal testing and be based on full exploitation of the toolbox of next generation safety assessments.

Key points:

- **The use of animals in testing is an important measure of impact**

To date, the Commission has not acknowledged the huge impact on the number of animals likely to be used as a consequence of the proposed changes to increased information requirements for:

- Endocrine disrupting chemicals
- Polymers
- Low production chemicals
- Concerns about carcinogenicity, neurotoxicity, immunotoxicity

Under Article 13 of the Treaty on the Functioning of the EU, full regard should be paid to animal welfare when formulating and implementing policies. Furthermore, Directive 2010/63 on the protection of animals used in scientific procedures has full replacement of animal testing as a final goal. Despite, this the Commission has not yet recognised the issue of animal testing in its consultations on the strategy.

The proposed increased information requirements are likely to lead to hundreds of thousands, potentially millions more animals used in testing. It is vital that the Impact Assessment not only recognises, but measures this. This is so that the Commission can work out which approach is likely to confer the best protection to human health and the environment whilst minimising the impact to animals used in testing.

- **Avoidance of a tick box approach**

A reactive, tick box approach to filling perceived data gaps with no assessment as to the need to fill that data gap will just lead to additional animal testing and increase the burden to industry with no benefit to human or environmental safety.

A pragmatic approach is needed so that additional information is only requested if it is necessary to make decisions about the safe use of chemicals.

Any additional information requirements should be based on real information needs; a clear, potential risk to human health or the environment should be identified, and the information requested should have a realistic possibility of leading to improved risk management measures.

This should be achieved by scientifically robust grouping of substances, identifying only those that are of potential concern and maximizing the use of NAMs.

- **More support for non-animal approaches**

The Chemicals Strategy for Sustainability and the legislation it generates should be an opportunity to move away from reliance on animal testing in the European Union – something supported overwhelmingly by European citizens and also necessary if we are to achieve the Green Deal objective to better protect people and planet.

In the Strategy, the Commission commits to foster such innovation but fails to outline *how* that will be achieved. Notably absent in the Strategy is any commitment to *increase funding* for the development of non-animal approaches for chemical safety evaluation, *increased efforts* above and beyond what the Commission does already, and measures to ensure the European Chemicals Agency (ECHA) has an mandate to promote non-animal approaches and *dedicated resources* in order to do so. The Strategy fails in this respect to include the recommendations made by DG GROW and/or the European Parliament's Motion for Resolution.

There is an urgent need for more investment in next generation animal-free approaches to be able to contribute actively to reductions in costs to business and remain competitive in the growing world of new approach methodologies.

Legislation ensuing from the proposals must stimulate the development and rapid adoption of animal-free New Approach Methodologies. This must include:

- Dedicated funding at Commission and Member State level
- Acceleration of the development and validation of NAMs at international (OECD) level
- Greater efforts to increase regulatory acceptance and implementation of those NAMs in which industry and the EU has already invested
- A joined-up approach within the Commission to the promotion of NAMs

To contact Cruelty Free Europe:
Martin Mallon, Public Relations Manager
+44 (0) 7590 055 206 or info@crueltyfreeeurope.org.

About Cruelty Free Europe

Cruelty Free Europe is a dynamic network of animal protection groups with a presence at the heart of EU decision-making, working to bring animal testing to an end across Europe and beyond. www.crueltyfreeeurope.org

To contact Cefic:
Heather Kiggins Communications Manager, Cefic
+32.486697667 or media@cefic.be.

About Cefic

Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.1 million jobs and account for 15% of world chemicals production. www.cefic.be