

A 10-POINT PLAN FOR TARGETED AND EFFECTIVE REVISION OF REACH



REACH is the cornerstone of the EU chemicals legislation. Revising REACH means changing the very foundation of the world-leading chemicals management system that we have in Europe. This 10-point action plan outlines how this can be done in a targeted and efficient way so that it effectively tackles areas where improvement is needed in line with the objectives set in the Chemicals Strategy for Sustainability.

Action 1

Introduce a new safety assessment scheme where reliable and human-relevant **non-animal safety assessment methods** have a prominent place (New Assessment Methods).



Why? Accuracy and reliability of non-animal methods have improved considerably over the past decade.



Result:

- Legislation reflects the latest advancements in the field of toxicology.
- Unnecessary animal testing is avoided.

Action 2

Introduce a specific registration scheme for polymers with a higher likelihood of hazard.



Why? The properties of polymers make them different from traditional substances. So the current REACH registration scheme for traditional substances cannot be copy-pasted to polymers. It is also impossible to register all polymers and this is also not needed since many pose no concern. Due to the sheer number of polymers (estimates range between 200,000 and 400,000), the only manageable way to register them is by grouping.



Result:

- Registration focuses on polymers that pose concerns
- A “system overload” from processing hundreds of thousands of registrations is avoided

Action 3

Make **essential use** a complementary tool for decision making but not the main driver for regulatory decisions.



Why? It is close to impossible to judge which uses are essential for society and this would require a committee with a political mandate to decide on behalf of the whole society. The application of this concept is likely to lead to a barrage of derogation requests and lengthy discussions instead of faster decision making.



Result:

- This new and untested concept is smoothly integrated into existing legislation as an additional consideration, leading to better informed decision making.

Action 4

Ensure generic bans target consumer uses with a high likelihood of exposure and focus on the most hazardous chemicals.



Why? “Generic” bans may impact up to 12,000 substances, affect nearly a third of all industry portfolio and disrupt many value chains, including consumer goods, electronics, pharmaceuticals, and energy production. Tackling the substances in “batches” starting with the riskier ones and focusing on protecting the general public makes it realistic and predictable for industry and gives time to gradually develop alternatives.



Result:

- Consumers are better protected;
- Supply chains are less disrupted as priority-setting helps plan for substitution

Action 5

Further improve safe handling of chemicals for professionals.



Why? Many professionals need to handle hazardous chemicals to do their job. Substitution of these substances for less hazardous alternatives may be impossible in many cases, without losing important properties and functionalities. Generic bans for professional uses may impair the quality of materials and solutions. Actions should focus on training, certification and best practices.



Result:

- Improved protection for professionals handling hazardous chemicals
- No disruption of professional services

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Action 6

The Restriction & Authorisation reform should lead to more efficient procedures that make optimum use of the whole regulatory toolbox and focus on clear priorities based on hazards, uses and exposure.



Why? There is no consistent and systematic use of restriction, authorisation, occupational safety and health and industrial emissions legislation today to manage risks of chemicals. This creates uncertainty for companies. A lot of time and resources today may be spent on cases leading to marginal benefits to health and environmental protection.



Result:

- (Groups of) substances with most severe hazards and highest likelihood of exposure are prioritised
- Resources are spent more efficiently, and regulatory measures are implemented quicker
- Policy by derogations is limited, providing the necessary investment certainty to industry

Action 7

Apply a safety margin (a so-called “Mixture Assessment Factor”) to address environmental mixture concerns selectively: to high volume, broad-use chemicals with long-term environmental hazards.



Why? Scientific evidence shows 95% of all environmental mixtures either pose no concern for the environment or can already be addressed by current legislation. Applying stricter assessment rules to all substances can have a substantial impact on business activities and supply chains due to the need to withdraw otherwise safe substances from the EU market. There is a need to focus on substances that can be released into the environment.



Result:

- Relevant “mixture effects” are addressed
- Avoid disrupted supply chains for safe substances
- Avoid risks of increasing reliance on imports of materials

Action 8

Give ECHA an increased mandate to revoke REACH registration numbers of repeated offenders and address non-compliance with restrictions.



Why? Evidence of enforcement of EU chemicals laws shows a high rate of non-compliance, particularly in imported goods/products and online sales.



Result:

- The ‘no data, no market’ principle is enforced
- Imports of non-compliant products (including via online platforms) are reduced
- Level playing field for EU and non-EU producers is enforced

Action 9

Secure a continuous dialogue between industry and ECHA during dossier evaluation process



Why? Generating necessary safety data and filling REACH registrations 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. An open dialogue and agreeing with ECHA in advance are key for the smooth updating or development of new registration dossiers.



Result:

- Safety data is generated faster
- Expectations for industry are clearer
- Dossiers fulfil expectations of authorities

Action 10

Ensure ECHA has resources at the level of declared ambition



Why? The actions envisaged by the EU Chemicals Strategy for Sustainability mean ECHA will need to significantly increase its resources to handle workload and process new requirements.



Result:

- ECHA can manage new tasks and has the manpower to provide necessary guidance on compliance for industry.