



# HEAL input on REACH revision roadmap consultation

31<sup>st</sup> May 2021

The Health and Environment Alliance (HEAL) welcomes the opportunity to **comment on the inception impact assessment for the revision of the REACH legislation.**

We support the Commission's assessment of the state of the legislation. In HEAL's view, an upgrade of REACH is necessary to fully untap its health protection potential against hazardous substances, better serve disease prevention and meet the EU chemicals strategy for sustainability (CSS) objective of a toxic-free environment, in which chemicals production and use avoid harm to current and future generations.

**To do so, it is important that the review:**

- fully incorporates earlier findings about the EU chemicals legislative acquis, e.g. study for the strategy on a non-toxic environment, 2018 REACH review, fitness check on endocrine disruptors;
- proposes actions to address every REACH-related commitment present in the CSS.

**HEAL therefore urges the Commission to guarantee that the following actions are included in the upcoming revision:**

- **Set up a clear action plan of action to deliver the CSS 'zero compliance' commitment**, which is currently absent from the roadmap. This is crucial to make the 'no data – no market' principle a reality, to speed up the evaluation process and to ensure that it allows for swift regulatory action when a substance presents concerns for health and/or the environment. This requires a commitment to upgrade completeness checks, define conditions under which registration numbers can be revoked, and explore options for mandatory and regular updates to registration dossiers. When the registrants fail to deliver the necessary data to the proper evaluation of a chemical, authorities should always have the flexibility to apply the precautionary principle.
- **Revise information requirements:** for all hazard properties (including endocrine disruption, carcinogenicity, mutagenicity, reproductive toxicity, immunotoxicity, neurotoxicity, immunotoxicity as well as environmental toxicity including mobility) for all tonnage levels. The current lack of information for low-tonnage chemicals is of concern. Comprehensive information about use and exposure is also necessary for further risk management measures.
- **Introduce registration requirements for polymers**, starting with those that people are most exposed to via consumer products;
- **Introduce SVHC categories** for endocrine disrupting chemicals, persistent, mobile, toxic (PMT) and very persistent and very mobile substances (vPvM) – as promised in the CSS. The introduction of SVHC categories for the immunotoxicity and neurotoxicity endpoints should also be considered. When substances are classified under CLP for endpoints that match with existing SVHC categories, SVHC identification should be triggered automatically.

- **Introduce a generic mixture assessment factor** to address the combination effects of chemicals for health and the environment and truly increase protection (civil society groups support the establishment of a generic MAF of 100) [1];
- **Reform and accelerate both restriction and authorization processes** in view of enhanced protection. In so doing, the commitment to truly implement the precautionary principle and place the burden of proof on industry applicants (especially for derogations requests) is crucial to guarantee that hazardous chemicals are restricted and that only uses, for which there is a societal added-value without safer alternatives can be granted, albeit in a time-limited way. The REACH revision must also lead to the initiation of restrictions for all priority substances of concern outlined in the CSS, including based on a grouping approach – which is not clear from the roadmap.
- **Increase transparency:** through improved provisions in articles 7 and 33 to guarantee transparency about hazardous chemical presence in articles, including from online retailers. Finally, the proceedings of the REACH committee, including Member States' votes, should be made public.

[1] [https://www.env-health.org/wp-content/uploads/2020/09/Final-NGO-comments-combination-effects-CARACAL-CA\\_MS\\_47\\_2020.pdf](https://www.env-health.org/wp-content/uploads/2020/09/Final-NGO-comments-combination-effects-CARACAL-CA_MS_47_2020.pdf)

**The Health and Environment Alliance (HEAL)** is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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