

# HEAL response to Sweden's proposal to identify Reactive Brown 51 as a substance of very high concern (SVHC) - REACH

Submitted via ECHA webform on 10 April 2025

**The Health and Environment Alliance (HEAL) thanks the Swedish Chemicals Agency for its proposal to identify Reactive Brown 51 (EC 466-490-7) as a substance of very high concern (SVHC) due to its reprotoxic properties (REACH Article 57(c)). We fully support this proposal.**

Reactive Brown 51 is registered in the EU at 1-10 tonnes per annum. It is used as a dye at industrial sites (e.g. in textile manufacturing), by professional workers (e.g. in dry-cleaning) and consumers (e.g. during home dyeing of textiles).

## Comments on the proposed SVHC property

### **Toxic for reproduction (REACH Article 57(c))**

As stated in the Annex XV report, the Committee of Risk Assessment (RAC) adopted its opinion on the proposal for harmonised classification and labelling (CLH) of Reactive Brown 51 as a presumed human reproductive toxicant (Repr. 1B; H360F) and skin sensitiser (Skin Sens. 1A; H317) by consensus in 2023. The CLH proposal for Repr. 1B (H360F) is based on data that provides clear evidence of an adverse effect on female sexual function and fertility in a reproduction/developmental toxicity screening test in Wistar rats (OECD Test Guideline 421, GLP).

**Therefore, HEAL considers the identification of the substance as an SVHC due to its reproductive properties under REACH article 57(c) to be unequivocal.**

**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 75 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. [env-health.org](http://env-health.org)

HEAL's EU Transparency Register Number: 00723343929-96