



CHEMTrust

Protecting humans and wildlife
from harmful chemicals



*ECHA Workshop
Integrated regulatory strategy
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Review and future of ECHA's integrated regulatory strategy

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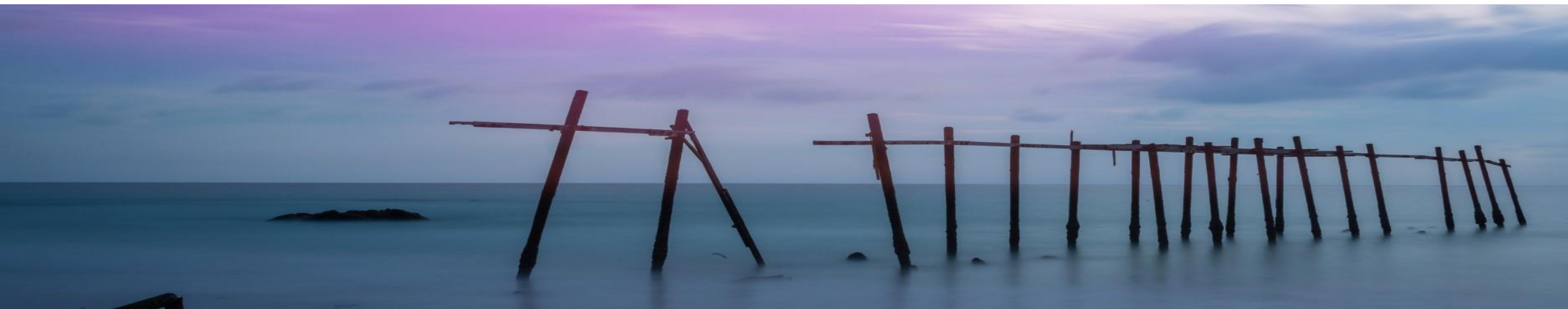
Positive achievements of IRS

- Very important work carried out over the last years
- Good assessment reports as basis for regulatory measures on highly relevant substances
- Grouping has become the default approach for chemicals assessment
- Best approach to ensure effectiveness & coherence, and avoiding regrettable substitution




(Too) little follow-up: risk management actions still outstanding

- Missing data on long-term effects: problem for hazard identification, most of the assessments end up as 'more data needed'
- Data gaps on uses and exposure information: often not detailed enough to even prioritise further
- Despite improvements in the compliance checking (ECHA's targeted checks are welcomed) the non-compliance rates are still very high...



Conclusions on IRS review

- Agree with ECHA to shift from screening towards impactful use of ECHA's knowledge and database
- IRS identified need for follow-up and RMMs in many cases
- Grouping provided new insights and is the way forward
- Concern regarding high workload on authorities
- The issue of 'no data, no problem' is still the same since decades
-  Need to improve delivery for **Session 3** health and environment protection

Improvements for the future IRS - incentives

- EU Ombudsman: missing incentives & lack of consequences in cases of non-compliance should be addressed! <https://www.ombudsman.europa.eu/en/decision/en/81645>
 - ECHA to publish all cases of non-compliance on the website
- Mandatory updating of registrations regarding specific uses (ERC, PROC, AC, SU etc.) and volumes (annually), including the full value chain to finished articles.
 - Prioritise chemicals for regulatory action if dossiers are not updated
 - Don't grant authorisations or derogations if dossiers not updated
 - Obtain data on uses earlier in the process, e.g. via DU notifications

Improvements for the future IRS -general

Session 3

- Need acceptance of data based on NAMs and read-across based by all stakeholders for the purpose of regulating chemicals including restricting harmful chemicals, - which will help reduce animal testing
- Apply a precautionary approach & regulate even if specific information is still missing on substances in a group
- Make use of OSOA (e.g. the new emerging concern mechanism and using synergies from other legislations)





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Lots of the groundwork is done!

More effective risk management
measures are needed to
minimise exposures and protect
people and wildlife!

