



Health and Environment Alliance (HEAL), European Environmental Bureau (EEB), and CHEM Trust comments on considerations for extended REACH information requirements (document CA/09/2022)

Comments sent by email to: GROW-CARACAL@ec.europa.eu ; ENV-CARACAL@ec.europa.eu ; GROW-ENV-REACH-REVISION@ec.europa.eu

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The Health and Environment Alliance (HEAL), the European Environmental Bureau (EEB), and CHEM Trust welcome the opportunity to provide written comments on current considerations regarding the extension of REACH information requirements. To start with, we would like to thank the Joint Research Centre (JRC) for the work carried out in preparation of the CARACAL 43 discussions as well as for the related supporting document and meeting presentation. However, the options presented raise a number of important questions and concerns, which we outline throughout this document.

The EU Chemical Strategy for Sustainability (CSS) commits to amending the REACH regulation to generate the necessary information on substances and toxicological endpoints to allow hazard identification and risk assessment generally and, in particular for ‘critical hazards’, i.e., CMR, PBT, vPvB, ED (human health and environment, respiratory sensitization, immunotoxicity, neurotoxicity, and other STOT (Specific Target Organ Toxicity). Further, the problem definition of the REACH inception impact assessment clearly states that current information requirements do not allow a sufficiently thorough hazard assessment, including for carcinogenicity, neurotoxicity, immunotoxicity and endocrine disruption. The lack of information occurs at all tonnage bands and is in particular significant for substances produced between 1-10 tpa and polymers.

We support the aim to update the REACH information requirements to serve the above-described purpose and allow REACH to better integrate the possibilities offered by New Approach Methodologies (NAMs) in the future.

Closing information gaps should be one of the most important priorities for the REACH revision as the information provides the basis for subsequent control measures and an improved protection for human health and the environment. However, we need to insist from the outset that for a future integration of the NAM to guarantee health and environment protection, it will be necessary to lower the level of evidence requested to identify chemicals’ hazards compared to current requirements.

The important findings from the REACH review and the flaws that it has analysed in the current system should guide the considerations for adding new information requirements to the REACH Annexes. This is in particular relevant on those endpoints needed to clarify whether a substance has SVHC properties. As the Commission Staff working document on the REACH review¹ in 2018 stated:

“REACH has also promoted alternative methods for testing though the legislative requirements to only test on animals as a last resort has been implemented at the expense of hazard information relevant for the protection of human health and the environment.”

¹ https://eur-lex.europa.eu/resource.html?uri=cellar:2834985c-2083-11e8-ac73-01aa75ed71a1.0001.02/DOC_1&format=PDF