



### REACH revision 2025: simpler, faster, bolder

The REACH Regulation, finalised in 2006, is the world's leading chemicals safety framework. It has provided more information on chemical properties and uses than any other system and has made progress in controlling the most harmful chemicals. It has also created innovation to safer chemicals<sup>1</sup>.

REACH now needs updating to increase its effectiveness and efficiency. **If REACH was working we would not now be facing a multi-billion euro bill for PFAS pollution.**

#### **Key problems include:**

- **Insufficient safety information:** Too many companies have failed to adequately register chemical safety data and self-classify chemical hazards, despite legal obligations. Due to a lack of effective enforcement, these companies continue to get away with this failure. In addition, there is a lack of safety information about key hazards like endocrine disruption, and systems for monitoring uses are ineffective and outdated.
- **Slow risk control:** Risk management measures for the most harmful chemicals are complex and too slow to prevent pollution. This complexity is challenging for authorities and industry, while slow decision-making leads to prolonged uncertainty for downstream users of chemicals, starving off investment in safer alternatives.

**Simplification of REACH is an excellent opportunity to address these problems.**

### CHEM Trust's proposals

Simplification must mean doing more with less, closing the loopholes, and maximising effectiveness while minimising the burden for all actors. The revision needs to make REACH:

- 1) **Simpler** in generating the information we need so that all chemicals with the most harmful properties are known to authorities and industry, avoiding costly clean-up or the reformulation of products;
- 2) **Faster** in controlling the most harmful chemicals and thus boosting the market for safer alternatives; and
- 3) **Bolder** in enforcing the rules, avoiding future problems, and protecting the internal market, people and nature.

#### **Simplification must not lead to:**

- **Slowing down risk management procedures even further**, by adding extra procedures.
- **Weakening the regulations:** Over 15 years of evidence shows that strong regulatory controls are needed, as the industry consistently fails to act without enforced legal obligations.

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<sup>1</sup> [https://chemsec.org/app/uploads/2023/04/The-bigger-picture\\_170509.pdf](https://chemsec.org/app/uploads/2023/04/The-bigger-picture_170509.pdf)

## Our key asks:

### 1) A *simpler* REACH

- **Digitise** supply chain communication & chemical safety assessment, creating an efficient system which updates downstream users on changes in both the hazards & regulatory status of chemicals. Updates of hazard information will enable safer use of the substance, while regulatory status updates will help users submit information on essential uses to the regulator.
- **Establish a mixture assessment factor (MAF)** to address chemical cocktails, rather than obliging each company to do a complex and costly specific assessment
  - *We are all exposed to mixtures all the time, and adverse impacts from mixture effects can be triggered even when each chemical is present at low concentrations*<sup>2</sup>.
- **Implement the Essential Use approach** to ensure that the most harmful chemicals can only be used if there is no safer alternative, and the use is essential – see ChemSec briefing<sup>3</sup>

### 2) A *faster* REACH

- **Ensure a clear direction** for all actors by setting a target by when products for the general public should be free of the most harmful chemicals: *Toxic-free consumer products by 2033!*
- **Controlling chemicals in groups** rather than one at a time, speeding up controls and preventing wasted investment in regrettable substitution with similarly hazardous chemicals.
  - *E.g. many parts of industry are moving from one endocrine disrupting bisphenol to another* <sup>4</sup>
- **Simplifying the risk management procedures** for the most harmful chemicals in products for the general public, by improving and extending the fast-track process for controlling Carcinogens, Mutagens and Reproductive Toxins ('GRA') to cover **known and suspected endocrine disruptors** and also the other hazards listed in the Commission's Communication on Essential Use<sup>5</sup>.

### 3) A *bolder* REACH

- **On protection**, ensuring that people and nature are protected from harmful endocrine disruptors, by updating REACH data requirements, which ensure that harmful chemicals can be identified and rapidly replaced, rather than waiting for more harm to occur.<sup>6</sup>
  - *EDCs have many serious and irreversible effects on important body functions, including the developing brain, immune system, as well as the reproduction of people and wildlife. Human biomonitoring studies show that the general population is continuously exposed to many substances with endocrine disrupting properties*<sup>7</sup>.
- **On enforcement**, creating a level playing field by naming and shaming companies that are not taking their responsibility, and implementing effective penalties in case of non-compliance, including revocation of registration numbers.
- **In avoiding problems from polymers**, by obliging manufacturers and importers of all polymers to notify basic information to the EU chemicals agency ECHA, which should then group and prioritise requests for registration data.

<sup>2</sup> <https://chemtrust.org/chemicalcocktails/>

<sup>3</sup> <https://chemsec.org/reports/8-key-points-for-the-essential-use-concept/>

<sup>4</sup> <https://chemtrust.org/toxicsoup/>

<sup>5</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C\\_202402894](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C_202402894)

<sup>6</sup> <https://chemtrust.org/stronger-reach-alternative-methods/>

<sup>7</sup> <https://chemtrust.org/2021-eu-edc-policy/>