



CHEM Trust
Protecting humans and wildlife
from harmful chemicals

Consultation Response

European Commission “Public Consultation in relation to the REACH REFIT evaluation”

A response from CHEM Trust

January 2017

Introduction

CHEM Trust welcomes the opportunity to respond to this consultation. CHEM Trust is a charity that works at UK, European and International level in order to prevent man-made chemicals from causing long term damage to wildlife and humans, by ensuring that harmful chemicals are substituted with safer alternatives.

Summary of our main points (see also summary on page 12)

- **REACH is an important and world-leading policy**, but it does have some flaws. We hope that this review process will lead to real improvements in the way REACH works, and consequently reduces the exposure of people and the environment to harmful chemicals.
- **We believe the focus of this review should be on increasing the efficiency and impact of REACH**, and there are real opportunities to do this.
- **Many registration dossiers are not of a high enough standard.** Incomplete dossiers should have their registration numbers refused or removed. The legal obligation to update dossiers should be strengthened, and existing dossiers should be scanned to identify those that are likely to need updating.
- **Evaluation, authorisation and restriction processes should make more use of grouping of chemicals, to prevent the continued tendency for companies to move from one problematic substance to a similar one.** Recent examples have included switching from BPA to BPS, ‘new’ brominated flame retardants and per- and poly-fluorinated chemicals.

Trustees

Oliver Smith (Chairman)
Nigel Haigh OBE
Leslie Jones OBE
Colin Church
Harriet Gillett
Debbie Tripley
Sarah Oppenheimer

CHEM Trust
34b York Way
London
N1 9AB, UK
askchemtrust@chemtrust.org.uk
Twitter: @CHEMTrust

UK Registered Charity No. 1118182
Company number: 5933897
EU Transparency register ID: 27053044762-72

- **In both Restriction and Authorisation there needs to be a more effective processes for challenging claims that safer alternatives are not available.** This could include employment of consultants by ECHA to investigate the issue.
- **The requirement to provide information on SVHCs in articles should be strengthened; this is one of the few methods for information flow in finished articles.** It is therefore an important tool in cleaning up the circular economy, and in facilitating consumer choice. In addition, all chemicals that meet SVHC criteria should be added to candidate list, so that this information flow is activated and so companies around the world can trigger measures to substitute these chemicals.

Concerns regarding the ‘tick box’ questionnaire

We are very concerned about the ‘tick box’ questionnaire which is part of this consultation. In our view it is likely to give misleading results, as a number of the questions can be read in multiple ways.

Here are three examples, though note that other questions also have similar problems:

- In question 9: rating “ECHA has handled the registrations of chemical substances effectively (i.e. support for registrant, access to IT tools)”
 - The first part of the question implies a general question about registration – which would include issues around accepting inadequate registration dossiers. We are critical of ECHA’s performance in this area.
 - The second part of the question suggests that it’s actually a question about “support for registrant, access to IT tools” – which is a completely different question
- In Question 24 “*In your view, how satisfactory are the following mechanisms and procedures of the REACH Regulation?*”
 - “Identification of relevant SVHCs for the candidate list”: A rating of “rather unsatisfactory’ could cover both a belief that too few or too many chemicals were being identified as SVHCs
 - “Substitution of SVHCs” could be rated ‘rather unsatisfactory’ if you thought REACH was ‘too effective’ (e.g. from the point of view of the company producing the SVHC) or ‘not effective enough’ in substituting.

We would therefore suggest that the results of this survey should be treated with care, as different organisations may be answering the questions in completely different ways.

In future questionnaires we recommend that:

- (i) questions should be clearer as to what is being rated
- (ii) there are open text boxes after each question to enable organisations to explain their response.

CHEM Trust priorities for the REACH REFIT evaluation 2017

We list below our main priorities for the REACH REFIT evaluation, including classification as to whether they are relevant to Effectiveness, Efficiency, Relevance or Coherence.

1) Improvements to registration

a) Ensuring the knowledge gap is closed (i.e. No data, no market)

Effectiveness/Efficiency: It is well known that REACH has made available a lot of information on chemical hazards and uses.¹ However, currently the REACH is neither effective nor efficient in ensuring that sufficient information of the requisite quality is compiled in the REACH registration phase, for example see the results of the German 'Mind the gap' project in 2015².

Solutions:

- ECHA should refuse to give registration numbers – or withdraw registration numbers – if dossiers are not complete or of appropriate quality.
- There needs to be a better enforcement of companies obligations to update their dossiers, as this is not happening according to ECHA's own data. It is good that ECHA started identifying dossiers and should do even more in future.

Given the importance of the hazard and exposure data as well as use descriptors for all other tasks in REACH (from information in the supply chain to chemical management measures) as well as in other EU laws, this issue is of highest priority for making REACH effective and efficient. Potential solutions were also discussed in the context of the ECHA workshop on 'REACH(ing) the WSSD 2020 goals' in January 2016³.

b) Add missing endpoints to ensure identification of harmful properties

Relevance: The current REACH Annexes which lay out the information requirements should be subjected to an update to ensure harmful properties are not overlooked. For example, the information obtained on the potential for neurodevelopmental toxicity⁴ is limited.

¹ ECHA Report on the Operation of REACH and CLP 2016

² Overview of the presentations at the Workshop on data availability in REACH registrations "Mind the Gap - Data Availability in REACH Registrations" on 2 March 2015

http://www.bfr.bund.de/en/overview_of_the_presentations_at_the_workshop_on_data_availability_in_reach_registrations_mind_the_gap_data_availability_in_reach_registrations_on_2_march_2015-193519.html

³ REACH(ing) the WSSD 2020 goals', ECHA,

https://echa.europa.eu/documents/10162/22816069/workshop_report_en.pdf

⁴ Developmental neurotoxicity and REACH

<https://www.efsa.europa.eu/sites/default/files/5.HUUSKONEN.pdf>

<http://www.chemtrust.org.uk>

In 2013 the Danish Centre on Endocrine Disrupters published an analysis⁵ that highlighted the current gaps in the ways in which endocrine disrupters can be identified in REACH and their report made proposals on how to overcome them.

Both the test data requirements for identifying EDCs harmful to humans and those harmful for the environment need to be significantly improved. For example, RIVM has also pointed out in two recent reports that the data requirements in the current legislation will not supply enough information for the identification of EDCs^{6,7}.

REACH aims at providing a high level of protection from harmful chemicals. It is therefore crucial to ensure the inclusion of those toxic endpoints which are of high relevance for human health impacts, particularly for future generations.

2) Strengthen Authorisation and the SVHC-related processes

The REACH authorisation system is the cornerstone for generating innovation, incentivising companies that are using the most problematic chemicals to move to safer alternatives. An ECHA conference in 2015 concluded that the authorisation process is mostly working.⁸ This is good news, but the authorisation has to become a more efficient tool in creating a more sustainable society.

We have 3 main points to improve the *effectiveness* and *efficiency* of Authorisation:

a) Ensure that all relevant SVHCs are placed on candidate list

- The goal of the officially agreed SVHC Roadmap is that all relevant SVHCs are on the REACH candidate list by 2020. However, the Environment Council has expressed concern at their December 2016 meeting that this goal is at risk.⁹ In CHEM Trust view, chemicals should be listed as SVHC even if it is decided to restrict them, to enable information transfer & inclusion in company chemical policies around the world.

b) Do not grant authorisations when safer alternatives are available.

- The authorisations for continued use of DEHP in recycled products and lead chromate in paints were given despite the wide availability of safer alternatives. This is in effect rewarding polluters over the producers of safer alternatives.
- REACH should in future avoid this situation. One way would be by a deletion of the adequate control route if there were safer alternatives. This is justified

⁵ Information/testing strategies for identification of substances with endocrine disrupting properties, available at: [http://orbit.dtu.dk/en/publications/information-testing-strategies-for-identification-of-substances-with-endocrine-disrupting-properties\(7474cbce-908a-4e6f-ada8-b07efa5e26cd\).html](http://orbit.dtu.dk/en/publications/information-testing-strategies-for-identification-of-substances-with-endocrine-disrupting-properties(7474cbce-908a-4e6f-ada8-b07efa5e26cd).html)

⁶ Endocrine disrupting chemicals within EU legal frameworks: environmental perspectives, http://www.rivm.nl/en/Documents_and_publications/Scientific/Reports/2016/oktober/Endocrine_disrupting_chemicals_within_EU_legal_frameworks_environmental_perspective

⁷ Endocrine disrupting chemicals within EU legal frameworks: human health perspective, http://www.rivm.nl/en/Documents_and_publications/Scientific/Reports/2016/oktober/Endocrine_disrupting_chemicals_within_EU_legal_frameworks_human_health_perspective

⁸ echa.europa.eu/view-article/-/journal_content/title/conference-on-lessons-learned-on-applications-for-authorisation

⁹ <http://data.consilium.europa.eu/doc/document/ST-15046-2016-INIT/en/pdf>

because REACH (Art53) clearly states that the aim of authorisation is to progressively replace SVHCs by suitable alternative substances and technologies. However at present the 'adequate control of the risk' route to authorisation does not adequately ensure this. We therefore propose that Art 60.2 should be amended to state that 'an authorisation shall be granted if there are no suitable alternative substances or technologies and if the risk to human health or the environment ... is adequately controlled...'

- In addition, we consider that future changes are needed to how the socio economic case is judged. We consider that it is crucial for the SEAC to base their opinion on the benefits for society rather than the benefit to the individual applicant. To do this, SEAC should be commissioning consultants to analyse the situation with respect to available substitution. For clarification purposes it would be important to remove the words "to the applicant" in article 60.5.b) which requires the Commission to consider the technical and economic feasibility for the individual application when granting an authorisation.

c) Extend authorisation to SVHCs in imported articles.

- To make REACH more efficient the authorisation process should be extended to cover imported articles. A comprehensive analysis carried out on behalf of the German Environment Agency identified several regulatory options that could achieve the objectives of REACH for articles containing SVHC as well as improve information and communication on articles containing SVHC.¹⁰

3) Improve efficiency and effectiveness of the Restrictions process

The restriction process needs to become more effective: during the 10 years REACH only very few substances have been restricted for some uses. This lengthy process¹ does not provide sufficient protection of consumers, workers and the environment.

Specific recommendations:

- In order to make the restrictions process less time consuming and burdensome to Member States, and more effective in addressing risks, it should start addressing groups of similar chemicals. For example, bisphenols or brominated flame retardants. Grouping should also consider the precautionary principle, i.e. the need to regulate on available evidence, rather than waiting for perfect evidence on all the substances in the group.
- ECHA and Member States should be better able to challenge proposals for exemptions for restrictions, so that information from companies can be better scrutinised. This could involve ECHA employing consultants to look at safer alternatives.

4) Better addressing risks from cumulative exposures

Relevance/EU added value: REACH needs to be further developed to better address the real world situation of cumulative exposures: Wildlife and humans are

¹⁰ Führ and Schenten: Enhancement of the REACH requirements for substances in articles, https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/texte_41_2015_enhancement_of_the_reach_requirements_for_imported_articles_0.pdf

exposed to many different substances from a whole range of consumer and other products, as well to their existing body burdens of substances, some of which may be already banned. Many of these chemicals, e.g. endocrine disruptors, will have additive action at specific endpoints. Single substance risk assessment is not adequately protective to account for possible mixture effects, see e.g. Martin et al.¹¹

The notes from the Dutch “REACH Forward” conference in June 2016 included the following relevant recommendation:

*“It was considered to be impossible to determine the risk of all conceivable combinations of chemicals. A pragmatic approach was suggested to deal with combination effects, **such as to limit allowable exposure to a proportion of the current limit values for the single substances.**”*
[our emphasis]

In other cases, additional generic risk considerations should lead to the implementation of ‘hazard based’ cut off or bans to prevent continued exposures.

The project REACH 4M commissioned by the German Environment Agency has developed several regulatory approaches for how REACH could better address mixture effects in the environment.¹² This is an important start to finally amend some crucial flaws in current EU risk assessment approaches.

5) Make REACH fit to serve a circular economy

Coherence: CHEM Trust has highlighted the importance of the REACH regulation in assisting in the development of a circular economy in our position paper on the subject, which was submitted to the Commission’s consultation on the circular economy in 2015¹³. Our recommendations included:

- Speeding up restriction and authorisation procedures, to remove problematic chemicals from the economy as soon as possible
- Ensuring the all SVHC chemicals are listed in the candidate list, in order to (i) create information flow on their use in articles (ii) encourage manufacturers around the world to move to safer alternatives.

6) More effective action on substances in articles

Relevance/EU added value: The large number of notifications through the EU Rapid Alert System for dangerous products (RAPEX) in 2016 regarding harmful chemicals in consumer products which pose a serious risk demonstrate that there are

¹¹ Martin et al, Environmental Health 2013, 12:53

<http://ehjournal.biomedcentral.com/articles/10.1186/1476-069X-12-53>

¹² Mixtures in the Environment: Development of Assessment Strategies for the Regulation of Chemicals under REACH

https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/texte_65_2014_aust_hassold_mixtures_in_the_environment.pdf

¹³ The Circular economy: To get it right we must address hazardous chemicals, CHEM Trust, August 2015

<http://www.chemtrust.org.uk/the-circular-economy-to-get-it-right-we-must-address-hazardous-chemicals/>

<http://www.chemtrust.org.uk>

still many gaps that need to be closed.¹⁴ Citizens need to be ensured that the impacts from harmful chemicals are under control which currently still does not seem the case. CHEM Trust has repeatedly highlighted the need for increased resources in enforcement at national level regarding SVHCs in consumer articles.¹⁵

7) Expand synergies with other EU laws

Coherence/EU added value: Furthermore we think it is crucial in the sense of strengthening synergies with other EU laws that this needs to go hand in hand with the work on circular economy and nontoxic environment. Additionally, there is still significant potential to increase synergies between REACH and other EU laws, e.g. the link between REACH and the Water Framework Directive (WFD) where the implementation of the restriction proposal can help achieving the environmental quality standard set by the WFD. Introducing triggers for action for EU level control measures to reduce emissions of priority substances and to eliminate the presence of priority hazardous substances in water would ensure greater benefits.

The EU added value could be greatly increased by ensuring the supply chain can effectively use the REACH information for the benefit of complying with other obligations under environmental, workers protection, products or waste legislation.

Chemicals in Food Contact Materials

EU rules on chemicals in food contact materials are currently inadequate, with many problems highlighted in a recent report from JRC¹⁶. The European Parliament have strongly criticised the current situation¹⁷, and we have produced a briefing summarising the problems and suggesting solutions¹⁸.

It is clear that REACH could be an important part of improving these regulations, and CHEM Trust organised an expert workshop on this issue which helped examine the issues; notes are available.¹⁹

¹⁴ http://europa.eu/rapid/press-release_IP-16-1507_en.htm

¹⁵ <http://www.chemtrust.org.uk/are-eu-laws-on-chemicals-like-reach-being-properly-enforced/>

¹⁶ *Non-harmonised food contact materials in the EU: Regulatory and market situation: BASELINE STUDY: Final report*, JRC, January 2017

<https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/non-harmonised-food-contact-materials-eu-regulatory-and-market-situation-baseline-study>

¹⁷ Laws regulating chemicals in food packaging are not good enough, European Parliament says, CHEM Trust, October 2016

<http://www.chemtrust.org.uk/meps-food-packaging/>

¹⁸ Chemicals in food contact materials: A gap in the internal market, a failure in public protection, CHEM Trust, January 2016

<http://www.chemtrust.org.uk/foodcontact/>

¹⁹ Chemicals in food contact materials: notes from a workshop on regulatory gaps, CHEM Trust, July 2016

<http://www.chemtrust.org.uk/overlap-gaps-fcmlaws/>

<http://www.chemtrust.org.uk>

Our answers in the open text boxes in the consultation

13. Please identify unintended effects of REACH, indicating whether you consider those to be positive or negative.

Positive: Over the last years investors and insurers have increasingly realised the business risks of producing hazardous chemicals. This illustrates the market advantage of moving out of these.

Two examples are

- a) the CRO FORUM (CRO Forum member companies are large multi-national insurance companies) who started looking into business risks from endocrine disrupters and emphasised: *For the risk management of liability insurers it is crucial to monitor this emerging risk.*²⁰
- b) the chemicalfootprint project (signatories include BNP Paribas Investment Partners, Staples, Trillium Asset Management) is an initiative for measuring corporate progress to safer chemicals. It provides a metric for benchmarking companies as they select safer alternatives and reduce their use of chemicals of high concern.²¹

Positive: The great extent to which companies in other regions of the world use the REACH SVHC list in their business considerations.

Negative: Due to the flaws in the current implementation of the authorisation system 2 authorisations have been given which disadvantage companies producing alternatives.

- DEHP in recycled PVC (classified as reprotoxic , will harm recycling reputation)
- Lead chromates in paints disadvantages EU producers of alternatives. The decision prompted Sweden to launch a court case against the Commission.

Negative: The identification of new PBT/vPvB chemicals has been excruciatingly slow and part of the problem is the burden of proof to conclude a chemical is a PBT-vPvB. During its 4 years of existence, the PBT group of ECHA has only identified very few PBT-vPvB chemicals despite a high ambition. In contrast, monitoring data highlight the presence of emerging chemicals in the environment. This gap needs to be addressed and the burden of evidence needed to come to a regulatory decision in the absence of conclusive information needs to be lowered. One way forward would be to increase the effectiveness by using a weight of evidence approach which gives more weight to monitoring data. Another consideration would be to accept regulatory decisions at an earlier stage and make more use of screening approaches.²² In 2014 ChemSec has added 13 chemicals with PBT or vPvB properties to the SIN list.²³

²⁰ <http://www.thecroforum.org/endocrine-disruptors/>

²¹ . <https://www.chemicalfootprint.org/value>

²² <https://www.umweltbundesamt.de/publikationen/identification-of-potential-pbtpvzb-substances-qsar>

²³ http://chemsec.org/wp-content/uploads/2016/03/New_SIN_substances_October_2014.2.pdf

Negative: An unwanted side effect of REACH is that there is a huge data bank with an unknown quality. A systematic check of the quality is difficult but more efforts are needed in this regard. One option for improvement would be to allow external users to extract and analyse larger data sets and invite flagging quality problems to ECHA.

14.1 How can the relevant aspect of REACH enforcement be improved?

- ECHA should withdraw registration numbers in case of insufficient or inadequate information in the registration dossier
- Effective monitoring of chemical contents of high risk products across the EU – e.g. PVC toys and building materials for phthalates, metals etc.

22.1 Where do you consider coherence should be enhanced?

Make REACH fit to serve a circular economy

Coherence: CHEM Trust has highlighted the importance of the REACH regulation in assisting in the development of a circular economy in our position paper on the subject, which was submitted to the Commission's consultation on the circular economy in 2015²⁴. Our recommendations included:

- Speeding up restriction and authorisation procedures, to remove problematic chemicals from the economy as soon as possible
- Ensuring the all SVHC chemicals are listed in the candidate list, in order to (i) create information flow on their use in articles (ii) encourage manufacturers around the world to move to safer alternatives.

Expand synergies with other EU laws

Coherence/EU added value: Furthermore we think it is crucial in the sense of strengthening synergies with other EU laws that this needs to go hand in hand with the work on circular economy and nontoxic environment. Additionally, there is still significant potential to increase synergies between REACH and other EU laws, e.g. the link between REACH and the Water Framework Directive (WFD) where the implementation of the restriction proposal can help achieving the environmental quality standard set by the WFD. Introducing triggers for action for EU level control measures to reduce emissions of priority substances and to eliminate the presence of priority hazardous substances in water would ensure greater benefits.

The EU added value could be greatly increased by ensuring the supply chain can effectively use the REACH information for the benefit of complying with other obligations under environmental, workers protection, products or waste legislation.

²⁴ The Circular economy: To get it right we must address hazardous chemicals, CHEM Trust, August 2015

<http://www.chemtrust.org.uk/the-circular-economy-to-get-it-right-we-must-address-hazardous-chemicals/>

<http://www.chemtrust.org.uk>

Twitter: @CHEMTrust

Chemicals in Food Contact Materials

EU rules on chemicals in food contact materials are currently inadequate, with many problems highlighted in a recent report from JRC²⁵. The European Parliament have strongly criticised the current situation²⁶, and we have produced a briefing summarising the problems and suggesting solutions²⁷.

It is clear that REACH could be an important part of improving these regulations, and CHEM Trust organised an expert workshop on this issue which helped examine the issues; notes are available.²⁸

RMOAs:

There are several problematic issues related to the RMOAs:

Since the inception of RMOAs, the listing of SVHCs has been slowed down to an extent that the Environment Council has expressed concern that the 2020 goal of including all relevant SVHCs in the REACH Candidate list is at risk.⁹

RMOAs can of course be a helpful exercise in the process of identifying the most relevant issues for regulation but the need for it illustrates again the importance of ensuring that better and more specific data are provided in REACH registration dossiers, as otherwise some of the work is shifted back to authorities. RMOA should also include reflections on the consequences of the respective risk management option with regard to the circular economy and potential recycling.

RMOAs should not be a way of introducing socio-economic considerations from the very beginning. REACH foresees the inclusion in the REACH candidate list based on the intrinsic hazard properties. In CHEM Trust view, chemicals should be listed as SVHC even if it is decided to restrict them, to enable information transfer & inclusion in company strategies for innovation as well as chemical policies around the world.

25. Additional Comments

- A summarised version of this briefing was submitted, see Appendix below.

Attachments:

- This CHEM Trust position paper
- CHEM Trust policy paper on circular economy:
<http://www.chemtrust.org.uk/circulareconomy/>

²⁵ *Non-harmonised food contact materials in the EU: Regulatory and market situation: BASELINE STUDY: Final report*, JRC, January 2017

<https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/non-harmonised-food-contact-materials-eu-regulatory-and-market-situation-baseline-study>

²⁶ Laws regulating chemicals in food packaging are not good enough, European Parliament says, CHEM Trust, October 2016

<http://www.chemtrust.org.uk/meps-food-packaging/>

²⁷ Chemicals in food contact materials: A gap in the internal market, a failure in public protection, CHEM Trust, January 2016

<http://www.chemtrust.org.uk/foodcontact/>

²⁸ Chemicals in food contact materials: notes from a workshop on regulatory gaps, CHEM Trust, July 2016

<http://www.chemtrust.org.uk/overlap-gaps-fcmlaws/>

<http://www.chemtrust.org.uk>

- CHEM Trust policy paper on food packaging:
<http://www.chemtrust.org.uk/foodcontact/>

For more information on CHEM Trust's work:

- <http://www.chemtrust.org.uk/>
- [@CHEMTrust](#) on twitter

Appendix – summary of this briefing, as submitted in answer to question 25

CHEM Trust priorities for the REACH REFIT evaluation

1) Improvements to registration

a) Ensure the knowledge gap is closed

Currently REACH is neither effective nor efficient in ensuring that sufficient information of the requisite quality is compiled in the REACH registration phase.²⁹

Solutions:

- ECHA should refuse to give registration numbers – or withdraw registration numbers – if dossiers are not complete or of appropriate quality.
- There needs to be a better enforcement of companies' obligations to update their dossiers.

b) Ensure identification of all harmful properties

The current REACH Annexes should be updated to ensure harmful properties are not overlooked, e.g. on neurodevelopmental toxicity.³⁰ In 2013 a Danish analysis suggests how to close gaps regarding identification of endocrine disrupters.³¹

2) Strengthen Authorisation and the SVHC-related processes

a) Ensure that all relevant SVHCs are placed on candidate list

b) Do not grant authorisations when safer alternatives are available.

- Art. 60.2 should be amended to state that 'an authorisation shall be granted if there are no suitable alternative substances or technologies and if the risk to human health or the environment ... is adequately controlled...'
- It would be important to remove the words "to the applicant" in article 60.5.b) which requires the Commission to consider the technical and economic feasibility for the individual application.

²⁹

http://www.bfr.bund.de/en/overview_of_the_presentations_at_the_workshop_on_data_availability_in_reach_registrations_mind_the_gap_data_availability_in_reach_registrations_on_2_march_2015-193519.html

³⁰ De developmental neurotoxicity and REACH

<https://www.efsa.europa.eu/sites/default/files/5.HUUSKONEN.pdf>

³¹ Information/testing strategies for identification of substances with endocrine disrupting properties, available at: [http://orbit.dtu.dk/en/publications/information-testing-strategies-for-identification-of-substances-with-endocrine-disrupting-properties\(7474cbce-908a-4e6f-ada8-b07efa5e26cd\).html](http://orbit.dtu.dk/en/publications/information-testing-strategies-for-identification-of-substances-with-endocrine-disrupting-properties(7474cbce-908a-4e6f-ada8-b07efa5e26cd).html)

c) Extend authorisation to SVHCs in imported articles.

- To make REACH more efficient the authorisation process should be extended to cover imported articles, see analysis from German Environment Agency.³²

3) Improve efficiency and effectiveness of the Restrictions process

In order to make the restrictions process more effective in addressing risks, it should start addressing groups of similar chemicals.

4) Better addressing risks from cumulative exposures

REACH needs to be further developed to better address cumulative exposures. Single substance risk assessment is not adequately protective to account for possible mixture effects, see e.g. Martin et al.³³

The project REACH 4M commissioned by the German Environment Agency has developed approaches for how REACH could better address mixture effects in the environment.³⁴

5) Make REACH fit to serve a circular economy

- Speeding up restriction and authorisation procedures, to remove problematic chemicals from the economy as soon as possible
- Ensuring the all SVHC chemicals are listed in the candidate list, in order to (i) create information flow on their use in articles (ii) encourage manufacturers around the world to move to safer alternatives.

6) More effective action on substances in articles

Citizens need to be ensured that the impacts from harmful chemicals are under control which currently still does not seem the case. There is a need for increased resources in enforcement at national level regarding SVHCs in consumer articles.³⁵

7) Expand synergies with other EU laws

There is significant potential to increase synergies between REACH and other EU laws, e.g. the link between REACH and the Water Framework Directive (WFD). Also

³² Führ and Schenten: Enhancement of the REACH requirements for substances in articles, https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/texte_41_2015_enhancement_of_the_reach_requirements_for_imported_articles_0.pdf

³³ Martin et al, Environmental Health 2013, 12:53
<http://ehjournal.biomedcentral.com/articles/10.1186/1476-069X-12-53>

³⁴ Mixtures in the Environment: Development of Assessment Strategies for the Regulation of Chemicals under REACH
https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/texte_65_2014_aust_hassold_mixtures_in_the_environment.pdf

³⁵ <http://www.chemtrust.org.uk/are-eu-laws-on-chemicals-like-reach-being-properly-enforced/>

EU rules on chemicals in food contact materials are currently inadequate³⁶ and REACH could be an important part of improving these regulations.³⁷

³⁶ *Non-harmonised food contact materials in the EU: Regulatory and market situation: BASELINE STUDY: Final report*, JRC, January 2017

<https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/non-harmonised-food-contact-materials-eu-regulatory-and-market-situation-baseline-study>

³⁷ *Chemicals in food contact materials: notes from a workshop on regulatory gaps*, CHEM Trust, July 2016

<http://www.chemtrust.org.uk/overlap-gaps-fcmlaws/>

<http://www.chemtrust.org.uk>